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The cost of breaking the rules just went up

Many carriers question the cost of noncompliance with the safety regulations when they discover either through a self-audit or investigation by the Federal Motor Carrier Safety Administration (FMCSA) that they are not making the grade.

Effective June 2, 2015, the agency revised its list of potential fine amounts to account for inflation. Most of the civil penalties were last adjusted for inflation in 2007, and some have not been changed since 2003. Other changes to the civil penalties were mandated by Congress in the Moving Ahead for Progress in the 21st Century Act (MAP-21).

How much money are we talking about?

Appendices A and B to Part 386 list penalties for violating the Federal Motor Carrier Safety Regulations (FMCSRs) and Hazardous Materials Regulations (HMR). The categories provided by the agency allow for a minimum and maximum dollar value, and in some instances multiply the value by the number of days the violation continues.

Recordkeeping violations are now \$1,100 (\$100 increase) for each day the violation continues, up to \$11,000 (\$1,000 increase).

see Cost, pg. 2

Changes to med card recordkeeping slated for mid-2018

A recent final rule published by the Federal Motor Carrier Safety Administration (FMCSA) — “Medical Examiner’s Certification Integration” — was created with the goal of reducing the risk of using a medically unqualified driver.

As a result of the rule, industry, medical examiners (MEs), and government entities will see major changes in their administrative procedures.

ME procedures

For the interim, the forms that MEs use during driver physicals — the medical examination report (MER) and the medical examiner’s certificate (MEC) — remain intact. On December 22, 2015, MEs are expected to begin using, at least a hardcopy version, of the new formats.

It should be noted that the criteria used to

qualify/disqualify a professional driver remain the same. Only the formats of the forms used during the exam have been revised.

The new forms will be required for both CDL and non-CDL holders subject to the medical qualification requirements. Both driver types are issued a copy of the MEC at the completion of an exam that results in certification.

As of June 22, 2018, MEs are required to enter the results of the driver’s physical onto an electronic version of the MER. The results of the exam are sent to electronically to the FMCSA via the secured National Registry of Certified Medical Examiners (NRCME) website. This communication with the FMCSA must be by midnight (local time) of the next calendar day

see Med card, pg. 2

Cost, from pg. 1

Knowingly falsifying records is now set at \$11,000 (\$1,000 increase) if such action misrepresents a fact that constitutes a violation other than a reporting or recordkeeping violation.

Non-recordkeeping violations by the motor carrier, in which there was an obvious, blatant disregard for the safety regulations (versus a recordkeeping error) results in a fine of \$11,000 (\$1,000 increase) for each violation. A non-recordkeeping violation for the driver increased \$3,750 (\$1,000 adjustment).

A violation of the alcohol prohibition in **49 CFR 392.5** and its 24-hour out-of-service order will now cost an additional \$375. The fine is set at \$4,125 for each violation.

A **Commercial Driver's License (CDL) holder** who is convicted of **violating an out-of-service order** can now expect a fine of \$4,750, an increase of \$1,000.

An **employer of a CDL holder** who knowingly allows, requires, permits, or authorizes that employee to operate a commercial motor vehicle during any period in which the CDL holder is subject to an out-of-service order now has a fine range of \$4,750 up to \$27,500. It previously was \$3,750 up to \$16,000.

As you can see, some of the numbers increased substantially in some cases. To view the entire list, visit: JJKeller.com/tmc.



Coming up with a figure

Following an investigation by the FMCSA, even if it did not result in a safety rating, the agency issues fines and penalties based on the acute and critical violations it discovered.

After an investigation, the investigator will enter the results into the Uniform Fine Assessment (UFA) software. It is a data collection tool that assists FMCSA staff and its state partners who perform investigations in determining fines. The software was developed to promote uniformity and consistency in the assessment of civil penalties. UFA calculates penalties and prepares a report demonstrating the manner in which FMCSA considered the statutory penalty factors, regulatory requirements, and administrative policies. Once the FMCSA determines the fines to be assessed based on the violations, the motor carrier will receive a Notice of Claim. At that time, the carrier has one of three options based on §386.81.

The first possibility is that the carrier could just pay the fine. Another option is to fight the violation(s) under the premise that the violation was incorrectly cited to the motor carrier. The final option is to admit the violation, but fight the fine amount with the defense that it was excessive and did not match up with the degree in which the carrier violated the FMCSRs.

