Introduction
In 2002 the Federal Motor Carrier Safety Administration (FMCSA) initiated a research program to explore and evaluate a national Employer Notification Service as a means for improving commercial motor vehicle (CMV) safety. The program consisted of a feasibility study, a system pilot test and a separate program evaluation by an independent third party. This report synthesizes the critical elements and findings of these initiatives and highlights the safety benefits to motor carriers, the trucking industry and society at large.1, 2, 3.

Under Federal Motor Carrier Safety Regulation (FMCSR) §383.31, CMV drivers are required to report to their employer any traffic violations within 30 days of conviction. Additionally, motor carriers are required by FMCSR §391.25 to annually check their drivers’ safe driving performance through a Driver History Record (DHR) obtained from the state issuing the driver’s Commercial Drivers License (CDL).

Through an Employer Notification Service (ENS), motor carriers are provided with near real-time notification of drivers’ traffic convictions and other changes to a driver’s CDL, allowing employers to take immediate action to mitigate unsafe driving behaviors. Thus, ENS addresses a fundamental shortcoming of existing compliance; research indicates that only 20 to 50 percent of drivers presently report a conviction to their employer within the required 30-day time period.

The Trucking Industry
The trucking industry is critical to the nation’s economy, as no other mode of freight transportation serves all communities, regardless of location or size. In 2006, the industry was responsible for hauling 69 percent of all freight tonnage transported in the U.S., totaling 10.7 billion tons. A $645.6 billion industry, trucking accounted for 83.8 percent of the nation’s freight bill in 2006. The industry provides 8.8 million jobs; 3.5 million of which are truck drivers.4

Today there are some 214,000 for-hire carriers, 277,000 private carriers and nearly 89,000 “other” interstate motor carriers. Of these carriers, 96 percent operate fleets of 20 or fewer trucks and 87 percent operate six or fewer trucks.5

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5 Ibid.
**Industry Safety**
Between 1998 and 2007, the large truck fatal crash rate declined 20 percent, from 2.52 per 100 million vehicle miles traveled (VMT) to 2.02 per 100 million VMT\(^6\). Nevertheless, the raw safety data indicates that total fatalities are stable at best. For more than five years, truck-involved fatalities have fluctuated between 4,700 and 5,000 annually.

More recently, the industry has initiated several important research studies to target and mitigate unsafe driving behaviors and reduce crash involvement. The following programs and initiatives are highlighted based on critical information and/or data links to an ENS program:

**Predicting Truck Crash Involvement**
In 2005 the American Transportation Research Institute (ATRI) developed the ATRI Crash Predictor Model. This research found that driver violations, convictions and past crashes increased the likelihood of a future crash by 18 to 325 percent\(^7\). Thus, the sooner a motor carrier is notified (through an ENS) of these behaviors, the more quickly a carrier can take corrective action such as targeted driver training. The findings of this study were used to refine the cost-benefit assessments of a future ENS program.

**Driving Simulators**
Where targeted and customized driver training has a role in reducing future crash involvement by high-risk drivers, it is possible that the use of driving simulators for that training may hold potential. The ATRI Board has initiated research to identify the role that customized driving simulator scenarios may play in reducing specific crash-predictive behaviors. A driver testing program is expected to begin in mid- to late-2009.

**Alternative Compliance**
Recognizing that new, innovative safety programs can positively impact seemingly impervious improvements in truck-involved crash data, there is a compelling argument for revising, even replacing, existing “traditional” truck safety regulations and compliance programs with more targeted, outcome-based activities. ATRI is working with the Commercial Vehicle Safety Alliance (CVSA) on research to quantify the safety impacts of alternative safety compliance activities. This includes evaluation of an ENS in place of a traditional annual DHR check.

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\(^7\) ATRI. Predicting Truck Crash Involvement: Developing a Commercial Driver Behavior-Based Model and Recommended Countermeasures. October, 2005.
In addition to quickly identifying high-risk drivers, ENS would also play a key role in helping motor carriers improve and tailor safety programs to their own specific needs (Figure 1). Coupled with other driver performance-related inputs to motor carrier safety programs, ENS would help carriers quickly determine if remedial training actions are effective and which safety program modifications are needed.

