NO SURPRISES:
The Fleet Manager's Step-By-Step Guide for DOT ROADSIDE INSPECTIONS
At a high level, a roadside inspection is an examination of the driver, vehicle, and carrier as they operate on the roadway. The inspections are conducted by specially trained officers who submit the reports to the Federal Motor Carrier Safety Administration (FMCSA).

Roadside inspections are the primary tool used by the FMCSA to:

- Generate data on carriers and drivers to determine which ones are not operating compliantly and/or safely;
- Provide industry-wide data on areas where carriers and drivers are having problems complying; and
- Stop unsafe drivers, vehicles, and carriers.

No matter what type of carrier you are, the goal is always that drivers receive no violations during roadside inspections since violations cause the FMCSA to look more closely at your company.

In this guide, we walk through a roadside inspection in great detail, from selection to completion, and discuss what the officer will be asking for, looking at, and what is expected within each inspection step. But first, we’ll explain why roadside inspections are so crucial to a carrier.
Roadside inspections matter because safety-related violations that are noted on a roadside inspection report are used in FMCSA’s carrier and driver evaluation tool - Compliance, Safety, Accountability (CSA). As part of CSA, the Safety Measurement System (SMS) scores the safety violations in seven Behavior Analysis and Safety Improvement Categories (BASICs). Four of these BASICs use data from driver inspections (Unsafe Driving, Hours-of-Service Compliance, Controlled Substances and Alcohol, and Driver Fitness), and one uses vehicle inspection data (Vehicle Maintenance).

Violations from roadside inspections are run through a formula to generate a measure. This measure is then compared to other carriers. The carriers with the worst measures are subject to an intervention from the FMCSA. The interventions may include:

- An Inspection Selection System (ISS) recommendation of “Optional” or “Inspect,”
- A warning letter notifying the carrier of its performance, or
- A focused or comprehensive review (an audit).

The driver portion of the system generates a driver score, which is used by investigators when conducting focused or comprehensive reviews. Drivers with high scores in the SMS will be among the drivers an investigator will select for the audit.

**New-Entrant Carriers**

An additional downstream use of roadside inspection data involves new-entrant carriers. This is a carrier that has recently received a US DOT number and has not yet had its new-entrant audit. New-entrant carriers are subject to special FMCSA monitoring, including scrutiny regarding the carrier’s roadside inspection reports. If the carrier is getting certain violations or has an extremely high out-of-service (OOS) rate, FMCSA will request that the carrier submit a plan for correcting the situation or conduct an immediate audit of the new-entrant carrier.
But what fleets feel most is the cost of not preparing for roadside inspections. Poor results can escalate quickly, including negative impacts such as:

- **A Higher ISS Score** - A higher score will ultimately mandate more inspections. When CSA BASIC scores surpass thresholds, this triggers interventions such as warning letters, focused on-site or focused off-site investigations, and comprehensive on-site audits, which can result in significant fines.
- **Lost Revenue** - With average revenue-per-day potential around $700 – $900, a 10-hour OOS period burns at least half of the revenue potential for the day. Plus, roadside repairs performed at an over-the-road vendor may cost three to four times more than repairs at the company shop. And, if you need to dispatch another driver to rescue a load, you are losing double the revenue and having a difficult conversation with your customer.
- **Lost Business Opportunities** - Based on customers viewing the enforcement data visible in the SMS, your company could be kept from new business, removed from existing freight lanes, or could even experience lower negotiated freight rates.
- **Litigation and Insurance Rates** - A pattern of violations is one of the main tools that a plaintiff or an insurance agent may use to support an assertion that your company may not take the safety regulations seriously.

In short, the return on your investment dollars that comes with driver and vehicle preparation is significant, especially as it pertains to avoiding potential liability.

