July 22, 2013

The Honorable Anne S. Ferro
Administrator
Federal Motor Carrier Safety Administration
Washington, DC 20590

Re: NTSB Safety Recommendations H-13-20 through H-13-23

Dear Administrator Ferro:

I am writing on behalf of NAFA Fleet Management Association regarding the Safety Recommendations that the National Transportation Safety Board (NTSB) has made to the Federal Motor Carrier Safety Administration (FMCSA).

On June 17, 2013, the NTSB adopted its safety study, *Crashes Involving Single-Unit Trucks that Resulted in Injuries and Deaths*.

An area identified for safety improvement by the NTSB includes the need for FMCSA to research the potential benefits of expanding the commercial driver’s licensure (CDL) requirement to lower weight classes. NTSB’s specific recommendations to the FMCSA are:

H-13-21: Conduct an assessment of the frequency with which single-unit truck drivers are operating with invalid licenses, together with the associated risks of invalid licensure, and publish the findings.

H-13-22: Evaluate the potential benefits of extending commercial driver licensure requirements to the operation of single-unit trucks with gross vehicle weight ratings below 26,001 pounds.

H-13-23: If the evaluation in H-13-22 indicates a benefit from extending commercial driver’s licensure, require commercial driver’s licenses for drivers of single-unit trucks in gross vehicle weight rating classes for which benefits have been shown.

The purpose of this letter is to respectfully request an opportunity to meet with FMCSA staff to share our thoughts as you proceed with an analysis and assessment of NTSB’s recommendations.

NAFA members are the professionals who manage more than 3.5 million vehicles in fleets of sedans, public safety vehicles, trucks, and buses. Safety is of paramount importance to fleet
managers. Fleet managers are all concerned with the safety of their drivers and those that they interact with every day as they perform their jobs in fleet vehicles. In the business world, safe driving means fewer accidents, lower insurance premiums, and the use of less fuel, but it also means the protection of a company’s greatest assets – its employees. NAFA Fleet Management Association has long understood that fleet safety extends far beyond a company’s bottom line. Since driver behavior impacts fleet crash rates, fuel consumption, and wear and tear on the vehicles, collectively drivers represent the single biggest factor in a safe, productive, and efficient fleet operation.

A missing component of NTSB’s safety report is that it makes no distinction between single-unit trucks in a managed fleet versus vehicles operated by the casual driver or vehicles in smaller, unmanaged fleets. We are confident that a more detailed analysis of accident data will reflect that the safety record of most managed fleets is significantly better. In a managed fleet, safety is a primary goal. Managed fleets maintain robust driver training programs, with continual monitoring of driver performance and an ongoing emphasis on improving driver behavior.

Yet NTSB’s findings do not factor in this important distinction. For example, the study finds that drivers of single-unit trucks in fatal crashes were three times more likely to have invalid licenses than the drivers of tractor-trailers involved in fatal crashes. While this may be true for some trucks, it is not relevant to drivers of single-unit trucks in managed fleets. For many reasons, including insurance, fleets are scrupulous about ensuring that drivers are properly licensed.

We also question the finding that requiring a CDL to operate single-unit trucks with gross vehicle weight ratings less than 26,001 pounds may be an effective means of reducing the frequency and severity of single-unit truck accidents. We believe that a CDL requirement for all single-unit trucks would be disproportionate to the risks associated with single-unit truck safety in the fleet vehicle environment.

We share your interest and those of NTSB in improving safety on our roads and highways. We welcome the opportunity to work with FMCSA as it reviews the NTSB recommendations. For additional information or to schedule a meeting, please contact Patrick O’Connor in our Washington, DC office at 202-223-6222.

Sincerely,

Phillip E. Russo, CAE
Executive Director

cc: Deborah Hersman, Chair, National Transportation Safety Board