



November 9, 2020

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

RE: Proposed Pilot Program to Allow Persons Ages 18, 19, and 20 to Operate Commercial Motor Vehicle in Interstate Commerce; Docket # FMCSA-2018-0346

Dear Acting Administrator Deck:

On behalf of the Agricultural Retailers Association (ARA), I am submitting comments in support of a new pilot program for drivers ages 18, 19, and 20 to obtain a commercial driver's license (CDL) in order to legally operate a commercial motor vehicle (CMV) in interstate commerce. ARA believes this new pilot program is necessary to increase the availability of trained and experienced commercial drivers that can operate in interstate commerce without adversely impacting transportation safety.

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 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.

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ARA supports this new pilot program and believes with the proper training, experience, and supervision a CDL driver ages 18, 19 and 20 can safely operate in interstate commerce. This 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 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. The agency should collect any relevant transportation safety data from all the states that have CDL drivers between the ages of 18 to 20 operating a CMV in intrastate commerce. The pilot program proposes to include separate 120-hour and 280-hour probationary periods, during which younger drivers would operate CMVs under the supervision of an experienced driver and must achieve specific performance benchmarks before advancing. After the driver has successfully completed the 120-hour probationary period, ARA believes they should be able to transport a limited amount of hazardous materials in containers such as nurse tanks. 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."

Thank you for your review and consideration of our comments! This 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