In addition, the overall number of fatalities has remained stable. To reduce these figures, industry and government have initiated several studies to identify and mitigate factors shown to increase the risk of a large truck crash.
ENS Background
The impetus for the initial ENS feasibility study was the concurrent recognition by industry and government that a national employer notification service held great potential for reducing truck-involved crashes.

Figure 2: The Evolution of ENS and Stakeholder Participation

Both the industry and FMCSA have been involved in the study and testing of a national ENS since 2002 (Figure 2). Industry involvement included motor carriers, an ATA subcommittee and ATRI (representing the industry).
Driver Violation Notification Service Feasibility Study

In 2003 FMCSA commissioned a study to determine the technical feasibility and potential safety benefits associated with a national ENS. Initially termed a Driver Violation Notification (DVN) Service, the research summarized current practices, developed a framework for estimating the benefits and costs of an ENS program and recommended a pilot deployment test of a prototype system.

Figure 3: Benefits Window

Based on industry perspectives on the shortcomings of existing regulatory compliance, and potential benefits of expedited identification of problematic driving behaviors, the research identified a “benefits window” (Figure 3). This window was defined as the ENS-generated reduction in awareness and reaction time between when a driver receives a conviction, the employer receives notification of the conviction and the time it takes a carrier to take remedial action to mitigate high-risk driving behaviors.

The goal of an ENS is straightforward; to close the time window between driver conviction and employer awareness or notification. Closing this window has the potential to reduce the likelihood of future crash involvement by drivers with
convictions (high-risk drivers) commensurate to drivers with no convictions (low-risk drivers). Other findings of the Feasibility Study include:

- A motor carrier could expect that 28.1 percent of its drivers would have at least one conviction-related change in license status each year;
- 50–80 percent of drivers do not report the violation prior to conviction or within the mandated 30 days;
- Drivers with a conviction in the last twelve months were 38 to 51 percent more likely to be involved in a crash;
- A national ENS would provide significant benefits by reducing crashes, fatalities, injuries and the costs associated with these crashes.

In essence, the study found the establishment of such a program was both technically feasible and likely offered safety benefits that far exceeded program costs. Based on these findings, FMCSA next initiated the process for the pilot test.

Critical Information: An ENS holds great potential for improving safety. It closes the window of time between a driver’s conviction, notification to the motor carrier and carrier remedial actions.

ENS Pilot Test
Despite incorporating many of the recommendations of the DVN Feasibility Study, the pilot program faced several significant and unforeseen challenges resulting in substantial delay. Though many states expressed a high level of interest in the program, difficulty in recruiting states to participate in the Pilot Test was the single greatest challenge.

Difficulty recruiting and maintaining commitment by states may be explained by several factors. These factors include significant concerns over driver/data privacy issues, a lack of funding to participate in the program and state involvement in other motor carrier safety initiatives. In March 2005, California and Georgia agreed to participate in the Pilot Test. However, both states withdrew before the test went live.

Recruitment of motor carrier participants for the Pilot Test was less problematic. The industry had long supported the idea of a national ENS and the opportunity to participate in the Pilot Test to clarify industry functional requirements was a strong incentive. While motor carrier interest in participation was high, several industry challenges arose as the Research Team began to engage carrier participants, primarily concerns over driver data/consent forms and program requirements for base-state truck driver recruitment.
Driver Consent & Acceptance

Participation in the ENS Pilot Test (as well as a future nationwide deployment of ENS) could require drivers to consent to more frequent use of drivers’ personal information. Traditional driver consent forms, used by many segments of the industry, explicitly state that carriers can obtain a driver’s DHR once per year. The primary concern over consent forms for motor carriers was protection from liability arising from future lawsuits and possible violation of federal provisions for the protection and management of driver/employee-related personnel data. These concerns also had to be addressed in the design of the ENS.

Critical Information: The ENS Pilot Test was confronted by both state recruitment and carrier engagement issues. The top concerns of motor carriers were driver data privacy/liability issues and driver consent forms.

