



Comments of the Shippers Coalition  
to the  
Federal Motor Carrier Safety Administration  
Docket No. FMCSA-2022-0081  
Agency Information Collection Activities; Renewal of an Approved Information Collection;  
Safe Driver Apprenticeship Pilot Program  
June 11, 2022

The Shippers Coalition respectfully submits these comments in support of an information collection request (ICR) that the Federal Motor Carrier Safety Administration (FMCSA) plans to submit for approval to the Office of Management and Budget (OMB). See the proposed ICR and request for comments at 87 Federal Register 23010 (April 18, 2022).

Introduction and Statement of Support

The Shippers Coalition (we or our) supports the proposed ICR because it would provide data necessary to implement and assess a statutorily directed pilot program under which 18- to 20-year-old commercial driver's license holders would be allowed to operate commercial motor vehicles in interstate commerce. The collection for which FMCSA seeks authorization would provide information on the safety performance of these drivers and the motor carriers employing them under the controlled conditions of the pilot program.

The nation currently faces widely reported and significant inefficiencies in supply chains and a shortage of commercial truck drivers. Safely allowing these below 21 years of age drivers to operate in interstate commerce is expected to increase the supply of commercial drivers. That increase, in turn, holds the potential to inject needed fluidity into supply chains, both in the short and long term, while presenting an enhanced career opportunity in trucking to 18- to 20-year-old men and women. FMCSA states that the pilot program supports "economic strength while maintaining DOT and FMCSA's commitment to safety." 87 Federal Register at 23011.

Before elaborating on our support, we note that the Shippers Coalition (formerly known as the SHIP Coalition) includes many of the nation's prominent companies and trade associations engaged in manufacturing, agribusiness, and other business. Coalition members directly or indirectly sustain millions of American jobs. They move freight by all modes and do not favor any mode. The Coalition has emerged as a leading voice for a more modern, safe, and environmentally-friendly trucking and freight transportation system.

The Shippers Coalition seeks to improve supply chain performance and freight transportation while –

- advancing transportation safety,
- reducing emissions, vehicle miles traveled (VMT), fuel consumption and congestion from what they would be otherwise, and
- protecting infrastructure.

## Further Discussion of Support for the Information Collection

The pilot program is mandated by section 23022 of the Infrastructure Investment and Jobs Act, also referred to as the Bipartisan Infrastructure Law.<sup>1</sup> As set forth in the Federal Register notice in this docket, FMCSA must report to Congress on various results under the pilot program, notably including the safety record of the participating apprentice drivers, so that record can be compared to the safety record of other drivers.

Clearly, data collection is a necessary step for the pilot program to be able to report those results.

The notice in this docket is fairly long for an information collection approval issue. The notice discusses a number of issues that were raised in the development of the pilot program. Those include the number of years of experience that a driver must have to supervise the apprentice drivers, whether the apprenticeship must be registered with the Department of Labor (which triggers certain requirements), and other matters.

We do not perceive that, at this stage, FMCSA is seeking to reconfigure the requirements for the pilot program as described in the Federal Register notice in this docket. We note, however, that if significant debate emerges at this time on program specifics, it could slow down the ICR approval and the implementation of the pilot program, and thereby delay the time when FMCSA issues its report on safety under the pilot program. A report with positive safety results would open the door to a permanent opportunity for these younger drivers to serve in interstate commerce, improving supply chain performance.

That said, should FMCSA or OMB reconsider any aspects of the pilot program or the data collection as part of the decisionmaking process in this docket, or subsequently, we suggest reducing requirements not required by statute – consistent with safety and collection of data sufficient for FMCSA to be able to compile and issue the required report. Fewer burdens should enable FMCSA to more readily attract participants into the pilot program, leading to a better documented report.

## Conclusion

The Shippers Coalition supports prompt action to improve supply chain resiliency and fluidity consistent with safety. This includes support for prompt completion of the pilot program called for in section 23022 of the IIJA. In turn, that means we support the proposed information collection, to better ensure an effective report.

The Shippers Coalition thanks FMCSA for its consideration, and asks that FMCSA take action in accord with the positions set forth in these comments.

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<sup>1</sup> Public Law No. 117-58, 135 STAT 429 et seq., sometimes referred to as “IIJA” and sometimes as the Bipartisan Infrastructure Law (BIL).