**The Selection Process**

A roadside inspection begins with the officer selecting the driver or vehicle for the inspection and then choosing a location. Common reasons drivers and vehicles are selected include:

1. **A visible violation**
2. **A driving violation**
3. **A high ISS Score**
4. **Involvement in an accident**
5. **Random selection**

**Let’s look at each of these in detail.**

1. **A visible violation**: A trained roadside inspection officer evaluates a vehicle by looking at it. If the officer sees a visible violation, he or she is likely to select the vehicle for inspection. Examples of violations that will trigger an officer’s interest include a light not functioning, missing conspicuity tape or reflectors,
a flat or otherwise visibly defective tire, improper cargo securement or loose securement devices, a missing or unreadable company name or DOT number, and a damaged or overly tinted window or windshield.

2. **A driving violation:** Many officers who conduct roadside inspections also conduct patrols and will pull commercial vehicles over for traffic violations. In these scenarios, the officer will conduct, at a minimum, a driver-only inspection. Examples of traffic violations that can lead to a roadside inspection include speeding, failing to obey a traffic control device, following too close, illegal parking, and improper lane use or lane change.

3. **A high ISS score.** Officers use an electronic system called the Inspection Selection System (ISS) to help them locate poor-performing carriers for inspection. ISS uses a carrier’s CSA BASIC scores to generate a score (from 0 to 100) and a recommendation based on that score. The three recommendations are Pass, Optional, or Inspect. If the carrier has any BASICs over the CSA threshold, the carrier will receive, at best, an Optional recommendation. If the carrier has multiple BASICs over the threshold, the carrier will likely have an Inspect recommendation. A carrier typically has an Inspect recommendation if FMCSA has little or no data on the company.

4. **Involvement in an accident:** In most jurisdictions, anytime a commercial vehicle is involved in a crash that meets specific criteria, the driver and vehicle must be inspected. In the case of a severe accident where the driver is not available or the inspection is done later, a vehicle-only inspection will be done.

5. **Random selection:** In some situations, the inspection facility will select vehicles randomly for inspection. This can also happen if the road officer or the officer at the fixed facility (scale or inspection area) has not seen a vehicle with a violation for a while.

**Inspection Site Selection**

If the officer is working at a fixed facility, such as a weigh station or inspection facility, the site selection will involve assigning an inspection location within the facility. If the officer wants to pull the vehicle over to do the inspection, the officer may delay conducting the traffic stop until the vehicle is in a location where the inspection can be done safely.
The Interview

As the officer approaches the vehicle, he or she will be looking at the general condition of the vehicle and observing the driver (either directly or through the mirrors). If additional vehicle issues become apparent during the approach to the driver, the officer will mentally note them. The more mechanical problems the officer sees, the more likely he or she is to do a full inspection, rather than a driver-only inspection.

Also, several driver behaviors will make the officer suspicious of the driver, including:

- Fidgeting excessively,
- Trying to rearrange his or her surroundings in the cab,
- Reaching for something that is out of sight, or
- Trying to stay out of sight of the officer.

Officer suspicions will affect how he or she makes the actual approach to the driver. Safety concerns for the officer’s well-being will influence his or her actions.

If present, this suspicion will continue all the way through the inspection. The officer will try to discover what the driver was trying to hide or change, or the reason for the driver’s unusual actions or anxiety.

When the officer reaches the driver, he or she will greet the driver, introduce himself or herself, and begin the interview. To put the driver at ease, many officers attempt to develop a rapport with the driver during this part of the inspection. The officer may ask some general “small talk questions.” Common questions include:

- What is your name?
- Who do you work for?
- What are you hauling?
- Where are you coming from and where are you going?
- Where and when did you start your day today?
- How many days have you been out?
- What problems have you encountered lately?
The information gathered during this discussion will be compared to other information that is captured later in the inspection. During the interview, the officer will prepare the driver for the inspection by giving basic instructions.

During this time, the officer is also determining if the driver may be impaired by illness, fatigue, drugs, or alcohol. If the driver appears to be impaired, the next step for the officer is to determine the exact problem. Depending on the officer’s initial findings, this could result in:

- A fatigue assessment,
- A field sobriety test,
- An examination by an officer trained in drug recognition (all officers are trained to recognize general signs of drug use, but certain officers have additional training and can determine what class of drugs is involved), or
- An arrest and drug or alcohol test.

