



# National Transportation Safety Board

Washington, D.C. 20594

## Safety Recommendation

Date: July 14, 1986

In reply refer to: H-86-10 and -11

Mr. Donald J. Bardell  
Executive Director  
American Association of Motor Vehicle  
Administrators  
1201 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Log: H-474H

On July 5, 1984, a tractor-semitrailer was following a car too closely on wet pavement near Ashdown, Arkansas. When the car slowed suddenly, the truck had to brake hard to avoid hitting it. The truck jackknifed, and the tractor rotated into the oncoming lane and struck a police car. All four police officers in the struck vehicle were killed. 1/

A tractor-semitrailer collided head-on with a church van in Lemoore, California, on October 8, 1982, killing all but 1 of the van's 11 occupants. There had been a stalled car blocking the truck's lane at an intersection. Instead of slowing down, the truck driver attempted to go around the car, and he lost control of the combination vehicle in the process. 2/

These are examples of the heavy truck 3/ accidents investigated by the National Transportation Safety Board in which driver performance was a major factor. The operation of heavy trucks places special demands on the driver, demands he or she may not always be able to meet. Long stopping distances, the possibility of brake fade on steep hills, restricted maneuverability, cargo shifting, and the danger of jackknifing are only a few of the problems that drivers of heavy trucks must face constantly, but which automobile drivers experience rarely, if at all.

1/ Highway Accident Report--"Collision of DeQueen, Arkansas, Police Department Patrol Car and Terrell Trucking, Inc., Tractor-Semitrailer, U.S. Route 71, Ashdown, Arkansas, July 5, 1984" (NTSB/HAR-84/07).

2/ Highway Accident Report--"J.C. Sales, Inc., Tractor-Semitrailer and Calvary Baptist Church Van Collision, State Route 198 at 19th Avenue near Lemoore, California, October 8, 1982" (NTSB/HAR-83/02).

3/ According to the definition used by the National Highway Traffic Safety Administration, all of the following are considered heavy trucks: 1) single-unit (or "straight") truck with gross vehicle weight greater than 26,000 pounds; 2) tractor-trailer combination; 3) truck pulling one or more cargo trailers; and 4) tractor pulling no trailer. A medium truck is any single-unit truck with a gross vehicle weight between 10,000 and 26,000 pounds. While this recommendation letter deals generally with drivers of heavy trucks, many of the observations apply also to those driving medium ones. Light vehicles, such as pickup trucks, are excluded.

Truck driving is a specialized skill, distinct in many ways, and more demanding than operating a smaller vehicle, such as a car. However, far too many people are able to enter the field without having first acquired that skill. The Safety Board has completed a study that examines the system that prepares candidates for employment as truck drivers and then initially places them into service. <sup>4/</sup> The objective of the study was to identify weaknesses in the system, to describe current efforts for improvement, and to offer recommendations for ways to augment those efforts.

In its review of State driver licensing practices, the Safety Board found that all States require license applicants to take a road test, but in 19 States and the District of Columbia, the applicant is not required to demonstrate proficiency in the type of vehicle he or she intends to drive. Thus, a person could take a road test in a small sedan, obtain a license, and then legally use that license for driving a tractor-semitrailer. Thirty-one States issue licenses corresponding to specific classes of vehicles, with the classifications usually determined by such factors as vehicle weight or number of axles. In a "classified licensing system," which the Safety Board endorses, applicants are given a road test in the type of vehicle specified in the license being sought.

In addition to the lack of classified licensing in some States, the Safety Board found that the test procedures used in many States are not sufficient for evaluating an applicant's qualifications to drive a heavy truck. To make truck driver licensing more uniform throughout the United States, and to make it a more effective means of setting and enforcing adequate qualification standards, the Safety Board believes a national license for truck drivers should be developed. Such a national system also would help prevent truck drivers from holding more than one license at a time and spreading the traffic violations accrued among those multiple records--a ploy used by some drivers to hide their unsafe behavior from authorities.

The following are some of the issues that will have to be addressed in developing a national truck driver licensing program, as well as some of the features that the Safety Board believes such a program should contain.

