



September 21, 2016

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building, Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

RE: Commercial Driver's Licenses; Proposed Pilot Program to Allow Persons Between the Ages of 18 and 21 With Military Driving Experience to Operate Commercial Motor Vehicles in Interstate Commerce [Docket No. FMCSA-2016-0069]

The American Association of Motor Vehicle Administrators (AAMVA) welcomes the opportunity to comment on FMCSA's pilot program authorizing commercial drivers with military experience who are under the age of 21 to operate in interstate commerce. AAMVA applauds FMCSA for providing this additional employment opportunity to the nation's veterans in commercial transportation.

Age of Drivers

This notice addresses the proposed under-21 eligibility criteria. Specifically, it notes (Paragraph VI B) that applicants for the study group be "18, 19, or 20 years of age as of the date they are approved by FMCSA for participation." AAMVA does not contest the age range for participation in the pilot, and reiterates the notice's comment that an 18 year old Commercial Learner's Permit (CLP) holder is already allowed to drive in intrastate commerce. The majority of United States jurisdictions also allow applicants 18 years or older to operate in intrastate commerce only. The extension of the range of operation for applicants with applicable military experience seems reasonable - especially given the variable geographic and mileage-based differences between jurisdictions in considering what constitutes intrastate commerce.

Differentiation of Study Group

AAMVA requests clarification on how the participants of the study group will be differentiated from other CLP holders. Study group participants will need some distinguishing characteristic to authorize their operation in interstate commerce. Of specific importance is participants' transition into and out of the pilot program. The pilot should recognize that the term of traditional CDL document issuance extends beyond the three years authorized for the pilot program. Modifications to the license issuance process require business process and/or data record modifications which come at a cost to jurisdictions. If it is FMCSA's intent to require a state to make changes to the CDL or the CDL record during the pilot, states will require pilot program funding to accommodate those changes.

Participating jurisdictions would also need to be granted regulatory relief from numerous aspects of the Federal Motor Carrier Safety Regulations for the duration of the pilot.

Pilot Criteria

The notice requests comment on a specific series of questions under Section XII. Specifically, FMCSA asks "If drivers reach age 21 while in the study group, should they be removed from the pilot and replaced

with a different driver meeting the eligibility criteria?" AAMVA recommends that data not be collected after the participant turns 21. Participant data extending beyond the age of 21 may defeat the safety data collection purposes of the program. Further, the data collection and interstate operation authority provided by FMCSA needs to align with the broader authority designated for the limited-term of the pilot.

AAMVA requests clarification on how often FMCSA is planning on analyzing and compiling the safety data intergral to the pilot program. This, along with FMCSA-provided jurisdiction eligibility criteria, may further refine whether or not a jurisdiction is able to participate. Jurisdictions that currently employ an Employer Notification System (ENS) may be better situated to inform the study as those systems either report all adverse information, or are at least capable of reporting changes in licensing status, to the representative motor carrier in an efficient and timely method.

Removal from the Program

FMCSA reserves the right to remove any motor carrier or driver from the pilot program. This ability to remove participants from the program needs to be carefully coordinated with pilot partners to ensure participant operating authority is rescinded in a timely and sufficient fashion.

Management of the Proposed Pilot Program Working Group

By statute, the FAST Act requires the Secretary to conduct, monitor, and evaluate the pilot program in consultation with a working group consisting of representatives of the armed forces, industry, drivers, safety advocacy organizations, and state licensing and enforcement officials. AAMVA supports involvement of its members in the working group to ensure state interests are duly represented as the pilot program continues its work.

AAMVA thanks FMCSA for its consideration, its commitment to safety, and for continuing to study ways to transition our veterans into the civilian workforce.