The ENS Architecture Design

The Pilot Test ENS system architecture activities were guided by the simple program objective of improving safety by offering motor carriers timely notification of unsafe driver behaviors. The initial ENS architecture design offered consistent standards, processes and data requirements for all states. Though this model offered much promise, it also required states to significantly modify internal IT systems and incur significant costs. Due to this insurmountable challenge, the Research Team explored other ENS design options.

![Figure 4. Final ENS Design Architecture](image-url)
An alternate system design was chosen, primarily based on the business model of Explore Information Services (EIS), a third-party driver information system provider (Figure 4). The new system design, finalized in 2007, allowed carriers to enroll drivers into ENS via a secure website and receive weekly email notifications of any driver DHR status changes. Employer notifications identified drivers by name and CDL number (CDLN) only.

The new approach proved successful in reducing state resource requirements, and documented that a national ENS could be built upon existing data communication protocols and connectivity with the states. In addition, the modified ENS design also featured a secure conduit of encrypted information, thereby negating many state-level and motor carrier concerns over driver data privacy and security.

Critical Information: The original ENS design was abandoned in favor of a new design that streamlined the requirements necessary for states to join the Pilot Test program. The new ENS design was based on the business model of a third-party information system provider (EIS/USIS).

ENS Evaluation Summary
Despite these challenges, the Pilot Test was conducted over 18 months in Minnesota and Colorado, beginning January 2007. Of the seven participating interstate motor carriers, over 1,000 drivers voluntarily enrolled in the program.

The Pilot Test was considered a success by many measures. The system functioned as intended; carriers were able to take appropriate actions much more quickly and participant carriers and states incurred very little cost. Additionally, motor carriers were able to identify and quantify significant benefits in terms of early identification of poor driver performance and/or driver behavior issues.

Cost-Benefit Approach
To determine if both the Pilot Test-generated safety benefits exceeded the costs of the program and if a national deployment of ENS would do the same, a cost-benefit analysis was developed and conducted by an independent evaluator. This analysis was based on two primary inputs; the benefits of reduced costs associated with prevented CMV crashes and comparative motor carrier expenses needed to comply with existing regulations versus ENS participation.

The evaluation developed cost-benefit assessments for three stratifications:

1) Individual carrier participants which allows any single company to assess the value of participation in an ENS program;
2) Trucking industry in total, which assumes that 100 percent of motor carriers and drivers are participating (essentially based on a national mandate);
3) Societal benefits, which extend beyond motor carrier benefits but allow policy and regulatory agencies to assess general public benefits and costs.

ENS benefits are defined as the avoidance of costs incurred due to a CMV crash. These include: worker compensation impacts; lost productivity; environmental remediation (in limited cases); insurance premiums; property damage; health benefit costs; and litigation costs. Industry benefits were estimated by ATRI at $46,521 per avoided crash. The estimated societal cost of a CMV crash is $91,112 ($96,730 in 2007 dollars).\(^8\)

During the ENS Pilot Test, motor carriers received DHR notifications for 132 drivers. Based on the DVN Feasibility Study findings, 2.99 percent of these drivers will be involved in a future crash. The number of avoidable crashes for the 1,099 drivers enrolled in the Pilot Test was estimated at 3.94.

Extrapolating these figures on a national basis, it can be estimated that in any given year that 866,520 drivers in the U.S. will receive a conviction and that 25,873 of these drivers will be involved in an avoidable crash in the next year.

Lastly, the benefit of more timely notification of a driver conviction must be quantified. Based on industry data, there are three estimates of how many drivers self-report traffic convictions to their employers within the required time frame (Table 1). These data sources provide an upper limit and lower limit of drivers that typically self-report. Based on these percentages, an average lag time between a conviction and carrier notification can be derived. As fewer drivers self-report convictions and the lag time between conviction and employer notification increases, the benefits of avoided crashes increases.

