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ISSUE NAME

Class A Passenger Vehicles

STATUS

Closed

Passenger Carrier Committee

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EMAILRick@Horan.me**SUMMARY OF ISSUE**

Class A Passenger Vehicles are treated as a restriction rather than an endorsement. Not only is this approach inconsistent with other FMCSA regulations, it is almost impossible to remove as there is only one ELDT provider in the nation that has a vehicle to provide such training.

JUSTIFICATION OR NEED

CVSA: this is a copy of an email that I am currently sending to the 3,800+ registered ELDT organizations in the country. I have included it here as it summarizes the justification for this change.....

I am a teamster in New York and hold the following CDL credentials:

- Class A license (no Manual Transmission or Air Brake restrictions)
- Passenger and School Bus Endorsements (among others)
- M Restriction (see below)

Vehicle Definitions and Descriptions

Class B Passenger Vehicle examples (16+ pass):

- Straight motor coach
- Straight school bus
- Articulating bus

Articulating Bus:

- In New York, an Articulated bus is a two-unit bus with flexible coupling connection between the units.
- Wikipedia describes Articulated Buses or Trailer Buses.
- FMCSA Guidance: A driver of an articulated bus with a GVWR of 26,001 pounds or more is required to possess a Class B CDL with the proper endorsement(s).

Class A Passenger Vehicle:

- I cannot find any official definition for this vehicle type anywhere on the FMCSA (Federal Motor Carrier Safety Administration) Website or any state DMV for that matter, but commonly called a “trailer bus” or trailer vehicle designed specifically for the transportation of passengers (a bus). Trailer buses typically comprise one of two forms ... (see Wikipedia)
- California makes reference to a trailer bus, but not a Class A Passenger Vehicle per se;; A “trailer bus” is a trailer

or semitrailer designed, used, or maintained for the transportation of more than 15 persons, including the driver, and includes a connected towing motor vehicle that is a motor truck, truck tractor, or bus.

- Class A Passenger vehicles are like unicorns in the United States, whose use seems to be limited to a few theme parks and military bases.

The Problem – Class Specific Passenger Restrictions Cause Confusion and Hurt Drivers

- The FMCSA, and every state, slaps needless restriction on Commercial Drivers Licenses if they hold a License Class (A) higher than their Passenger Endorsement vehicle Class (B).
- (e) Group A passenger vehicle. If an applicant applying for a passenger endorsement performs the skills test in a passenger vehicle requiring a Group B CDL, the State must indicate on the CDL, if issued, that the person is restricted from operating a passenger vehicle requiring a Group A CDL. (RH note: This is the M Restriction – See below)

M

If a driver possesses a Class A CDL, but obtains his or her passenger or school bus endorsement in a Class B vehicle the State must place an "M" restriction indicating that the driver can only operate Class B and C passenger vehicle or school buses.

- (f) Group A and B passenger vehicle. If an applicant applying for a passenger endorsement performs the skills test in a passenger vehicle requiring a Group C CDL, the State must indicate on the CDL, if issued, that the person is restricted from operating a passenger vehicle requiring a Group A or B CDL. (RH note: This is the N Restriction – See below)

N

If a driver possesses a Class B CDL, but obtains his or her passenger or school bus endorsement in a Class C vehicle; the State must place an "N" restriction indicating that the driver can only operate Class C passenger vehicle or school buses.

- When it comes to CDLs, Endorsements are good and Restrictions are bad, especially when you can't get rid of them.
- In 2015 the FMCSA decided amended its Passenger vehicle regulations to restrict what you can't drive rather than endorse what you can.
- Many people, even law enforcement, DMVs and even the FMCSA themselves are confused about the difference between Class A and Class B passenger vehicles.
- This upside-down regulatory approach also negatively impacts commercial drivers when potential employers mandate that applicants have restriction-free CDLs.
- It doesn't have to be this way.

Endorsements Demonstrate Knowledge of Different Vehicle Types, Not Restrictions

- The FMCSA should treat Class A Passenger Vehicles the same way they treat School Buses, as an endorsement, not a restriction
- Ex: Class B license holders that earned a Passenger endorsement (P) in a motor coach do not get slapped with a School Bus Restriction
- Instead, a School bus Endorsement (S) is added to the Class B license when the driver passes the road and written test for that vehicle type.

The Solution – Class Specific Passenger Endorsements

- Since there are three types of Passenger vehicle, A, B, and C, the FMCSA should use two-letter symbols to denote the specific Passenger endorsement(s) earned,
- Ex: PA would denote a Class A Passenger (combination) vehicle, PB, Class B Passenger (straight and articulating) vehicles, and PC for Class C Passenger vehicles.
- M and N restrictions would be eliminated.
- This regulatory approach would align with how the FMCSA handles other Endorsements and Restrictions, be easier to understand and not negatively impact drivers.

Can you Help?

- I am working with the FMCSA on getting these changes implemented through their Petition for Rulemaking procedure.
- While I am making some progress but it's obvious that they need to hear that this is a problem from other folks in the industry.
- What are your thoughts on the matter? (besides the obvious conclusion that I must have too much time on my hands?)

- Your emailed response will be a great help!

REQUEST FOR ACTION

Support my latest Petition for Rulemaking that asks the FMCSA to regulate Class A Passenger Vehicles as endorsements, not restrictions.

SUPPORTING DOCUMENTS/PHOTOS

- [FMCSA-Rules-Change-Petition-Change-Class-A-Passenger-Restriction-to-Endorsement.pdf](#)

ACTION TAKEN BY COMMITTEE

The committee agreed there is a common misconception on what this restriction is for (trailers designed to transport people) and how to have it removed from a CDL. Guidance needs to be provided to enforcement, industry, and motor vehicle departments. This item was closed as presented and CVSA will speak with AAMVA and FMCSA to decide the best approach to disseminate this information, but did not wish to participate in the requestor's petition to FMCSA.