The Federal Motor Carrier Safety Administration has promised "continuous improvement" of CSA 2010, and carriers are counting on it.

By Jerry Laws  Mar 01, 2011

The Federal Motor Carrier Safety Administration made scores in most of the categories of CSA 2010, its new safety measurement system, available to the trucking industry, other affected entities, and the public in mid-December 2010 (http://ai.fmcsa.dot.gov/sms/). FMCSA at the same time promised it would carry out a "continuous improvement process in support of CSA," and the industry is counting on the agency to fulfill this promise. Motor carriers want the weighting of some violations to be adjusted -- downward if they have little or no relationship to accident causality, upward if they believe the relationship is stronger than the proposed weighting specifies -- and want to be compared only with their peers, not dissimilar companies.

An open dialogue between industry groups and the agency for many months before the scores were posted did produce changes the industry welcomed. Still, smaller carriers may not have been fully ready for CSA's debut.

"I think what the government's saying is, 'Now, I've got all this electronic roadside data. I don't have the capacity to hire several thousand more federal auditors to look at the safety performance of carriers, so why don't I use this electronic data to manage the process.' I think, in general, the concept is very supported by most of the industry," said Don Wrege, corporate safety director for Salson Logistics, based in Newark, N.J. He has conducted CSA 2010 training classes for the Smith System Driver Improvement Institute, Inc.

Carriers who felt they were doing well on safety were alarmed when CSA's Safety Measurement System methodology placed them in Alert status, said Wrege. They feared their customers and drivers would see this, become concerned, and possibly go elsewhere.

There are effectively seven BASICs (Behavior Analysis and Safety Improvement Categories) on which carriers and drivers alike are being scored:

• Unsafe Driving BASIC -- operating commercial motor vehicles in a dangerous or careless manner (speeding, reckless driving, improper lane change, inattention)
• Fatigued Driving BASIC -- driving while ill, fatigued, or not in compliance with the hours of service regulations.
• Driver Fitness BASIC -- vehicle operation by drivers who are unfit to operate a commercial motor vehicle because of lack of training, experience, or medical qualifications.
• Controlled Substances/Alcohol BASIC -- operating a CMV while impaired by alcohol, illegal drugs, or misuse of prescription or over-the-counter medications.
• Vehicle Maintenance BASIC -- failure to maintain a CMV properly (violations relating to brakes, lights, other mechanical defects, and failure to make required repairs).
• Cargo-Related BASIC -- failure to properly prevent shifting loads, spilled or dropped cargo, unsafe handling of hazardous materials.

Crash history is the seventh category evaluated by the Safety Measurement System -- history or patterns of high crash involvement, including frequency and severity, based on information from states' crash reports.

Cargo Violation Weights Challenged
As of late January 2011, cargo BASIC scores could be viewed online by motor carriers but not by the public. "I agree with what they've done by pulling it in," Wrege said, "because the cargo side was very distorted from a sense that you were being peered with carriers that weren't exactly the same type of carrier." He cited flatbed trucks and van trailers as an example, saying if 10 of each were traveling on a road, more violations would be found on the flatbeds.

"It wasn't true apples to apples. They weren't putting the flatbeds into a group of flatbeds," he said. "You're being peered against those who will likely have very minimal cargo issues because unless the inspectors open the cargo doors of the van, they're not going to see if any blocking or bracing or cargo issues are there, unless it's protruding through the wall.

"Any time a flatbed carrier gets in front of an inspector, it's not hard to see maybe one of the straps is loose, maybe one of them's cut, maybe the chain or binder is loose, or something else is bent . . . It's so easy to look at a flatbed and find something. It's difficult to secure perfectly. Drivers make mistakes. Some kinds are very minimal in the weighted value of what they've done. But cargo carries such a high weighted value that the flatbed carriers were getting killed by the new cargo BASIC on that basis. So that's one area that the government needs to find some middle ground on."

The American Trucking Associations told FMCSA in late November that several cargo BASIC violations were weighted too high when they actually had no relationship with accident causation. ATA suggested reducing several severity weights of 5 to 2 or 1 and several 10s to 5s.

Wrege said a truck with one strap slightly cut among 10 securing a load of steel will be out of service. "I really would like to challenge their research that says that one cut on that ultimate connection really has the potential to cause a collision or cause injury or death related to a collision," he said. "I think the data's really skewed there, and I think we need to go back and look hard and adjust the point value."

Interviewed Jan. 24, Wrege said he believes FMCSA is making an honest attempt to re-evaluate the scoring on cargo violations and hopes carriers will be measured only against their true peers: van against van, tank against tank, flatbed against flatbed. He said he believes the agency will be willing to adjust CSA, and the end result will be beneficial for carriers that do a good job on safety and overall management.

He said students in his CSA classes were trying to learn how the numbers stacked up for them. Many did not realize the data being included in CSA went back 24 months before CSA took effect in December 2010; this caught many drivers and fleet owners, especially small ones, by surprise.

"It took a little bit to make them understand that they're waiting too long to work with drivers to change the culture and behavior of their drivers. Because their drivers are really the ones that are steering their numbers," he explained. "I say, 'If you don't take care of the guy who's turning the key, you can have all the electronic devices you want on that truck, but the guy who's turning the key is the guy whose behavior you have to adjust. And you have to get him to do a good job on pretrip and recording properly, keeping his log up to date. He's really the critical part in this process.'"

Wrege said he approves of the BASICs as FMCSA defined them and believes they address the chief causes of driver-caused accidents. Saying CSA is the best way for the government to manage the
700,000 motor carriers operating in the United States with a relatively small staff of inspectors, he said he expects FMCSA and the industry will find a middle ground. A workable, fair CSA will be in place and accepted by the trucking industry before the end of 2011, and it will significantly boost the industry's safety, he predicted.

**Who's Reading the Data?**

Many commercial trucks already are equipped with electronic data recording equipment that collects and downloads data. The question is how well the data are being used by fleet owners.

"A lot of data's been coming through to enable you to red-flag certain aspects [of driver behavior]," said Wrege. "Over the last few years, since 2007 forward, we've gone through a recession. A lot of safety jobs have been cut back, which caused monitoring of this data to diminish considerably. You don't really have the people to monitor, to look at the data and make important decisions when these red flags come up and tell you about a truck going at a high rate of speed or a driver who's gone over hours. I think there are some companies that are very dedicated to doing that, but they're usually the larger companies. The small to midsize carrier is still struggling to get staffing where it needs to be. Until you get revenue where it needs to be, they're still going to have trouble monitoring this data on an ongoing basis. But I think they're going to get there as soon as the industry stabilizes."

And yet these data -- speed, braking, and more -- are going to make or break them, both financially and in how they score on CSA.

"It's all about the guy with the key. Using that data to help driver behavior is ultimately the goal. . . . That data will help you change driver behavior, help you develop incentives to move the driver in that [preferred] direction," Wrege said. "I think it's all there. The data can be collected, but sometimes you can get overwhelmed with data. The staffing's just not where it needs to be to do that."

Drivers are directly affected by CSA. FMCSA has been informing drivers about the Safety Measurement System, including with a Jan. 13 program on Dave Nemo's show on the Sirius XM Satellite Radio Road Dog Trucking channel and by placing pocket cards and brochures explaining the system in "Info to Go" racks at travel center chains and in independent truck stop counters displays beginning Jan. 12.

**About the Author**

Jerry Laws is Editor of Occupational Health & Safety magazine, which is owned by 1105 Media Inc.