

Vehicle Inspections & Maintenance — *Requirements, Risks, Benefits*

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Gary Petty
President & CEO
National Private Truck Council

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Thank You for Joining Us!

- This webcast will cover ...
 - A regulatory overview
 - Best practices in compliance
 - A case study in implementation
 - Question & Answer session
- You will be muted during the event.
- Please use the Q&A feature to send in questions. We'll try to answer them during the Q&A period if they are not covered in the presentation.
- The slides and recording will be posted within 7 days at:
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Meet Your Speakers



Tom Bray
Sr. Industry Business Advisor
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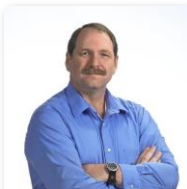


Tom Moore, CTP
Executive Vice President
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Driver/Dispatch Manager
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Vehicle Inspections & Maintenance

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

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Audience Poll

Where do you struggle the most when it comes to vehicle inspections and maintenance?

- Developing/updating our maintenance program
- Getting vehicles in for scheduled maintenance
- Getting drivers to do effective inspections and/or report defects
- Nothing, we have a great maintenance program

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Two Pieces to the Puzzle

- Carrier maintenance (inspection, maintenance, and repair)
- Driver inspections
- Regulatory concept is:
 - Company gives the driver a vehicle that is in good condition
 - Regularly/systematically maintained
 - Inspected and maintained well enough that problems are address in the shop
 - Driver inspects the vehicle daily and keeps it in good condition

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Systematic Maintenance

- Regulation: §396.3(a)
 - Carrier must systematically inspect, repair, and maintain...all vehicles
 - Can have others do it for you
 - ...or cause to be systematically inspected, repaired, and maintained
- Interpretation: Question 1 to §396.3
 - Systematic means a regular or scheduled program to keep vehicles in a safe operating condition
 - Not do an annual inspection and fix it when it breaks

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Systematic Maintenance

- You set up the program
 - Manufacturer's recommendations
- Your experience
 - Repairs
 - History of similar vehicles
 - Known failure points (life cycle or mean time between failures)

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Systematic Maintenance

- Example of a systematic/preventive program
 - PM A Safety check: Monthly
 - PM B Safety check and full service: Every other month
 - Could include oil change or be a "dry" service
 - PM C Annual: Full and complete inspection and long-term maintenance (including required periodic/annual inspection)

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Systematic Maintenance

- Periodic (normally annual) inspection requirement in §396.17
 - Qualified technician must conduct
 - One year of experience or meets ATA/TMC training exemption
 - Training on conducting the inspection
 - Standard for passing found in Appendix A to Part 396
 - Inspector cannot fail the vehicle for defects not listed in Appendix A
 - Pass or fail
 - Cannot tell inspector that you will fix it later

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Systematic Maintenance

- Condition vehicle must be in to be on the road
 - Must comply with:
 - Part 393
 - Condition of lights, brakes, windows/windshields, fuel systems, coupling devices, tires, wipers, mirrors, defrosters, horn, speedometer, exhaust, rear impact guards, seats and seatbelts, emergency equipment, cargo securement, frame, cab, doors, wheels, rims, steering, suspension, etc.
 - Appendix A to Part 396
 - Condition components must be in to pass an annual inspection

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Maintenance Records

- Regulations:
- §396.3(b)
 - Vehicle information
 - Fleet number, make, model, year, VIN, and tire size
 - Record of all maintenance inspection, maintenance, or repairs for the previous 12 months
 - Record must indicate the date and nature of the activity
- §396.9 Roadside inspection reports retained for 12 months
- §396.11 DVIRs kept for 3 months
- §396.21 Annual inspections retained for 14 months

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Driver Inspections

- Pretrip §392.7 and §396.13
 - Driver must be satisfied before operating
 - List of required components
- Enroute inspections
 - §392.9 Cargo securement checks
 - §397.17 Tire checks
- Post-trip/DVIR §396.11
 - Driver must submit a DVIR if there is a defect on the vehicle at the end of the workday

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Is It Working?

- Review to determine if systematic/preventive maintenance is working:
 - Roadside inspection violations
 - On-road repairs
 - Unscheduled component repair/replacement in shop

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How Does FMCSA Judge Your Program

- Roadside inspection vehicle violations
 - CSA: Number of violations compared to number of inspections
 - Vehicle inspection out-of-service rate
- Compliance reviews and investigations
 - Vehicle out-of-service rate
 - Repair of known defects (roadside inspections and DVIRs)
 - Maintenance records match systematic/preventive program

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Raising the Bar

Tom Moore, CTP
National Private Truck Council

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Good Business

- Overarching goal: Enhance customer service
- Provide the best equipment
- Create driver ownership
- Inspections provide the pulse of fleet maintenance
- Understand the link between safety and maintenance

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Understand Why the Regs Aren't Followed

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

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Where Is Maintenance Conducted?



