

**The DVIR Rules:
Maintenance Policies & Practices**

May 20th, 2015

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Gary Petty
President & CEO
National Private Truck Council

NPTC
National Private Truck Council

J. J. Keller
& Associates, Inc.
Since 1953

Introduction

- Regulatory Background – Tom Bray
- Beyond Compliance – Tom Moore, CTP
- Fleet Perspective – Clint Wenger, CTP
- Housekeeping issues:
 - You will be muted during the event.
 - Please use the Q&A feature to send questions us. We'll try to answer them during the Q&A period if they are not covered in the presentation.

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Regulatory Background

Thomas Bray
Sr. Editor, Transportation Management
J. J. Keller & Associates, Inc.

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Regulations Involved

- Part 393: Parts and accessories
- Part 396: Inspection, repair, and maintenance
- Part 571: Vehicle safety standards
- Appendix G: Minimum periodic inspection standards (standards for passing an periodic annual inspection)
- NOT a regulation:
 - OOS Criteria
 - Recommended practices



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“Systematic Maintenance Program”

- Carrier responsible for systematic inspection and maintenance (§396.3)
 - Carrier establishes, and then follows and documents
 - Records of all inspection, maintenance, and repairs kept for one year (use for internal tracking as well!)
 - DVIRs must be kept for three months
 - Records of periodic (annual) inspections must be kept for 14 months




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Carrier Responsibilities

- All vehicles operating under DOT number must comply with the regulations
- A vehicle not meeting standards in Appendix G cannot operate on the roadway
 - Other defects will result in a violation during a roadside inspection as well




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Typical Maintenance Program



- Any problems that are reported by the driver or discovered during maintenance are repaired immediately
- Scheduled maintenance
 - Items and timing based on OEM recommendations and carrier history
 - PM-A ("check-out" or "safety check")
 - PM-B Full service plus PM-A
 - PM-C Annual inspection (including FMCSA annual)
 - PM-D Seasonal or special
 - Some parts components replaced based on age or "cut-offs"



Driver Inspections



- Required by the regulations
 - Pre-Trip (§392.7 and §396.13)
 - Enroute inspections (§392.9 and §397.17)
 - Post Trip/DVIR (§396.11)
 - > DVIR only required for property-carrying vehicles if there is a defect (as of 12/18/2014)






Defect DVIR Flow

Driver notes defect on form

Mechanic or carrier official acts on report, then signs that repairs were completed or not necessary

Next driver to pre-trip vehicle reviews previous DVIR and signs agreeing with the mechanic or carrier official


DVIR with all signatures is retained by the carrier



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Common Violations



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- DVIR violations common during compliance reviews (formerly number one critical violation)
- Common violations:
 - Failure to submit
 - Failure to act on reported defects (can lead to claims of knowingly operating unsafe equipment)
 - Failure to have certifying signatures
 - Failure to retain



Beyond Compliance



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National Private Truck Council

Tom Moore CTP
Sr. Vice President
National Private Truck Council



Why the Regs Aren't Followed



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- Lack of understanding
- Poor communication
- Conflicting goals
- Forms and processes that lead to poor follow-through



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Raising the Bar: Daily Inspections Best Practices

- Hire intelligently
- Train drivers and technicians
- Arm them with the right tools
- Ensure follow-up with all personnel
- Pay a driver incentive tied to inspection performance with inspections as one metric




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Raising the Bar: Roadside Inspections Best Practices

- Weekly and spot inspections
- Review CSA data monthly
- Compare your data to CSA Vehicle data to locate problems
- Track ALL roadside inspections for trending
- Address vehicle issues that repeat through maintenance adjustments (improve schedules or checklists)



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Raising the Bar: Annual Inspections Best Practices

- Consider more frequent inspections
- Enhance internal communications
- Improve vendor relationships



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Audit Your Inspection Practices

- Out of service rates
- Accident rates
- Equipment violation citations
- Maintenance cost and repair




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Benefits of Raising the Bar

- Lower overall maintenance costs
- Increased fuel mileage
- Improved driver retention
- Improved on-time percentages



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Clint Wenger, CTP
Coborn's, Inc.

Clint Wenger, CTP
Logistics Manager
Coborn's Inc.





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Coborn's Overview

- 28 Class 8 Trucks
- 65 Drivers
- 75 trailers
- 3.5 million miles annually
- Slip seat operation
- Coborn's and Cash Wise Grocery stores.
- Minnesota, Wisconsin, South Dakota, North Dakota



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Coborn's, Inc.



Coborn's Delivers Overview

- 65 Trucks
- 70 Drivers
- 1.1 million miles Annually
- Home grocery delivery in the Minneapolis Metro area.




