Potential Costs of an ELDT Rule

POTENTIAL COSTS	POTENTIALLY AFFECTED ENTITIES												
		CDL Drivers			Training Entities								
		New Entry-Level CDL Drivers											
	Carriers (transportation operations)	***Without Endorsements***	***With Endorsements (P, S, H)***	***Existing CDL Drivers***	***Third-Party Training Schools***	***Post-Secondary Vocational-Technical Schools***	***Colleges & Universities***	***Carriers*** *(in-house training, a.k.a. finishing school)*	**State Driver Licensing Agencies (SDLAs)**	**Non-SDLA State or Local Gov't Agencies**	**State or Local Enforcement Agencies**	**FMCSA**	**Society**
Training costs borne by drivers, i.e., tuition, etc. (may include interest plus principal if student debt is incurred)		✓	✓										
Training costs borne by carriers (direct costs of in-house training programs, and/or costs of reimbursing new drivers fully or partly for driver-paid training, etc.)	✓												
Materials related to driving training (documents, training guides, etc.)		✓	✓										
Travel (transportation, lodging, etc.)		✓	✓										
Opportunity cost	✓	✓	✓										
Recordkeeping (development and operating costs for a potential National Registry for recipients of Training Certificates, possible CDLIS updates, etc.)									✓			✓	
Recordkeeping (development and maintenance of driver training records by training entities)					✓	✓	✓	✓					
Recordkeeping (maintenance of driver training records by drivers)		✓	✓	✓									
Recordkeeping (development and maintenance of driver training records by carriers)	✓												
Enforcement									✓		✓	✓	
Increased labor costs (from potential "barriers to entry" effect in driver labor market resulting from increased training requirements)	✓												
Creation of new training entities					✓	✓	✓	✓					
Expansion of existing training entities					✓	✓	✓	✓					
Increase in driver training tuition rates (potentially resulting from increased demand for driver training)		✓	✓										
Additional CDL license fees (e.g., if SDLAs incur additional costs and attempt to recoup some or all of those additional costs from new CDL applicants, etc.)		✓	✓										
Certification or accreditation of training entities					✓	✓	✓	✓					
Administrative oversight by non-SDLA state or local agencies (e.g., state education department oversight of training schools; professional & vocational licensing boards, etc.)										✓			
Development and possible ongoing revision of new training curriculums					✓	✓	✓	✓					
Transitional costs to the training entity industry (some training entities may decide to shut down rather than meet ELDT requirements; teach-out costs, i.e., completion of instruction for students currently enrolled in an institution that decides to shut down, etc.)					✓	✓	✓	✓					
Hiring of additional trainers					✓	✓	✓	✓					
Instructor education and training					✓	✓	✓	✓					
Acquisition, maintenance and operation of training vehicles					✓	✓	✓	✓					
Acquisition, maintenance and operation of simulators					✓	✓	✓	✓					
Environmental (CO_2 emissions, criteria pollutant emissions of CO, VOC, NO_x, PM_{10}, $PM_{2.5}$, SO_2)													✓