If a carrier challenges the violations or fine amounts, the case will go into arbitration and FMCSA will assign someone to review the facts of the enforcement case. Once an enforcement case is closed, it becomes a matter of public record. ♦

Med card, from pg. 1

after the ME completes the driver physical. The results submitted by the ME include both non-excepted, interstate CDL and non-CDL holders. Up to June 22, 2018, the ME will continue to submit his or her monthly recap of medical exams to the FMCSA via the NRMCE portal.

As of June 22, 2018, if certification is pending (i.e., results of additional tests) this is also transmitted to the agency. The driver is informed that the additional information or tests must be submitted within 45 days or a new exam is required. The ME is only instructed to provide the MEC to non-CDL holders and any current or prospective employer requesting a copy.

Driver and employer responsibilities

The role of the non-CDL holder and his or her employer does not have any changes before or after the compliance dates. The driver will be issued an MEC, and the employer must retain a copy of the card in the Driver's Qualification (DQ) file for three years. The employer must continue to document the verification that the examiner appears on the NRMCE.

Under the rule, motor carriers with CDL holders will have fewer checks and balances built into the regulations. Prior to the compliance date, the CDL driver will still be issued the MEC, continue to submit a copy to the state licensing office preferably within 5 days of the exam, and carry a copy on his or her person for 15 days following the exam. After the rule is in place, a CDL holder no longer is automatically given a copy of the MEC since he or she no longer has to carry it or give the state a copy.

Up to the compliance date, the employer will have to:

- Document that the CDL holder was examined by a medical professional appearing on the NRCME; and
- Hold on to a copy of the MEC up to 15 days following the exam and have a copy of the driving record showing the medical status within those 15 days.

As of June 22, 2018, the CDL holder's employer no longer has to verify the NRCME status, and the rule indicated it will have access to the driving record with

see **Med card**, pg. 5

A whole new meaning to drinking on the job

The daily activities of many at your motor carrier involve working outside in the summer heat or in buildings with stagnant air. Some job titles (e.g., driver, yard jockey, driver helper, and technician) may be at a greater risk of heat exposure leading to illness or even death.

What is required in workplace safety regulations?

Even though OSHA (Occupational Safety and Health Administration) does not require that employers train employees on the dangers of heat stress, it is recommended. Failure to safeguard your employees is a violation of OSHA's "General Duty Clause," which states that every employer covered under the Occupational Safety and Health Act furnish employees a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm.

It is important to note that employers with employees working in California are obligated to provide training on Heat Illness Prevention and offer specific preventative measures. The Cal/OSHA Standard was revised as of May 1, 2015.

The Standard applies to "all outdoor places of employment" in California. Even though any warehouse workers or technicians in California are not covered under this specific rule, remember that they are covered under the federal General Duty Clause and Cal/OSHA's Illness and Injury Prevention Plan, Standard 3203.

All employers with employees working in outside work environments within the state must:

- Train all employees and supervisors about heat-related illness and prevention.
- Make fresh drinking water accessible. The water provided must be at least at least 1 quart per hour per employee. Employers must encourage employees to consume water.
- Allow employees access to shade at all times, encouraging periods of at least 5 minutes to cool down.

Specific industries in California have an additional requirement of providing "high-heat procedures." Agriculture, construction, landscaping, oil and gas extraction, and transportation or delivery of agricultural products, construction materials, or other heavy materials in which the vehicles are not equipped with air conditioning and tasks that do not involve loading/unloading.

These employers are called upon to implement the following procedures — to the extent practicable

— when the air temperature is at least 95 degrees Fahrenheit:

- Make sure there is a communication medium so that employees at the worksite can contact supervisors as necessary. This may be accomplished through voice, observation, or electronic means such as a cell phone or text messages providing there is service coverage. Employers must have a preshift tailgate meeting during high heat. For remote workers such as drivers, this may be accomplished through radio or telephone communications.
- Watch employees for alertness and signs or symptoms of heat illness.
- Remind staff to consume ample water throughout the work shift.
- Monitor new employees more closely for the first 14 days by a supervisor/designee.

Where to begin?

Your first step in determining who is at the greatest risk for heat-related illnesses at your motor carrier is to look at the job description and perform a job hazard analysis.

