

TRUCK TALK

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Silly Little Violations...

When the Federal Motor Carrier Safety Administration (FMCSA) initiated the Safety Management System (SMS), one of the purposes was to identify and quantify levels of violations and assign meaningful points to these violations. On the surface this would appear to be an equitable and fair measurement system to document motor carrier performance in the Compliance, Safety, Accountability (CSA) world. As this program has evolved, it becomes quite evident that:

Silly little violations do not exist!

Certainly the SMS analysis system is somewhat weighted toward violations which have the probability of causing or contributing to vehicular accidents. In an identifiable number of instances, the driver is faulted and written up under categories which may be considered minor by many (such as log violations known as 'form and manner' which can be considered minor due to the 1 point assessment). The problem with these types of violations is that they are very common. As a result, large numbers can contribute in a negative manner to a carrier's ranking. This is because the ranking is a comparison (percentile or grading on a curve) with other carriers of like size and mileage.

It's easy to see how these numbers can be affected by violations that on the surface do not seem particularly important to drivers, carriers and the DOT. A quick count of the driver portion of these regulations indicates that there are 15 different types of 1 point violations. These are, for the most part, not considered critical or likely to contribute to a vehicular accident but, when added up - particularly for small motor carriers (with fewer than 10 trucks) - can result in a negative impact on the carrier's SMS numbers. As many small carriers have found out, these numbers are being reviewed by shippers and brokers who use these numbers to determine suitability to carry cargo.

How do small carriers prevent these types of violations?

The best answer to this question can be to analyze the nature of violations that are received and plan training based on the past history of violations. An informed driver who knows the regulations and practices compliance on a daily basis is the best way to reduce the number of these small violations. Use of the Pre-employment Screening Program (PSP) system works well to identify drivers with a history of these types of violations before they are employed. Ongoing education can help most drivers stay 'fresh' on the regulations and how they can affect daily operations.

Management 'buy in'

There is no better program for a carrier, small or large, than the universal understanding that a company is committed (both in word and in spirit) to the concept of compliance with all regulations, regardless of perceived severity or consequence. This attitude, when combined with a Safety Plan that is a part of the daily operating process, should contribute to lower numbers in SMS.

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