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

DEPT. OF TRANSPORTATION
DOCKETS
2008 APR 21 A 10:49

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

Dear Sir/Madam:

I represent NorthAmerican Transportation Association and the National Moving Contractors Association. We wish to express a serious concern with the Federal Motor Carrier Administration's notice of proposed rulemaking (NPRM): "Minimum Training Requirements for Entry-Level Commercial Vehicle Operators." Although our two organizations support an enhanced driver-training rule, certain provisions of this proposed rule do not show good judgment and would seriously hamper our member's ability to recruit new drivers.

We are a non-political transportation benefits organization who collectively represents approximately 3,000 small to medium transportation companies who use the services of about 14,000 employee drivers and independent contractors.

Accreditation Requirements for Entry-Level Trainees

I concur that training from an accredited school would certainly enhance the dignity of a professional truck driver. I believe that the first thing that commercial drivers need is **proper and consistent training**. This would also do away with some unscrupulous, fraudulent driving schools call "mills" who will grant anyone a diploma for a set price.

The Professional Truck Driver Institute in Alexandria, VA has been certifying schools since 1986. PTDI - certified courses are currently offered at 66 schools in 28 states and Canada. PTDI was the first nonprofit organization to develop uniform skill performance, curriculum, and certification standards for the trucking industry and to award course certification to entry-level driver training courses. They have been working with motor carriers, truck driver training schools, insurance industry, and government to make safety a number one priority.

NorthAmerican Transportation Association
Helping others to succeed in business...™

So it would only makes sense to adopt the curriculum program they already have in place.

However, this is only about 15% of the schools in the U.S.

Our database contains approximately 416 private schools and community colleges that provide CDL training in the United States. Thusly, 315 organizations would become ineligible and obsolete.

There is an alternative for these fine organizations to take.

NorthAmerican Transportation Association has teamed up with Advance Online and the United States Department of Transportation's Transportation Safety Institute.

The Transportation Safety Institute (TSI) was established in 1971 to assist DOT modal administrations accomplish their mission essential training requirements. Since its inception, TSI has expanded its clientele to keep up with the needs of the Department and transportation industry. The Institute offers premier transit, aviation, pipeline, motor carrier, highway safety, hazardous material, and risk management training nationally and internationally.

We offer US DOT/ Transportation Safety Institute's (TSI) Motor Carrier Safety Compliance Courses on-line at our website www.ntassoc.com listed under NTA OnLine Institute for Motor Carriers. The only other place you will find this training is at the TSI website. We have driver courses as well as management courses plus other DOT/TSI courses.

Each person having taken a course and upon passing the applicable course is able to download a actual Certificate of Completion issued by the United States Department of Transportation, Transportation Safety Institute which can be verified.

What better training than from the organization that has been doing this for the last 37 years.

It should be a requisite that each driver pass the most basics courses i.e. drug testing, hours-of-service and maintenance before a commercial driver's license is issued.

If you have any questions, please feel free to call me at 800-805-0040 or by e-mail at wayne@ntassoc.com

Sincerely,



Wayne Schooling
President & CEO