



November 9, 2020

James Mullen
Deputy Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Submitted electronically via Regulations.gov

RE: Proposed Pilot Program to Allow Persons Ages 18, 19, and 20 to Operate Commercial Motor Vehicles in Interstate Commerce [Docket No. FMCSA-2018-0346]

SNAC International (SNAC) appreciates the opportunity to provide comments on the Federal Motor Carriers Safety Administration's (FMCSA) proposed pilot program to allow drivers 18 to 20 years old to operate commercial motor vehicles (CMVs) in interstate commerce. The more than 400 snack manufacturers and suppliers that SNAC International represents, the multitude of men and women they employ, and the millions of consumers they serve all stand to benefit from the safe, more reliable trucking workforce that a pilot program of this nature would help support. Our answers to the questions as outlined in the Federal Register Notice can be found in the Appendix below.

Summary of SNAC's Position

Snack companies collectively engage tens of thousands of professional drivers and utilize commercial vehicles in a wide range of fleet operations. With that diverse network in mind, SNAC International member companies have been significantly impacted by increased transportation costs attributed in large part to America's truck driver shortage. The organization supports efforts to encourage young Americans to enter the workforce as truck drivers in order to ensure the long-term health of this vital industry.

SNAC supports FMCSA's pilot program proposal and urges the agency to implement such a program. It is our belief that a well-designed, safety-focused program will draw significant industry participation and provide the opportunity for FMCSA to gather and analyze the real-world data it needs to make informed policy decisions on this important issue.

The pilot project closely follows the requirements of the DRIVE Safe Act (H.R.1374/S.569) legislation that has strong bipartisan support in both the House and Senate. As proposed, the training regimen established by this pilot exceeds what is currently required for 18-20-year-old CMV drivers. With these additional standards in place we do not believe additional requirements are necessary.

Current law restricts 18-to-20-year-olds from driving interstate commerce which makes it difficult for companies to recruit younger drivers. As the nation's driver workforce ages there is a heightened need

for new drivers. As a result, we believe there will be significant interest from employers and drivers to participate in the pilot.

The prohibition against younger drivers has been in place for decades and this type of pilot project is long overdue. In a recent study, the Virginia Tech Transportation Institute evaluated a number of safety performance measures such as crashes and moving violations which indicated that CMV driving experience has a greater impact than age. We believe FMCSA's pilot program would ensure that these drivers receive extensive training designed to provide as much experience as possible while ensuring safety.

Conclusion

On behalf of its 400 member companies, SNAC International thanks the FMCSA for the opportunity to provide additional comments with respect to the development of the pilot program. We strongly support FMCSA moving forward to implement this pilot program that will ensure a safe, more reliable trucking workforce.

If you have any questions, please do not hesitate to reach out to SNAC International's Director of Government Affairs, Jessica Hixson, at jhixson@snacintl.org.

We greatly appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth H. Avery". The signature is written in a cursive, flowing style.

Elizabeth H. Avery
President and CEO
SNAC International

Appendix I:

Questions from FR 2020-1997: SNAC International thanks FMCSA for thoughtfully seeking additional information regarding the elements of the pilot program. Below are the questions with SNAC's corresponding feedback.

1. *Should FMCSA consider any additional safeguards to ensure that the pilot program provides an equivalent level of safety to the regulations without the age exemption?*

Since the pilot requirements exceed current CMV licensing standards and go beyond an equivalent level of safety, we do not believe additional requirements are necessary.

2. *Would carriers be able to obtain enough drivers to serve in the control group?*

We believe there will be significant interest from employers and potential drivers to participate in the pilot. Under current law, most companies are unable to recruit younger drivers, yet the need for new drivers continues to grow. We believe that these are attractive positions for individuals seeking an opportunity to enter a lifelong career. As a result,

3. *Would the vehicle technology requirements proposed for study group drivers limit participation by smaller companies?*

The safety technology requirements are important to this program so we would welcome consideration of providing grants to help support technology upgrades.

4. *Should FMCSA limit the distance that the study group drivers should be allowed to operate (e.g. 150 mile-radius)?*

As proposed, the pilot would provide appropriate safety requirements and we do not believe additional limitations are necessary.

5. *Are the data collection efforts proposed so burdensome for carriers as to discourage their participation?*

We do not believe this would be overly burdensome for those wanting to participate.

6. *Should we limit participation to drivers who have not been involved in a preventable crash?*

Yes, that should be in consideration.