

1. Is there evidence of increasing or decreasing fraud among third-party examiners based on the pass rates and subsequent safety history of CDL holders who were tested by third-party testers?
  - a. NYS DMV has overseen seventy-three (73) third-party CDL tests by fourteen (14) different entities since the program began in June 2022. We have not experienced any fraud with these entities to-date. The pass rate for third-party testers is 58%, which is similar to state administered tests. The program entities are relatively new, so we are administering a high rate of oversight and monitoring.
2. Are there significant differences in the outcomes of third-party testing on CDL testing?
  - a. NYS DMV has not noticed any differences in the outcomes of third-party testing on CDL testing.
3. Would it be feasible to conduct a future study on the safety impacts of delegating CDL knowledge testing to third-party testers based on available data?
  - a. NYS DMV currently conducts all CDL knowledge tests in our issuing offices, using a vendor-based automated testing solution, which helps reduce fraud and malfeasance. There are currently no plans to extend this to third-party testers. NYS DMV has no objection to a future study on the safety impacts of delegating CDL knowledge testing to third-party testers.
4. How do the driving histories of drivers who received behind-the-wheel training (pre-ELDT requirements) compare to drivers who completed the new ELDT requirements?
  - a. N/A
5. How do the driving histories of drivers who received theory instruction (pre-ELDT requirements) compare to drivers who completed the new ELDT requirements?
  - a. N/A
6. How do skills test pass rates of drivers pre-ELDT compliance compare to pass rates of drivers after the ELDT compliance date?
  - a. ELDT was implemented in February 2022
    - i. 2021 CDL passing rate for calendar year 2021 – 51%
    - ii. 2022 CDL passing rate by month:
      1. March 2022 - 60%
      2. April 2022 - 59%
      3. May 2022 - 57%
      4. June 2022 - 54%
      5. July 2022- 58%
      6. August 2022 – 57%
      7. September 2022 – 60%
      8. October 2022 – 52%

7. Are there identifiable safety benefits that have been realized by the adoption of the 2005 AAMVA CDL Test Model?
  - a. NYS DMV has realized several benefits from the adoption of the 2005 AAMVA CDL Test Model, including:
    - i. CDL tests are now completed in multiple sections, with banked scoring for certain passed test sections. Banked scoring makes test scheduling more efficient.
    - ii. There are now also auto-fails for certain procedures (i.e., brake check), unlike NYS DMV's prior test model, when there were only auto-fails for anything considered a dangerous action or violation.
    - iii. CDL testing courses are now in contained safe areas, whereas the previous NYS DMV CDL tests were conducted on roadways.
8. Are there external factors preventing SDLAs and the CDL community from achieving the full potential of safety benefits of the 2005 AAMVA CDL Test Model?
  - a. NYS DMV currently conducts CDL testing in the in all areas throughout NYS; however, test locations in some populated areas (for example, metropolitan areas) are subject to space restrictions, and the driving routes are potentially problematic due to the nature of the volume of traffic. Conversely, NYS DMV has had some issues finding compliant CDL test sites in rural areas due to some of the required test components (for example, 4-lane highways).