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LANSING

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UPDATED GUIDANCE ON CDL RESTRICTIONS: APPLICABILITY & PROCEDURES

CDL examiners were first introduced to new CDL restrictions during training in 2013. A procedures memo and an FAQ document were issued when the restrictions became effective July 8, 2015. More information was given in a notice emailed October 15, 2015.

This memo repeats some information previously given, but it provides additional guidance about reporting the restrictions on driver skills test certificates and score sheets. It is important that examiners understand their responsibility to report and record the restrictions so that drivers are issued proper CDLs.

Important: This document also describes a change in how examiners deal with “M” and “N” restrictions. The new instructions replace the instructions in previous messages.

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NEW RESTRICTIONS THAT EXAMINERS ADD, AS APPLICABLE

These restrictions became effective in July 2015. Examiners must determine which of these restrictions must be placed on the applicant’s CDL and properly report them on driver skills test certificates and score sheets.

E – no manual transmission equipped CMV

A driver with an “E” restriction may not operate a CMV equipped with a manual transmission.

For the purposes of the skills test and the restriction, an automatic transmission includes any transmission not operating fully on the gear shift and clutch principle. A manual transmission is any transmission that is not an automatic.

Examiners will not see this restriction on a CLP. An applicant with a valid CLP may operate a CMV equipped with a manual transmission.

For an applicant who does not already hold a CDL, the examiner must check the box for this restriction and report it on the Final License line of the skills test certificate if an applicant does not test in a vehicle equipped with a manual transmission. For an applicant who already holds a CDL, the examiner reports the restriction on the certificate only if the “E” restriction is on the applicant’s CDL.

O – no tractor trailer CMV

A driver with an “O” restriction may not operate a tractor-trailer CMV.

For the purposes of the skills test and the restriction, the federal rules define a “tractor” as a power unit designed to haul a trailer connected by a fifth-wheel connection. A CMV designed to haul passengers¹ or cargo on the power unit is not considered a tractor for the purposes of the skills test and this restriction.

Examiners will not see this restriction on a CLP. An applicant with a valid CLP with an “A” group designation may operate a tractor-trailer CMV.

The examiner must check the box for this restriction and report it on the Final License line of the skills test certificate if an applicant testing for an original CDL with an “A” group designation—or an applicant adding an “A” group designation to a CDL--does not test in a tractor-trailer CMV.

IMPORTANT: This restriction is not reported by the examiner if an applicant who holds a CDL with an “A” group designation without the “O” restriction tests to clear an air brake restriction or a manual transmission restriction in a class A CMV that is not a tractor-trailer.

L – no air brake equipped CMV (formerly the “28”)

A driver with an “L” restriction may not operate a CMV equipped with air brakes.

For the purposes of the skills test and the restriction, “air brakes” means any braking system operating fully or partially on the air brake principle.

Examiners may see this restriction on a CLP. An applicant with an “L” restriction on a CLP may not operate a CMV equipped with air brakes and may not test in a CMV equipped with air brakes.

For an applicant who does not already hold a CDL, the examiner must check the box for this restriction and report it on the Final License line on the skills test certificate if an applicant tests in a CMV not equipped with air brakes. For an applicant who already holds a CDL, the examiner reports the restriction on the certificate only if the air brake restriction is on the applicant’s CDL.

Examiners must understand the difference between the “L” and “Z” restrictions.

Z – no full air equipped CMV

A driver with a “Z” restriction may not operate a CMV operating on the full air brake principle. The driver may operate a CMV equipped with air over hydraulic brakes.

For the purposes of the skills test and the restriction, “air over hydraulic brakes” means a power unit braking system operating partially on the air brake and partially on the hydraulic brake principle.

Examiners will not see this restriction on a CLP. An applicant may operate a CMV equipped with air over hydraulic brakes unless the applicant’s CLP has an “L” restriction.

¹ A vehicle with a seat next to the driver or seats in a sleeper cab is not considered to be “designed to haul passengers.”

For an applicant who does not already hold a CDL, the examiner must check the box for this restriction and report it on the Final License line on the skills test certificate if an applicant tests in a CMV with a power unit braking system equipped with air over hydraulic brakes.

IMPORTANT: This restriction is not reported by the examiner if an applicant tests in a class “A” combination CMV if the power unit is equipped with full air brakes and the trailer is equipped with hydraulic or electric brakes.

M – no Class A passenger vehicle (formerly the “29”)

A driver with an “M” restriction may not operate a passenger vehicle requiring a group A CDL.

Examiners should see this restriction on a CLP if the applicant’s CLP or CDL does not have an “A” group designation.

The examiner must check the box for this restriction and report it on the Final License line of the skills test certificate when an applicant tests in a class “B” passenger CMV (including a school bus).

PROCEDURE CHANGE: Federal rules require that this restriction be placed on a CLP or a CDL, when applicable, **even if the driver does not hold a CDL with an “A” group designation.**

N – no Class A and B passenger vehicle (formerly the “30”)

A driver with an “N” restriction may not operate a passenger vehicle requiring a group A or B CDL.

Examiners should see this restriction on a CLP if the applicant’s CLP or CDL does not have an “A” or “B” group designation.

For an applicant who does not already hold a CDL with a “P” endorsement, the examiner must check the box for this restriction and report it on the Final License line of the skills test certificate when an applicant tests in a class “C” passenger CMV (including a school bus). For an applicant who already holds a group B CDL with a “P” endorsement, the examiner reports the restriction on the certificate only if the “N” restriction is on the applicant’s CDL or CLP.

