

TRUCK TALK

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CSA Lessons Learned

The full implementation of Compliance, Safety and Accountability (CSA) in December, 2010 certainly did not come as much of a surprise to most motor carriers – after all, it had been delayed once and seemed to be evolving every week. After 10 months of CSA there have been some lessons learned and we now have more information on what direction the Safety Measurement System (SMS) will be going in the future.

CSA and its integration into the industry are having an impact on motor carriers and drivers in a number of ways:

Carriers will initially be impacted in their ratings under the 7 BASICs and the potential for intervention (and possibly fines) by the FMCSA. More than one area of deficiency will, in all probability, involve an intervention in some form or other – a letter or possibly either an on- or off-site focused investigation.

Drivers are impacted by CSA simply because any form of on-highway violation which is discovered goes on not only the motor carrier's record but also the record of the driver. The record of the driver can and will have an impact on that person's ability to keep or secure employment. Carriers with problems in any of the 7 BASIC areas would be reluctant to hire drivers with any type of repeated violation regardless of the seriousness of the violation in the BASIC area in which they are facing sanction or intervention. It makes no sense for a carrier who seeks to improve its performance in the Fatigued Driving BASIC to hire a driver with a history of log violations. This takes into consideration that the motor carrier is aware of the impact of high scores in any of the BASICs and seeks to improve by hiring the top level of driver as identified through the Pre-employment Screening Program. Drivers who have had a history of Fatigued Driving violations would provide themselves with an opportunity to improve their record by being employed by a carrier who has a history of strict enforcement of the Hours of Service regulations and/or electronic logs.

Brokers have been aware of CSA almost from the beginning. In an effort to protect their customer (the shipper) many brokers established standards that they would no longer utilize the services of carriers who have a deficient score in any of the BASICs. Brokers were among the first to use CSA and the SMS as sales tools with their customers – affecting a posture of 'use us; we'll protect you from substandard carriers'. This obviously will have a negative impact on carriers who have not looked after their BASIC scores and may bring economic stress to a group that is already impacted by rising costs in every area.

Test results thus far indicate that the SMS is a significant improvement over the previous system, SafeStat, in identifying unsafe carriers. An independent study conducted by the University of Michigan Transportation Research Institute states "the effect of the warning letter intervention is likely one of the most significant findings in the evaluation. Twelve months after receiving a warning letter, SMS results showed that 83% of test carriers in test states had resolved identified safety problems and only 17% continued to have safety problems".



Compliance ★ Safety ★ Accountability



Test results also show CSA interventions contact approximately three times the number of motor carriers contacted using SafeStat which relied primarily on in-office compliance reviews. CSA On-site Focused Investigations cost approximately 53% less than compliance reviews and were effective in producing compliance.

The crash rate for motor carriers that were identified with safety problems by the SMS in the Unsafe Driving BASIC was more than 3 times greater than the crash rate for motor carriers not identified with any safety problems by the SMS.

As a motor carrier or a driver, how do you keep from becoming a target of the FMCSA? Sometimes the simplest solution that leads a company or driver toward the upper level of carriers is the most difficult path that is paved with strict compliance with all regulations. Keep in mind that this is not a one day/week/month/year program but must be an ongoing program that is woven into the operating policy and structure of a carrier. It has to be embraced by the officers and directors of the company, the operating staff, the maintenance staff and the drivers.

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