

DEPT. OF TRANSPORTATION
DOCKETS

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March 24, 2008

Docket #FMCSA-2007-27748
Docket Management Facility
U.S. Department of Transportation
Room W12-140
1200 New Jersey Avenue, S.E.
Washington, DC 20590-0001

***Re: Notice of Proposed Rulemaking: Minimum Training Requirements
for Entry-Level Commercial Vehicle Operators***

Dear Sir or Madam:

I am writing to express my concerns with the Federal Motor Carrier Administration's notice of proposed rulemaking (NPRM): "Minimum Training Requirements for Entry-Level Commercial Vehicle Operators."

Transsystems supports a better driver training rule, but the provisions of the proposed rule the company's ability to recruit new drivers.

Transsystems is primarily an agricultural carrier operating in rural areas. The company employs up to 800 drivers during its busy season.

The company has a multi-year driver training program that applies to all drivers from entry-level to fully qualified drivers. Our training program includes classroom, web-based, and over-the-road training. We have strict standards and we require every employee to complete each step of the training curriculum.

The accreditation and the hours-based training requirements in the proposed rule are expensive and would divert resources that are better deployed in training that has a demonstrable impact on safety. The appropriate amount of time necessary for

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driver training cannot be determined unless or until truck driver training hours have been properly validated by FMCSA.

I believe that training standards based upon performance are more likely to produce a safe driver than standards based upon hours of training.

The proposed rule also would impose qualification requirements on classroom and skills driver training instructors which do not align with industry practice and would limit the number of individuals available to train new drivers. The Agency's proposal establishes that trainers be state certified and requires instructors to have at least two years of experience rather than one. In this regard as well, FMCSA has set forth a provision without any empirical evidence to support its position. The proposed requirements exceed industry practice and, if adopted, would limit type and availability of individuals to train entry-level drivers.

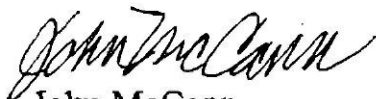
Transsystems believes that the proposed entry-level driver training rule should be reconsidered.

Sincerely,

TRANSYSTEMS LLC



Scott Lind
President



John McCann
Director of Training



Rich Carl
Vice President of Safety