Training Requirement and Other Qualification Standards. The Safety Board has recommended that truck drivers under the jurisdiction of the Federal Motor Carrier Safety Regulations be required to master the skills taught in a formal truck driver training program. Those Federal regulations govern interstate trucking operations. In order to apply the training requirement to intrastate drivers as well as interstate, the requirement also should be established as a prerequisite for obtaining the National Driver License. Other uniform qualification standards are needed for the License, for example, in areas such as minimum age, medical condition, and previous driving record. These qualifications probably should be derived from the Federal regulations.

License Classification and Differentiation. The national licensing system should be classified by vehicle size, as well as other vehicle factors determining the skills needed for safe operation. Perhaps using a model program developed by the American Association of Motor Vehicle Administrators and other existing classification schemes as reference, the framers of this system will have to arrive at a standard series of license classes. The system should stipulate that road tests for each class be given in the largest type of vehicle allowable in that class. There should be a separate license or license endorsement for hazardous materials drivers. Separate licenses or endorsements also may be needed for drivers of trucks with special handling characteristics, such as tank trucks or combination vehicles with multiple trailers.

<sup>4/</sup> Safety Study---"Training, Licensing, and Qualification Standards for Drivers of Heavy Trucks" (NTSB/SS-86/02).

Performance Test Procedures. A standardized performance test procedure will be needed, as well as uniform eligibility and training standards for license examiners.

Certificates of Proficiency. In some States, a motor carrier can issue a certificate indicating that a driver has been tested and meets the company's performance standards, and the State will accept that certificate in lieu of a road test. A review is needed of the Safety implications of this practice, to determine whether it should be permitted in the national system.

Knowledge Test and Driver's Manual. Uniform knowledge tests will be needed that feature substantial emphasis on safe driving practice. It may be advisable to include questions on the operational requirements of the Federal Motor Carrier Safety Regulations. Another promising source would be the test battery being developed for the Bureau of Motor Carrier Safety's (BMCS) Model Curriculum for Training Tractor-Trailer Drivers. All questions in the knowledge test should be properly validated before being put into use.

The standard driver's manual also may be drawn from portions of the BMCS curriculum. Although individual States probably would have to augment the manual with information on their own traffic regulations, each State would no longer have to develop a full driving handbook on its own.

License Renewal. Each person holding the National Truck Driver License should be required to undergo a full retest of knowledge, performance, and vision each time that license is due for renewal.

One-License/One-Record Concept. One of the most important reasons for establishing the National Truck Driver License is to promote the one-license/one-record concept, which is an effort to prevent drivers from holding more than one license at a time. With a single system for issuing licenses and recording traffic violations, it will be much harder than it is now for a driver with a bad record to avoid detection.

In order to make that system truly effective, it will be necessary for the national license to supplant all others. Persons operating vehicles not covered by the national system would continue to drive on whatever type of license they received from the State. But those wishing to drive qualifying commercial vehicles would have to surrender all other driver licenses before being issued a new, national license. After that, any traffic violation, regardless of the type of vehicle driven, would be recorded on the national license. The situation must be avoided in which a driver would maintain one license for driving a truck and another for driving a private automobile. That would run counter to the principle of one-license/one-record. Furthermore, it is the Safety Board's position that everything a person does on the highway, regardless of vehicle, has bearing on his or her fitness to drive a truck.

Program Administration. Administering the National Truck Driver License involves developing uniform qualification standards and licensing procedures and then implementing them throughout the United States. The roles of State and Federal governments in these functions must be determined.

At present, driver license administration is close to an exclusively State operation, and, as shown, this arrangement is in need of improvement. At the other extreme, licensing could be made an exclusively Federal function, analogous to the Federal Aviation Administration's licensing of pilots. That would require the creation of a new

network of licensing bureaus, and since there are many more commercial drivers than pilots, the costs of such a network would be prohibitive. The most realistic course, therefore, would be a partnership between governments on the State and Federal levels.

