

2008 FEB -5 A 9:57



TAYLOR MOTORS, INC

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Murray, KY. 42071

DEPARTMENT OF TRANSPORTATION
DOCKETS

January 30, 2008

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Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

Re: 49 CFR Parts 380, 383 and 384 Minimum Training Requirements for Entry-Level Commercial Motor Vehicle Operators; Proposed Rule

To Whom It May Concern:

Company Background: Taylor Motors, Inc. is a School Bus Contractor serving Department of Defense Schools on 5 military bases in 4 states. The company operates approximately 120 vehicles with approximately 130 drivers within these areas. The primary business relates to transporting military school children as passengers to and from school on military bases. Occasionally off post travel is required for field trips or athletic events. Two of the facilities are located on state lines where drivers will occasionally transport student passengers to and from events and one (FT Campbell) is literally on the state line. We go back and forth (on post) between KY and TN daily.

The company is required by contract to follow all state laws that effect school bus transportation and drivers (as well as driver trainers) are trained in the states they primarily serve. Company drivers are also required by contract to be trained and follow any and all other federal requirements related to transportation. As a result Taylor Motors depends on internal and external trainers to instruct them on current federal regulations including the new driver requirements and certifying them as fit for the road.

Comment: Inherent in this comment is the Company's acknowledgement that training is important to insure safer and more responsible drivers on the roadway. Assuming that school systems and contractors have not been trained adequately may be an erroneous assumption. Most states we are aware of spend from 24 to 40 hours in the classroom and on the road training all drivers. In fact, school bus drivers are required to have update training before returning to school annually. This includes many subjects related to interstate or multi state driving during some field trips.

In addition, as a contractor following state specific school bus law, we follow federal mandates like the new driver training requirements: Driver Qualifications, Hours of Service, Driver Wellness and Whistleblower protection as outlined in 380.503 (Entry-level

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driver training requirements). Implementations of these standards coupled with the state school bus requirements add up to numerous training hours for our drivers. These training hours use certified/trained school bus driver trainers and other expert trainers in fields such as First Aid who are supplemented with the latest information available from states and organizations like J.J. Keller.

As noted in the proposed rule, "32 percent of the school bus drivers worked for non-governmental entities, mainly as contractors to the local educational agencies." As a contractor that borders other states in 3 of our locations, there would be a constant need to have drivers readied to the new training requirements. With attrition over the proposed preparation phase and the actual implementation by 2014 it would appear that well over 50 percent of the driver work force would be categorized as new drivers.

If for example 65 drivers were hired within the inclusion period for our company the cost based on the annual expense calculations from the proposed rule would mean tens of thousands of dollars. The requirement would force the driver education program currently used to increase from an average of 31 hours to 90 hours. This represents an increase of 59 hours per driver. 59 hours times 65 drivers would mean 3,835 additional hours of training. At your suggested rate of \$36.40, the cost would be \$139,594.


This figure equals more than one-third of \$346,000, your stated annual projected training expense for all school bus operations in the United States. We therefore contend that your estimate is extremely low.

What can be done to improve the current training curriculum? We suggest requiring each state to train on Driver Qualifications, Hours of Service, Driver Wellness and Whistleblower protection as outlined in 380.503. School bus drivers will then be included in required Federal training just in case they ever cross state lines.

Another issue in training some and not others (who may only drive home to school and school to home) is the unpredictability of driver's availability. Generally, in order to operate a successful transportation business all drivers must be trained to perform all required services. Since many school bus drivers border on part time, having a partially trained staff of drivers with some trained to cross state lines or drive recordable trips and others not trained in this particular area would not be feasible.

Finally, we believe this proposed rule will not accomplish its intended purpose (better trained drivers) and may morph into something overwhelming for business and public institutions.

Thank you.


Gary Taylor
President
Taylor Motors, Inc.