



August 10, 2019

The Honorable Raymond P. Martinez
Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: Commercial Driver's License (CDL): Pilot Program to Allow Drivers under 21 to Operate Commercial Motor Vehicles (CMV) in Interstate Commerce; Docket # FMCSA-2018-0346-0001

Dear Administrator Martinez:

On behalf of the Agricultural Retailers Association (ARA) I am submitting comments on a potential second pilot program to allow non-military drivers aged 18, 19, and 20 to operate commercial motor vehicles (CMVs) in interstate commerce. ARA supports a second pilot program being considered by FMCSA which is necessary to increase the availability of trained and experienced commercial drivers that can operate in interstate commerce without adversely impacting transportation safety. ARA supports the Under 21 Military CDL Pilot Program but does not believe the number of participants in this program will collect enough safety data on younger drivers that would be captured with a second pilot program for non-military drivers aged 18, 19, and 20.

Statement of Interest

ARA is not-for-profit trade association that represents America's agricultural retailers and distributors. Agricultural retailers play an important role in feeding the world by providing farmers with crop input products like seed, fertilizers, crop protection products and equipment. Agricultural retailers also provide their farmer customers with crop consulting and custom application services. Agricultural retailers can perform soil sampling so that the right kind and amount of fertilizer is applied in the right place. Also, agricultural retailers perform approximately 45 percent of crop pesticide applications who are trained and certified to perform these activities. Agricultural retailers primarily rely on trucks to deliver crop input products to the farm. Retailers usually employ their own drivers and the work is generally season as their facilities are busiest during planting and harvesting seasons. ARA members have a strong commitment to vehicle safety and support FMCSA's mission to reduce crashes, injuries and fatalities involving large trucks.

Comments

Agricultural retailers heavily depend on commercial drivers for "just in time" delivery of farm supplies and other essential products and services to their farmer customers. Commercial truck

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traffic is a vital component to the nation's economic prosperity. Our industry, like many others, are experiencing a growing driver shortage due to increased regulatory costs and burdens from the Electronic Logging Device (ELD) requirements as well as retirements.

ARA supports a second pilot program and believes with the proper training, experience, and supervision a CDL driver between the ages of 18 to 21 can safely operate in interstate commerce. This second pilot program should be focused on short-haul drivers operating within a maximum range of 300 air-mile radius and minimum range of 150 air-mile radius with the requirement they operate daily from and back to their normal work reporting location.

ARA's agricultural retail-distribution members heavily depend on commercial truck drivers for "just in time" delivery of farm supplies and other essential products and services for their farm and ranch customers. Our industry and many others are experiencing a growing driver shortage and higher shipping prices due to increased regulatory costs and burdens from Hours of Service (HOS) regulations that do not work for today's agricultural industry. The federal age requirement for CDL drivers operating a commercial motor vehicle goes back to the 1930s. However, all the contiguous 48 states have an age requirement for an individual to obtain a CDL is 18 years old. In many states, individuals who are at least age 16 years older are legally allowed to operate a farm tractor or self-propelled implement of husbandry on a public road after being certified as successfully completing a tractor and machinery certification course. Young adults that grew up on a farm would already have experience operating large machinery.

Agricultural retailers and distributors that participate in this second pilot program would be primarily focused on short-haul drivers and take the necessary steps to ensure they receive rigorous training, experience and supervision in order to guarantee they operate a CMV in a safe and secure manner. Any motor carrier participating in such a pilot program should ensure they have a satisfactory safety fitness determination by FMCSA. The agency should collect any relevant transportation safety data from all of the states that have CDL drivers between the ages of 18 to 21 operating a CMV in intrastate commerce. With the right program and oversight by FMCSA, insurance carriers should be willing to work with participating motor carriers to cover younger drivers for affordable insurance coverage. FMCSA's annual reports for large trucks and buses shows that fatal accidents involving commercial truck drivers are not significantly higher among younger drivers. In fact, data from 2012-2013 shows that persons killed in crashes involving larger trucks were lower among the Age Group of 18-25.

Thank you for your review and consideration of our comments! A second pilot program for younger drivers will bring a new and talented influx of skilled employees for the nation's agribusinesses and help provide future generations of even safer, better trained, experienced CDL drivers operating in interstate commerce.

Sincerely,



Richard D. Gupton
Senior Vice President, Public Policy & Counsel