Testing applicants and examining their qualifications should remain a State function, using the motor vehicle bureaus already in place. The Federal government, working with the States and other interested parties, should develop uniform standards and testing procedures, and ensure that these are adhered to in all States. The other functions in the national licensing program will include:

- 1) Issuing the licenses, and making sure that each driver under the system obtains only one.
- 2) When warranted because of the license holder's record, suspending or revoking the driving privilege, or taking other enforcement action. (The program will have to establish uniform criteria for such action.)
- 3) Maintaining records on all license holders.

There will be roles for both State and Federal authorities in carrying out these functions. It should be the responsibility of the Department of Transportation (DOT), based on public comment and its own analysis, to assign those roles.

The DOT will have to determine how and where the license records will be kept. The recordkeeping function will be essential to the success of a National Driver License system. Without a single, complete file on each license holder that includes all traffic violations and other relevant information, it would be impossible to detect and take action against unsafe drivers. Whether the records are kept by the States (presumably the State issuing the license) or the Federal government, the accuracy of those records will depend on an effective communications system. Notification of every violation must be transmitted to the recordkeeping entity. If the records are maintained by the States, there probably would have to be a central listing of all license holders, indicating the licensing State and containing sufficient identifying information on the license holder to prevent that driver from obtaining more than one license.

The Safety Board ~~has reviewed~~ current efforts to improve the National Driver Register (NDR) as well as proposals to expand its services. The NDR, operated by the National Highway Traffic Safety Administration (NHTSA), is a clearinghouse of data on drivers whose licenses have been suspended, revoked, or denied, or who have a record of having committed certain serious traffic offenses. It was established in 1960 to assist State driver licensing officials in exchanging driving records. Its purpose is to enable a State to determine whether another State has taken an adverse action (such as suspension or revocation) against a license applicant. States participate in the NDR voluntarily by providing information to the Register and by making inquiries regarding license applicants. They use NDR to screen license applicants to ascertain whether or not they previously have had a license suspended, revoked, or denied in another State or have committed serious traffic offenses.

The NDR files are only as good as the information submitted voluntarily by the States, and policies regarding the submission of data and inquiries vary from State to State. Throughout its existence, the NDR has suffered from problems of incomplete (and sometimes inaccurate) information, and from slow responses to inquiries. These problems have been documented repeatedly by the Safety Board, by the NHTSA itself, and by others in studies at least as far back as 1973.

In 1980, the DOT submitted a report to Congress outlining the problems of maintaining current and accurate data and pointing out the need to automate the NDR. <sup>5/</sup> That study recommended a system in which NDR would serve as a conduit for retrieving information from one State in response to an inquiry from another State and transmitting that information without interception. In this way, the NDR would no longer be required to maintain massive files, and the information would be as accurate as the information in the providing State's file at the time of inquiry.

In response, Congress enacted the National Driver Register Act of 1982, <sup>6/</sup> which mandated that NDR be converted to a fully automated system, enabling a State to determine virtually instantly whether another State has taken an adverse action against a driver. It also established a timetable for implementation of the automated system and mandated that a pilot test of the system be conducted.

This law mandates that the NDR be changed from a system containing substantive data regarding adverse licensing actions taken by the States on their drivers and reported to the NDR, to a "pointer system" linking the States to a national communications network by means of the central computer of the NDR. Under the pointer system (termed the "Problem Driver Pointer System" (PDPS)), the NDR will simply be an index for directing an inquiring State to any appropriate State of record. It will not retain information beyond that necessary to identify drivers, and it will not have the capacity to intercept the information being exchanged between States. No longer will NHTSA be required to maintain a large data bank. Substantive data on problem drivers will remain the responsibility of the States and will not be contained in the NDR.

State participation will remain voluntary, although the terms and conditions of participation will be formalized and agreed on by both the States and NHTSA. The most significant impact of this change is that both the types and the contents of reports to be submitted to the NDR are specified by the statute. This law transfers a significant responsibility and workload to the states.

