

# INSURANCE INSTITUTE FOR HIGHWAY SAFETY

October 25, 2001

The Honorable Joseph M. Clapp  
Administrator  
Federal Motor Carrier Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

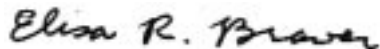
**Commercial Driver's License Standards, Requirements, and Penalties;  
Commercial Driver's License Program Improvements  
Docket No. FMCSA 2001-9709**

Dear Mr. Clapp:

The Insurance Institute for Highway Safety strongly supports the Federal Motor Carrier Safety Administration's proposal to amend the requirements for holding commercial driver's licenses. This rule would enhance the safety of large trucks by disqualifying drivers who have committed serious traffic violations in private or commercial vehicles. All provisions in the proposal are reasonable, and it should be finalized without any delay.

In particular, the Institute supports the proposal to prohibit states from masking convictions so that they do not appear on drivers' records, including the current practice of dismissing moving traffic violations if drivers attend safety classes. Research has shown that driver improvement classes do not reduce crash involvement rates (Lund and Williams, 1985; Struckman-Johnson et al., 1989).

Sincerely,



Elisa R. Braver, Ph.D.  
Senior Epidemiologist

cc: Docket Clerk, Docket No. FMCSA 2001-9709

## References

Lund, A.K. and Williams, A.F. 1985. A review of the literature evaluating the defensive driving course. *Accident Analysis and Prevention* 17:449-60.

Struckman-Johnson, D.L.; Lund, A.K.; Williams, A.F.; and Osborne, D.W. 1989. Comparative effects of driver improvement programs on crashes and violations. *Accident Analysis and Prevention* 21:203-15.