



*A bold voice for transportation workers*

August 22, 2022

Larry W. Minor  
Associate Administrator for Policy  
Federal Motor Carrier Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

Mr. Minor,

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Federal Motor Carrier Safety Administration's (FMCSA) notice regarding the National Ground Water Association's (NGWA) petition for exemption from FMCSA's Entry-Level Driver Training (ELDT) requirements. These requirements are necessary to obtain a Class B license to operate a groundwater well drilling rig. TTD consists of 37 affiliate unions representing millions of transportation workers, including commercial motor vehicle (CMV) operators, who are subject to the FMCSA's Commercial Driver's License (CDL) requirements.<sup>1</sup>

In its application, NGWA requests exemption from all ELDT requirements for individuals operating "any vehicle, machine, tractor, trailer, semi-trailer, or specialized mobile equipment propelled or drawn by mechanical power and used on highways to transport water well field operating equipment, including water well drilling and pump service rigs equipped to access groundwater." The request would include exemptions from ELDT requirements including demonstrating proficiency in proper techniques for initiating vehicle movement, executing left and right turns, changing lanes, navigating curves at speed, and stopping the vehicle in a controlled manner.

Without any adequate justification or assurance of equivalent levels of safety under the requested exemption, TTD **opposes** this exemption as proposed. There are alternatives that would ensure equivalent levels of safety without undermining the applicability of ELDT requirements that are designed to protect workers and the public. Recent trends in traffic safety have been very concerning and the National Highway Traffic Safety Administration [reported](#) that traffic fatalities for the first quarter of 2022 were at a twenty-year high. Given the current challenges in roadway safety, it is irresponsible to propose exempting key training requirements for professional drivers.

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<sup>1</sup> Attached is a list of TTD's affiliated unions.



NGWA's exemption request is overly broad and not time-limited. As it is written, NGWA's request for exemption goes far beyond creating a limited exemption to address a temporary gap in qualified workers. Instead, this exemption would allow all drivers of groundwater drilling rigs to bypass time-tested, critical safety training that has been the backbone of road safety for professional drivers and the public.

The NGWA cites labor shortages as justification for its exemption request. [TTD has dispelled](#) the claims of workforce shortages that many in the transportation industry have used to erode worker protections – the very protections that often attract workers.

TTD understands the difficult, dangerous, and stressful conditions that often-underpaid drivers face that make it difficult to attract and retain qualified workers, but a waiver from fundamental driving skills is not the solution. The solution to attracting the workers industries need is better compensation and working conditions, not waiving fundamental safety requirements. We urge FMCSA to reject this exemption request and direct NGWA to find an alternative that maintains equivalent levels of safety for all road users.

We appreciate the opportunity to comment on this docket and look forward to working with FMCSA in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Regan', with a circular flourish at the end.

Greg Regan  
President