Verifying Documents

During this part of the inspection, the officer is doing more than it appears. The officer is beginning to determine who the carrier is based on the driver’s interview and the documents provided (vehicle registration, driver’s log, shipment paperwork, etc.) and whether the vehicle might be transporting hazardous materials.

The officer will verify the various documents, as well as the carrier and driver qualifications. Related to the carrier itself, the officer will verify that:

- The carrier’s DOT number is current and not inactive,
- The carrier is not under an out-of-service order,
- The carrier’s UCR is current (if an interstate carrier),
- The carrier has valid for-hire authority if acting as a for-hire carrier, and
- The vehicle’s required credentials are correct and valid.

Related to the driver’s documents and qualifications, the officer will:

- “Run” the driver’s license to get a motor vehicle report (MVR) and verify that the license is current and valid. The officer will also note the class, endorsements, and restrictions on the license and compare this information to the vehicle the driver is operating. To determine if a CDL is required, the officer may check the vehicle’s weight rating.
• **Verify the driver is medically qualified.** If the driver is a CDL driver, this will involve verifying that the medical information listed on the driver’s MVR is current. If the driver is a non-CDL driver, this will involve checking the driver’s medical card. The officer will look over the medical card line-by-line to make sure it is correct and not fraudulent.

• **Verify that the driver is complying with any medical terms** listed on either the license or the medical card. As an example, if either one says the driver is required to use corrective lenses, the officer will verify the driver is wearing either glasses or contacts.

• **Verify that the driver has the necessary exemption** if the driver has a condition that is normally disqualifying. The officer may ask the driver for his or her skills performance evaluation paperwork if the driver has an amputated limb.

### Duty Status Records

This part of the inspection has traditionally been the longest part of the driver portion. This involves the officer requesting the driver’s records of duty status, or logs, along with any supporting documents the driver has, such as bills of lading, shipment paperwork, and toll or fuel receipts. The officer will closely examine the logs for the current and previous seven days, looking for:

- The use of the correct type of log (electronic or paper),
- Missing information or entries,
- Incidents of operating past a limit, and
- Falsification.

How this will be done depends on the specific type of log the driver is using: an ELD, paper logs or exempt time records.

**Let’s take a look at each in detail.**

### ELDs

**The fast and easy ELD inspection.**

For a driver with an ELD, the hours-of-service portion of the roadside inspection will go quickly if:

- The ELD did not have any missing or questionable information such as jumps in location, mileage, and engine hours;
- The driver did not exceed a limit in the current or previous seven days;
- The driver did not use any special driving categories;
- The data had no edits, the driver used on-duty time when required, and there were no malfunctions in the eight-day period.
ELDs

If the driver is using an ELD, the officer will first determine if the device meets the standards dictated in the regulations. This will involve verifying the ELD is on the FMCSA’s ELD registry and that it is connected to the vehicle in such a way it can receive the required vehicle data. Once the officer verifies the device is an ELD, the officer will:

- Ask to see the display (or printout), and/or
- Ask the driver to transfer the log data.

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<tr>
<th>Sequence for Displaying Logs</th>
<th>Sequence for Data Transfer</th>
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<tr>
<td>The officer asks for the logs to be displayed on the device or printed if the device does not have a display.</td>
<td>The driver tells the officer which overall transfer method the device uses, either telematic or local.</td>
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<tr>
<td>The driver puts the device into the roadside mode so the data is visible to the officer.</td>
<td>The officer selects the specific transfer method - webservice or email for telematic, or USB or Bluetooth for local.</td>
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<td>The driver provides the device and the device’s user manual to the officer, or moves the device display to the date and data the officer is requesting to see, as some officers will not handle a driver’s device.</td>
<td>The officer provides the driver with any necessary transfer information or comments to be added to the file.</td>
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The driver must be able to present the display in roadside inspection mode for the officer, as well as transfer data to the officer. If the driver can only do one or the other, the officer will issue a violation. If the driver cannot do either task, the officer will place him or her out of service for 10 hours for not having a log.

