

**Subject: Department of Transportation - Commercial Driver's License Testing**

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1 Whereas, the American Academy of Audiology contends it is necessary for the United States  
2 Department of Transportation (USDOT) to rectify antiquated hearing testing standards for  
3 individuals seeking a Commercial Driver's License (CDL), and  
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5 Whereas, the USDOT regulations require operators of most commercial motor vehicles to meet  
6 certain physical prerequisites including hearing acuity, and  
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8 Whereas, the Hearing acuity requirements are stated in *Title 49-TRANSPORTATION;*  
9 *CHAPTER III--FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION, DEPARTMENT*  
10 *OF TRANSPORTATION PART 391--QUALIFICATIONS OF DRIVERS; Subpart E-Physical*  
11 *Qualifications and Examinations*, and  
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13 Whereas, the USDOT hearing acuity pass/fail criteria requires that candidate commercial drivers  
14 first perceive a forced whispered voice in the better ear at not less than 5 feet with or without the  
15 use of a hearing aid, and  
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17 Whereas, forced whisper tests were utilized to evaluate hearing before audiometers were available,  
18 and for some time after when audiometers were not readily available, and  
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20 Whereas, the validity and reliability of forced whisper tests are seriously suspect, as they rely on  
21 the test administrator to make subjective pass/fail decisions based upon their ability to hear the  
22 reply, and  
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24 Whereas, other test variables such as test administrator voice (male versus female), ambient noise,  
25 and accurate measurement of test administrator distance from the subject prior to testing could all  
26 impede accurate results, and  
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28 Whereas, an **option** to be tested by use of an audiometric device is provided in the requirements  
29 which states that the candidate driver does not have an average hearing loss in the better ear  
30 greater than 40 decibels at 500 Hz, 1,000 Hz, and 2,000 Hz with or without a hearing aid when the  
31 audiometric device is calibrated to American National Standard (formerly ASA Standard) Z24.5–  
32 1951; and  
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34 Whereas, the phrase *with or without a hearing aid* regrettably illustrates the governments failure  
35 to understand that pure tone thresholds are not obtained on aided test subjects, and  
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37 Whereas, current test measurements exist that would evaluate the candidate driver's hearing  
38 ability more accurately and would ensure they do not exhibit greater than a mild hearing loss (i.e.  
39 greater than an average 40 decibel loss in the better ear at 500 Hz, 1000 Hz and 2000 Hz) with or  
40 without a hearing aid, and

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Whereas, these contemporary test measurements are readily available and would not create an undue burden on the candidate driver, and

Whereas, requiring these current test measurements would facilitate improved consumer safety.

Be it resolved, that the American Academy of Audiology recommends the USDOT revise their current hearing acuity pass/fail criteria to remove the forced whisper test as a viable measure of hearing acuity for candidate drivers and require the use of pure tone measurements for all candidates not currently using amplification, and

Be it resolved, that the American Academy of Audiology recommends the use of an aided speech reception threshold test and/or aided sound field measures utilizing warble tones at 500 Hz, 1000 Hz and 2000 Hz of no greater than an average 40 dB loss for those candidates utilizing amplification, and

Be it resolved, that the American Academy of Audiology will further investigate the current *Physical Requirement* for hearing acuity, research related to safety concerns for hearing impaired drivers and federal statutes and/or regulations that would obstruct a change in this hearing acuity requirement.

References:

<http://www.fmcsa.dot.gov/documents/hearing1.pdf>

<http://www.fmcsa.dot.gov/documents/hearing2.pdf>

<http://www.fmcsa.dot.gov/rules-regulations/administration/fmcsr/fmcsrruletext.aspx?reg=r49CFR391.41-b>