<table>
<thead>
<tr>
<th>Analysis Scenario</th>
<th>Average Notification Lag Time</th>
</tr>
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<tbody>
<tr>
<td>Annual DHR Pull</td>
<td></td>
</tr>
<tr>
<td>Assuming 57.4% self-report</td>
<td>2.9 months</td>
</tr>
<tr>
<td>Assuming 47.4% self-report</td>
<td>3.5 months</td>
</tr>
<tr>
<td>Assuming 37.4% self-report</td>
<td>4.5 months</td>
</tr>
<tr>
<td>Third-party Monitoring</td>
<td>15 days</td>
</tr>
<tr>
<td>ENS</td>
<td>3.5 days</td>
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</table>

Based on this approach, the total number of crashes avoided annually for carriers that participated in the Pilot Test may be extrapolated to reflect the

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\(^8\) Zaloshnja, E. and Miller, T., *Unit Costs of Medium and Heavy Truck Crashes*, Prepared for the Federal Motor Carrier Safety Administration, December 2006
impact of a nationwide deployment of ENS. The Evaluation Report estimates that such a system would prevent 2,486 to 3,503 crashes per year as compared to the current manual system of obtaining DHRs once per year for each driver (Table 2).

Table 2. Estimated Number of Crashes Avoided Annually Through ENS Deployment

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Nationwide Number of Avoided Crashes</th>
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<tbody>
<tr>
<td>Annual DHR Pull</td>
<td>2,486</td>
</tr>
<tr>
<td>57.4% Self-Report</td>
<td>2,486</td>
</tr>
<tr>
<td>47.4% Self-Report</td>
<td>2,995</td>
</tr>
<tr>
<td>37.4% Self-Report</td>
<td>3,503</td>
</tr>
<tr>
<td>Third-party Monitoring</td>
<td>356</td>
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</table>

Based on the average cost of a CMV crash ($46,521) and the most conservative estimate of convictions that will be reported more quickly by ENS (42.6% of drivers do not self-report), total industry safety benefits are estimated in the first year of ENS deployment at $115.7 million and total societal safety benefits are estimated at $240.5 million.

If a national ENS were deployed as a replacement for the annual DHR requirement, additional savings would accrue to the industry. Rather than paying for a DHR for each driver every year (participant carriers noted that approximately 80 percent of annual DHRs show no change in DHR status), carriers would only pay for those DHR notifications where there was a conviction. The Evaluation Report found that, in the first full year of ENS deployment, eliminating the costs to motor carriers of ordering and processing DHRs for all drivers would result in an additional $78.3 million savings for the industry.

In addition to identifying the benefits of ENS, the Evaluation Report also identified the costs to the industry. The costs of participating in the ENS program for the trucking industry include driver enrollment, information technology/computer-related and training costs, estimated at $58 million total though most of these costs are one-time costs.

Critical Information: An independent evaluation found that the Pilot Test was successful by several measures. The Pilot Test proved a national ENS was feasible, generated significant benefits for participant carriers and would prevent between 2500 to 3500 large truck crashes each year.

Cost-Benefit Findings
Based on the cost-benefit approach, the ENS Pilot Test produced benefit-cost ratios (BCRs) well above 1.0, indicating that benefits outweigh motor carrier costs to participate in ENS.
Net benefits (benefits minus costs) to Pilot Test carriers ranged from $131,746 to $189,934 and societal benefits ranged from $295,807 to $416,797 (Table 3).

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<tbody>
<tr>
<td>Annual DHR Pull (57.4% Self-Report)</td>
<td>13.5</td>
<td>$142,264</td>
<td>$10,517</td>
<td>$131,746</td>
<td>$295,807</td>
</tr>
<tr>
<td>Annual DHR Pull (47.4% Self-Report)</td>
<td>16.3</td>
<td>$171,358</td>
<td>$10,517</td>
<td>$160,840</td>
<td>$356,302</td>
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<tr>
<td>Annual DHR Pull (37.4% Self-Report)</td>
<td>19.1</td>
<td>$200,452</td>
<td>$10,517</td>
<td>$189,934</td>
<td>$416,797</td>
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</table>

Extrapolating the benefit-cost ratios and net benefits to the industry, the nationwide deployment of ENS would generate $1.2–$1.8 billion in benefits to the industry over a 10 year period (Table 4). Societal benefits would range from $1.9 billion–$2.7 billion. It should be noted that in all scenarios deployment of a nationwide ENS would provide significant benefits to the industry and society as a whole.