Once the officer has the log display or the data, the officer will check the header information and underlying data for missing information, which could include:

- Entries the driver missed (shipment numbers or trailer numbers);
- Driver, carrier, or vehicle information that is required to be in the header section of the log/data (The officer will also compare the driver name and license number in the ELD data to the license the driver provided.); and
- Location, mileage, or engine hour entries that should have been captured automatically.
Missing data might indicate a form and manner error (the driver missed an entry) or a larger issue. A larger issue could include a driver who drove with the device disconnected. This would create missing data and a jump in location, mileage, and engine hours. If the driver did this repeatedly, there will be repeated incidents of missing data and jumps in location, mileage, and engine hours.

The officer will also look for violations of the hours-of-service limits. Using the display method, the officer will manually count the hours and minutes on each duty line between the 8- or 10-hour breaks. If the officer receives the data from the driver, the officer’s computer will compare the driver’s hours to the basic limits when it was received and point out any incidents where a limit was exceeded.

In either case, if a limit was exceeded, the officer will look for a comment explaining the excess hours. If a comment is present, the officer will question the driver as to the situation that led to the extra hours and the comment. If the comment is present and the situation meets one of the exceptions or exemptions that allows a driver to exceed a limit, the officer will not write a violation. However, if the driver exceeded a limit and there is no comment, or if the driver’s explanation is not adequate, the driver will receive a violation for driving when out of hours.

The officer will be looking for falsification violations. To detect this, the officer will closely examine:

- Any unassigned driving time on the device,
- The use of either of the special driving categories,
- Any edits to the data,
- The driver’s use of on-duty time, and
- Any malfunctions.

Let’s examine each of these closer.

**Unassigned Driving Time**

The officer will see unassigned driving time in the data (there is a “flag” that specifically points this out to the officer). The officer will look at the circumstances and question the driver about it.

One of the most common methods drivers use to falsify an electronic log is to log out and drive, creating the unassigned driving time. If the officer discovers the time belongs to the driver, but the driver did not accept it as part of the day’s login process, the officer will cite the driver for not accepting it.
Next, the officer must determine if the driver purposefully created a false log in order to operate in excess of a limit. This is not hard to see. A few clear examples of a false log are if the driver:

- Drove right to a limit, then logged out and continued to drive;
- Logged in late, and when the unassigned driving time is added back into the driver’s log as actual driving time, the 8- or 10-hour break is no longer long enough; or
- Logged in late, and then worked right up to a limit (the driver is well over hours when the unassigned driving is assigned).

**Special Driving Categories**

The issue with misusing the special driving categories — yard movement and personal use — is that either one keeps driving time off of the driving line when it should be there, creating a false log. To determine if the use of the special driving category was correct or if an attempt was made to falsify the log, the officer will investigate the specific situation. This will involve reviewing any supporting documents the driver has, referring to maps, and questioning the driver.

For **yard moves**, which is defined as an area that the public is not allowed to drive in due to signs or gates, this involves the officer verifying the driver was actually in a yard when the movement took place.

For **personal conveyance**, this involves the officer determining if:

- The company has a policy allowing the use of personal conveyance;
- The driver could be considered off duty at the time of the move;
- The driver was going to a purely personal destination; and
- There was no benefit to the company as a result of the move; OR
- The movement was made when the driver was out of hours and ordered to move by a shipper, receiver, or officer, and the driver moved to the nearest safe location and documented the situation on the ELD.

If the officer decides the use of yard move or personal conveyance was improper, the driver will be cited for having a false log.
Edits

When it comes to edits, the officer will investigate to determine if each edit was the result of an error or omission, or if the edit was an attempt by the driver (or the driver’s supervisor) to hide on-duty time. **The edits that will draw special attention are the ones in which on-duty time was changed to off-duty time.**

On-Duty Time

Finally, the officer will verify that the driver is logging on-duty activities as on-duty time. This is done by comparing supporting documents to the driver’s log and verifying that inspections, loading, unloading, cargo securement, fueling, and other on-duty activities were logged correctly.