For some job titles at your carrier, exposure to the heat is intermittent or occasional. They may be at a greater risk of becoming ill since they have not built up a tolerance to the summer heat. For example, this could be a driver who has become accustomed to his or her air conditioning and then has to assist in loading/unloading, repairs, vehicle inspections, etc. Or it might be someone who does not normally work in the warehouse that finds himself/herself in the stagnant air for an extended period.

Even employees who are used to working in the heat could be at risk. This is especially true if they must wear heavy, protective clothing or gear as a part of their job. This might be a technician in your shop welding, for example. ♦

Risk Management **TIP**

Do you have a tip to share?

Submit your transport-related tips to:

Transport Safety Risk Management & Security

c/o Kathy Close,
fax: (920) 727-7519

e-mail: kclose@JKeller.com

FMCSA seeks to determine feasibility of a ‘Beyond Compliance’ program

The comment period in drawing to a close for a notice published by the Federal Motor Carrier Safety Administration (FMCSA) on April 23, 2015, in regards to the potential development of a “Beyond Compliance” safety program.

According to the agency notice, both the U.S. Department of Transportation and the truck and bus industries have invested millions of dollars in research, development, and implementation of strategies and technologies to reduce commercial motor vehicle crashes. The Beyond Compliance concept would allow FMCSA to consider a company’s proactive measures when evaluating the carrier’s safety, specifically voluntary best practices and technologies that exceed the regulations. However, the Beyond Compliance initiative would not result in regulatory relief.

Best practice research by FMCSA

Over the past decade, the FMCSA completed studies that would be useful in the development of a Beyond Compliance safety program.

FMCSA’s “Driver Notification Feasibility Study” tested the use of an Employer Notification System (ENS) by motor carriers instead of the current annual requirement for obtaining and reviewing a driver motor vehicle record. It found that motor carriers that received near real-time notification that a driver had been issued a citation, conviction, or commercial driver’s license disqualification took action.

If the best practice of using the ENS were implemented nationally, FMCSA estimates that it could prevent 6,828 crashes and 88 fatalities annually.

Other studies by FMCSA examined the use of new technologies:

- Studies in 2005 on roll stability control systems and tire pressure sensors demonstrate safety benefits for each.
- FMCSA’s 2009 study, “Analysis of Benefits and Costs of Lane Departure Warning Systems for the Trucking Industry,” predicted a reduction of 1,973 injuries and 100 fatalities annually through use of that technology. This report projected that for each \$1 spent on this technology, the return on investment was \$1.98.

During the development of FMCSA’s Compliance, Safety, Accountable program, the agency conducted six listening sessions that revealed that an incentive-based approach to improving carrier safety would be a more effective tool than the current penalty-based system.

Studies outside of FMCSA

Some motor carriers have pursued voluntary, non-governmental safety-related programs for cost savings and safety benefits. For example, FMCSA, has been examining the impact of such programs as:

- North American Fatigue Management Program;
- ISO 9000;
- National Private Truck Council’s Best Practices Program;
- North American Transportation Management Institute’s Certification Program; and
- Partners in Compliance.

The agency has also looked outside of the United States at other successful best practice and safety improvement programs from which to glean concepts. They include the Maintenance Management Accreditation Scheme, the Australian Trucking Association’s TruckSafe Program, and the Canadian Standards Association Safety Management System.

MCSAC given an assignment

On March 30, 2015, FMCSA tasked the Motor Carrier Safety Advisory Committee (MCSAC) with providing recommendations on its potential Beyond Compliance program. MCSAC must look at the potential benefits and feasibility of voluntary compliance and suggest ways to credit carriers and drivers who

initiate and establish programs above the minimum requirements of the safety regulations.

MCSAC has been asked to provide its suggestions on the following three areas, backed up by data or analysis:

1. What voluntary technologies or safety program best practices would be appropriate for beyond compliance?
2. What type of incentives would encourage motor carriers to invest in technologies and best practices programs?
3. How would FMCSA verify the voluntary technologies or safety programs were being implemented?

By MCSAC’s June 2015 meeting, it is required to present a report to the FMCSA Administrator outlining its recommendations.

Stakeholder input

In addition to FMCSA’s research and MCSAC’s report, the agency is reaching out to interested parties in determining the possible development of a Beyond

see **FMCSA**, pg. 5



Trucker ergonomics examined by NIOSH

It had been decades since a study was last conducted on the anthropometric (i.e., human body measurements) data in an effort to improve the ergonomic design of truck cabs, according to the National Institute for Occupational Safety and Health (NIOSH). As a result, NIOSH launched the first-ever federal anthropometric study of U.S. truck drivers.

