



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

February 27, 2026

Dockets Operations
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Washington, DC 20590-0001

RE: Docket Number: FMCSA-2025-1117

Qualifications of Drivers: Minimum Age for Drivers; American Trucking Associations; Application for Exemption

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments in response to the Federal Motor Carrier Safety Administration's (FMCSA) request for feedback on the American Trucking Associations' (ATA) request for a 5-year exemption to allow motor carriers that previously participated in the agency's Safe Driver Apprenticeship Pilot (SDAP) program to continue onboarding and training drivers under the age of 21, docket number FMCSA-2025-1117.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle (CMV) safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

Historically, CVSA has supported the use of pilot programs to determine whether a concept will have a positive impact on safety. As noted in our response to the agency's request for comments to the September 2020 notice of proposed pilot program (docket number FMCSA-2018-0346), there is value in conducting such a pilot program to assess the impacts of allowing younger drivers to operate in interstate commerce.

CVSA also supported the inclusion of the Safe Driver Apprenticeship Program as part of the Infrastructure Investment and Jobs Act (IIJA) of 2021. The language in IIJA was similar to the concept outlined by FMCSA in 2020. The congressionally-mandated program included a number of key parameters, including the use of specific safety technologies, a structured apprentice program, as well as reporting and benchmark requirements. The program officially launched in July 2022, with data collection on drivers participating in the program beginning in November 2022.

To date, CVSA is not aware of any incidents involving drivers operating under the pilot program, nor, as ATA points out in their exemption request, did the agency choose to exercise its authority to discontinue the pilot program at any time. While not conclusive, these facts may indicate that the program demonstrates an equivalent level of safety.

It is our understanding that the pilot program ended in November of 2025, without the agency issuing a final determination on its efficacy, possibly due to insufficient data collected. The agency is required, under Section 23022 of IIJA, to issue a report to congress, within 120 days of the conclusion of the pilot program, on its findings and recommendations. The data, analysis, conclusions and recommendations within that report and the agency's internal evaluation of the program's safety performance should inform FMCSA's decision on the exemption request from ATA. If available, CVSA recommends that FMCSA make the report and its supporting documentation available to the public for review and consideration, to better inform stakeholders' feedback to the exemption request.

If the data gathered to date is insufficient for the agency to make a determination, CVSA sees value in granting the exemption to allow FMCSA to continue to evaluate the safety performance of drivers operating under the pilot program, as, if deemed successful, the approach would provide access to a larger pool of safe, highly-trained commercial motor vehicle drivers, as well as deployment of safety technology that is proven to reduce and mitigate crashes. However, should FMCSA grant ATA's exemption request, it is imperative that it be modeled exactly on the pilot program that expired in November of 2025, including the safety technology requirements, reporting metrics and tools for law enforcement to verify participation in the program. Each of these factors influenced the safety performance of the Safe Driver Apprenticeship Program, so any extension of that program, based on its performance to date, must follow the same model. In addition, if granted, CVSA encourages FMCSA to use the exemption period to continue gathering the additional data needed to allow the agency to make a final determination on the safety performance of drivers operating under the program prior to the exemption's expiration.

The Alliance works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,



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