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<tbody>
<tr>
<td>Third-party DHR Annual Pull</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>57.4% Self-Report</td>
<td>15.7</td>
<td>1,301</td>
<td>83</td>
<td>1,218</td>
<td>1,942</td>
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<tr>
<td>47.4% Self-Report</td>
<td>18.0</td>
<td>1,492</td>
<td>83</td>
<td>1,409</td>
<td>2,339</td>
</tr>
<tr>
<td>37.4% Self-Report</td>
<td>20.3</td>
<td>1,683</td>
<td>83</td>
<td>1,600</td>
<td>2,736</td>
</tr>
<tr>
<td>Manual Annual Pull</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>57.4% Self-Report</td>
<td>17.0</td>
<td>1,415</td>
<td>83</td>
<td>1,332</td>
<td>1,942</td>
</tr>
<tr>
<td>47.4% Self-Report</td>
<td>19.3</td>
<td>1,606</td>
<td>83</td>
<td>1,523</td>
<td>2,339</td>
</tr>
<tr>
<td>37.4% Self-Report</td>
<td>21.6</td>
<td>1,797</td>
<td>83</td>
<td>1,714</td>
<td>2,736</td>
</tr>
<tr>
<td>Third-party Monitoring</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>57.4% Self-Report</td>
<td>7.6</td>
<td>635</td>
<td>83</td>
<td>552</td>
<td>373</td>
</tr>
</tbody>
</table>

Based on these safety and operational benefits, surveyed motor carriers unanimously supported the development of a national ENS system if participation eliminated the redundancy and expense of conducting annual DHR pulls.

**Critical Information:** A national ENS would generate $1.3 to $1.8 billion in benefits to the industry over a 10 year period. Societal benefits would range from $1.9 billion to $2.7 billion for the same period.
Though participating motor carriers provided strong endorsement for a national ENS program, they also proposed several features and functionalities that were not included in the Pilot Test. ENS services desired by industry or government but not included in the Pilot Test were documented on a list coined as the “Build-To” capabilities.

"Build-To” Features
The most frequently cited enhanced features or services that motor carriers suggested for a national ENS system include:

- The ability of ENS to support facility-specific, back-office and internal IT system needs through improved and/or expanded data formats;
- Enhanced reporting capabilities of historical driver performance and immediate notification of serious driver violations/suspension of license;
- Drivers working for multiple employers and drug and alcohol testing results;
- Driver change of address and related support information.

Critical Information: Participant carriers recommended several ENS pilot system enhancements that should be included in the design of a national deployment of ENS.

Lessons Learned
Despite validating the original DVN Feasibility Study findings, the ENS Pilot Test and evaluation determined that the ideal ENS system must incorporate or address the following motor carrier issues:

- A key value of participating in an expanded ENS would be the elimination of the annual DHR pull mandate;
- A national system would require a single portal/user interface and billing system and mandatory participation by all states;
- A national ENS program would have to resolve the issue of where and how owner-operator notifications are processed to ensure that the safety benefits accrue;
- A national ENS would have to resolve the challenge of terminated, unsafe drivers taking a new job with a different carrier.

Critical Information: Though the Pilot Test was deemed a success, the Pilot Test did not resolve all outstanding issues that may arise during the deployment of a national ENS.
Next Steps
Given the nearly unanimous acknowledgement of the potential safety benefits of the ENS concept, strategies for national deployment of an ENS were examined within the legal, financial, technical and operational issues that must be addressed for deployment.

Enabling Legislation vs. Existing Codes
Among these issues is the need for FMCSA to clarify the agency’s existing interpretation language that carriers are presently/already exempted from the DHR requirement if they participate in an ENS program9. Carriers perceive that there is enough uncertainty in the existing language that it is presently unused.