The results of the 4-year study are meant to be a resource for truck manufacturers, parts suppliers, transportation researchers, fleet managers, and other interested parties. Specifically, it is hoped that the results will aid in the design of the next generation of medium- and heavy-duty trucks.

Primary funding for this project came from the National Occupational Research Agenda (NORA), a partnership program unveiled by NIOSH in 1996 to stimulate innovative research and improved workplace practices in the United States.

Stakeholders joined the efforts as the study's existence became known. A Research Cooperative of Industry Partners — including truck manufacturers — joined the endeavor and provided invaluable technical knowledge, as well as additional financial support to increase the sample size.

What should be included?

In preparation of the study, NIOSH conducted a pilot program in 2006 to set the perimeters. Fifty anthropometric dimensions from a sample of 60 truck driv-

ers were under consideration. The study examined the usefulness of the data in relationship to relevance to the dimensions to the design of the cab work environment and how easily the field data could be collected. NIOSH whittled the final list down to 33 dimensions plus shoe length and shoe width. Data collection took place between 2009 and 2010.

Physical attributes of drivers

The professional drivers used in the study consisted of 1,779 male and 171 female truck drivers located in 16 different locations in 15 states across the continental United States. Only drivers with a valid Class A Commercial Vehicle Driver's License (CDL) were measured.

The study revealed some interesting physical traits of Class A CDL holders:

- The average commercial driver was larger and heavier (13.5 kg for males and 15.4 kg for females) than individuals in the general U.S. population.
- Current male drivers were heavier by about 12 kg on average than male drivers of 25-30 years ago.
- On average, drivers were larger in body width and girth, even though they were not taller than the general population.

A comparison of current female truck drivers to their counterparts of 25-30 years ago was not possible due to the small sample size for the female truck drivers in the previous studies. ♦

Med card, from pg. 2

the required information within a couple of days of the exam.

Tracking by FMCSA and states

The final rule gives state licensing agencies over three years to develop IT systems for the transmission of medical information from the FMCSA's CDL database (i.e., CDLIS). Rather than taking 10 days for the information to appear on the driving record, the rule calls for just one day on the part of the state as of its compliance date. Having information earlier al-

lows the state to immediately place a driver in a "not certified" status and begin the CDL "downgrading" process for medically unqualified drivers.

Even though FMCSA will receive CDL and non-CDL holders' medical status, only the CDL holder status is forwarded to the state. States are expected to have the ability to pull medical certification from the NRCME site for drivers that at the time of the exam did not hold a CDL, but upgraded at a later date within the issuance of the certification.

FMCSA will also transmit any medical variances (exemptions) the driver may hold. ♦

FMCSA, from pg. 4

Compliance program. It is soliciting feedback on very specific questions, and encourages the submission of any other reports or data on this issue.

FMCSA is taking comments until June 22, 2015, on the following questions:

- What voluntary technologies or safety program best practices would be appropriate for a Beyond Compliance program?
- What safety performance metrics should be used to evaluate the success of voluntarily implemented technologies or safety program best practices?
- What incentives would encourage motor carriers to invest in technologies and best practices programs?
- Credit on appropriate Safety Measurement System (SMS) scores (e.g., credit in Driver Fitness for use of an employer notification system)?
 - o Credit on Inspection Selection System (ISS) scores?

see FMCSA, pg. 8

Stressed tires could spell D-A-M-A-G-E

Drivers are the first line of defense against a defective tire. Being on the lookout for potential tire problems keeps downtime and damage costs to a minimum. Any detected problems should be reported and addressed by the fleet maintenance shop.

Equipping drivers

The first is to make sure your drivers are equipped with the proper tools, including:

- An axe handle, hammer, or “tire buddy” used for checking tires when hot. “Thumping” tires is recommended any time the vehicle is parked.
- A good pair of pliers for removing objects from the tires.
- A quality tire pressure gauge. The tire gauges used to check pressures must themselves be checked frequently to make sure that they are accurate. If they are off by more than 5 psi, they should be replaced or repaired.
- A tire depth gauge.
- A tire pressures log on the maintenance inspection reports, pre-trip inspection reports, or a post-trip Vehicle Condition Report.

Inspections by the driver should include a visual examination of the tire and rim and a check of the tire inflation.

