

July 10, 2019

The Honorable Raymond Martinez
Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Notice and Request for Comments: Commercial Driver's Licenses; Pilot Program to Allow Drivers Under 21 to Operate Commercial Motor Vehicles in Interstate Commerce, Docket No. FMCSA-2018-0346.

Dear Administrator Martinez:

The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the Federal Motor Carrier Safety Administration's (FMCSA's) suggested pilot program to allow 18- to 20-year-old persons to operate commercial motor vehicles in interstate commerce. If FMCSA does move forward with this pilot program for 18- to 20-year-olds, then every possible safeguard should be implemented to offset the risk posed by young drivers. However, IIHS believes there are two fundamental steps FMCSA should take before proposing such a program.

FMCSA is conducting a similar pilot program for 18- to 20-year-olds with prior military trucking experience (<https://www.fmcsa.dot.gov/under21pilot/under-21-pilot-program>), and IIHS believes FMCSA should wait for the results of that study to inform any similar efforts like the one suggested here. IIHS has expressed concern about the generalizability of these results to younger drivers without prior military experience (Teoh, 2016), but believes it still would be prudent of FMCSA to wait for these results and implement any lessons learned.

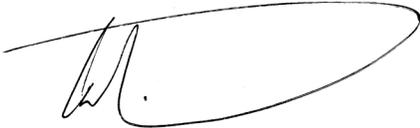
Another step FMCSA should take before proposing this pilot program is to use its resources to conduct a retrospective study estimating crash risk by age, focusing on 18- to 20-year-olds, among drivers with CDLs operating intrastate. Since most states allow drivers under 21 years to obtain a CDL and operate large trucks in intrastate commerce, there is an opportunity to directly study the effect of driver age and produce more recent research than what is currently already known about the elevated crash risk of younger truck drivers (Blower, 1996; Blower, Lyles, Campbell, & Stamatiadis, 1990; Campbell, 1991). This would require obtaining crash and exposure data from states and careful consideration of how to control for differences confounding the relationship between driver age and crash risk such as years of experience and type of industry. Certainly, such a study would have limitations, but FMCSA has the appropriate industry and technical expertise to deal with such issues.

If this pilot program does go forward, a key safeguard FMCSA should employ is requiring substantial experience driving large trucks with a CDL in intrastate commerce as a condition of entry to the pilot program. Furthermore, this required experience should be with a clean driving record including no crashes, no moving violations, and no roadside inspection violations that resulted in a truck being placed out-of-service. Each of these issues is a known risk factor for interstate truck crashes (Teoh, Carter, Smith, & McCartt, 2017) and should be avoided, especially for an already high-risk group such as 18- to 20-year-olds. It is not clear how long this required experience should be, but at least a year would be a reasonable time to gain some experience and demonstrate a safe driving record. Whatever the time period, FMCSA should also impose a minimum number of miles driven unsupervised to ensure that real experience has been accrued by potential drivers and that they did not simply hold a CDL without necessarily using it.

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In summary, IIHS believes it would be premature of FMCSA to propose another pilot program allowing 18- to 20-year-olds to drive large trucks in interstate commerce. IIHS encourages FMCSA to take the steps of learning from the results of the pilot program of 18- to 20-year-olds with military trucking experience and conducting basic research on crash risk and driver age among intrastate CDL holders.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Teoh', enclosed within a large, hand-drawn oval shape.

Eric Teoh
Senior Statistician

References

- Blower, D. (1996). *The accident experience of younger truck drivers* (Report No. UMTRI-96-23). Ann Arbor, MI: The University of Michigan Transportation Research Institute.
- Blower, D., Lyles, R.W., Campbell, K.L., & Stamatidis, P. (1990). *The Michigan heavy truck study*. Lansing, MI: Michigan Office of Highway Safety Planning.
- Campbell, K.L. (1991). Fatal accident involvement rates by driver age for large trucks. *Accident Analysis & Prevention*, 23, 287–295.
- Teoh, E.R. (2016, September 20). [IIHS comment on FMCSA's request for comments on commercial driver's licenses: Proposed pilot program to allow persons between the ages of 18 and 21 with military driving experience to operate commercial motor vehicles in interstate commerce]. Docket No. FMCSA-2016-0069. Copy available at <https://www.regulations.gov/document?D=FMCSA-2016-0069-0048>
- Teoh, E.R., Carter, D.L., Smith, S., & McCartt, A.T. (2017). Crash risk factors for interstate large trucks in North Carolina. *Journal of Safety Research*, 62, 13–21.