

**OPPOSE ANY AMENDMENT TO LOWER THE AGE TO DRIVE A TRUCK IN  
INTERSTATE COMMERCE**

June 15, 2020

The Honorable Peter DeFazio, Chairman  
The Honorable Sam Graves, Ranking Member  
Committee on Transportation and Infrastructure  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Chairman DeFazio and Ranking Member Graves:

In preparation for the upcoming mark-up of the INVEST in America Act, we write to inform you of our strong opposition to any amendments that would allow teenagers to drive commercial motor vehicles (CMVs) in interstate commerce. Of major concern is the Developing Responsible Individuals for a Vibrant Economy (DRIVE-Safe) Act (H.R. 1374) and the potential for that bill to be offered as an amendment. As the Nation's leading organizations and associations representing highway, auto and truck safety and American truckers, we are certain any efforts to lower the age to obtain an interstate commercial driver's license (CDL) would not only be detrimental to road safety, but also to those seeking to enter the trucking industry as professional drivers.

**Younger drivers both lack overall experience and are less safe behind the wheel than their older counterparts.** In fact, CMV drivers under the age of 19 are four times more likely to be involved in fatal crashes, and CMV drivers who are between 19 and 20 years of age are six times more likely to be involved in fatal crashes. Research has shown that most drivers under the age of 21 lack the general maturity, skill and judgment necessary in handling CMVs, while other studies have shown that the prefrontal cortex – the portion of the brain responsible for complex cognitive behavior and decision making – does not fully develop until a person is in their mid-20s. The current federal age requirement of 21 for the interstate operation of a CMV reflects these realities. However, under the proposal envisioned by the DRIVE-Safe Act, teenagers entering an apprenticeship may have only recently received a full driver's license from their state to operate an automobile, let alone a CMV. Some may not have even gone through a graduated driver licensing (GDL) program, which allows novice drivers to gradually gain driving experience under more complex conditions.

**The training standards included in the DRIVE-Safe Act are woefully inadequate.** The first probationary period only consists of 80 hours of behind-the-wheel training which can be completed in a little over one work week under the current Hours of Service rules. The 160 hours of driving time in the second probationary period can be covered in just an addition two weeks. Additionally, we have serious concerns about who will be permitted to train new entrants. The experience requirements for those training apprentices in the bill are completely insufficient and, if enacted, could allow even young apprentice drivers to qualify as trainers the moment they turn 21. Furthermore, it would be irresponsible for Congress to create training

standards for a select pool of new drivers when the Federal Motor Carrier Safety Administration (FMCSA) has yet to fully implement its Entry-Level Driver Training final rule.

**Despite oft-made claims to the contrary, there is not a “driver shortage.”** In fact, a March 2019 U.S. Bureau of Labor Statistics (BLS) study found that “the labor market for truck drivers works about as well as the labor markets for other blue-collar occupations” and “a deeper look [at the trucking industry labor market] does not find evidence of a secular shortage.” While claims of a driver shortage were dubious prior to the outbreak of COVID-19, the resultant economic downturn has caused tens-of-thousands of professional drivers to lose their jobs as demand for freight declined dramatically. Because it remains unknown when or if the economy will fully recover and freight demands will return to pre-COVID levels, now is the worst time to introduce a new pool of younger drivers into the long-haul trucking industry. Not only is their introduction unnecessary at this time due to the lack of demand, it also could prevent many career truckers from returning to their jobs, as large fleets take advantage of access to less expensive and less experienced new drivers. Rather than considering dangerous initiatives to get teenagers behind the wheel of 80,000 pound trucks, Congress should instead be focusing on the causes of the staggering driver turnover rate, which is above 90 percent among large truckload carriers, as well as its impact on safety. This perilously high rate decreases safety, as drivers who leave the workforce are replaced with less experienced individuals in an effort to keep labor costs as low as possible and avoid improving working conditions.

**This proposal has been overwhelmingly rejected.** In 2001, a petition was filed with the FMCSA to lower the federal CDL age requirement to 18, citing a driver shortage as the primary reason for the effort. FMCSA declined to lower the minimum age for an unrestricted license because the agency could not conclude that the safety performance of younger drivers was on par with, or even close to, that of older CMV drivers. The public overwhelmingly rejected the idea with 96 percent of individuals who responded opposing the proposal along with 88 percent of the truck drivers and 86 percent of the motor carriers after FMCSA posted the petition in the Federal Register. In the nearly 20 years since the petition, there has never been a significant disruption in the delivery of goods by truck due to a lack of drivers and hundreds of thousands of new CDLs have been issued each year. Over this time, driver compensation remained relatively stagnant, failing to increase at a rate that even reflects inflation. While we would prefer to assume most motor carriers participating in the apprenticeship program would do so with the best of intentions, experience tells us many will unfortunately use the initiative to take advantage of teenagers, whom they view as cheaper labor. Additionally, because younger drivers are subjected to increasingly poor working conditions, unknowingly sign predatory lease-to-own schemes and regularly receive inadequate compensation, they rarely stay in the job long enough to accumulate the experience necessary to operate a heavy vehicle in a safe and responsible manner. Moreover, the FMCSA currently has two ongoing pilot programs assessing the impacts of lowering the age for an interstate CDL. At a minimum, Congress should take no action on this issue until the completion of those pilot programs and publication as well as public review of the results and recommendations.

**Any proposal to lower the age of interstate truck drivers from 21 to 18 should be opposed.** Ignoring the basic facts outlined above and promoting policies to get even younger drivers in the cab of a truck will only compound today’s turnover crisis and make our roads less safe.

Sincerely,

Catherine Chase, President  
Advocates for Highway and Auto Safety

James P. Hoffa, General President  
International Brotherhood of Teamsters

Todd Spencer, President  
Owner-Operator Independent Drivers Association

Joan Claybrook, Executive Committee Member  
Truck Safety Coalition  
Former Administrator, National Highway Traffic Safety Administration (NHTSA)

cc: Members of the House Transportation and Infrastructure Committee