



## **Commercial Vehicle Safety and Nondomiciled CDLs**

### **Senate Transportation Committee**

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### **Introduction**

Thank you for the opportunity to speak today. My name is Jeff Mercadante, and I represent PITT OHIO, a family-owned transportation and logistics company headquartered in Pittsburgh, Pennsylvania. Since our founding in 1979, PITT OHIO has grown from a regional carrier into a nationally recognized leader in freight and supply chain solutions. But what truly defines us is not just what we move—it's how we move it safely.

Safety is the cornerstone of our culture. It is embedded in every decision we make and every mile we travel. Our drivers share the road with the public, and we view that responsibility with the highest level of care. From rigorous training programs and advanced vehicle technologies to proactive safety audits and continuous improvement initiatives, we work tirelessly to protect our employees and everyone who shares the highways with us.

This commitment has earned PITT OHIO the American Trucking Associations' President's Trophy, the highest honor for safety in our industry—awarded to the safest carrier in the nation. We have received this award every year we've been eligible. In addition, we've been recognized by multiple state trucking associations, including PMTA, for excellence in safety performance across the regions where we operate.

Our mission is guided by three pillars: Customer Driven, People Driven, and Quality Driven. These principles ensure that while we deliver reliable, cost-efficient, and innovative solutions, we never compromise on safety. Today, our network spans the Mid-Atlantic and Midwest, with extended coverage across the U.S. and Canada through trusted partnerships. Every mile we cover reflects our unwavering commitment to safeguarding lives.

At PITT OHIO, safety is not a program—it is a promise. A promise to our drivers, our customers, and the communities we serve. We believe that protecting people is the most important cargo we carry.

The issue before you today—commercial vehicle safety and the integrity of nondomiciled CDL issuance—has very real operational and public safety implications. I appreciate the opportunity to share the employer perspective and discuss where system weaknesses create risks that carriers cannot solve alone.

### **Real-World Impacts of Improperly Licensed or Poorly Prepared Drivers**

For trucking companies like PITT OHIO, the commercial driver's license is the foundation of the entire safety framework. The trucking industry depends on state and federal agencies to uphold the highest standards of CDL testing, issuance, and oversight so that every driver who holds a CDL has

met the legal and safety requirements to operate a commercial motor vehicle. When that system functions well, employers can trust that a driver who presents a CDL meets the requirements to operate an 80,000 lb truck safely.

But the rules only work when they are consistently enforced. When states apply federal requirements unevenly – or when verification systems fail – the CDL no longer functions as the reliable marker of qualification it is intended to be.

Recent events across the country have shown that there are gaps and inconsistencies in how states implement CDL rules. These weaknesses make it harder for carriers to know whether the drivers they are hiring are truly qualified, and they place unnecessary risk on the companies that must put these drivers on the road.

At PITT OHIO, we have experienced this firsthand.

Earlier this year, we hired an individual from another country who stated he had three and a half years of commercial driving experience. Before allowing him into our driving academy, our internal review revealed that his background was questionable. He actually had only five months of experience. If our team had not conducted this deeper investigation, he could have been placed on the road based without the experience required to do so safely, based solely on a CDL from Pennsylvania with a six-year term, a credential that appeared valid.

We have also encountered non-domiciled drivers with valid work visas and valid CDLs, but unclear renewal eligibility because we were uncertain whether the license expiration aligned with the duration of lawful presence. Employers rely on the DMV to ensure that a CDL cannot outlast a driver's legal authorization to work in the United States. Without accurate and consistent safeguards, carriers cannot rely on the documentation presented to them—and that uncertainty introduces avoidable risk into the system.

Our safety program is designed to catch discrepancies like this, but many carriers – especially small companies – do not have the resources to perform this level of verification. They rely on the integrity of the CDL system. When the licensing system breaks down, those employers may unknowingly put unqualified drivers into service, placing the public—and their own companies—at risk.

