



November 9, 2020

U.S. Department of Transportation, 1200
New Jersey Avenue SE, West Building
Ground Floor, Room W12-140,
Washington, DC 20590-0001

RE: Docket Number FMCSA-2018-0346

To Whom It May Concern:

I am writing today on behalf of the National Demolition Association (NDA) regarding the proposed new pilot program to allow drivers aged 18, 19, and 20 to operate commercial motor vehicles (CMVs) in interstate commerce. The National Demolition Association represents nearly 500 companies that offer standard demolition services as well as a full range of demolition-related services and products. We educate members on the latest advances in equipment and services, provide educational programs and tools to stay abreast of regulatory and safety matters, help keep regulators informed about issues in our industry, and increase public awareness of the economic and societal benefits of demolition.

NDA supports the Federal Motor Carrier Safety Administration (FMCSA's) pilot program proposal and would support FMCSA moving forward to implement the younger driver pilot program. Drivers transporting a variety of materials, including heavy machinery, demolition scrap and others frequently have to cross state lines. Forty-nine states and the District of Columbia currently permit drivers under the age of 21 to operate commercial motor vehicles, yet these businesses transporting products and material via interstate commerce cannot employ these individuals. This restriction not only deprives these companies of the opportunity to recruit and safely train these younger drivers, but it also makes it more difficult for them to enter a career in trucking. There's no doubt that we have an aging workforce, so it is critical that the industry recruits the new drivers it will need.

The pilot project closely follows the requirements of the DRIVE-Safe Act, legislation that has strong bipartisan support in both the House and Senate. As proposed, the pilot would create an appropriate standard for these drivers to meet, and we do not believe additional requirements are necessary.

The prohibition against younger drivers has been in place for decades, and this type of pilot project is long overdue. A pilot project along the lines of that proposed by the agency would ensure that these drivers are required to receive extensive training designed to provide as much experience as possible. Drivers who participate in a pilot project as proposed would receive more federally mandated training than all other CMV drivers.

Thank you for the opportunity to provide comment. Please contact Kevin McKenney with questions at kmckenney@demolitionassociation.com.

Sincerely,

Jeff Lambert
CEO