

Submitted Electronically

November 9, 2020

Docket Operations
Federal Motor Carrier Administration
U.S. Department of Transportation
West Building Ground Floor
Room W12-140
1200 New Jersey Ave., SE
Washington, D.C., 20590-0001

RE: Docket No. FMCSA-2018-0346

Dear Acting Administrator Deck:

The undersigned organizations commend the Federal Motor Carrier Safety Administration (FMCSA) for proposing a pilot program to allow drivers 18, 19 and 20 years old to operate commercial motor vehicles (CMVs) in interstate commerce, and strongly support the agency implementing such a pilot at its earliest opportunity.

The farmers, ranchers, food and beverage manufacturers, processors, package suppliers, farm supply dealers and agricultural product marketers that make up our memberships believe the pilot program has the potential to remove a significant impediment to driver eligibility and the efficient movement of goods in interstate commerce – the inconsistent minimum age rules for the operation of CMVs for drivers operating in interstate versus intrastate commerce. Currently, in 49 states, the minimum age for intrastate CMV operation is 18 (or under), while the federal minimum is 21 for interstate CMV operation.

As you know, the proposed pilot program closely resembles the DRIVE Safe Act (H.R.1374/S.569) legislation that enjoys large bipartisan support in both the House and Senate. This legislation has been driven in part by the driver shortage confronting our nation. It is estimated that the commercial trucking sector currently has an estimated shortage of 60,000 drivers, a number that is expected to increase to 1.1 million drivers over the next decade. This shortage is attributable to growing demand for trucking service and an aging workforce, issues that the agricultural sector is facing as well. This shortage inevitably will lead to higher transportation costs, resulting in increased prices for consumers of agricultural and food products domestically, while making U.S. agricultural exports less competitive.

While 49 states already allow Commercial Driver's License (CDL) holders 18, 19 and 20 years old to operate CMVs in intrastate commerce, we strongly support the opportunity to further demonstrate that training and driver development are more critical than merely making eligibility determinations based upon a driver's age. It is important to note that the current federal age threshold raises a significant barrier to entry for those interested in operating CMVs. It is often the case that many individuals already have chosen a profession or career path prior to turning 21. This understandably limits the potential driver pool, exacerbating an already significant

driver shortage that has become more acutely evident and problematic during the Covid-19 pandemic. This pilot program is crucial in demonstrating that a driver can just as safely operate a CMV for an interstate movement from Oakland, CA, to Reno, NV as they can from San Diego to Sacramento, CA.

In addition, our organizations are pleased that FMCSA is considering undertaking a pilot program with broad driver eligibility to ensure a statistically significant sample is collected that we believe will demonstrate that CMV drivers aged 18, 19 and 20 can operate CMVs safely in interstate commerce. While we support the previous pilot program – the Under 21 Military CDL Pilot Program – we believe the newly proposed pilot with its broader driver eligibility will provide a more robust sample size that will enable FMCSA to draw conclusions about the safety data gathered.

In conclusion, we concur with FMCSA's proposed minimum pilot program requirements for drivers aged 18-20, such as the apprenticeship program and driver education. And we agree that FMCSA should permit 19- and 20-year-old commercial drivers who have operated CMVs in intrastate commerce for a minimum of one year and driven 25,000 miles to participate in the younger driver CDL pilot program, given their requisite experience to operate safely.

Thank you for your consideration of our comments. The proposed pilot program has the potential to foster a well-trained pool of safe younger drivers to help our industries and others contribute to serve domestic and global consumers. We would be pleased to respond to any questions you may have.

Sincerely,

Agribusiness Council of Indiana
Agricultural and Food Transporters Conference
Agricultural Retailers Association
Agriculture Teachers Association of Texas
American Bakers Association
American Beverage Association
American Cotton Producers
American Farm Bureau Federation
American Forest and Paper Association
American Frozen Food Institute
American Honey Producers Association
Catfish Farmers of Arkansas
Corn Refiners Association
Florida Aquaculture Association
Florida Tropical Fish Farms Association
Grain and Feed Association of Illinois
Hardwood Federation
Institute of Shortening and Edible Oils
Kansas Agribusiness Retailers Association
Kansas Grain and Feed Association

Montana Agricultural Business Association
Montana Grain Elevator Association
National Aquaculture Association
National Cotton Council
National Cotton Ginner's Association
National Council of Farmer Cooperatives
National Grain and Feed Association
National Grange
National Milk Producers Federation
Nebraska Grain and Feed Association
North American Millers' Association
North American Renderers Association
North Dakota Grain Dealers Association
Ohio AgriBusiness Association
Renew Kansas Biofuels Association
South Dakota Grain and Feed Association
Specialty Soya & Grains Alliance
Texas Agricultural Cooperative Council
Texas Forestry Association
Texas Grain and Feed Association
Texas Logging Council
The Fertilizer Institute
The Texas Cotton Association
United Fresh Produce Association
Wisconsin Agri-Business Association
Wisconsin Paper Council