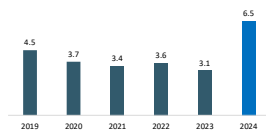
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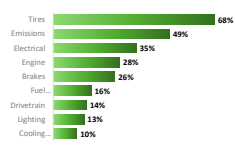
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Breakdown Metrics

Breakdowns Per 100,000 Miles



Leading Cause of Breakdowns



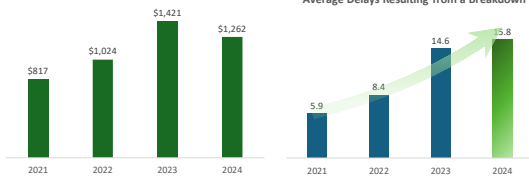
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Cost of Breakdowns

Average Delays Resulting from a Breakdown



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Daily Inspections: Best Practices

- Drivers to inspect the entire vehicle
- Train drivers on inspections and defects
- Verify inspections are being done
 - Observations
 - Tracking unreported defects
- Provide drivers with a direct contact for when a defect is discovered on the road
- Get repairs done quickly if driver is waiting
- Ensure follow-up with all personnel

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Pre, Post & Intertrip Inspections

- Do you have:
 - A policy on completing inspections
 - A training program for inspections
 - Do it the same way every time
 - Do you have a good checklist or form for them to use
 - Does your ELD provider offer electronic inspections
 - When a defect is discovered what do they do next
 - Do you have a list of OOS vs run the vehicle
 - Are they trained on what to do if they need to place the vehicle OOS
 - Are your back-office dispatchers trained
 - Do you have a process in place to get defects fixed

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Annual Inspections: Best Practices

- Conduct annual inspections more frequently
- Audit your processes:
 - Out of service rates
 - Accident rates
 - Roadside breakdowns
 - Equipment violation citations
 - Maintenance cost and repair

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Roadside Inspections: Best Practices

- Pay a driver incentive tied to inspection performance
- Identify your issues and address them
- Look at your roadside inspection data
 - Most common vehicle violations
 - High-severity vehicle violations
 - Triggering violations

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Preparing Your Drivers for Inspection

- Train drivers on roadside inspections
- Practice roadside inspections by conducting mock ones
- Mock driver inspections:
 - License on person (and medical current for CDL drivers)
 - Medical card on person (non-CDL driver)
 - Driver can transfer ELD records
 - Driver can locate ELD-related documents (user manual, transfer instructions, malfunction instructions, blank logs)
 - Driver can locate proof of periodic/annual inspection

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The Bigger Picture: Good Business Practices

- Have a systematic, preventive, and effective maintenance program
 - Scheduled inspections by qualified technicians
 - Scheduled replacement of components that wear out
 - Realistic cut-off points for such components (tires, brake linings, etc.)
 - Lights, tires, and brakes (including ABS lights) should be checked as part of all maintenance activities
- Make sure all vehicles are current on maintenance
 - Do not let vehicles go past service dates
 - Verify all vehicles have a current periodic (annual) inspection
 - Have a maintenance recordkeeping system that:
 - Points out when a maintenance activity is due
 - Have checklists for technicians to use

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Benefits of Raising the Bar

- Lower overall maintenance costs (PM and in-house repairs are always cheaper than on-road emergency repairs due to breakdowns or OOS orders)
- Increased fuel mileage (tire inflation and lubrication)
- Improved driver retention (drivers that are constantly broken down tend to go to work somewhere else)
- Improved on-time percentages due to less breakdowns and out-of-service orders

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Tracy Whisnant, CTP
Driver/Dispatch Manager



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Tracy Whisnant

- 30 years in transportation field
 - 1997 – MDI driver
 - 2014 – Dispatcher
 - 2015 – Transportation Supervisor and Driver Trainer
 - 2017 – Dispatch Assistant Manager
 - 2020 – Driver Manager/Dispatch Manager
- Certified in:
 - DOT Compliance
 - Reasonable Suspicion
- Certified Transportation Professional (CTP)
- Member of National Private Truck Council (NPTC)

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MDI OVERVIEW

- Privately-owned Full Line Wholesale Grocery Distributor
- Based in Hickory, NC
- In Business since 1931
- Supplies over 850 retail food stores across FL, GA, KY, MD, OH, PA, NC, SC, TN, VA, and WV
- 250 Tractors, 700 Trailers, & 330 Drivers
- 1,900 + Total Employees
- 1,500,000 Square Foot Warehouse
- Will log over 26,000,000 miles this year

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About our Operations

- Paper DVIRs
 - Switching to eDVIR this year
- Slip Seat Operation
- Company owned garage (cost center)
- 5 year/500,000-mile lifecycle
- Partnership with Vendors
 - Roadside calls
 - Supplier relations
 - Tire Vendor
 - Towing

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Set Clear Driver Expectations

- Pre-trip
 - "Stem to Stern" and "Masthead to Keel"
 - Inspect to "satisfaction" that the unit is in "good working order"
 - 11 items/systems to inspect
 - No driving if not satisfied
- During trip
 - 3 hours/150 miles/every stop
- Post-trip
 - Same items as Pre-trip, except fluids and hot items
- Red Tag Process

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Seven Step Approach

1. Vehicle Overview
2. Engine Compartment
3. In-Cab and Engine Startup
4. Lights
5. Walkaround
6. Turn Signals
7. LAB PS Brake Test

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How long does an Inspection take?

- As long as it takes!
- Time will vary by:
 - Vehicle Components
 - Vehicle Condition
 - Vehicle Age
 - Driver's Skill Level
 - Driver's Familiarity with the vehicle

How do we manage driver inspections

- Monitor the driver's logs
- Observations – hands off
 - On-Board Cameras
 - Cameras Around your facility
- Observations – hands on
 - Random in-person observations
 - Pop-up Inspection Station
- Incentives

Drivers need to understand “The Bigger Picture”

- Safety First
- Early Detection
- Compliance
- Protecting Cargo
- Driver Confidence and Peace of Mind

Periodic (Annual) Inspections

- Plan
- Move work around as needed
- Communicate
- Get Drivers Involved

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Questions and Answers

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More Questions?



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Navigating the Drug and Alcohol Testing Regulations and Protocols

May 21st – 10:00 AM Central

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