



# California Construction Trucking Association

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CalConTrk.org

January 9, 2015

Docket Management Facility  
U.S. Department of Transportation  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue SE.  
Washington D.C. 20590-0001

**RE: Docket Number – FMCSA-2007-27748** – Minimum Training Requirements for Entry-Level Driver Commercial Motor Vehicle Operators; Establishment of a Negotiated Rulemaking Committee

Dear Acting Administrator Darling,

The California Construction Trucking Association (“CCTA”) submits these comments in response to the U.S. Department of Transportation, Federal Motor Carrier Safety Administration (“FMCSA” or “Agency”) Notice and publication on December 10, 2014 at 79 Fed. Reg. 237, concerning whether the Agency has identified an accurate and reasonably comprehensive pool of affected stakeholders for the purposes of conducting a negotiated rulemaking on establishing minimum training requirements for entry-level commercial motor vehicle operators (“CMV’s”).

The CCTA is the largest non-profit association of construction trucking firms in the U.S. Founded in 1941 and headquartered in Upland, California. The CCTA advocates at the state and federal level for sensible legislation and regulation on behalf of our members. Our members consist of one-truck owner-operators to fleets employing over 350 drivers. As both direct users and employers of drivers required to possess a commercial drivers license (“CDL”) this rulemaking will have a direct effect on all our members and the CCTA believes the second largest user group of CDL holders in the U.S. – the construction industry, needs to be an active participant in this negotiated rulemaking process.

FMCSA has identified approximately two dozen stakeholders ranging from safety advocacy groups, organized labor, motorcoach/bus associations, and various trucking associations. Not identified by the Agency is the construction industry. The construction industry employs nearly one million CDL holders to drive a wide variety of CMV’s requiring a class “A” CDL and we do not believe any party currently identified by the Agency can effectively represent the interests of our industry.

For example, the types of CMV’s operated range from dump trucks, cement mixers and concrete pumps, to cranes. The training and skill sets necessary for safely operating vocational/construction trucks can be decidedly different than the training and skill sets required to operate a CMV hauling freight and running vast distances. It is also not uncommon in the construction industry for the primary job function of the CDL holder to be as an equipment operator who only needs a CDL to transport equipment on/off site instead of over long distances.

The CCTA wishes to be added as an effected stakeholder to represent the vocational/construction trucking segment of the trucking industry in this negotiated rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Brown". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lee Brown  
Executive Director  
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