

June 2, 2021

The Honorable Gary Peters, Chair
The Honorable Deb Fischer, Ranking Member
Committee on Commerce, Science and Transportation
Surface Transportation, Maritime, Freight, and Ports Subcommittee
United States Senate
Washington, D.C. 20510

Dear Chairman Peters and Ranking Member Fischer:

Thank you for holding the recent hearing, “Freight Mobility: Strengthening America’s Supply Chains and Competitiveness.” We appreciate your leadership on this important topic and urge you to prioritize safety for policies involving the movement of freight by commercial motor vehicles (CMVs).

Fatal truck crashes continue to occur at an alarmingly high rate. In 2019, over 5,000 people were killed in crashes involving a large truck. Since 2009, the number of fatalities in large truck crashes has increased by 48 percent. Additionally, 159,000 people were injured in crashes involving a large truck in 2019, and injuries of large truck occupants increased by 18 percent. The cost to society from crashes involving CMVs was estimated to be \$143 billion in 2018, the latest year for which data are available. When adjusted solely for inflation, this figure amounts to over \$150 billion. According to the U.S. Department of Labor (DOL), truck driving is one of the most dangerous occupations in the United States.

During the hearing there was discussion of an alleged “driver shortage” plaguing the trucking industry. In fact, the DOL has determined 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 truck industry labor market] does not find evidence of a secular shortage.”¹ Yet, certain trucking interests continue to advance reckless proposals that would allow teenagers as young as 18 to operate CMVs in interstate commerce in response to the fictitious driver shortage despite consistent research demonstrating that younger drivers have higher crash rates.

The trucking industry is facing a retention crisis, not a driver shortage. According to industry data driver turnover at some carriers is near 90 percent.² In addition, states issue more than 450,000 new commercial driver licenses (CDLs) each year demonstrating that there are candidates to fill vacancies.³ Instead of advancing initiatives that will not address the retention issue but instead will degrade public safety, the industry should be focused on keeping drivers through improved safe working conditions.

¹ United States Department of Labor, Bureau of Labor Statistics, Is the U.S. labor market for truck drivers broken? (Mar. 2019).

² American Trucking Associations, Fourth Quarter Truck Driver Turnover Rate Shows Muddled Picture (Mar. 12, 2021).

³ Greg Rosalsky, Is There Really A Truck Driver Shortage?, National Public Radio (May 25, 2021).

The Insurance Institute for Highway Safety (IIHS), citing numerous studies, has stated that “age is a strong risk factor for truck crash involvement.”⁴ In fact, age is the most important factor in the high rate of involvement of younger CMV drivers in fatal crashes. The general pattern of over-involvement in fatal crashes for younger CMV drivers dominates all other factors. Studies of young CMV drivers show that as the age of the driver decreases, large truck fatal crash involvement rates increase.⁵ CMV drivers under the age of 19 are four times more likely to be involved in fatal crashes, and CMV drivers between the ages of 19-20 are six times more likely to be involved in fatal crashes than all truck drivers.⁶ Moreover, CMV drivers aged 19-20 are about five times more likely to be involved in police reported and fatality crashes compared to all other truck drivers age 21 and older.⁷

Younger motor vehicle drivers have similarly high crash rates. Teen drivers are far more likely to be involved in fatal crashes because they lack driving experience and tend to take greater risks. In 2018, all drivers ages 18-20 had a fatal crash involvement rate, per 100,000 licensed drivers, that was 60 percent higher than drivers who were age 21 years or older.

Attempts to lower the age required to operate a CMV in interstate commerce have been consistently rejected by government regulatory agencies, industry, drivers, law enforcement, safety groups and others because of substantial safety concerns associated with young drivers operating CMVs across state lines. For over eight decades, since 1937, in order to obtain a commercial driver’s license (CDL) to drive a CMV in interstate commerce, an applicant has been required to be at least 21 years of age. In 1975, the Federal Highway Administration (FHWA) examined the issue as “part of a comprehensive overhaul of the driver qualification requirements” and found “that most drivers under the age of 21 ‘lack the general maturity, skill and judgement that is necessary in handling commercial motor vehicles.’”⁸ As such, FHWA concluded that there was no support to lower the age requirement.

In 2003, the Federal Motor Carrier Safety Administration (FMCSA) declined to lower the minimum age for an unrestricted CDL to 18 as part of a pilot program because the agency could not conclude that the “safety performance of these younger drivers is sufficiently close to that of older drivers of CMVs such that screening, training, and mentoring would improve their performance and enable them to achieve safety performance levels equivalent to or greater than older drivers.”⁹ The public overwhelmingly opposed the idea with 96 percent of individuals who

⁴ Insurance Institute for Highway Safety, Comments to the docket, FMCSA-2000-8410-0515; citing Christie, R. and Fabre, J. 1999. Potential for fast-tracking heavy vehicle drivers. Melbourne, Australia: National Road Transport Commission; Blower, D. 1996. The accident experience of younger truck drivers. Ann Arbor, MI: University of Michigan Transportation Research Institute; Frith, W.J. 1994. A case-control study of heavy vehicle drivers’ working time and safety. *Proceedings of the 17th Australian Road Research Board Conference*, 17-30. Queensland, Australia: Australian Road Research Board; Stein, H.S. and Jones, I.S. (1988).

⁵ Campbell, K. L., *Fatal Accident Involvement Rates By Driver Age For Large Trucks*, *Accid. Anal. & Prev.* Vol 23, No. 4, pp. 287-295 (1991).

⁶ *Id*; Data on CMV drivers under the age of 21 is likely restricted to intra-state operations.

⁷ Blower, D.; Lyles, R.W.; Campbell, K.L.; and Stamatiadis, P. 1990. The Michigan heavy truck study. Lansing, MI: Michigan Office of Highway Safety Planning (1990).

⁸ 81 FR 56746 citing Minimum Age Requirements of the Federal Motor Carrier Safety Regulations, FHWA (April 1975).

⁹ Young Commercial Driver Pilot Training Program, Notice of denial of petition to initiate a pilot program, 68 FR 34467, 34470 (June 9, 2003).

responded to this notice opposing this proposal along with 88 percent of the truck drivers and 86 percent of the motor carriers who responded. Additionally, a 2015 public opinion poll commissioned by Advocates for Highway and Auto Safety showed that 73 percent of the public opposed allowing teen truck and bus drivers to operate a CMV in interstate commerce.

As this Subcommittee moves forward with considering surface transportation reauthorization legislation, we urge you to advance solutions that will reduce the number of deaths and injuries on our nation's roads caused by crashes involving CMVs, not policies that will needlessly endanger the public.

Sincerely,

Catherine Chase, President
Advocates for Highway and Auto Safety

Joan Claybrook, Chair
Citizens for Reliable and Safe Highways (CRASH)

James P. Hoffa, General President
International Brotherhood of Teamsters

Todd Spencer, President
Owner-Operator Independent Drivers Association

Daphne Izer, Co-Chair
Parents Against Tired Truckers (P.A.T.T.)

Russell Swift, Co-Chair
Parents Against Tired Truckers (P.A.T.T.)

Dawn King, President
Truck Safety Coalition

cc: Members of the Surface Transportation, Maritime, Freight, and Ports Subcommittee