



September 21, 2016

Docket Management Facility  
U.S. Department of Transportation  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue, SE  
West Building, Ground Floor  
Washington, D.C. 20590-0001

**RE: Docket # FMCSA-2016-0069; Commercial Driver's Licenses; Proposed Pilot Program To Allow Persons Between the Ages of 18 and 21 With Military Driving Experience To Operate Commercial Motor Vehicles in Interstate Commerce**

On behalf of the Agricultural Retailers Association (ARA), I am submitting the following comments regarding the Federal Motor Carrier Safety Administration's proposed pilot program to allow a limited number of individuals between the ages of 18 and 21 to operate commercial motor vehicles (CMVs) in interstate commerce if they have received specified heavy-vehicle driver training while in military service and are sponsored by a participating motor carrier.

**State of Interest**

ARA is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets.

**Comments**

ARA supports this proposed pilot program as it is a great opportunity for individuals between the ages of 18 to 21 with experience and training operating heavy vehicles to gain valuable experience in the private sector and fill a growing need. We encourage FMCSA to initiate another pilot program for short-haul drivers between the ages of 18 to 21 operating no more than 150 air-mile radius from their normal work reporting location and only for the purposes of transporting farm supplies, agricultural commodities, livestock, farm machinery, and other agricultural products.

Commercial truck traffic is a vital component to the nation's economic prosperity. The current shortage of drivers is roughly 35,000 to 40,000 and growing due to retirements and individuals leaving the industry. Agricultural retailers heavily depend on commercial drivers for "just in time" delivery of farm supplies and other essential products and services to their farmer customers during the planting and harvesting seasons. Companies will need to recruit 100,000 new drivers a year over the next decade to keep pace with the country's freight needs. Rural America and the agricultural industry face the brunt of this problem.



According to the U.S. Census Bureau, depopulation in rural counties can be seen throughout the United States. Between 1980 and 2010, the total number of U.S. residents increased by more than 36 percent to nearly 309 million. During that same 30-year period, more than half of all U.S. rural counties lost population. In fact, the FDIC Report on Long Term Trends of Rural Depopulation states that rural counties that experienced outflows lost 14.8 percent of their population on average.

Historically, young workers face considerably higher unemployment rates than older workers. The youth unemployment rate in the United States increased to 12.30 percent in March 2015 from 11.90 percent in February 2015. According to the U.S. Bureau of Labor Statistics, the youth unemployment rate reached an all-time high of 19.50 percent in April 2010. Unemployment early in a young person's career can have a lasting negative effect on their earnings, productivity, and employment opportunities. It is important to provide the nation's young adults with the skills necessary to obtain an important job in the labor market.

The federal requirement for drivers in interstate commerce goes back to the 1930s. In all of the contiguous 48 states the age requirement for an individual to obtain a commercial driver's license (CDL) is 18 years old. All drivers under the age of 21 with a CDL are only allowed to operate within their state lines (intrastate). However, FMCSA's annual report for large trucks and buses shows that fatal accidents involving commercial drivers are not significantly higher among younger drivers. In fact in the last two years of data (2012-2013) persons killed in crashes involving larger trucks were lower among the Age Group of 18-25.

Agricultural retailers hiring drivers between the age of 18 to 21 under this program or one focused on short haul drivers will take the necessary steps to ensure they obtain rigorous training and supervision in order to guarantee CMVs are operated in a safe manner. Any motor carrier participating in this pilot program should ensure they have a satisfactory safety fitness determination by FMCSA. The agency should collect all relevant safety data from all states during the 3 year pilot program regarding commercial drivers between the ages of 18 to 21 operating CMVs intrastate. This would be a great control group for the pilot program and provide FMCSA with critical safety data in helping determine if the federal age requirement of 21 is outdated and unnecessary.

Thank you for your review and consideration of my comments regarding this important pilot program.

Sincerely,

A handwritten signature in blue ink that reads "Richard D. Gupton". The signature is written in a cursive, flowing style.

Richard D. Gupton  
Senior Vice President, Public Policy & Counsel