The Safety Board recognizes that in some cases the efforts required of some States in order to participate in the PDPS will be significant and time-consuming. Although the States have automated their driver licensing operations to varying degrees, they will need to make some changes in order to accommodate the new NDR. In particular, they will need to provide access to their records by the NDR and by commercial drivers (who will be given access to NDR for the first time). Additionally, the States will need to develop procedures to enable the transmission of inquiries to their own files and to the NDR simultaneously.

Based on its discussion with the States, the NHTSA is allowing 16 months for the first four States participating in the PDPS (the pilot test States) to make the necessary preparations, including procurement of hardware and software, testing new communications systems, testing and installing new equipment, training, and developing new internal procedures. While recognizing that these States are testing something that has not been done previously, the Safety Board hopes that these preparations can be completed in less than 16 months. Further, the Safety Board hopes that licensing officials in other States will be able to shorten this preparation time when the PDPS becomes available to them.

<sup>5/</sup> "The National Driver Register: A Part of the States Driver Licensing System;" June, 1980, U.S. Department of Transportation, NHTSA, Document No. DOT-HS-805527.

<sup>6/</sup> Public Law 97-364, October 25, 1982, 96 Stat. 1740.

While the NHTSA works to implement the PDPS, it also has been making improvements in the quality of data stored in its NDR file, and in the promptness of its responses to State inquiries. The most significant improvement has been in the capacity of States to access the NDR file interactively. Known as the Rapid Response System (RRS), this feature will enable a State to know virtually instantly whether there is an NDR record on a license applicant. If States that issue licenses over the counter are to be able to screen an applicant before the license is issued, they must have this on-line access to the NDR file.

The Rapid Response System differs from the PDPS only in that the former provides access to the data base maintained by the NHTSA, rather than direct access to other States' driver records. Those States that develop the capacity to make on-line inquiries of the NDR files are being asked by the NHTSA to do so in a way that will be compatible with the design of the Pointer System. In essence, States that participate in the Rapid Response System will be using the Pointer System to access NHTSA files instead of other States' records.

States which use the Rapid Response System will be able to initiate participation in the Pointer System more rapidly after the Pointer System has been tested and evaluated. All that will be required will be development of the capacity to receive and respond to other States' inquiries transmitted through the Pointer System. The Safety Board urges the States to participate in the Rapid Response System as soon as it becomes available, both as a means of obtaining interactive access to the NDR and as a means of preparing for participation in the Pointer System.

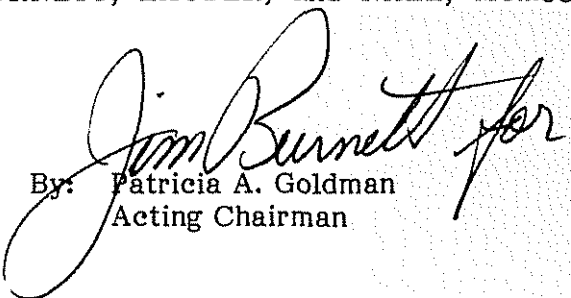
Therefore, the National Transportation Safety Board recommends to the American Association of Motor Vehicle Administrators:

Develop recommendations on how a National Driver License for commercial truck drivers could be administered jointly by State and Federal authorities, and submit these recommendations to the Secretary of Transportation. (Class II, Priority Action) (H-86-10)

Urge all States to implement the Rapid Response System of the National Driver Register (NDR) as soon as feasible, both to obtain prompt ~~access to NDR records~~ and to prepare for use of the Problem Driver Pointer System when it becomes available. (Class II, Priority Action) (H-86-11)

The National Transportation Safety Board is an independent Federal agency with the statutory responsibility "...to promote transportation safety by conducting independent accident investigations and by formulating safety improvement recommendations" (Public Law 93-633). The Safety Board is vitally interested in any actions taken as a result of its safety recommendations and would appreciate a response from you regarding action taken or contemplated with respect to the recommendations in this letter. Please refer to Safety Recommendations H-86-10 and -11 in your reply.

GOLDMAN, Acting Chairman, and BURNETT, LAUBER, and NALL, Members, concurred in these recommendations.

  
By: Patricia A. Goldman  
Acting Chairman