PROCEDURE CHANGE: Federal rules require that this restriction be placed on a CLP or a CDL, when applicable, **even if the driver does not hold a CDL with an “A” or a “B” group designation.**

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RESTRICTIONS THAT CANNOT BE ADDED OR REMOVED BY EXAMINERS

The following restrictions may not be added or removed by examiners. If an applicant’s CDL or CLP shows these restrictions, the examiner should report the restriction on the Final License line of the skills test certificate.

K – intrastate only

A driver with a “K” restriction has self-certified their driving status as either Non-Excepted Intrastate or Excepted Intrastate. The driver is restricted to intrastate driving.

V – Medical Variance

A driver with a “V” restriction has qualified for a medical variance according to 49 CFR 383.73(o)(3). The driver may be restricted under the terms of the medical variance.

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RESTRICTIONS APPLICABLE ONLY TO THE CLP

The following restrictions apply to a driver only while driving on a CLP. Both are applied programmatically and are removed upon issuance of the CDL. The examiner does not report them on the skills test certificate.

P – no passengers in CMV bus

A CLP holder with the “P” endorsement is prohibited from operating a CMV carrying passengers, other than Federal/State auditors and inspectors, test examiners, other trainees, or the CDL supervising driver.

X – no cargo in CMV tank vehicle

A CLP holder with an “N” endorsement may only operate an empty tank vehicle and is prohibited from operating any tank vehicle that previously contained hazardous materials unless the tank has been purged of any residue.

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REPORTING TEST RESULTS ON THE DRIVER SKILLS TEST CERTIFICATE

Proper completion of the skills test certificate helps ensure that the applicant is issued the proper CDL. The examiner reports information about the CMV used to take the test in the *Commercial Motor Vehicle Description* section using information lines and check boxes. The group designation and endorsements for which the applicant qualifies is reported using check boxes in the *Commercial Driver License Eligibility* section. Any restrictions to be placed on the CDL are reported using check boxes in the *Commercial Driver License Restrictions* section.

The examiner uses this information, as well as any CDL credentials held by the applicant prior to the test, to determine what group designation, endorsements, any restrictions to write on the *Final License* line. The examiner should use the format “group/endorsements/restrictions” on that line, separating the three groupings using the “/” sign—e.g., B / PS / LME reports the driver is eligible for a CDL with a “B” group designation and “P” and “S” endorsements with “L”, “M”, and “E” restrictions.

If not all three groupings are needed, then the examiner does not leave blanks—e.g., write a “B” group designation, no endorsements, and an “L” restriction as B/L.

Endorsements not associated with the CDL, such as a cycle endorsement, are reported before the CDL groupings—e.g., CY-A / P / M.

It is permissible to use the words “group,” “endorsement,” and “restriction”—e.g., GROUP A / ENDORSEMENTS P & S / RESTRICTIONS L & M & E.

A few more reminders:

- The restrictions E, L, O, and Z are not applied to a driver who, before the test, held a CDL without the restriction. Example- applicant holds a group A CDL with no restrictions; she takes a skills test in a class B school bus with an automatic transmission and hydraulic brakes. It is not necessary for the examiner to question the applicant on what type of vehicle she used when she tested for her group A CDL; she is grandfathered. The examiner would report A / PS / M.
- The *Commercial Driver License Eligibility* section should reflect information from the test the applicant passed and the CDL held by the applicant, if applicable.
- The *Commercial Driver License Restrictions* section should reflect information from the test the applicant passed and the CDL held by the applicant, if applicable.

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SCORE SHEETS: REPORTING TEST INFORMATION

The *Michigan CDL Skills Test Score Sheet* (TPT-011) was streamlined when it was redesigned in 2013 to reduce the time it takes for an examiner to report information about the applicant, test vehicle, license, and the type of test administered. This makes it critical that examiners accurately use the letter codes created for that purpose.

The codes are the same letters used for the CDL group designations, endorsements, and restrictions. The codes are used to report information about the applicant’s driver license in the field named *License Information*, information about the applicant’s CLP in the *TIP Information* field, and information about the type of test in the *Test Administered* field.

License Information – The examiner records in this field exactly what the test applicant possesses on their license (a.k.a. hard card or plastic license). An endorsement unrelated to a CDL--e.g. CY or F—is recorded prior to the CDL or base license information record first. For example, enter “CY-B/PS for an applicant who currently holds a cycle endorsement and a CDL with a “B” group designation and “P” and “S” endorsements.

TIP Information – The examiner records in this field exactly what is on the applicant’s CLP, even if it is not what the applicant tested for.

Test Administered – This field reflects the type of test taken, based on the test vehicle. It does not reflect information from the base license, the CLP, or what final license will be issued.

This section describes how the three fields on a score sheet should be completed for the following scenario:

- The applicant presented a Michigan CDL with an “A” group designation, “P” endorsement, and a restriction “Not valid to operate class A passenger vehicle.”

License Information: A / P / M

- The applicant passed the school bus endorsement written test. He presented to the examiner a CLP with the endorsement “PS” and restrictions “M-no class A passenger vehicle” and “P-no passengers in CMV bus.”

TIP Information: A / PS / MP.

- The applicant tested in a class B school bus equipped with an automatic transmission and hydraulic brakes.

Test Administered: B / PS / LM

The examiner would issue a driver skills test certificate with the Final License line: CDL A / PS / M.

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If a CDL examiner has a question or concern we encourage them to contact the Driver Testing Section at 517-241-6850 or thirdpartytesting@michigan.gov.