

TRUCK TALK

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CSA - A Work in Progress Progresses

When FMCSA announced the implementation of CSA in 2008, they indicated that the entire CSA program would be a "work in progress" and they reserved the right to make changes as they see necessary to improve the "product" and to effectively measure the on-highway performance of motor carriers. And there were a number of changes prior to 'going public' with the system. On March 27, 2012 further changes were announced within the BASIC categories which have the potential of affecting ALL motor carriers.

These changes are:

1. *Strengthening* the vehicle maintenance BASIC by incorporating cargo/load securement violations from today's Cargo-Related BASIC.
Simply stated, violations which have characteristically been noted in the Cargo-Related BASIC will be placed in the Vehicle Maintenance BASIC in an effort to remove 'bias' from inspections conducted on open trailer/flat bed equipment.
2. Changing the Cargo-Related BASIC to the HM (Hazmat) BASIC to better identify HM-related safety problems.
To summarize – there will effectively be no cargo-related BASIC in the sense that we now have it – it is being re-made into the HM BASIC and only violations related to HM will be cited in this area.
3. Aligning the SMS system to reflect violations under Intermodal Equipment Provider (IEP) regulations.
In the cases where violations should be found during a pre trip inspection, these violations will be applied to the CARRIER SMS summary.
4. Aligning violations that are included in SMS with CVSA inspection levels by eliminating vehicle violations derived from driver-only inspections and driver violations from vehicle-only inspections.
In cases where vehicle violations are discovered during driver-only checks and driver violations are discovered during vehicle-only checks, they will NOT be counted against the carrier.
5. More accurately identifying carriers involved in transporting HM.
The FMCSA will tighten HM placardable inspection criteria to focus intervention resources on carriers who are involved in the majority of HM transportation. In other words – for a carrier to exceed the HM threshold due to roadside inspections, the carrier must have
 - a. At least TWO placardable inspections in the last 24 months with at least one inspection during the last 12 months.
 - b. At least 5% of total inspections that are HM placardable inspections.

6. More accurately identifying carriers involved in transporting passengers.
As a result, the FMCSA will update the definition of Passenger Carrier within the SMS as follows:

- a. **Add all for-hire carriers with 9 - 15 passenger capacity vehicles and private carriers with 16 plus passenger capacity vehicles, as these carriers/entities are under FMCSA authority.**
- b. **REMOVE all carriers with only 1 – 8 capacity vehicles and private carriers with 1 - 15 passenger capacity vehicles (effectively removing many limousines, vans, taxis and such) as these carriers/entities are generally outside of most FMCSA authority.**

7. Modify the SMS display to:

Change current terminology (inconclusive and insufficient date) to fact based descriptions, such as: “ <5 inspections” or “no violations within 1 year.”

Separate crashes with injuries and crashes with fatalities.

FMCSA announced some time ago that they were going to proceed with the plan to determine which crashes were preventable in the CRASH Indicator BASIC. However, that plan has been withdrawn for the foreseeable future due to perceived flaws in the accident report as prepared by the various enforcement entities.

There is no question that some of these ‘augmentations’ can and will be beneficial to the accurate assessment of Motor Carrier compliance. It is noteworthy that issues will arise due to relocating some information from one BASIC into another. Fasten your seatbelt and I’ll try to explain. For example, a motor carrier with a score of 65.1 in the Cargo Securement BASIC will have those violations migrated into the Vehicle Maintenance BASIC, which may positively or negatively impact the score in that Vehicle Maintenance BASIC. If they do not haul hazardous materials, they will have a score of zero in new Hazmat BASIC, and a new score in the Vehicle Maintenance BASIC, which will depend on the nature and number of the combined cargo securement and vehicle maintenance violations.

During the preview time period, there is a need for carriers who do NOT agree with the numbers that are presented to provide feedback to FMCSA. This could provide enough information that could drive further enhancements to this system. Providing this feedback is important and vital to prevent flaws within the system. To view all of the changes in their entirety, go to:

http://csa.fmcsa.dot.gov/Documents/SMS_FoundationalDoc_Final.pdf

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