

18-21-year-old interstate drivers: Answering FMCSA's questions

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Commercial Driver's Licenses; Pilot Program To Allow Drivers Under 21 To Operate Commercial Motor Vehicles in Interstate Commerce

General

1. What data are currently available on the safety performance (e.g., crash involvement, etc.) of 18-20-year-old drivers operating CMVs in intrastate commerce?
This is a question for insurance companies or carriers/drivers with intrastate business.
2. Are there concerns about obtaining insurance coverage for drivers under 21 who operate CMVs in intrastate commerce, and would these challenges be greater for interstate operations?
Insurance will be one of the most difficult obstacles to overcome for any training program, except for those carriers that are self-insured. Any small carrier's training program may find insurance is unaffordable, unattainable, and not cost-effective to admit students under the age of 21.

Training and Experience

1. What is the minimum driving experience that should be required for a driver to be admitted to a pilot?
If the carrier is implementing an apprenticeship program for 18 and above, no experience should be required. The reason for an apprenticeship is to offer experience and learning combined with on the job training.
 - a. Should there be a requirement for experience driving non-commercial vehicles (e.g., to hold a regular driver's license for some minimum period of time)?
No, if carrier is implementing a training program -- it is easier to train someone from scratch than it is to correct bad habits while ingraining good ones.
 - b. Should there be a requirement for experience driving a CMV in intrastate commerce for some minimum period of time? If so, what should that period be and how should it be measured (e.g., time with a CDL, hours driven, vehicle miles traveled) and why?
Yes, there should be a minimum of six months to a year of intrastate experience before going OTR. The average experienced OTR driver will log on average 10,000-15,000 miles per month; an average team with experience will log 18,000-22,000 in a month. Therefore, a CLP holder in training should complete a minimum of 30,000 OTR miles with a trainer in the jump seat. This should be logged as vehicle miles traveled with the student behind the wheel and not combined with miles driven by a trainer.
 - c. Is there a minimum amount of time a younger driver should be required to hold a CLP or CDL? If so, how long and why? Are there driver training topics that should be required for younger drivers beyond those covered in the ELDT final rule? If so, what are they and why?

Yes, 30,000 miles for an OTR driver as described under section (b) or four months, whichever comes first. If a CLP reaches the end of the four-month period before reaching 30,000 miles, they are not getting enough training time behind the wheel. CDL training drivers should complete the 30,000 miles before being released by a trainer. I am sure you have mentioned several topics in the ELDT, however I will mention a few that should be mandatory for any program and self-explanatory:

- *Basic CMV rules and regulations*
- *Pre- and post-trip inspection*
- *Trip planning and map navigation*
- *Using paper logs*
- *Using the ELD*
- *Backing skills*
- *Speed, space and distance evaluation and navigation*
- *Using tire chains*
- *Basic first aid and survival skills*

2. What kind of supervision, and how much, should be required for drivers under 21 in a pilot?

Trainees should always be supervised while performing pre- and post-trip inspections and while piloting a CMV with trainer in jump seat or on ground guiding with hand signals and verbal commands.

3. Should there be any specific training/qualification requirements for mentors, supervisors or co-drivers? If so, what type of training or qualifications?

- *Trainers should have a minimum of 5 years or 500,000 accident-free miles.*
- *Hazmat trainers should have a minimum of 1,000,000 accident-free miles.*
- *Recent training graduates if not solo drivers should be paired with co-drivers, mentors or supervisors that have at least two years' experience.*

4. Should FMCSA require that participating motor carriers establish a formal apprenticeship program according to Department of Labor Standards? If so, why?

A regional approach to apprenticeships could be a fruitful approach:

- *Northwest Mountain - OR, WA, MT, ID, WY, CO*
- *Far west/Southwest – CA, NV, UT, AZ, NM, TX*
- *Midwest- OK, KS, NE, SD, ND, IA, MO*
- *Great Lakes -MN, WI, IL, MI, OH, IN*
- *Southeast- AR, TN, KY, AL, MS, LA, GA, FL, NC, SC,*
- *Northeast-PA, VA, WV, MD, NJ, NY, CT, MA, VT, NH, RI, MA*

By dividing apprenticeship schools into regions companies in those regions might sponsor students who live in those regions.

Operational Requirements

1. Should there be time or distance restrictions on younger drivers? If so, what should these be and why?

Student drivers should not be behind the wheel driving while on public roads for at least two weeks after starting program and must understand basic rules and regulations and pass pre- and post-trip inspections before advancing to next phase. Once students begin on public roads, they should only be allowed no more than four hours driving for first two weeks and only advance to eight upon trainer judgement of ability. Trainees should not drive between the hours of midnight and 6 a.m. until end of second month or third month.

2. Should younger drivers have more limited hours of service, such as a maximum of 8 hours of driving each day? If so, what limits should be applied and why?

After two-week stage with an eight-hour shift, trainee can advance to 10-hour shift if trainer accesses ability to advance. Students should be in jump seat observing trainer in off duty not driving when relieved of driving duties. Trainers are responsible for the safe operation of the CMV, and therefore should be in jump seat training when not driving.

3. Should younger drivers be prohibited from transporting hazardous materials, passengers, and/or operating tank vehicles or oversize/overweight vehicles? Should there be other restrictions?

This is strictly for Class A drivers: There should be a graduated license throughout the entire industry. I outlined a potential example of a graduated license via that I believe may serve as a blueprint for what sorts of experience levels should be able to participate in the pilot program: Essentially, non-hazmat, non-specialized hauling could be allowable for two years, with hazmat in the third year. [Find a detailed outline for my graduated-license model via this link.](#)

Requirements for participation?

1. What safety standards should participating motor carriers have to meet? Are the requirements from the Under 21 Military Pilot Program appropriate?

Present proposed requirements should be fine.

2. What safety standards should participating drivers have to meet? Are the requirements from the Under 21 Military Pilot program appropriate?

Proposed standards are acceptable.

3. What action(s) should the Agency consider taking if drivers in this pilot program are convicted of violations while operating in interstate commerce?

Depends upon the gravity of the violation and trainer should also receive penalty as well.

4. At what point should FMCSA remove a driver or motor carrier from a pilot program?

More than two serious violations by one participating driver and they should be removed. If two occur with a trainer supervising, the trainer should be removed, possibly the carrier, too.

Technology Requirements

In answer to each of these questions, I feel speed should be limited to 65 mph for younger drivers in the program. Any other technology should be up to the discretion of the companies and insurance coverage.