



Owner-Operator Independent Drivers Association

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October 7, 2019

The Honorable Raymond Martinez
Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Docket # FMCSA-2019-0120, "Extension of Compliance Date for States' Query of the Drug and Alcohol Clearinghouse"

Dear Administrator Martinez:

The Owner-Operator Independent Drivers Association (OOIDA) is the largest trade association representing the views of small-business truckers and professional truck drivers. OOIDA has more than 160,000 members located in all fifty states that collectively own and operate more than 240,000 individual heavy-duty trucks. OOIDA's mission is to promote and protect the interests of its members on any issues that might impact their economic well-being, working conditions, and the safe operation of commercial motor vehicles (CMVs) on our nation's highways.

OOIDA cautions that extending the compliance date for the requirement that States request information from the Commercial Driver's License Drug and Alcohol Clearinghouse before completing certain commercial driver's license (CDL) transactions until January 6, 2023, may cause confusion for the industry. Drivers might interpret any delay in the Clearinghouse as a delay to the entire program, thus failing to register at the proper time. Furthermore, states have had the same amount of time as the industry to prepare for the January 2020 implementation date after the final rule was published in December 2016.

OOIDA recommends that FMCSA consider delaying the January 6, 2020, implementation date not only for States, but for all industry stakeholders. Registration has only recently opened for drivers and motor carriers who now have just three months left before the Clearinghouse is scheduled to launch. A broader delay would allow the entire industry sufficient opportunity to register and would provide additional time for the Agency to ensure an efficient rollout.

Thank you,

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