Visual tire inspection

When performing the tire inspection, the following should be checked first:

- Rims for bends, cracks, or bad lug holes.
- Wheels for broken studs and nuts; cap nut looseness (rust streaks); and oil/grease seals for leaks.
- Tire treads for any kind of foreign object embedded in the tread surface; check for puncturing objects; look for cuts, cracks, or separations.
- Tire sidewalls for bumps or bulges, tears, or cracks.
- Valve stems for caps and position (180 degrees apart on duals and clear of any wheel spokes).
- Tire pressure. Air pressure should be checked and corrected when the tires are cold. If it is absolutely necessary to check hot tires, 15 percent should be added to the standard cold pressure.
- For overheating by feeling the sidewall (during and after trip).

**Poster
Topic
This Month**

see **Tires**, pg. 7

Report focuses on onboard video systems

The National Transportation Safety Board (NTSB) released a safety report on many of the advantages of commercial motor vehicle onboard video systems, in addition to highlighting areas for improvement. These systems record video either continuously or as the result of a triggering event.

Commercial carriers use video systems for both safety and security reasons. For passenger-carriers, the systems monitor passenger behavior and dissuade negative actions, such as bullying or theft. The recordings also allow all types of carriers to monitor traffic surrounding the vehicle and assist in recording the observance of traffic laws. In addition, use of the technology enhances driver safety through feedback programs that correct potentially unsafe behaviors.

When available, NTSB has also used information from onboard video systems in its accident investigations to help determine the probable cause of the crash, to make recommendations to prevent future crashes, and to reduce loss of life and injury when crashes do happen. The report highlights two recent crash investigations in which continuous video systems were installed on commercial vehicles.

The report focuses on the benefits offered by these systems for evaluation of both driver and passenger behaviors and collision analysis. NTSB found that some commercial vehicles equipped with onboard video systems did not always provide useful video, or were not properly installed or maintained. The agency found the following common shortcomings:

- No view of what is happening in front of the vehicle.
- No view of all seating positions, including the driver.
- Lack of low-light recording capability (no night vision).
- Low frame rates, such that videos are jumpy or skip over events.
- Poorly positioned cameras.
- Improperly maintained cameras.

To view the report, visit: [nts.gov/safety/safety-studies/Documents/SR1501.pdf](https://www.nts.gov/safety/safety-studies/Documents/SR1501.pdf). ♦

OOIDA questions science in proposal

In a letter addressed to both the Federal Motor Carrier Safety Administration (FMCSA) and the National Highway Transportation Safety Administration (NHTSA), the Owner-Operator Independent Drivers Association (OOIDA) claims a lack of solid science to substantiate a rule mandating the use of speed limiting devices on large trucks.

OOIDA cautions the two agencies that mandating the use of speed limiters will create, in its opinion, a dangerous speed differential on U.S. highways. In its letter, the association cites the elimination of car-truck speed differentials by states over the past 15 years. OOIDA indicated it is not seeking higher speed limits, but rather the same speed for all vehicle types. A lack of consistency and uniform speed will result, according to OOIDA, in a lack of predictability on roadways.

A proposed rule on the topic is anticipated by FMCSA yet this year.

PHMSA soliciting feedback on recordkeeping

Federal regulations require the Pipeline and Hazardous Materials Safety Administration (PHMSA) to provide interested members of the public and affected agencies an opportunity to comment on information collection and recordkeeping requests. A recent notice by the agency — in an attempt to request a renewal and extension from the Office of Management and Budget (OMB) — offers the opportunity to comment on the recordkeeping burden associated with requirements for hazardous materials shipments.

Specifically, parties are asked to comment on:

- Providing a shipping paper and emergency response information;
- Radioactive materials transportation requirements; and
- Subsidiary Hazard Class and Number/Type of Packagings.

Interested persons are invited to submit comments on or before June 29, 2015. ♦

Tires, from pg. 6

Inflation check

Maintaining correct tire pressures can reduce tire costs by up to 20 percent; incorrect tire pressures can only lead to tire problems. Underinflation is the major cause of tire failure; the increased flexing of the tire in motion causes excessive heating up of the tire components. It reduces the strength of the tire and leads to breakdown of the rubber compounds. The tire can separate or even catch fire from the extreme heat. Low inflation increases the rolling resistance of radial tires, which means higher fuel costs and less tread life. Tread separation, bruises, breaks, and blowouts can result.

