

Robert Passmore  
Department Vice President

Docket Operations  
U.S. Department of Transportation  
1200 New Jersey Avenue SE.,  
Room W12-140  
Washington, DC 20590-0001

Docket Number FMCSA-2022-0081  
Agency Information Collection Activities; Renewal of an Approved Information Collection:  
Safe Driver Apprenticeship Pilot Program

The American Property Casualty Insurance Association (APCIA) appreciates this opportunity to provide insurance industry perspective on the information collection for FMCSA's pilot program for 18-20-year-old drivers. We are concerned that FMCSA has not stated how its information collection will enable comparison of pilot program participants with existing statistics showing that drivers under age 21 are significantly more likely to be involved in accidents than drivers over 21.

APCIA represents the majority of the U.S. property casualty insurance market and the broadest cross-section of home, auto, and business insurers of any national trade association. APCIA has over 1200 member companies that write 71 percent of America's commercial auto insurance. They insure both the trucks and the cars that share our nation's highways. This gives APCIA members a unique perspective, seeking the best balance for highway safety.

Our comments address the third area of input requested by FMCSA: "ways for FMCSA to enhance the quality, usefulness, and clarity of the collected information." For this pilot program to succeed, the agency must show that participating drivers are no more likely than the current population of interstate commercial truck drivers have highway accidents.

In this request for comment, FMCSA provides a summary of public comments to its January 7, 2022, Information Collection Request. The agency notes that "The majority of these comments cited previous studies showing age as a factor in safe driving performance." Unfortunately, FMCSA says nothing further about age-related driving statistics. We hope that the agency will correct this oversight in response to its current request for comment and in conducting the pilot program.

To assist FMCSA in evaluating this pilot program, APCIA offers the following information about driver accident rates by age for comparison with pilot participants, in addition to the agency comparing these drivers to the overall commercial driver population:

- National Safety Council published crash rates per 100,000 drivers by age for 2020. These show a 26 percent drop in the accident rate from age 18 to age 21, with crash involvement dropping further as drivers continue to gain experience and maturity.

AGE	CRASH RATE PER 100,000 DRIVERS
16	26,342
17	22,422
18	22,582
19	20,473
20	17,364
21	16,814
24	14,339

- National Highway Traffic Safety Administration's Traffic Safety Facts 2019 shows the following on pages 121-122. Although by multi-year age increments, NHTSA's statistics are in line with the NSC's above. The crash rate per 100,000 drivers drops 22 percent from the 16-20 age group to the 21-24 age group and drops further as drivers continue to gain experience and maturity.

AGE	CRASH RATE PER 100,000 DRIVERS
16-20	11,221
21-24	8,751
25-34	6,838

The pilot program includes specific training requirements, as set out in statute. These requirements are grouped into two probationary periods of 120 hours and 280 hours. The required hours then translate into three work weeks and seven work weeks respectively. An apprentice driver can complete the entire program in 2 1/2 months. FMCSA notes in this request for comment that these are the statutory requirements and that motor carriers are able to add to them. While we understand the agency's reluctance to vary the pilot program requirements from what is contained in the statute, FMCSA should structure its information collection to capture the amounts and effects of any additional training that individual motor carriers add to the pilot program. Such information may help guide future training requirements.

Recognizing FMCSA's statement that the probationary period hours are required by the statute, we remain concerned that there does not seem to be any explanation or supporting documentation for these probationary time periods. We urge the agency to locate and publish the source(s) of the enabling legislation's apprenticeship requirements. The research that led to this set of requirements may point toward additional enhancements for highway safety.

Trucking insurance is built on statistics. The number of claims and dollars paid are key (though not sole) factors in determining future insurance costs. Insurers individually determine their underwriting appetites, whether for general cargo vs. tank trucks or for fleets employing younger drivers than have been allowed up to now. The statistical results of FMCSA's younger driver pilot program might factor into individual insurer interest in under-21 drivers, and availability to insurers of detailed statistical information on the pilot program's safety results, including access to a data set of all drivers who have successfully completed the program versus those who have not, will be critical to the program's success. The more information about this pilot program that FMCSA makes available for outside analysis, the better able insurers and others will be to evaluate the apprenticeship's impact on highway safety and appropriately underwrite such risks.

Our association's members insure both trucks and the cars that share our nation's highways. We look forward to continuing our mutual work to improve highway safety across the United States and to learning how pilot program participants compare to existing interstate commercial drivers.

Sincerely,



Robert Passmore