

July 21, 2023

Mr. Joshua Jones
Federal Motor Carrier Safety Administration
Commercial Driver's License Division
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Docket No. FMCSA-2023-0055

Dear Mr. Jones:

The Iowa Department of Transportation (Iowa DOT) is pleased that FMCSA is seeking comments on the requirements of the Training Provider Registry (TPR) for the federally-mandated Entry Level Driver Training program (ELDT) for commercial driver license (CDL) applicants.

In the eighteen months since the initiation of this program in February 2022, Iowa has experienced higher CDL appointment utilization and test pass rates and we are generally supportive of the program. However, as per the docket, we are commenting on two ways that FMCSA can enhance the quality, usefulness and clarity of the collected information in the TPR:

1. FMCSA needs to ensure the accuracy of information provided by any registrant in the TPR. In Iowa, we have documented to FMCSA a TPR-registrant that was listing a CDL training location that was not under the control of the registrant, either through ownership, lease or other agreement. It was, in fact, an Iowa DOT facility and while we allow certain on-site training and practice activities for all users (commercial or non-commercial), we do not allow any single entity to claim the site as "their own" or to register it as an official business location.

While we have notified FMCSA of this problem and the registrant has since removed the address from the TPR, the listing should not have been allowed to occur in the first place. FMCSA should require any applicant to produce some proof of business address – lease, agreement, title – as a condition of being added to the TPR.

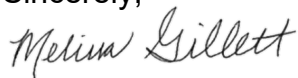
2. FMCSA also needs to continually audit TPR registrants to ensure accuracy of information and compliance with ELDT and broad CDL requirements. In Iowa,

we have reported to the FMCSA Iowa Division three instances when a TPR registrant has conducted public road training (as required in ELDT) when the applicant has not held the proper commercial learner credential. Yet we have no follow-up from FMCSA as to any action taken to ensure compliance of the registrant and no indication in the TPR that the registrant is noncompliant, under investigation or not in good standing.

Furthermore, we see throughout the TPR that in-person registrants are missing address data. We cannot ascertain whether the registrant never showed an address or whether it was once provided and since removed, but a business address should be a requirement for any in-person registrant for the benefit of customers and regulators alike.

In summary, while we support the general concept of ELDT, we have experienced problems with the quality, usefulness and clarity of the TPR. We request that FMCSA dedicates resources, develops processes and enables its staff to ensure accurate information in the TPR and to ensure continued compliance of registrants.

Sincerely,



Melissa Gillett, Director
Iowa DOT Motor Vehicle Division