Malfunctions

If the electronic logging device has malfunctioned, the officer will inquire as to the nature of the malfunction to verify that it is a legitimate malfunction and not a situation where the driver was looking to justify switching to paper logs.

The officer will also ask when the malfunction occurred. If the malfunction occurred more than eight days ago, the officer will ask for a copy of the extension letter issued by FMCSA. The driver should have this in their possession.

Finally, the officer will expect the driver to present some type of record for each of the required days. The records could be a combination of logs displayed on the device that were captured prior to the malfunction, printouts from the ELD, and/or paper logs.

To pass the inspection with a malfunction, the driver and carrier must follow the malfunction procedures dictated in the regulations. This involves the driver:

- Immediately notifying the company of the malfunction in writing, including the details of why the driver believes the device malfunctioned (the regulation requires notification within 24 hours, but it should be done as soon as possible);
- Having a copy of the company notification in his/her possession to show officers; and,
- Immediately reconstructing the current and previous seven days using the device, getting printouts covering the previous days, or reconstructing the days using the blank paper logs.
During the roadside inspection, the driver is expected to present records covering the current and previous seven days upon demand. If the driver doesn’t have them prepared when requested, a violation will be written. “I can have my company send them to me if you want to see them,” will not satisfy the requirement.

If the carrier is not able to repair or replace the ELD within eight days, the carrier needs to take alternate action, including:

• As of the fifth day after the malfunction, apply to the local FMCSA office for an extension, or
• Assign the vehicle to a driver that is not required to use an ELD.

Once the malfunction is resolved, the driver will need to continue to carry the paper logs that were created during the malfunction for the next seven days. If the driver undergoes a roadside inspection, he or she will need to present both the paper logs and the device.

Once all of the malfunction days are outside of the eight-day window, the driver can go back to simply presenting the device during a roadside inspection.

**Paper Logs**

If the driver is using paper logs, the officer will ask the driver why he or she is using paper rather than electronic logs. The officer will listen closely to the driver’s answer and compare the answer to the list of exemptions. If the exemption is legitimate, the officer will verify the driver is qualified to use the exemption and is using it appropriately.

For example, if a driver states he can use a paper log because the vehicle he or she is operating is older than model year 2000, the officer will check the vehicle’s identification number (VIN) and verify it is older than model year 2000 (the model year is coded into the VIN). If the vehicle itself is not older than model year 2000, the officer will next check the engine age. If the engine is not older than model year 2000, the officer will cite the driver for not having the correct log.

If the driver is using a paper log when an ELD is required, the driver will be placed out of service for 10 hours, and then allowed to complete the current assignment once his or her paper log is up to date. Once the current assignment is complete, the carrier will need to either purchase and install an ELD on the road or return the vehicle to a company facility empty so an ELD can be installed.
If the driver is found to be using a paper log when an ELD is required during a future inspection, the officer will again place the driver out of service after verifying the driver is on a subsequent assignment.

If the officer verifies there is an exemption that allows the driver to use paper logs, the officer will then dig into the logs. In general, officers are very thorough when inspecting paper logs. They will:

- Make sure all required entries are on the log,
- Compare the log to all supporting documents to make sure it is accurate,
- Verify mileages from point-to-point on the log and for the day,
- Check that all required on-duty time is logged as on-duty time, and
- Verify the driver did not operate when over an hours-of-service limit threshold.

If a driver states that he or she is using paper logs due to a malfunction, see pages 12 - 13.

If the driver is using an app on a cell phone, tablet, or laptop in place of a paper log, the sequence will be the same, with one critical difference. Once the officer determines the device is not an ELD, the officer will expect the driver to be able to print the logs during the inspection, if requested.

**Time records**

Drivers who are not required to have an ELD or log their hours of service on paper logs could be using one of the short-haul exemptions in §395.1(e) or one that exempts the driver from the limits and logging requirements, such as the agricultural exemption or the utility service vehicle exemptions in §395.1(k) and (n).