Program Design Options
Throughout the ENS research, many system design considerations and preferences were identified. These included technical architecture considerations as well as jurisdiction management, regulatory and cost components. Though technical and policy issues remain to be addressed, three high level design considerations are recommended.

Program Design Option #1 – Federally Managed/Mandated System
A national system was strongly preferred by participating and interviewed motor carriers since it centralizes the data, standardizes information and costs and utilizes a single entry portal. Within a national system design, a federally managed program was the preferred route for many carriers, who believe that motor carrier safety issues and programs should not be based on 50 different interpretations and approaches. This is especially critical given that trucking is primarily defined as an interstate industry.

This design may garner support from the industry by affording motor carriers similar protections from liability and mitigate carrier concerns over driver consent forms and data privacy and protection concerns. The industry may also consider this design best suited to ensure uniformity across all states, a key concern expressed by motor carriers throughout the feasibility study and Pilot Test.

Critical Information: Participating and interviewed motor carriers strongly supported a federally-managed/mandated system. This design option would likely offer interstate motor carriers a uniform system across all states with standardized requirements and fees.

Program Design Option #2 – Third-Party Provider/Market-Based System
In lieu of a federally oriented ENS program, several states and third-party providers have developed ENS-like programs to notify carriers of driver violations

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or convictions. However, these programs are quite disparate in appearances due to the considerable differences in state data, costs and IT infrastructures.

There are a number of driver data management firms (EIS/USIS, ChoicePoint, License Monitor, First Advantage ADR, and HNI Risk Services) that have the ability to request/receive DHRs from states; none have the ability to provide an exception-based service for all 50 states. The data sharing contracts also have different cost structures and data usage requirements. These deficiencies would likely prevent industry and societal benefits from being fully realized. Consequently, utilizing a third-party, marketplace system would not meet many of the preferred industry attributes for uniformity without additional federal level guidance.

Critical Information: A market-based system of third-party providers will require considerable federal/national guidance to ensure uniformity.

Program Design Option #3 – Hybrid System
A third option could benefit from specific components of both the federal system and the third-party option by aggregating the ENS program requirements under a federal contract. The contract would be sponsored and guided by a federal or national entity, but operated by a third-party provider that has the technical capabilities and experience to access state DMV systems. Once the system requirements and business model are defined at a national level, one or more third-party providers could then meet the minimum program requirements and possibly add value-added services to increase the overall program impact.

This hybrid option provides several key benefits:

- Lower costs to states during development;
- Standardized data formats for connectivity and interoperability;
- Leverages existing architectures and data;
- The hybrid system allows states and carriers to continue to identify unsafe drivers as rapidly as possible.

Critical Information: The hybrid design, based on third-party providers and strong federal involvement, would offer several benefits to both industry and government. This design would likely include strong federal guidance while leveraging the expertise of existing third-party providers.

Program Management Options
Regardless of which ENS design is ultimately chosen by FMCSA, a nationwide deployment of ENS would require at least some type of program management ranging from significant to minimal federal involvement. Based on the numerous program attributes described above, a strong FMCSA role would meet many of
the industry objectives. With adequate funding support, many state objectives could also be met or replicated in a national system that includes strong federal guidance.

Critical Information: A strong role by FMCSA would facilitate many industry objectives.

Program Funding Options
Funding for a nationwide ENS should be based on an approach that first recognizes the critical safety objectives that are met with a national ENS program. Secondary considerations then must address the need to adequately fund both the initial costs of designing and implementing the program, the costs of maintaining and operating the program and the price point at which the industry will support and adopt a national ENS. Existing ENS-like programs are currently funded at the state and third-party provider levels.

Before a national ENS can be deployed, there are two primary concerns that would have to be resolved; one for states, the other for motor carriers. The potential revenue loss to states is created as carriers would receive and pay for DHRs for only those drivers with an event or conviction. One potential offset to this decline in revenue is for states to consider fee increases to non-commercial DHR requests. Another potential offset to the decline in revenue is the reduction in administrative/personnel costs incurred by states as they receive fewer requests for DHRs. It is important to note that these cost reductions will continue as long as the state participates in an ENS (as opposed to the one time, up-front costs incurred by modifying state systems to connect to an ENS).

