



Neil D. Schuster  
President and CEO

Jennifer Cohan, Chair of the Board  
Director  
Delaware Division of Motor Vehicles

April 10, 2014

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

**RE: Commercial Driver's License: Commonwealth of Virginia, Department of Motor Vehicles; Application for Exemption  
Docket Number FMCSA-2014-0096**

In accordance with the Veterans Opportunity to Work (VOW) to Hire Heroes Act of 2011 and the National Defense Authorization Act of 2012, AAMVA endorses any program that facilitates the training and transition of our nation's military service members to a successful civilian vocation. AAMVA believes the development of opportunities to support our veterans and service members not only provides them with stable, long-term employment, but also bolsters the nation's economy, strengthens commerce, and puts capable individuals behind the wheel.

As you are aware, AAMVA has been heavily involved in the development of an application for a military skills test waiver. Under current federal regulations (49 CFR 383.77) this waiver may be used by "service members who are currently licensed and who are or were employed within the last 90 days in a military position requiring the operation of a military motor vehicle equivalent to a Commercial Motor Vehicle (CMV)." AAMVA believes that this 90-day transition period may not fully allow for an effective transition from military to civilian life. Our veterans and service members often need a period of acclimation to civilian life which could include numerous life decisions that a 90-day window may not accommodate. With that understanding, AAMVA formally supports the Virginia Department of Motor Vehicles in their application for exemption.

Further, AAMVA formally requests FMCSA consider a blanket exemption for all United States jurisdictions from the provisions of 49 CFR §383.77(b)(1). As there is no evidence to suggest otherwise, we believe this action will not have any negative impact on highway safety.

Both AAMVA and the United States Armed Forces have realized the potential for the Military Skills Test Waiver Program. Since its inception, over 4,684 commercial driver's licenses have been issued to veterans. Forty-nine (49) AAMVA member jurisdictions currently offer the military skills test waiver with the final two jurisdictions preparing to come on board.

AAMVA hopes that you will join the association and our member jurisdictions in the support of our troops, both former and current, by extending the transition date for the military skills test waiver. Thank you for your continued support and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neil D. Schuster", is written over a light blue horizontal line.

Neil D. Schuster  
AAMVA President and CEO