

COMMENTS TO NOTICE; REQUEST FOR INFORMATION
Docket Number FMCSA-2006-26602
Renew Approval of an Information Collection; OMB Control No. 2126-0011
(Commercial Driver Licensing and Test Standards)
Request for Comments

Thank you for the opportunity to participate in this request for information and provide comments. We understand that the total burden hours estimated for the seven information collection components in this notice are based on information submitted by all jurisdictions. New York State understands that Commercial Driver Licensing (CDL) and test standards are necessary to prevent unqualified and or disqualified drivers from being issued a CDL, and to prevent unsafe drivers from spreading their convictions among several licenses in several states.

New York State General Comments

Based on NY's estimated and actual CDL recordkeeping, we believe that the components below may not be accurate.

Component #5 CDLIS Recordkeeping:

FMCSA's estimated national total for drivers that change their state of domicile per year (230,400) divided by 51 jurisdictions = 4,518 Change State of Record (CSOR) transactions per jurisdiction per year. We understand that these figures may be valid based on the methodology used for national estimates.

However, in August of 2007 NY processed 649 CSOR's. We estimate that we process 7500 CSOR's per year which shows NY processes roughly 3000 more CSOR's per year than the FMCSA estimate. Therefore, $7,500 \times 51 = 382,500$ transactions $\times 2/60 = 12,750$. With this, we feel that the change state of domicile requirement has an estimated annual burden of 12,750 hours and not 7,680 hours.

Component #6 CDL Application Form:

FMCSA estimates a national total of 576,000 new CDL applicants per year.

On the last week of August (8/27-31, 2007) NY added 496 pointers. Our estimate which accounts for slower times of year during the winter and Holidays would be 24,500 new CDL applicants processed per year. In addition, we estimate it takes on average five (5) minutes to read and complete an original CDL application and three (3) minutes to read and complete the CDL renewal application which includes the out of state survey. The NY state CDL license is valid for eight (8) years.

Therefore we estimate there are 1,249,500 ($24,500 \times 51 = 1,249,500$) new CDL applicants processed per year.

FMCSA estimated 11,520,000 active CDL drivers divided by 8 (NY's renewal period) = 1,440,000 CDL drivers renew a year.

- NY's national yearly new CDL applicant estimate of 1,249,500 new applicants X 5/60 = an estimated annual burden of 104,125 hours.
- NY's national CDL renewal estimate of 1,440,000 renewals X 3/60 = an estimated annual burden of 72,000 hours.

We estimate the total burden hours for these combined collection of information activities is 176,125 hours (104,125 hours + 72,000 hours) rather than the FMCSA combined estimate of 48,000 hours.

Component #7 Knowledge and Skills Test Recordkeeping:

We estimate it takes DMV staff five (5) minutes on average to record the results of the CDL knowledge test which includes system response time and entry audit time. We agree with FMCSA that 25% fail the test. If we estimate there are 1,249,500 CDL knowledge tests recorded per year X 5/60 (5 minutes to record) X 1.25 (25% failure rate) we conclude the total burden hours to be 130,156 for this information collection activity, opposed to 24,000 hours.

Respectfully Submitted by
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