



# *Driver's Education Association of Maryland*

P.O. Box 19111, Towson, MD 21284  
Phone (410) 426-1000 . Fax (410) 741-3823 . [www.goDEAM.com](http://www.goDEAM.com)

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*Maryland Motor Vehicle Administration*

*Re: COMAR 11.23.02 Regulation .33 (Training Vehicle Requirements) – Subsection F -  
Age of Instructional Vehicles*

*Christopher Ertel – Driver's Education Association of Maryland (DEAM)*

Philip Dacey, La Cheryl Jones and other stakeholders, I want to thank you for this opportunity to address an important industry concern with COMAR 11.23.02 Regulation .33 (F).

As written, COMAR 11.23.02 requires the removal of a driver's education training vehicle after it has exceeded the age of 7 years. - - *Regulation .33 Subsection (F)* – A training vehicle may not be more than 7 model years old.

The consensus among the industry is that the maximum age of instructional vehicles should be increased from 7 years to 10 years therefore changing the regulation as follows:  
COMAR 11.23.02 Reg .33 (F) A training vehicle may not be more than **10** model years old.

As you already know, MVA licensed Professional Driving Schools educate students on the rules of the road in the classroom setting and with behind-the-wheel training. Each licensee provides the behind-the-wheel training in its privately-owned instructional vehicles and must maintain all vehicles in conditions required by the MVA, as follows:

COMAR 11.23.02 requires all Driver's Education training vehicles to be in good shape and inspected annually, as follows:

*Regulation .33 Subsection (C)* –

- (3) Service, clean, and maintain training vehicles on a regular schedule;
- (4) Have all training vehicles inspected annually by a licensed State inspection station;
- (5) Only use a training vehicle for instruction in the driver education program that has passed the annual Maryland State Inspection;

It is this important requirement that mandates that all instructional vehicles be maintained in a safe operating condition by all schools.

Advances in automotive technology have greatly increased the reliability and longevity of vehicles, and according to the most recent U.S. DOT data, the average age of all light vehicles in operation is nearly 12 years.

Accordingly, it is reasonable to believe that an 8, 9, or 10-year-old vehicle – having been maintained properly and inspected annually – is safe and has plenty of remaining life.

This regulation has a significant impact on the finances and operations of our Maryland licensed Professional Driver's Education Schools. A driving school incurs many different operating expenses, but the purchase of a new vehicle is conceivably one of its largest expenses. A change to the maximum allowable age of instructional vehicles would mean that driving schools may be able to purchase new vehicles less often, resulting in significant business savings – *without jeopardizing public safety*.

A change to this regulation would obviously correct a major concern regarding the age of vehicles being used in driver instruction and alleviate added financial expenses for a sector of Maryland's small business that provides a valuable educational service.

We respectfully request that the Administration make this change to increase the maximum age of instructional vehicles from 7 years to 10 years in COMAR 11.23.02 Reg .33 (F) during its annual review.

If you have any questions or concerns, feel free to call me at 410-426-1000 or email me at [info@godeam.com](mailto:info@godeam.com).

Drivers Education Association of Maryland,



Christopher Ertel  
Director of Operations