FMCSA has already tied improperly issued non-domiciled CDLs to serious and fatal crashes nationwide. When an unverified or underprepared driver is behind the wheel of a 40-ton vehicle, the risk to the public is substantial.

While the current pause in non-domiciled CDL issuance is necessary to examine the process and correct the problems, it has created its own operational challenges for carriers. During the pause, companies cannot bring qualified foreign-national drivers on board even when they meet all federal requirements. Employers have had to re-verify documentation for existing drivers, creating dispatch delays and additional administrative workload. Reduced driver availability slows freight movement and increases supply-chain costs. And once issuance resumes, we can expect significant backlogs

at training schools and testing centers as enhanced verification procedures take effect. In short, the pause illustrates how deeply carriers depend on a reliable, functioning CDL system—not only for safety, but for day-to-day operations.

The bottom line is simple: carriers cannot fill the gaps left by an inconsistent licensing process. PITT OHIO invests heavily in internal safety checks, but not every carrier has the resources to do that. The CDL must be a credential that employers can trust. When it is not, both safety and operational reliability are compromised.

### **The CDL Pipeline Problem**

Another major challenge we face is not a shortage of people who want to become drivers, but a shortage of qualified, job-ready drivers entering the industry. At PITT OHIO, we see this gap every day. We receive applications from many individuals who are eager to work, but far fewer who come to us with the level of training and skill that safe commercial driving requires.

Over the past several years, there has been rapid growth in CDL schools—some excellent, but others that do not provide the depth or quality of training needed for real-world operations. We routinely encounter applicants whose primary training experience came from simulators. Simulators have value, but they cannot replace the judgment, confidence, and muscle memory that only come from actual behind-the-wheel driving under supervision.

We also see candidates who attended what we would describe as “CDL mills”—programs that move students through as quickly as possible, focusing on test-day performance rather than developing foundational skills. These individuals may arrive with a valid CDL but lack the practical competence to operate safely on day one.

It is not uncommon for us to meet newly licensed drivers who struggle with basic vehicle control, backing maneuvers, or situational awareness, despite having recently passed a skills test.

For a carrier like PITT OHIO—where safety is central to our culture—these issues require us to bridge the training gap ourselves. We invest heavily in extended onboarding, remedial instruction, and internal safety programs to ensure that every driver we put on the road meets our standards. This is a responsibility we take seriously, but it also increases our costs, lengthens the time before a new hire is productive, and diverts resources that could be spent elsewhere in our operations.

The bottom line is that the CDL pipeline is not consistently producing drivers who are fully prepared for the real-world demands of commercial driving. Carriers should not have to rebuild foundational skills that should have been taught before a CDL was issued.

For these reasons, the renewed emphasis by USDOT on strengthening oversight of CDL training, testing, and licensing practices is welcome and necessary to ensure that only well-prepared, truly qualified drivers enter the profession.

## **The Cost of System Weaknesses**

When verification, oversight, or training standards break down, the consequences are not limited to the drivers who slip through the system. Responsible carriers bear significant and ongoing costs because of these weaknesses.

At PITT OHIO, we see this in several ways. First, the industry as a whole faces higher insurance premiums driven by losses associated with poorly trained or underqualified drivers who should never have been licensed in the first place. Even though our company invests heavily in safety and maintains a strong safety record, we still share in the industrywide financial impact when others enter the system without proper preparation. And with trucks moving more than 70% of all freight in the United States, higher costs for carriers translate into higher costs across the supply chain.

Second, carriers must compensate for these gaps through more extensive onboarding and verification processes. We conduct deeper background checks, more rigorous internal testing, and additional review of documentation—steps that are necessary, but time-consuming and costly. These processes slow down hiring, delay productivity, and require dedicated staff attention simply because the licensing system cannot always be relied upon to ensure that every CDL holder has met the minimum standards.

Third, we provide ongoing remedial training to bring newly hired drivers up to the level of competence required for safe operations. Many applicants arrive with CDLs but lack foundational skills, forcing us to devote significant resources to rebuilding knowledge and experience that should have been developed before the license was issued.

