

Betty Boaz

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Sent: Wednesday, March 11, 2015 4:29 PM
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Subject: use of simulators for CDL test purposes

Questions were raised in today's House Transportation Committee hearing on SB 126 about whether a simulator could be used for testing CDL applicants.

49 CFR 383.113(e) says, "A State may utilize simulators to perform skills testing, but under no circumstances as a substitute for the required testing in on-street conditions." Federal regulations require the skills test be taken in a vehicle representative of the group the applicant intends to drive, each applicant must identify safety-related parts of the vehicle, and each applicant must demonstrate skills related to inspection and operation of air brakes, basic vehicle control skills, and safe on-road driving skills. Applicable federal regulations are quoted below.

Please let me know your further questions.

Federal regulations:

49 CFR 383.73 Testing and Licensing Procedures. State procedures. . . (b) Initial CDL. Prior to issuing a CDL to a person, a State must: . . . (2) Check that the vehicle in which the applicant takes his/her test is representative of the vehicle group the applicant has certified that he/she operates or expects to operate. . .

Third-party testers (e.g., at community or technical colleges) must follow the same procedures; see 49 CFR 383.75.

49 CFR 383.91 Commercial motor vehicle groups. (a) Vehicle group descriptions. Each driver applicant must possess and be tested on his/her knowledge and skills . . . for the commercial motor vehicle group(s) for which he/she desires a CDL. The commercial vehicle groups are as follows:

- (1) Combination vehicle (Group A) – Any combination of vehicles with a gross combination weight rating (GCWR) of 11,794 kilograms or more (26,001 pounds or more) provided the GVWR of the vehicle(s) being towed is in excess of 4,536 kilograms (10,000 pounds).
- (2) Heavy Straight Vehicle (Group B) – Any single vehicle with a GVWR of 11,794 kilograms or more (26,001 pounds or more) or any such vehicle towing a vehicle not in excess of 4,536 kilograms (10,000 pounds) GVWR.
- (3) Small Vehicle (Group C) – Any single vehicle, or combination of vehicles, that meets neither the definition of Group A nor that of Group B as contained in this section, but that either is designed to transport 16 or more passengers including the driver, or is used in the transportation of hazardous materials as defined in Sec. 383.5.

(b) Representative vehicle. For purposes of taking the driving test in accordance with Sec. 383.113, a representative vehicle for a given vehicle group contained in Sec. 383.91(a), is any commercial motor vehicle which meets the definition of that vehicle group. . .

49 CFR 383.113. Required skills. (a) Pre-trip vehicle inspection skills. Applicants for a CDL must possess the following basic pre-trip vehicle inspection skills for the vehicle class that the driver operates or expects to operate:

- (1) All test vehicles. Applicants must be able to identify each safety-related part on the vehicle and explain what needs to be inspected to ensure a safe operating condition of each part, including
 - (i) Engine compartment;
 - (ii) Cab/engine start;
 - (iii) Steering;

- (iv) Suspension;
- (v) Brakes;
- (vi) Wheels;
- (vii) Side of vehicle;
- (viii) Rear of vehicle; and
- (ix) Special features of tractor trailer, school bus, or coach/transit bus, if this type of vehicle is being used for the test.

(2) *Air brake equipped test vehicles.* Applicants must demonstrate the following skills with respect to inspection and operation of air brakes:

- (i) Locate and verbally identify air brake operating controls and monitoring devices;
- (ii) Determine the motor vehicle's brake system condition for proper adjustments and that air system connections between motor vehicles have been properly made and secured;
- (iii) Inspect the low pressure warning device(s) to ensure that they will activate in emergency situations;
- (iv) With the engine running, make sure that the system maintains an adequate supply of compressed air;
- (v) Determine that required minimum air pressure build up time is within acceptable limits and that required alarms and emergency devices automatically deactivate at the proper pressure level; and
- (vi) Operationally check the brake system for proper performance.

(b) *Basic vehicle control skills.* All applicants for a CDL must possess and demonstrate the following basic motor vehicle control skills for the vehicle class that the driver operates or expects to operate:

- (1) Ability to start, warm up, and shut down the engine;
- (2) Ability to put the motor vehicle in motion and accelerate smoothly, forward and backward;
- (3) Ability to bring the motor vehicle to a smooth stop;
- (4) Ability to back the motor vehicle in a straight line, and check path and clearance while backing;
- (5) Ability to position the motor vehicle to negotiate safely and then make left and right turns;
- (6) Ability to shift as required and select appropriate gear for speed and highway conditions; and
- (7) Ability to back along a curved path.

(c) *Safe on-road driving skills.* All applicants for a CDL must possess and demonstrate the following safe on-road driving skills for their vehicle class:

- (1) Ability to use proper visual search methods;
- (2) Ability to signal appropriately when changing direction in traffic;
- (3) Ability to adjust speed to the configuration and condition of the roadway, weather and visibility conditions, traffic conditions, and motor vehicle, cargo and driver conditions;
- (4) Ability to choose a safe gap for changing lanes, passing other vehicles, as well as for crossing or entering traffic;
- (5) Ability to position the motor vehicle correctly before and during a turn to prevent other vehicles from passing on the wrong side, as well as to prevent problems caused by off-tracking;
- (6) Ability to maintain a safe following distance depending on the condition of the road, visibility, and vehicle weight;
- (7) Ability to adjust operation of the motor vehicle to prevailing weather conditions including speed selection, braking, direction changes, and following distance to maintain control; and
- (8) Ability to observe the road and the behavior of other motor vehicles, particularly before changing speed and direction.

(d) *Test area.* Skills tests shall be conducted in on-street conditions or under a combination of on-street and offstreet conditions.

(e) *Simulation technology.* A State may utilize simulators to perform skills testing, but under no circumstances as a substitute for the required testing in on-street conditions.

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