



## Vehicle Maintenance: What the Regulations Require



**Tom Bray**  
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J. J. Keller & Associates, Inc.




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### Key Requirements

- Vehicle must be in compliance at all times
- A systematic maintenance plan must be in place
  - Preventative Maintenance
  - Annual Inspections
- Daily driver inspections
- Recordkeeping requirements



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### Vehicle Requirements: Part 393

| Vehicle part   | Subpart   | Section          |
|--|-----------|------------------|
| Lights and reflectors  | Subpart B | §393.9 to .31    |
| Brakes   | Subpart C | §393.40 to .55   |
| Windows  | Subpart D | §393.60 to .63   |
| Fuel systems   | Subpart E | §393.65 to .69   |
| Coupling devices   | Subpart F | §393.70 to .71   |
| Micellaneous (tires, wipers, mirrors, horn, speedometer, etc.) | Subpart G | §393.75 to .94   |
| Emergency equipment  | Subpart H | §393.95          |
| Frame, cab, wheels, steering, and suspension                   | Subpart J | §393.201 to .209 |



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## Systematic inspections

- You must **systematically** inspect and maintain all vehicles under its control for more than 30 days (\$396.3)
- Carrier establishes program, and then follows and documents

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## Normal program development

- Obtain OEM recommendations on:
  - Items to be checked and maintained
  - Intervals for inspection and maintenance
- Consider your history with current, similar, or past vehicles

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## Preventive maintenance template

- 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

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## Annual Inspection

- Vehicle must undergo thorough inspection once per year (within 12 months of the last one)

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## Recordkeeping

- Regulatory requirement: §396.3
  - Vehicle information
    - Make
    - Model
    - Year
    - VIN
    - Fleet number assigned
    - Tire size
  - Last and next maintenance activity
  - Records of all inspection, maintenance, and repairs over the previous 12 months

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## Maintenance and Records

- Your vehicles: It's up to you
- For your rental vehicles – your rental provider will be handling this
- For your leased vehicles –
  - This will be determined by the lease contract

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## Daily Driver Inspections

- Pre-trip
- Enroute
- Post-trip/DVIR

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## Beyond Compliance

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Senior Vice President  
National Private Truck Council



## Why the Regs Aren't Followed

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

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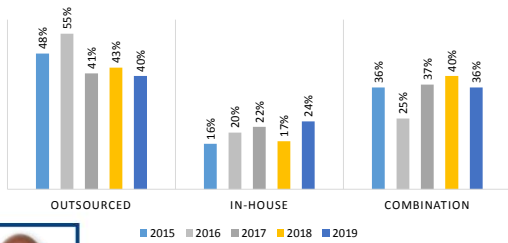
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Senior Vice President  
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## Where Is Maintenance Conducted?



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## Daily Inspections Best Practices

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



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## 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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## Annual Inspections Best Practices

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

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## Audit Your Inspection Practices

Establish Key Performance Indicators (KPIs)

- Out of service rates
- Accident rates
- Equipment violation citations
- Maintenance cost and repair
- Breakdown percentage
- Cost of breakdown
- Miles between breakdowns

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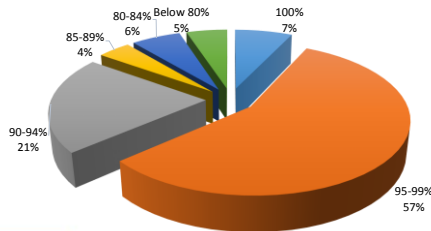
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## PM Currency Rates




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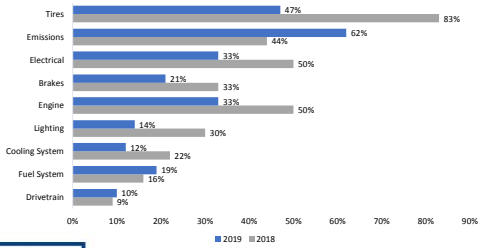
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## 50% Track Breakdown Rate = 4.5 Leading Causes of Breakdowns



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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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## The Fleet Perspective: Atlas Trucking Company



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Director of Safety and Maintenance  
Atlas Trucking Company



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## Atlas Trucking Company



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## Atlas Trucking Company / Atlas Fleet Services

- Founded in 1999 as the in-house carrier for Eaton Steel Corporation
- 120+ Trucks (both company drivers and owner-operators)
- Flatbed carrier primarily steel bars and slinky coil
- Specialize in heavy haul and over-dimensional freight
- Atlas Fleet Services handles all maintenance for Atlas Trucking as well as outside customers
- State of the art 73,000 square foot shop located in Taylor MI.
- Combining safety and service for success



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## Equipment Specs

- Equipment specs play a big role in safety and what you need it to do in your application.
- Work with the dealer and manufacturer to get the right equipment for the job.
- Regional? Local? Heavy Haul? Non-CDL?
- Buy vs lease, full service lease or contracted maintenance?



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- Heavy Haul**
- 8 Axle
  - Step decks
  - RGN trailers



- Specialized Tractors**
- Gross Weight up to 160k



- Michigan Heavy Hall**
- 160k combined weight



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## Driver involvement

- Driver involvement is essential, they must know the equipment.
- Have a technician walk them through the equipment and answer any questions they may have.
- Teach techs and drivers how to operate specialized equipment that is specific to your fleet.



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## Driver Communication

- DVIR (Driver Vehicle Inspection Report)
- On-line training
- Pre-trip training
- Email/Phone calls
- One on one (Boots on the ground)



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## Three Types of Maintenance

Normal wear and tear can result in lower efficiency of your equipment.

1. Preventative- Normal PM's (Wet or Dry), DOT inspections.
2. Predictive – Oil samples, alignments, winter prep
3. Corrective – Occurs after a breakdown




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## Technology and Safety

- Lane Departure Warning
- Lane Keep Assist
- Adaptive Cruise Control
- Roll Stability Control
- Maintenance challenges, radars, sensors, software updates, etc.
- Future technologies

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## Maintenance Challenges

- Just like on the trucking end of the industry there is limited capacity at dealers and shops.
- Work with your equipment provider to secure some sort of repair agreement. The more you buy the quicker they get you in.
- Find a good private or for-hire repair facility to help with the log jams at dealerships




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## One Size Doesn't Fit All

- How are you going to maintain your equipment?
  1. Outsource
  2. In House
  3. Contract Maintenance Programs
  4. Combination
- Chose what is right for your operation




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## You're in Control

- Whether you do your maintenance or send it out, you are in control. Ask questions. Ask for a root cause of failure so the breakdown doesn't happen again.
- Can you improve on an existing product?
- Never sit idly by and hope the issue is fixed and won't happen again. Be proactive in everything safety and maintenance.

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## Ask!!!!

- You are not alone in this industry. Whatever challenges you're facing, someone has faced the similar challenge.
- Never be afraid to reach out to your peers.
- Continue to use organizations such as the NPTC for resources.
- Enjoy what you do, don't stress and have fun!

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## Question & Answer Session



**Gary Petty**  
President & CEO  
National Private Truck Council



**Tom Bray**  
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**Tom Moore, CTP**  
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## More Questions?



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