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Overview

- Safety as a Core Value
- Cost
- Have a process
- Follow-up on preventable maintenance defects
- Common defects
- Safety observations
- Systematic, inspection and repair program
- Recognition



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Safety “Core Value”

- Having a solid pre and post trip inspection program, promotes safety as a core value.
- Vehicle inspections aren't optional, they are required, by law.
- Safety Management Plan updated Annually, vehicle inspection training is very important.
 - Workshops, quick reference guides, recognition.



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Safety “Core Value”

- Leadership team (Dispatchers, Supervisors and Shift Leads should be knowledgeable.
 - Focused Leadership training on vehicle inspections and maintenance process.
 - Role play training on coaching sessions with drivers.




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Cost

- Are there times when a rushed driver feels like he is helping operations?
- Costs
 - Citation costs
 - Out of Service (OOS)
 - Break downs and service calls (4 times the cost) and missed equipment utilization.
 - Customer service




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Cost




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- U.S DOT regulation change focused on reducing cost. (95% of inspections "No Defect").
- Option to still complete inspection report each day.
- EOBRs have options to complete electronically.





Have a Process



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1. Vehicle Overview
2. Engine Compartment (most expensive)
3. Inside cab
4. Lights
5. Walk-around
 - Coupling/Uncoupling system
6. Signal lights
7. Brake system



Have a Process



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- Routine is important, be sure to understand the different areas of inspection.
- Inspect in the same order each time.
- If available, review the previous drivers inspection and sign off on defects and that repairs have been completed.



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Scheduled Maintenance Follow-up




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- When a vehicle goes through it's scheduled maintenance and found to have defects, which could have been noted during normal pre and post trip inspections, use the opportunity to coach and train.
- Communicate back to drivers with picture and examples.






Common defects (Coborn's)




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- Tires: #1 cause of tire issues is under inflation. Check cold.
- Cracked brake shoes






Common Defects (Coborn's)



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- Rubbing brake lines (air brake test)
- Air leaks (glad hands)
- Brake shoe depth (wear)



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Enforcement Officers

1. Air Brake Check
2. Light checks
3. Engine Compartment
4. Coupling system

Don't have silly violations that invite drivers/trucks into inspections!!

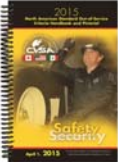


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CVSA Out of Service Criteria

- Have a clear understanding of what places a CMV Out of Service.
- Check the condition of the vehicle, if it wouldn't pass inspection, don't drive until it does.



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Safety Observations

- Vehicle inspections should be included in safety observation programs.
- Observing drivers when they believe "no one else is looking" will give insight into normal routines.
- Use the observation to coach the driver on the importance of vehicle inspections

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Safety Observations

- Observing behaviors is difficult for “over-the-road carriers”.
- Monitor logs for proper “form and manner,” including ELDs if they are in use.
- Supply a tool for checking brakes, tread depth and windshield cracks.



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Systematic Inspection, Repair and Maintenance program

- To the extent practicable reduce risk of mechanical problems happening while vehicle is in motion.
- Motor carriers still need to review vehicle inspections that list defects.



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Systematic Inspection, Repair and Maintenance program

- **Preventative Maintenance Schedules**
 - PM A: Maintenance Check-out
 - PM B: Oil and Filter change, in depth checks of engine and driveline.
 - PM C: A and B service and more extensive, annual inspection etc.

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Systematic Inspection, Repair and Maintenance program



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- **Yard Checks** : At specified times throughout the day, technicians will "cruise the yard" and check the equipment that is newly arrived into the yard. These checks involve simple items such as brakes, tires, lights, body damage, and upcoming maintenance requirements



Recognition




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- **Recognizing what drivers are doing right is powerful!!!**
- **Recognition examples**
 - Positive observation: \$10.00 gift card
 - Clean Level I: \$20.00




Question & Answer Session




Gary Petty
National Private Truck Council



Tom Moore
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Please continue to submit your questions.



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Thank you for participating!

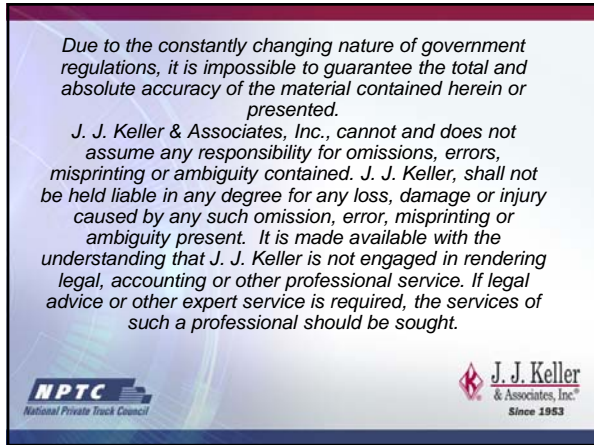
Join us for our next webinar series:

Hours of Service and ELDs
Thursday, May 21st, 2015 @ 10AM Central Time

Visit www.jjkeller.com/nptcinfo for more information

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