



November 19, 2018

*Via regulations.gov*

Rosemary Lahasky  
Deputy Assistant Secretary  
Employment and Training Administration  
U.S. Department of Labor

Re: Docket No. ETA-2018-0001; Agency Information Collection Activities; Comment Request; Data Collections from Industry-Recognized Apprenticeship Program Accreditors

Dear Ms. Lahasky:

As the national representative of the trucking industry, American Trucking Associations, Inc. (ATA) has a strong interest in matters affecting our nation's trucking workforce, including the possibilities for economic opportunity, improved quality of life, and upward mobility, potentially afforded by Industry-Recognized Apprenticeship Programs (IRAPs). As such, ATA appreciates this opportunity to comment on the information collection request (ICR) proposed by the U.S. Department of Labor (DOL), entitled "Industry-Recognized Apprenticeship Programs Accrediting Entity Information".<sup>1</sup>

Truck-driving is the most common job in 29 states,<sup>2</sup> and one of the most in demand jobs in 2018 with the biggest pay raises.<sup>3</sup> Trucking comprises the largest share of the transportation workforce—42 percent—and has by far the largest number of projected transportation job openings.<sup>4</sup> These findings are in accord with ATA's own studies, which showed that driver wages have increased by double-digit percentage points since 2013,<sup>5</sup> that the industry was short 50,000 drivers in 2017,<sup>6</sup> and that 890,000 new drivers will need to be hired over the next decade, due to retirement and increased freight volume.<sup>7</sup>

Directly and through our affiliated organizations, ATA's united federation of motor carriers, state trucking associations, and national trucking conferences represents more than 30,000 motor carriers in the United States—encompassing every type and class of motor carrier operation. Our diverse membership also includes not only educational organizations and driver recruitment corporations, but also equipment manufacturers, supply chain and logistics companies, and Silicon Valley firms engaged in the testing and development of automated vehicle technologies. Further, in recent years, several of our largest member carriers that operate their own truck driver training schools across the country have

<sup>1</sup> 83 Fed. Reg. 47643 (Sep. 20, 2018).

<sup>2</sup> Quoc Trung Bui, "Map: The Most Common Job in Every State," *NPR*, February 5, 2015.

<sup>3</sup> Paul Davidson, "The most in demand jobs in 2018 with the biggest pay hikes include cashier, truck driver," *USA Today*, May 22, 2018.

<sup>4</sup> U.S. Departments of Labor, Transportation, and Education, *Strengthening Skills Training and Career Pathways Across the Transportation Industry*, August 2015.

<sup>5</sup> American Trucking Associations, *Driver Compensation Study 2017*, Mar. 27, 2018 ("The median salary for a truckload driver working a national, irregular route was over \$53,000 – a \$7,000 increase from ATA's last survey, which covered annual pay for 2013, or an increase of 15%. A private fleet driver saw their pay rise to more than \$86,000 from \$73,000 or a gain of nearly 18%.")

<sup>6</sup> American Trucking Associations, *Truck Driver Shortage Analysis 2017*, Oct. 20, 2017.

<sup>7</sup> *Id.*

become sponsors of Registered Apprenticeships, while many other member carriers administer on-the-job training and work-and-learn programs that could be the foundation on which IRAPs can be built.

ATA is thus well positioned to understand how apprenticeships, and IRAPs in particular, could be used to connect 890,000 Americans over the next decade to truck-driving jobs that offer a median salary of \$53,000, health insurance, retirement benefits, and thousands of dollars in signing bonuses<sup>8</sup>—all without the need to obtain a college degree or even a GED. By the same token, because one of the greatest strengths of the apprenticeship model is its ability to anticipate and respond in real time to changing economic conditions and changing skills that will be in demand,<sup>9</sup> ATA is strategically positioned to utilize IRAPs to prepare new entrants into the trucking industry for the jobs of the future<sup>10</sup>—jobs that ATA and other informed stakeholders across the ideological spectrum believe will require humans, even when fully autonomous driving technology is ready to be implemented on a wide scale, in limited segments of the industry, 20 to 25 years down the road.<sup>11</sup>

In short, ATA appreciates DOL’s efforts to expand apprenticeships, as they are well-suited for upskilling both the current and future workforce. ATA looks forward to helping expand IRAPs throughout the trucking industry, as appropriate, by serving as a qualified IRAP certifier or by supporting qualified IRAP certifiers. Where the fit is right, IRAPs could enable field practitioners and innovators on the cutting edge of changing the nature of the jobs themselves to serve as effective instructors and mentors who transfer these skills to the next generation of workers. With this goal in mind, ATA offers the following specific affirmations of, and suggested improvements to, the ICR in question, which ATA generally supports.

