**Entry Level Driver Training Advisory Committee**

**Data Needs / Cost Benefit Analysis (CBA) Working Group Meeting Notes**

**March 27, 2015, 9:30 AM EDT**

**Meeting Attendees**

Bob Armstrong USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Rob Behnke National Association of Publicly Funded Truck Driving Schools (NAPFTDS)

Lamont Byrd Teamsters

Betsy Campos USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Rich Clemente USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Brian Dahlin USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Jim Edwards National Association of Small Trucking Companies (NASTC)

Sean Gallagher USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Charlie Hood National Association of State Directors of Pupil Transportation Services (NASDPTS)

Shaun Kildare Advocates for Highway and Auto Safety

Joshua Kovarik Con-way Freight

Jill Laptosky USDOT, Office of the Secretary of Transportation (OST)

Mike LaRocco National Association of State Directors of Pupil Transportation Services (NASDPTS)

Kim McCarthy……USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Bob Miller………...USDOT, Federal Motor Carrier Safety Administration (FMCSA)

David Money……..Professional Truck Driver Institute (PTDI)

Suzanne O'Malley USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Richard Parker……ELDTAC Facilitator

Bob Petrancosta FedEx Ground

Boyd Stephenson American Trucking Associations (ATA)

Howard Stone USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Shannon Watson USDOT, Federal Motor Carrier Safety Administration (FMCSA)

Tom Weakley Owner-operator Independent Driver Association (OOIDA)

Ronna Weber National School Transportation Association (NSTA)

Andrea Wohleber Transportation Trades Department (TTD), AFL-CIO

**Discussion**

Brian Dahlin (FMCSA) led the discussion. Items discussed included:

* Administrative items:
	+ Request that work group participants review roster and provide changes or updates to Brian Dahlin at brian.g.dahlin@dot.gov
* Re-cap of last meeting’s main points:
	+ The approach is to develop high-level categories and sub-categories that provide the analytical basis for the work moving forward. The matrix tables regarding categories of entities, costs, and benefits are part of this effort.
	+ The analysis must make a distinction between the current baseline and the future.
		- Approach is to begin developing a profile of today’s pre-rule world, and then estimate the changes relative to that baseline.
	+ Overview of FMCSA’s research and analysis division research projects that relate to ELDT.
		- Results of these will most likely not be available for the NPRM.
		- To the extent that we’re able to identify the relationship between safety and training that information would be beneficial. However, the group should continue to proceed with or without an identified link.
* Discussion regarding the categories of entities affected:
	+ The training entity category needs to be refined and/or expanded. Categories for mom-and-pop (‘Uncle Hank’) training programs, joint-labor management 501(c) (3) organizations, and labor run training programs are missing from the table. *Input regarding the structure of the training industry would be exceedingly helpful in understanding how the categories differ from each other.*
		- *Note: the “Categories & Numbers of Affected Entities” Excel table has been updated following the March 27th meeting to include the three additional categories mentioned above.*
	+ With regard to how definitive the categories need to be, a high-level understanding of the make-up of the entities is a minimum. Granular data is always good, but we can start with basic data, such as:

(1) The number of potential drivers.

(2) Who pays for the training?

(3) Who provides the training?

* Categories can be developed for school buses that are analogous to truck carrier categories.
* Approach to this type of analysis is two-fold. First, the baseline must be estimated. That is, what does the world look like today; how many potential drivers exist, how many get training, who provides that training, etc.). The second step is to determine the change between the baseline and the new rule.
* FMCSA efforts at gathering data:
	+ FMCSA is developing an information collection request to determine the number of CDLs issued annually. We hope to receive this information from the State Driver Licensing Agencies before the summer’s end.
	+ FMCSA began conducting outreach with the training facilities before the negotiated rulemaking began in an effort to determine where the potential drivers are receiving training.
	+ FMCSA is working to conduct a general population survey regarding the general level of pre-CDL training.
	+ The US DOT Volpe Center is working on two studies related to the benefits of pre-CDL training:
		- One study will compare two states; one with training requirements and one without, tracking drivers’ performance on a longitudinal basis.
		- The other study likewise examines drivers’ safety and violations records and compares outcomes to the level of training received (based on the self-reported level of training received by drivers sampled).
* Insurance information as a proxy:
	+ David Parker and William Stieg have discussed the possibility of providing FMCSA with information regarding the insurance pay-out changes before and after a carrier institutes a training program.
	+ It was noted that insurance companies in general might not track their losses this way, and they would not want to share propriety information. However, the way in which insurance companies might look at experience and age in relation to premiums before and after this rule would be useful.
* Group action items
	+ Review your contact information in the workgroup roster. Provide edits/corrections if needed, to Brian Dahlin.
	+ Review categories of entities potentially affected by an ELDT Rule:
		- This action item refers to the Excel file titled “Categories & Number of Affected Entities,” an updated version will be circulated to the group by FMCSA as soon as possible (an earlier version was circulated prior to the 3/27 group meeting).
		- Provide feedback to this Excel file, considering the following two questions:
			* Are the first-level and second-level categories accurately categorized, exhaustive, and mutually exclusive?
			* What is the estimated number of entities in calendar year 2014 for each of these categories?
		- Feedback should be sent to Brian Dahlin.
	+ Any legal concerns related to confidential business information (CBI) should be directed to and discussed with Carolyn (“Kim”) McCarthy at carolyn.mccarthy@dot.gov.