In these cases, the officer will question the driver to determine if the exemption is applicable. As long as everything is answered accurately, there is no violation. However, if the driver cannot answer the officer’s questions correctly or is incorrectly applying one of these exemptions, the driver will be cited for not having a log and placed out of service for 10 hours.
Driver Vehicle Inspection Reports (DVIRs)

In the next step of the roadside inspection, the officer will ask the driver for DVIRs. The regulations do not require the driver to carry previous DVIRs, but an officer can request that the driver present any DVIRs in his or her possession. The officer will check for:

- Unresolved vehicle issues, such as defects noted that were not repaired, and a
- Correct completion of any DVIR noting a defect.

If a DVIR indicated a defect and the defect has not been addressed, this could be an issue. If the driver and carrier have been knowingly operating the vehicle with a defect that affects the safety of the vehicle, the officer could write a significant fine.

If the driver noted a defect and it was addressed, the officer will expect to see three signatures on the DVIR, including that of:

- The driver who conducted the post-trip inspection and noted the defect on the DVIR,
- The carrier official who oversaw the repairs or decided the repair was not necessary, and
- The next driver to pre-trip the vehicle.

Officers are not surprised when the same driver’s name appears in all three spots. This is a common occurrence when the carrier operates assigned equipment, and the driver either oversaw or did the repairs.

Annual (Periodic) Inspection

The final part of the driver portion of the inspection involves the officer verifying that the vehicle has a current annual inspection (called “periodic” in the regulations). If the vehicle is a combination vehicle made up of a truck or tractor and a trailer (or multiple trailers), the officer will ask for proof of annual inspection for each piece of equipment in the combination. The proof can be either:

- A copy of the annual inspection report, or
- A decal indicating when the inspection was conducted.

The driver is responsible for pointing out the decal when the officer asks for proof of annual inspection. It’s not the officer’s job to locate the decal if the carrier is using that option.

Once the report or decal is located, the officer will verify that the inspection took place within the last 12 months. When viewing the report, the officer will not write a violation until the month after the month the inspection is due. For example, if the annual inspection was due on May 2nd based on the date of the last inspection, the officer will not write a violation until May 31st has passed.
If the driver cannot produce a copy of the annual inspection report or locate the decal for the officer, or if the report or decal indicates it has been more than 12 months since the last inspection, the officer will write a violation for no annual inspection.

**Driver Inspection Recap**

If the officer is conducting only a driver inspection, the inspection ends with the annual inspection verification. The officer will document the driver, carrier, and vehicle inspected, and note any violations. If any violations were discovered, the officer will compare the violation to the North American Out-of-Service Criteria, published by the Commercial Vehicle Safety Alliance (CVSA), to decide if the driver should be allowed to continue to drive. The driver could be placed out of service if he or she:

- Has a driver’s license that has been suspended, revoked, downgraded, disqualified, etc.;
- Does not have the correct license for the vehicle being operated;
- Is found to be impaired by illness, fatigue, drugs, or alcohol;
- Cannot provide logs and cannot provide a reasonable explanation as to why he or she does not have logs; or
- Is currently out of hours or has a false log.

The officer will provide the report to the driver once it is complete and discuss any violations that were discovered. If the driver is placed out of service, the officer will instruct the driver what must be done before the driver can operate a commercial motor vehicle again. **Roughly 5 percent of driver inspections result in an out of service order.**

If there were violations, but no out-of-service violations, the driver may continue, but the violations must be corrected as soon as possible.

The outcome every carrier wants is no violations issued, and that is the case in about two-thirds of all driver inspections conducted.