Finally, the industry faces reputational harm when unqualified drivers—regardless of who employs them—are involved in high-profile crashes. These incidents shape public perception of the entire trucking industry, including companies like PITT OHIO that invest heavily in training, supervision, and safety programs. When the licensing system allows unprepared drivers onto the road, it puts all carriers at risk—both operationally and reputationally.

At PITT OHIO, we will always invest in safety. It is part of our culture, and it has been essential to our success. But we cannot fully absorb the systemic risks created by inconsistent or inadequate licensing oversight. The CDL system must function reliably for every carrier, every time, so that those of us who are committed to doing things the right way are not left compensating for weaknesses we cannot control.

## **What Carriers Need from the Commonwealth**

To protect public safety and support responsible employers, Pennsylvania must ensure that its CDL licensing and training system is accurate, consistent, and fully aligned with federal requirements. Carriers like PITT OHIO are committed to safety, and we invest significant resources in training, supervision, and compliance. But no matter how much we invest, we still rely on the Commonwealth to uphold the foundational functions of driver credentialing. A commercial driver's license is only meaningful when every part of the system that produces it can be trusted.

First, Pennsylvania needs a fully resourced PennDOT capable of performing the core responsibilities that federal law requires: verifying lawful presence, validating identities and documentation, and providing consistent oversight of licensing practices. When verification systems fall short or when the state is forced to pause CDL issuance, the ripple effects are felt throughout the industry. Ensuring that PennDOT has the staffing, technology, and administrative capacity to sustain these functions is essential not just for compliance but for restoring confidence in the system itself.

The Commonwealth also needs stronger oversight of CDL training providers and third-party testers. While many training schools deliver excellent instruction, others fall well below an acceptable standard. A system that allows inadequately trained drivers to enter the workforce places the public at risk and shifts the burden onto carriers who must retrain drivers after the fact. State or federal agencies should consistently evaluate training providers, identify programs that are not meeting expectations, and remove those that fail to prepare students for safe operation. This includes ensuring that training reflects real-world driving and not just the minimum needed to pass an exam.

We encourage the Commonwealth to work closely with its federal partners to ensure seamless cooperation and alignment across all agencies responsible for commercial driver licensing and safety. The CDL system only functions effectively when state and federal authorities apply the same standards, share accurate information, and enforce the rules consistently. Carriers operate across state lines every day, and we rely on a uniform regulatory framework so that a CDL issued in one state carries the same meaning and integrity everywhere in the country. Stronger coordination between state and federal agencies will help close gaps, reduce inconsistencies, and create a system that carriers and the public can trust.

Finally, the Commonwealth can support safety by continuing to invest in the infrastructure that drivers rely on every day, including expanded truck parking and safer, well-maintained roadways. These investments are essential for compliance with hours-of-service rules, for driver safety, and for efficient freight movement. Clearer communication with industry stakeholders is also critical, as carriers depend on timely, accurate information about licensing changes, enforcement priorities, and administrative processes.

With these improvements, the Commonwealth can help ensure that only well-prepared, fully qualified drivers enter the profession and that employers like PITT OHIO can continue operating with the highest safety standards.

## **Closing**

In closing, I want to emphasize that trucking companies like PITT OHIO take enormous pride in our safety performance and our critical role in keeping the U.S economy moving. Our drivers are well-trained, professional, and among the most skilled drivers on the road. We invest heavily in making sure of that.

But we cannot say the same for every driver operating on Pennsylvania's highways. We know this because of what we see when drivers come to us after working elsewhere.

A CDL must be a reliable, trustworthy credential. Carriers need assurance that the drivers entering the system—domiciled or nondomiciled—meet the same high standards that responsible fleets already maintain.

We are committed to working alongside this Committee, PennDOT, and federal partners to strengthen the licensing system and improve commercial vehicle safety across the Commonwealth.

Thank you for your time, and I look forward to answering your questions.