The information that DOL proposes to collect is both useful and reasonable, as it aligns with ATA’s views that quality certificate programs should, among other things:

- Focus on certifications that are based on industry-defined, nationally-validated, competency-based standards developed in cooperation with a nationally-recognized trade association or other industry body;

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<sup>8</sup> American Trucking Associations, *Driver Compensation Study 2017*, Mar. 27, 2018

<sup>9</sup> Gail Heriot, “Apprenticeships: Useful Alternative, Tough to Implement,” *CATO Institute*, Nov. 17, 2016.

<sup>10</sup> ATA and informed stakeholders across the ideological, and labor and management spectrum agree that automation, combined with the effects of the growing demand for freight in our e-commerce economy, will (1) likely lead to a net *increase* in the number of jobs requiring human workers in the transportation, distribution, and logistics (TDL) sector; (2) not be able to replace the many non-driving tasks that human truck drivers are relied up on to perform on a daily basis, today; (3) most likely be adopted in limited segments of the industry (i.e. over long stretches of highway-driving rather than urban cityscapes and last-mile delivery); and (4) be implemented in those select segments gradually over the next few decades, affording policymakers and all stakeholders sufficient time to prepare for a manageable and smooth transition that ensures benefits to the American workforce. See Jay Lim, American Trucking Associations, Inc. – Comments; Federal Docket ID DOT-OST-2018-0150-0025; see also other authorities cited in *infra* note 10.

<sup>11</sup> Steve Viscelli, “Driverless? Autonomous Trucks and the Future of the American Trucker,” *U.S. Berkeley Labor Center and Working Partnerships USA*, September 2018; Erica Groshen *et al.*, “Preparing U.S. Workers and Employers for an Autonomous Vehicle Future,” *Securing America’s Future Energy (SAFE)*, June 2018; Aleksandr Yankelevich *et al.*, “Preparing the Workforce for Automated Vehicles,” *American Center for Mobility, Michigan State University, Texas A&M Transportation Institute*, July 2018; Jay Lim, American Trucking Associations, Inc. – Comments; Federal Docket ID DOT-OST-2018-0150-0025.

- Focus on certifications that are recognized nationwide (national portability) supported by an infrastructure able to deliver related training and assessments nationwide;
- Focus on education and training programs that include “earn and learn” experiences and include attainment of industry-recognized credentials;
- Choose programs that use well-qualified, experienced instructors who are themselves certified; and
- Focus on programs with assessments delivered under strong safeguards for Equal Employment Opportunity.

Similarly, DOL’s assumptions and logic underlying its costs and burdens estimate seem reasonable and accurate, at least for prospective accreditors who have prior experience in acting as an accreditation body or have affiliated workforce development and education foundations that serve a certifying role. Such prospective accreditors should be capable of absorbing the administrative burden.

However, for prospective certifiers like ATA that do not have such experience and are in the process of consulting with educational institutions and accreditation bodies to explore paths to forming a consortium that would apply to become a certifier, further guidance and/or technical assistance from DOL would be appreciated. In particular, examples, model language, and/or hypotheticals that would satisfy the following criteria, among others, set forth in DOL’s July 27, 2018 Training and Employment Notice and the “Industry-Recognized Apprenticeship Programs Accrediting Entity Information” form would better enable ATA to prepare for the administrative burden of this proposed ICR:

- Data and performance metrics that capture information on the return on investment for each program sponsor.
- Quality assurance processes for complaints and appeals.

Additionally, ATA would appreciate guidance from DOL on the necessity and applicability of the following proposed application requirements for prospective certifiers like ATA who are considering establishing either single-sector (trucking) or cross-sector (trucking and passenger vehicle) foundational-course IRAPs for emerging niche occupations, such as the jobs currently available in the Highly Automated Vehicle (HAV) industry in the form of test drivers, mechanics, and fleet managers:

- Documentation showing separation between the individuals who assess the apprenticeship program and the individuals who make the accreditation decision.
- The training of assessors to ensure there is consistency (inter-rater reliability) of accreditation decisions from program to program.
- The frequency of assessor training occurs.

Thank you again for the opportunity to provide these comments. If you wish to discuss these comments further, please contact the undersigned at (703) 838-1908 or [jlim@trucking.org](mailto:jlim@trucking.org).

Sincerely,



Jay Lim  
Vice President  
Workforce Development Policy