If the officer will be conducting a vehicle inspection as well, the officer simply rolls right into the vehicle portion of the inspection and will include the driver’s inspection results in the full inspection report.
If the officer is going to conduct a vehicle inspection, the next step will be preparing the driver for the vehicle portion of the inspection. This involves the officer providing the driver with the necessary safety information and instructions. Common statements the officer may make to the driver include:

- **Your wheels will be chocked until I tell you otherwise, so do not try to move the vehicle or worry about it moving when the brakes are released.**

- **Do not operate any controls unless I ask you.**

- **When I am checking your lights, I will use the following hand signals to indicate which lights I want turned on.**

There will be other instructions as the inspection progresses. It is critical that the driver pay attention to the officer’s instructions. If the driver does not, the officer or driver could be injured, or the officer may see a vehicle defect that is not actually a defect. For example, if the driver does not turn on a light when requested, it could lead an officer to believe it’s not working.

### The Walkaround

Next, the officer will conduct the walkaround portion of the vehicle inspection. This involves checking all the lights and all mechanical components that are visible without going under the vehicle. To get started, the officer will ask the driver to open the hood so he or she can check all of the engine and steering axle components.

When checking the steering components, the officer will be looking for damage, rubbing, non-factory holes or welds, and any loose components, connection points, or hardware. When looking at the engine components, the officer will be looking at the air compressor (if the vehicle has air brakes, otherwise the brake master cylinder) and for any fluid leaks. If doing
a complete vehicle inspection, the officer may check the brake adjustment on the steer-axle brakes at this point. Of course, if the vehicle does not have a conventional configuration, this step will be adjusted accordingly.

Next, the officer will work his way around the vehicle, inspecting as he or she goes, starting at the front of the vehicle and then down the left side, across the rear, and up the right side. During this part of the inspection, the officer will be inspecting all of these components for function, damage, looseness, excessive wear, and will be comparing the condition of the components to the requirements in Part 393 and Appendix G of the regulations:

- Windshield and side windows;
- Windshield wipers and washer system;
- All required lights;
- Visible air/brake lines;
- Cargo securement;
- Coupling devices;
- Exhaust system;
- Visible part of the frames;
- Fuel system;
- Visible suspension components; and
- The wheel assemblies, including the tires, rims, lugs, wheels, and hubs.

As far as cargo securement, the officer will verify that the cargo is secured against movement in accordance with the requirements in Subpart I of Part 393. For van-type units, this may involve breaking the seal (if one was used) and verifying the cargo is secured using the front and sidewalls of the trailer, and some type of rear securement. In the case of flatbed-type vehicles, this will involve verifying that there are enough securement devices to satisfy the requirements, that they are tight, and that they are not damaged.

In some cases, the officer may stop the inspection after the walkaround. If this happens, the officer will document the driver portion and any vehicle defects discovered.
The Underside

If the officer is conducting a full vehicle inspection, he or she will inspect the underside of the vehicle next. At some fixed facilities, the officers will have a “pit” or “trench” that can be used for this. In other cases, the officer will be on a “creeper” under the vehicle. In all cases, the officer is looking at the following components to determine if any of them do not meet the standards in Part 393 of Appendix G:

- Brake components, including the lines, chambers, connecting hardware, linings/pads, drum/rotor, etc.;
- Brake adjustment using a two-step process, which involves marking the brake pushrods with the brakes released when inspecting other items under the vehicle, and then measuring movement when the brakes are applied on a second pass under the vehicle;
- Driveshaft(s) and driveline components;
- Lower exhaust components;
- Inside of the frame;
- Lower fuel system components; and
- Inside suspension components.

Brake System

Once the officer is done with the underside of the inspection, the next step will be checking the tractor protection valve and/or trailer emergency brakes. In an air brake vehicle, this involves having the driver disconnect the trailer air supply hose. The officer should hear the trailer spring brakes apply, and the tractor protection valve should close and stop the air loss from the tractor. The driver will then be asked to step on the brake pedal to verify the service side of the protection valve has closed.

The remaining items are checked in close quarters with the driver. The officer will ask the driver to turn the key on. As the vehicle is going through its key-on checks, the officer will verify that the ABS warning lights power up and go off, confirming that the warning lights and system are functioning.
normally. The officer will also verify that the visual low-air warning is functioning. If necessary, the officer will have the driver pump the brakes to lower the air pressure to make the low alarm activate.