The second area of concern that would have to be resolved is the cost motor carriers would be willing to pay to participate in an ENS. To conduct this sensitivity analysis, motor carriers would need to be provided with a costing model, easily adaptable to a specific carrier’s size/operating characteristics, that presents a credible and accurate representation of the true costs associated with existing regulatory compliance and compliance afforded under a national ENS. As found throughout the ENS research process, carrier participation and support for the program would be contingent upon an exception-based system that provided regulatory relief from the current DHR mandate.

Based on a significant portion of the industry’s use of third-party driver monitoring services as well as the finding that a significant portion of motor carriers obtain DHRs more frequently than currently mandated, it is reasonable to assume that at least a portion of the industry may support both modest increases in the cost of obtaining a DHR with a conviction and an enrollment fee for each driver.

Lastly, a reasonable funding option might include federal revenue support for the deployment of an ENS through the use of federal grants to states to offset the costs to modify existing state-level systems. Federal funding for ongoing state-
level participation may follow other federal grant programs such as the Motor Carrier Safety Assistance Program (MCSAP). However, it should be noted that the majority of state-based costs to participate in ENS are in the initial phases, while the potential decline in DHR-related revenues would be long-term.

**Critical Information:** Funding options for a national ENS would need to address potential state revenue losses and motor carrier costs. Motor carriers would need to know the costs of current compliance activities in order to compare the costs of a national ENS. Modest increases in the cost to obtain a DHR and an enrollment fee for each driver are potential funding sources.

**Conclusions**
Over the last seven years, industry and government alike have actively sought a means for motor carriers to quickly identify high-risk driver behaviors that have been shown to predict a driver’s likelihood of a future crash. With this knowledge, motor carriers may reduce avoidable crashes by taking remedial action that may include driver training or disciplinary action.

Though current regulations call for drivers to report to their employer a traffic violation conviction within 30 days, research has shown that a significant portion of drivers do not. In lieu of a national system that provides motor carriers quick notification of a change to a driver’s DHR, a sizable segment of the industry participates in a wide variety of ENS-like programs.

The feasibility study concluded significant safety benefits from the deployment of a national ENS and, based on these findings, recommended that FMCSA conduct a Pilot Test to validate the study’s findings. Upon this recommendation, FMCSA initiated a pilot test with volunteer states and motor carriers. The Pilot Test proved that a national ENS could provide motor carriers with timely notification of driver convictions in a cost-effective manner for both industry and states alike.

An independent evaluation of the Feasibility Study and the Pilot Test concluded safety benefits and the reduction of carrier costs significantly outweighed costs to participate in the program. Furthermore, the evaluation found that these benefits could reasonably be extrapolated to the industry at large. In addition, an ENS would likely provide the greatest DHR acquisition/processing cost savings to those carriers with the most vigilant driver DHR monitoring processes (motor carriers that voluntarily exceed the minimum mandated requirements for obtaining a driver’s DHR once per year).

Upon these findings, the Evaluation Report recommends that FMCSA, industry and other stakeholders continue their partnership to develop and deploy a national ENS. Though issues must be resolved with each of the three potential
deployment options, the benefits to motor carriers, the trucking industry and society at large must be realized.

Though issues remain unresolved, there are several current events that suggest momentum is building for transitioning from the research phase of an ENS to deployment. In addition to FMCSA’s efforts to clarify the existing interpretation language, the ATA has indicated the group will pursue legislation for the deployment of an ENS.

Many in the industry opine that the recent introduction of a bill in the U.S. Congress to establish a national drug and alcohol testing clearinghouse for drivers may provide a roadmap for future deployment of an ENS. The industry also believes that, if this legislation is ultimately enacted, the design and implementation of the clearinghouse should accommodate, to the extent feasible, the architecture of an ENS. This approach would further promote the industry’s desire for a one stop shop for all driver-related information.