



March 6, 2024

Docket Operations
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor
Washington, DC 20590-0001

RE: FMCSA Incorporation by Reference of the Most Recent Edition of the American Association of Motor Vehicle Administrators (AAMVA) Commercial Driver's License Information System (CDLIS) State Procedures Manual (SPM), Version c.0. Docket No. FMCSA-2023-0269; RIN 2126-AC68

AAMVA thanks the Federal Motor Carrier Safety Administration (FMCSA) for its continued partnership in ensuring commercial motor vehicle safety and for its diligence in incorporating the latest version of the CDLIS SPM (version c.0). The incorporation of the SPM provides important updates to the state procedures that support the effective operations of the CDLIS system.

AAMVA offers one substantial citation correction to the incorporation by reference. On page 12803 of the notice of proposed rulemaking (NPRM), in the discussion of proposed rulemaking, section, VI – FMCSA states the following:

“The SPM (version c.0) also includes descriptions, excerpted from the CDLIS System Specifications (version c.0), of the nationwide computerized data-exchange transactions used to electronically record and report driver information.”

The more accurate citation to the supporting documentation would be referral to the SPEXS System Specifications B.0.1. The reference should read, “The SPM (version c.0) also includes descriptions, excerpted from the SPEXS System Specifications B.0.1, of the nationwide computerized data-exchange transactions used to electronically record and report driver information.” AAMVA offers this just to be clear on the most recent provision of supporting documentation available to the CDLIS system.

On page 12804, the NPRM states, “A change in the driver's status is caused either by an unresolved drug and alcohol violation or an erroneous violation.” AAMVA notes as a clarification that driver status may also be reciprocally changed by the driver's successful completion of the return-to-duty process.

Throughout the NPRM, there are some references to the term “S2S” - which in transportation safety terminology is a reference to a very distinct and separate application from the CDLIS system. Specific examples of where the S2S application's reference may be confused with “state-to-state” CLDIS exchanges are available on page 12806 (17) and elsewhere in the NPRM.

Finally, AAMVA notes some non-substantive technical clarifications:

On page 12804, item 5 states that “a new bullet item was added to the ‘Procedures for Issuing a CDL or CLP’ section of the SPM to establish procedures relating to issuing a duplicate CDL or CLP...” AAMVA notes that this is not an addition, this language is also present in the SPM 5.3.2.1 as well.

AAMVA understands that the importance of this action is simply to update the incorporation by reference in the Federal Motor Carrier Safety Regulations (FMCSRs). We offer the above as additional evidence of the importance of these updates and to ensure that citations to reference materials provide end users with a clear path of support. We again thank FMCSA for its commitment to safety and for our shared partnership in protecting the nation's roadways.

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