



November 10, 2025

Docket Operations
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

**RE: [Docket No. FMCSA-2025-0622] RIN 2126-AC98 Interim final rule; request for comments
Comments on “Restoring Integrity to the Issuance of Non-Domiciled Commercial Drivers
Licenses (CDL)”**

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer comments to the Federal Motor Carrier Safety Administration (FMCSA) on Restoring Integrity to the Issuance of Non-Domiciled Commercial Drivers Licenses (CDL) - Interim Final Rule, as published in Volume 90 Number 186, of the Federal Register on September 29, 2025.

About The National School Transportation Association

NSTA is the leading resource for school bus transportation solutions and the voice for private contractors for over 60 years. We are a membership organization for school bus contract operators engaged primarily in transporting students to and from school and school-related activities. Members range from small family businesses to large multi-state operators. Private school bus contractors account for 38 percent of the nation’s pupil transportation services and employ more than 250,000 individuals as bus drivers, mechanics, maintenance workers, dispatch, and office workers. School transportation represents the largest form of mass transportation in the United States. Daily, almost 26 million K-12 students are transported by an estimated 480,000 yellow school buses.

NSTA Requests Development of a Re-Certification Process for State Driver Licensing Agencies (SLDA) to continue to offer Non-domicile Products

Under provisions of the Interim Final Rule (IFR), NSTA recognizes that all states have currently paused the issuance of Non-domiciled products. However, in considering next steps regarding the future of these programs, NSTA requests that FMCSA develop a process for states to “re-certify” their Non-domicile programs. Establishing a clear and consistent process will ensure that well-functioning Non-domicile programs, that remain aligned with applicable federal standards, can once again operate. FMCSA estimates that 200,000 drivers are affected under the new rule, so the re-certification process is crucial in establishing consistency among SDLAs.ⁱ In addition, a clear re-certification process will enhance program integrity and provide greater confidence for motor carriers who rely on Non-domicile products for their Commercial Motor Vehicle (CMV) operations. We would ask that this mechanism be put in place as soon as possible, so that well operating SDLAs do not remain disadvantaged.

NSTA Requests Clarity in Determining Immigration Status by SDLAs

As SDLAs resume the issuance of their respective Non-Domiciled CDL programs, verification of lawful immigration status continues to be a critical step. Pursuant to Interim Final Rule (IFR), SDLAs are required to verify immigration status through the Systematic Alien Verification for Entitlements (SAVE) database, administered by U.S. Citizenship and Immigration Services (USCIS). While NSTA recognizes the

importance of this verification in ensuring the integrity of Non-Domiciled CDL products, we urge FMCSA to provide clear and consistent guidance on the proper implementation and use of the SAVE database in issuance of Non-domiciled products.

Usage of a SAVE-based verification process has the ability to provide the most up-to-date information on a CDL holder or CLP applicants immigration status. As applicants and/or license holders attempt to provide the necessary proof of lawful immigration status, paper documentation provided by applicants can be flagged due to a range of factors that could potentially be verified by usage of information provided within SAVE. Since a CDL issued in one state affects every state in which a driver operates, nationally verified and coordinated data collection becomes vital. We realize that this is a multi-jurisdictional situation, and we urge the Department of Transportation (DOT) to interface with the Department of Homeland Security (DHS), as well as the Department of Justice (DOJ) on providing solutions to remediate the current situation. In the end, NSTA requests that SDLAs are given the necessary resources to administer the program – utilizing the most up-to-date information through the SAVE database.

Summary and Conclusion

In conclusion, NSTA supports FMCSA’s oversight of state Non-domiciled programs and efforts to ensure program integrity that leads to safer roadways. NSTA requests the development of a clear and uniform process to guide SDLAs in the re-certification of their Non-domiciled programs, as well as a path forward in the utilization of the SAVE database as the national immigration status verification method. NSTA also urges interdepartmental cooperation that serves to create a landscape of effectiveness and efficiency that Americans can rely upon, as the CDL program is administered nationally.

NSTA sincerely appreciates the opportunity to offer comments on Docket No. FMCSA-2025–0622 and looks forward to furthering engagement with FMCSA on this important matter. If you have any questions, or further clarification is required, please do not hesitate to contact me at 703-684-3200 ext. 700, or via email at cmacysyn@yellowbuses.org.

Sincerely,



Curt Macysyn
Executive Director
National School Transportation Association

ⁱ Federal Motor Carrier Safety Administration. (2025). 49 C.F.R. Parts 383 and 384 (p. 35). U.S. Department of Transportation.