



Owner-Operator Independent Drivers Association

**National Headquarters: 1 NW OOIDA Drive, Grain Valley, MO 64029
Tel: (816) 229-5791 Fax: (816) 427-4468**

**Washington Office: 1100 New Jersey Ave. SE, Washington, DC 20003
Tel: (202) 347-2007 Fax: (202) 347-2008**

October 20, 2025

The Honorable Sam Graves
Chairman
Committee on Transportation and Infrastructure
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
Committee on Transportation and Infrastructure
Washington, DC 20515

The Honorable Ted Cruz
Chairman
Senate Committee on Commerce, Science,
and Transportation
Washington, DC 20515

The Honorable Maria Cantwell
Ranking Member
Senate Committee on Commerce, Science,
and Transportation
Washington, DC 20515

RE: Improving Commercial Motor Vehicle Training, Licensing, and Qualification Standards

Dear House and Senate Transportation Committee Leaders:

Earlier this year, OOIDA testified before each of your respective Committees emphasizing an urgent need for more comprehensive training, licensing, and qualification standards for commercial drivers. Simply put, far too many individuals are entering the trucking industry without the basic skills necessary to safely operate a commercial vehicle. Additionally, inconsistent and improper licensing processes among states has permitted hundreds of thousands of unqualified drivers to work on our nation's roads which has needlessly resulted in numerous fatal crashes.

We have supported White House, U.S. Department of Transportation (USDOT), and Federal Motor Carrier Safety Administration (FMCSA) initiatives this year that curb these deficiencies, including restoring English Language Proficiency violations into the Out-of-Service Criteria and a recently announced Interim Final Rule (IFR) restoring integrity to the issuance of Non-Domiciled commercial driver's licenses (CDLs). To this end, Congress should immediately move to **codify the recent IFR by passing Congressman Rouzer's H.R. 5688, the Non-Domiciled CDL Integrity Act.**

The trucking industry has suffered from an overcapacity of truck drivers, which has helped drive the longest-running freight recession in decades. To be clear, there is no "driver shortage" in trucking. Instead, there is tremendous driver turnover as under-trained drivers are put into a new job they are unprepared for. Congress should reject legislation, such as H.R. 5563, the DRIVE-Safe Act, that would exacerbate driver turnover by placing younger drivers in these same exact challenging and unappealing positions. Like relaxed enforcement of English language proficiency requirements and the recent explosion of non-domiciled CDLs being issued by states, policies like the DRIVE-Safe Act are said to be addressing a "driver shortage" that never existed. In reality, those supporting these policies simply want to maintain a steady flow of cheap labor. Rather than making it easier for unsafe drivers to enter our industry, Congress should take aggressive action that will strengthen training, licensing, and qualification protocols for commercial truck drivers.

OOIDA recommends the following proposals be included in Highway Bill Reauthorization legislation that is being developed within your Committees:

1. **Bolster Entry-Level Driver Training (ELDT) Standards:** ELDT requirements implemented in 2022 were an important first step to ensuring drivers are properly trained when entering our industry. Unfortunately, these bare minimum standards have proven insufficient since they took effect. OOIDA favors the introduction of mandatory behind-the-wheel (BTW) hours for new drivers. In 2015 we participated in the Entry-Level Driver Training Advisory Committee which overwhelmingly supported a minimum number of BTW hours as part of ELDT standards. As a result, the agency's Notice of Proposed of Rulemaking originally contained a 30-hour BTW benchmark. Regrettably, this critical element was omitted in the final ELDT rule after only two of the 28 committee members expressed opposition. Compared to the brief evaluation an examiner is currently required to conduct, mandatory BTW training provides greater opportunity to evaluate the skills of the entry-level driver and for the trainer to offer corrective actions. These hours expose the entry-level driver to multiple road signs and various traffic/roadway situations, giving the instructor more options to identify and correct deficiencies. At a minimum, Congress should improve ELDT by embracing the ELDTAC's recommendation that drivers complete a minimum of 30 hours BTW training.

OOIDA also supports the Commercial Motor Vehicle English Proficiency Act, S. 2114, introduced by Senator Roger Marshall (R-KS). This common-sense bill would require drivers demonstrate they can read critical road signs **before** being permitted to operate an 80,000 lb. vehicle on public roadways. It would also require CDL testing be conducted only in English. In addition to reading road signs, professional truckers routinely communicate with law enforcement and first responders in order to do their jobs safely and effectively.