Overinflation is less likely to happen, but it can cause tire damage, too. An overinflated tire is more rigid and so it does not absorb road shocks as well, a problem that may cause serious damage to treads as the tire bounces and skids along the road. Overinflation also decreases the tire footprint. Only the center portion of the tread is in firm contact with the ground, rather than the entire width. The reduction in footprint will cause an extreme center wear pattern. Higher pressures can also overstress the rim, causing rim damage. Finally, an overinflated tire is more prone to puncture or cuts from road debris.

Air pressure checks

Drivers may need to be trained to make proper inflation checks, if the vehicles are not in the yard often enough. Drivers need to understand that each time a check is made, the air seal at the valve is opened and dirt can get into the valve and damage the seal. In addition, if the seal is damaged or broken, water may also be allowed to enter. This is quite dangerous: water can freeze and crack the seal. If the gauge isn't used properly, the tire could even lose pressure.

Maintenance checks of tire pressure should be scheduled at least every 30 days. Tires lose about 0.33 pounds of air each day. For every eight-degree increase or decrease in ambient temperature, one psi of tire pressure will be gained or lost. No more than 6 to 8 psi should need to be added to any one tire during a regular airing or inflation check. Any tire found to be more than 10 psi below the others on the unit should be checked further to find out why. Tires below 20 percent of normal pressure should be removed, inspected, repaired, and aired in a safety cage.

One consideration to keep in mind is that proper inflation levels depend on the loads that are carried. Load/inflation tables, which can be used to determine the required minimum inflation pressure for a given tire size and maximum expected tire load, are available from tire manufacturers. ♦



New registry of hazmat routes published by FMCSA

The Federal Motor Carrier Safety Administration (FMCSA) recently published a notice in the *Federal Register* for carriers that transport hazardous materials (hazmat).

A new National Hazardous Materials Route Registry (NHMRR) effective April 29, 2015, replaced the routes published July 14, 2014, and includes the current route limitations and allowances, and information on State and Tribal Government routing agency contacts reported to FMCSA as of March 30, 2015.

To access the most recent NHMRR, visit: www.JJKeller.com/thm.

Background

The NHMRR is a listing, as reported by State and Tribal Government routing officials, of all the designated and restricted road and highway routes for transportation of highway route controlled quantities (HRCQ) of Class 7 (radioactive materials (RAM)) and non-radioactive hazardous materials transportation.

State and Tribal Governments have been given the authority to designate and limit routes for the transportation of hazardous materials as defined by the Pipeline and Hazardous Materials Safety Administration (PHMSA). These chemicals or products appear on PHMSA's list because they are seen as potential hazard if released during transportation.

The NHMRR provides publicly accessible information necessary for compliance for transporters of hazardous materials. The route restrictions placed on

the transportation of hazardous materials depends on the substances involved.

Regulatory requirements

A motor carrier transporting non-radioactive hazardous materials that require placarding is instructed to comply with routing designations. If a motor carrier transporting hazardous materials required to be marked or placarded is not subject to State or Indian Tribe routing requirements, the carrier must operate the vehicle over routes which do not go through or near heavily populated areas, places where crowds are assembled, tunnels, narrow streets, or alleys, except when:

- There is no practicable alternative;
- It is necessary to reach a terminal, points of loading or unloading, facilities for food, fuel, rest, repairs, or a safe haven; or
- A deviation is required by emergency conditions.

Operating convenience is not a basis for determining if a route can be used.

Motor carriers transporting Division 1.1, 1.2, or 1.3 materials must furnish drivers with a written route plan for the Class 1 materials shipment. In some cases this plan may be prepared by the driver, if the trip begins at some other point than the carrier's terminal.

When transporting highway route controlled quantities of Class 7 (radioactive) materials, motor carriers are required to develop and adhere to written route plans in accordance with §§397.71 and 397.101(d). ♦

FMCSA, from pg. 5

- o Reduction in roadside inspection frequency?
- o Other options?
- What events should cause the incentives to be removed?
- o If safety goals for the carrier are not consistently achieved, what is the benefit to the motoring public?

- Should this program be developed by the private sector like PrePass, ISO 9000, or Canada's Partners in Compliance?
- How would FMCSA verify that the voluntary technologies or safety programs were being implemented?

Comments will be accepted by FMCSA until June 22, 2015. ♦

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