



Neil D. Schuster
President and CEO

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

August 20, 2014

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: Minimum Training Requirements for Entry-Level Commercial Drivers' License Applicants;
Consideration of Negotiated Rulemaking Process FMCSA-2007-27748; RIN 2126-AB66**

The American Association of Motor Vehicle Administrators (AAMVA) thanks FMCSA for the opportunity to provide input on the prospects of a negotiated rulemaking process for minimum training requirements for entry-level commercial driver's license applicants. While we have concerns about oversaturation of stakeholders providing input, we believe the negotiated rulemaking process would allow consolidated expertise prior to issuance of regulations.

AAMVA stresses that our organization's input, as well as the direct input of numerous State Driver's License Agencies with varying demographics and business processes will be instrumental in shaping these regulations. We formally request FMCSA include both AAMVA and numerous State Driver Licensing Agencies in the negotiated rulemaking process.

We thank you for your continued dedication to roadway safety and look forward to pursuing these regulations in a collaborative environment.

Sincerely,

A handwritten signature in black ink that reads "Ian M. Grossman". The signature is written in a cursive style.

Ian Grossman
Vice President of Member Services and Public Affairs