

***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