If the officer has heard multiple or serious air leaks, or there are questions about the air compressor’s condition, the officer will check that the air system is capable of supplying the vehicle. This involves having the driver release the parking brakes and apply the service brakes with the engine running at idle. If the air system cannot keep up with the leakage, the vehicle will be placed out of service.

### Steering ‘Lash’

The officer will then position himself or herself where the steering wheel movement can be measured while seeing the steer tire. The officer will have the driver move the steering wheel, and measure how far it moves before the tire begins to move.

### Coupler Play

Finally, the officer will remove the chocks. He or she will have the driver leave the trailer brakes locked and “wiggle” the truck or tractor against the trailer to measure the free play in the coupling system. Part of this is also verifying that the trailer brakes are capable of holding the trailer in place.
Vehicle Inspection Recap

At this point, the officer will document the inspection. The driver, the carrier, and the vehicle information will be documented on the vehicle inspection report, and any violations discovered will also be recorded. If the inspection was a full driver and vehicle inspection, the officer will document the driver portion at this time as well.

As with the driver violations, the officer will compare any vehicle violations discovered to the North American Out-of-Service Criteria. Any violations that result in an out-of-service order must be corrected before the vehicle leaves the inspection location. The only other option is to have the vehicle towed by a tow truck to a repair facility. Common reasons vehicles are placed out of service include:

- A flat tire;
- Too many brakes out of adjustment or otherwise defective;
- Critical required light not functioning, such as turn signal at the rear of the rearmost vehicle;
- Damage or excessive wear to certain brake components;
- A suspension component necessary to hold the axle in place found to be defective;
- Excessive air loss;
- Inadequate cargo securement; and
- A steering component that is defective, welded, or excessively worn.

The officer will provide a copy of the inspection report to the driver and discuss any violations that were discovered. If the vehicle is placed out of service, the officer will instruct the driver what must be done before the vehicle can be operated again. Roughly 20 percent of vehicle inspections result in an out of service order.

If there were violations but no out-of-service violations, the vehicle may continue, but the violations must be corrected as soon as possible. If the violation is not corrected during the driver’s workday, the driver must complete a DVIR for the day and include the defect that led to the violation.

Just like driver inspections, the outcome every carrier wants when it comes to the vehicle portion of the inspection is having no violations issued.
Each year, roughly 3.5 million roadside inspections are conducted. Those inspections lead to roughly 1 million driver violations and 3.8 million vehicle violations per year.

Due to the consequences attached to roadside inspections, it is important that they go well.

Luckily, the regulations being enforced, the steps the officer will follow, and the processes the officer will use are all known and predictable. This means roadside inspections can be managed.

Steps can be taken to prepare the company, vehicle, and driver for roadsides.

Preparing the company involves making sure all of the required company credentials are current.

Getting the vehicle ready for inspection involves making sure it is current on maintenance and inspected by the driver.

Preparing drivers involves making sure they carry their credentials at all times, that their credentials are current, and that they are trained on the roadside inspection process.
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Tom Bray is a Sr. Industry Business Advisor in the Editorial Resources area at J. J. Keller & Associates, Inc. He specializes in motor carrier safety and operations management. In addition to the many publications he supports at J. J. Keller, Tom has been a frequent contributor to industry publications and websites, including Heavy Duty Trucking, truckinginfo.com, Transport Topics, Fleet Maintenance and Work Truck, among others. He has authored whitepapers and presented webinars on a number of key transportation subjects. He is also a frequent speaker at transport safety seminars and conferences on topics such as hours of service, vehicle maintenance, cargo security, and driver fatigue. Prior to joining J. J. Keller, Tom worked in the trucking industry for 22 years, with responsibility for DOT compliance, policy development, driver human resources, driver training, training program development, CDL testing, claims management, and accident and injury prevention. Tom is active in the Wisconsin Motor Carriers’ Council of Safety Supervisors and the Wisconsin Motor Carriers’ Safety Director/Supervisor Development Committee.