2. **FMCSA Must Better Utilize the Training Provider Registry to Remove Bad Actors:** The 2022 ELDT rule also created FMCSA's Training Provider Registry (TPR), a database for all registered training schools and providers. FMCSA has the authority to remove registered entities that are no longer in compliance with training requirements. So far, only a handful of the thousands of registered training providers have been removed or are currently recommended for removal from the TPR. We are also unsure if FMCSA is tracking where unsafe drivers, such as those who have been involved in preventable, deadly crashes, earned their training certifications since 2022. FMCSA must take decisive action to more quickly remove both non-complaint and inadequate training locations from the TPR.

OOIDA supports legislation included in the Fiscal Year 2026 Senate Transportation, Housing and Urban Development, and Related Agencies funding bill that requires USDOT to submit information on the number of certificates issued by training providers on the TPR and a plan on how FMCSA will conduct regular audits of the TPR.

3. **Strengthen New-Entrant Audit Requirements:** Congress can improve safety by requiring more stringent USDOT oversight of new carrier applicants prior to granting operating authority. Currently, bad actors and unqualified drivers can quickly obtain operating authority because the barriers to entry are simply too low. USDOT's New Entrant Safety Audit is now conducted almost entirely online, making it more a reflection of an applicant's ability to complete administrative paperwork rather than understanding how to operate a trucking business at the safest level. The lack of sufficient review for new entrants also allows 'chameleon carriers' to reenter our industry with relative ease, despite previous violations.
4. **Eliminate Unsafe CDL Exemptions and Waivers:** Historically, FMCSA has granted waivers for select large carriers from 49 CFR 383.25(a)(1), which requires that a Commercial Learners Permit (CLP)

holder be accompanied by the holder of a valid CDL who has the proper CDL group and endorsement(s) necessary to operate the CMV. The CDL holder must at all times be physically present in the front seat of the vehicle next to the CLP holder while operating a CMV on public roads or highways and must have the CLP holder under observation and direct supervision. We strongly oppose any exemptions and waivers that eliminate or weaken this critical safety requirement.

This regulation is designed to properly ensure that inexperienced drivers will have sufficient training, instruction, and oversight as they learn the job. In the 2011 final rule on CDL Testing and CLP Standards, FMCSA noted that, “safety considerations outweigh convenience during driver training.” OOIDA has consistently opposed 49 CFR 383.25(a)(1) waivers for individual motor carriers, but FMCSA is now considering a proposed rulemaking to remove the front-seat requirement altogether for CLP Holders who have passed the skills Test. The CDL Flexibility proposed rulemaking fails to explain how the CLP holder will be adequately mentored if the CDL holder is not in the passenger seat. Given the minimum nature of current entry-level driver training (ELDT) standards, inexperienced drivers will face countless conditions, scenarios, and other challenges they had absolutely no training for during their first months and even years on the road. Eliminating 383.25(a)(1) ignores the fact that well-trained, more experienced drivers have better safety records and can pass their knowledge along to less seasoned drivers.

Further, the CDL Flexibility proposal seeks to remove the 14-day waiting period for CLP holders to take the CDL skills test, which was also adopted in the May 2011 final rule on CDL Testing and CLP Standards. FMCSA explained, “the mandatory waiting period was necessary to allow applicants to obtain sufficient behind-the-wheel (BTW) training in preparation for the skills test.” FMCSA also encouraged CLP holders to train for as long as necessary to gain sufficient CDL driving skills. Until sufficient BTW training is mandatory, we oppose waiving the 14-day waiting period in order to preserve training opportunities as much as possible.

5. **Establish More Oversight and Accountability for Third-Party CDL Testing Providers:** OOIDA has historically raised concerns about the reliance and expanded use of third-party knowledge examiners and skills testers as we continue seeing instances of third-party examiner fraud and bribery. More oversight of third-party testers is warranted as states are increasingly utilizing these services. While there are regulations stipulating some accountability measures for third-party CDL skills examiners, there are no requirements for third-party knowledge examiners. FMCSA has proposed similar accountability standards for skills examiners, but the agency must offer further specifics about how oversight will be implemented and ensure that necessary compliance can be achieved.

OOIDA appreciates the steps USDOT has already taken to improve safety in the trucking industry this year, but we believe Congress must do more to prevent bad actors from ever operating on our nation’s highways. We will continue working with your Committees on our shared goals of making our roads safer, while making trucking an appealing and sustainable career for professional drivers.

Thank you,



Todd Spencer
President & CEO
Owner-Operator Independent Drivers Association, Inc.

cc: Members of the U.S. House and Senate