

Commercial Driver's License Standards: Exception for Certain Military Personnel
Docket Number FMCSA-2025-0118

I support the proposed amendment to 49 CFR Part 383, which clarifies the Commercial Driver's License (CDL) exemption for military personnel.

The inclusion of dual-status military technicians, as defined in 10 U.S.C. 10216, corrects outdated regulatory language that has imposed uneven standards on U.S. Reserve technicians compared to their active-duty counterparts. Historically, military reservists have often been held to standards that differ from those applicable to active-duty personnel, even though their roles, training, and responsibilities are nearly identical. This amendment harmonizes treatment by ensuring that all military personnel operating Commercial Motor Vehicles (CMVs) for military purposes receive the same exemption, as they should.

Current CDL training requirements impose significant financial and administrative burdens on Reserve Commands. For dual-status military technicians, these requirements result in unnecessary expenditure when they already receive specialized training through robust military programs such as the Defense Traffic Safety Program. Eliminating the redundant training requirement would not only yield cost savings—estimated at approximately \$1,900 to \$3,100 per technician—but also allow Reserve Commands to better allocate resources toward mission-critical activities. The proposal streamlines regulatory requirements and reduces administrative encumbrances, thereby also improving the efficiency of recruitment and retention efforts within Reserve programs.

Some might assert, incorrectly, that eliminating the CDL requirement might compromise safety by foregoing the standardization inherent in commercial driver training. However, military personnel, including dual-status technicians, are already subject to rigorous, specialized training tailored to the unique operational environments they face. The exemption is limited to those operating CMVs exclusively for military purposes, with training provided under a framework that emphasizes safety comparably—if not more stringently—to civilian standards. The consistent safety record of existing exemptions demonstrates that safety is maintained despite the waiver of CDL training.

In summary, this proposed rule change modernizes the CDL exemption framework by explicitly including dual-status military technicians alongside active-duty military personnel, military reservists, National Guard personnel on active duty, and active-duty U.S. Coast Guard personnel.

The proposal is deregulatory in nature, eliminating outdated requirements that impose unnecessary and unproductive regulatory burdens, saving taxpayer funds and enhancing operational flexibility for military Reserve Commands. These amendments promote equitable treatment, result in tangible cost savings, and uphold rigorous safety standards. As a result, I strongly support this deregulatory proposal.

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