

**BASIC #5****VEHICLE MAINTENANCE**FMCSR [392](#), [393](#) and [396](#)**TIRES, LIGHTS, REFLECTORS, BRAKES, FLUID LEVELS, etc.:**

- 1) Specifically address Vehicle Maintenance in the company Safety Policy; operating an Out of Service vehicle should be treated as a Serious Offense.
- 2) Observe and critique the driver's vehicle inspection method during orientation, in-cab and road test; continue to conduct periodic behavior observations of driver vehicle inspection process; critique and correct as necessary; document these behavior observations to the driver personnel file.
- 3) Drive with headlights and markers on at all times, for safety; be sure all lights, signals and flashers operate while conducting pre-trip inspection prior to departure
- 4) Provide information (video, handout, signs, examples, etc.) on proper vehicle inspection during driver orientation and throughout ongoing safety training; obtain signed attendance roster or acknowledgement receipt.
- 5) Provide education; invite DOT/CVSA to talk to your group about North American Standard Inspection Procedures (NASIP); be sure management is in attendance; have managers attend a CVSA seminar or webinar; subscribe to industry associations (state trucking, industry segment, heavy haulers, etc.) and get on mailing list to receive latest information to share with drivers and shippers on maintenance issues
- 6) Use "quiz trucks" with pre-planted defects for training and safety meetings; review current violation trends with all drivers; quiz drivers on the nine (9) major components required to be inspected every day under [FMCSR 392.6](#) (eight (8) for intermodal operations); contact state trucking association for information on truck rodeos and driving championships.
- 7) Review all violations and conduct a thorough root-cause analysis; follow-up on missing roadside inspection reports; hold individual(s) accountable under company disciplinary policy for failure to report roadside inspections; retrain if necessary; come up with specific preventability measure(s) on all occurrences and communicate to all company personnel how future instances can and will be avoided.
- 8) Carry spare parts and accessories in trucks; lights, fuses, reflective tape, etc.
- 9) Conduct periodic management inspections of vehicles on the lot.
- 10) Establish a pre-determined road service and satellite shop maintenance network for over the road operations.
- 11) Set up an on-site designated Safety Inspection Lane and Mirror Check departure station; have a trained maintenance employee accompany the driver during the inspection and sign-off that vehicle is satisfactory prior to departure.

- 12) Spot audit Driver Vehicle Inspection Reports for accuracy; compare against known maintenance repairs for items that should have been noted on the DVIR; ascertain the thoroughness of driver inspections in the DVIR remarks and content; if several consecutive weeks worth of reports all indicate “OK”, flag that driver for a formal Vehicle Inspection Behavior Observation the next time they are available.
- 13) Establish an individual maintenance file for each commercial motor vehicle with company number (if so marked), make, serial number, year, and tire size, vehicle owner, scheduled maintenance due dates, record of inspection, repair and maintenance performed, and record of test conducted on bus pushout windows, emergency exits and lights.
- 14) Review company’s preventative maintenance program which should be able to detect and repair common defects during normal routine maintenance cycle before they cause a violation; test maintenance personnel to ensure they are knowledgeable and qualified to perform work necessary.
- 15) Review vehicle repairs, parts and maintenance records for indications of aggressive driving such as premature brake wear.
- 16) Enforce a written Lockout/Tagout procedure for maintenance of equipment that is Out-of-Service.
- 17) Offer incentive for “clean” roadside inspections in the form of recognition, company merchandise, gift card, cash spiff, etc.

***Did you know? The state issuing the most lamp and marker light violations is – Ohio!***

## **FIRE EXTINGUISHER and EMERGENCY EQUIPMENT**

- 1) Replace/recharge extinguishers at least every 12 months; minimum 5 BC type required (10 BC for Hazmat); 10 ABC recommended for all trucks.
- 2) During Pre/Post Trip inspections, check for discharged extinguishers.
- 3) Ensure that the fire extinguisher is accessible and ready for use. If it is stored behind the seat or has equipment or other debris impeding access, this can cause a violation.
- 4) Check for defective straps, clamps and holders; replace if they exhibit *any* signs of wear and tear.
- 5) Visually inspect for three functioning, bi-directional reflective triangles during every inspection.
- 6) Conduct periodic management inspections of vehicles on lot for compliance.

## **NO PRE-TRIP INSPECTION**

This violation might occur as a direct result of how the driver conducts themselves during the stop. When asked “did you conduct your pre-trip inspection today?” the driver must answer truthfully. They will most likely be asked this question if the inspector notes a common violation that should have been caught during the pre-trip inspection (brakes, steering, lights, reflectors, tires, horn, wipers, mirrors, coupling device, or emergency equipment).

Although FMCSR 392.7 only requires the driver to sign the previous day’s post-trip inspection report, the following item(s) could be produced in support of them having conducted their pre-trip inspection:

- A copy of the prior day post-trip DVIR signed a second time by the driver in the “Acknowledgement”, dated and time-stamped immediately prior to departure.
- A Safety Inspection Lane checklist document signed by the driver, dated and timed prior to departure.
- An On-duty/Not-driving log entry (line #4) with line drawn to Remarks section noting City and State or Route and nearest mile marker with appropriate comment. Best practice; use remarks such as “Vehicle Safety Check” or “Truck Safety Inspection” as opposed to using abbreviations or acronyms such as “PTI” or “Pre-trip” (driver signature required).
- Note; if Pre-Trip takes less than 15 minutes to conduct, the driver may still note that they conducted a Vehicle Safety Check in the Remarks Section of the log by drawing a straight line from the corresponding time to when it was conducted.

## **OPERATING A CMV WITHOUT DOCUMENTED PERIODIC INSPECTION**

Keep track of vehicle inspection intervals; use a spreadsheet or other type of software that will notify management 30 days prior to due date. Post a report for drivers and dispatchers so they are aware of upcoming due dates for:

- DOT (FHWA) Inspection
  - State/Local Inspections
  - Required (Hazmat, OSHA, etc)
  - Scheduled maintenance
- 1) Specifically address Vehicle Maintenance in the company Safety Policy; operating an uninspected vehicle should be treated as a safety violation.
  - 2) Require company Drivers and Owner Operators to turn in a copy of periodic inspections and maintenance records; periodically spot check files for compliance.
  - 3) Conduct periodic management inspections of vehicles on the lot.

## CARGO RELATED

- 1) Specifically address Cargo, Loading and Unloading in the company Safety Policy; operating an improperly loaded vehicle can cause serious damage, injury or death and should be classified as a safety violation.
- 2) Obtain a fresh MVR on new hires within 30 days; verify that they have proper CDL endorsement(s) license for type of equipment operated and cargo transported (i.e. Tank, Hazmat, Combination Vehicle, Doubles/Triples).
- 3) Conduct new-hire in-cab orientation and check-ride (20 miles recommended) to verify ability to safely load cargo and operate equipment.
- 4) Provide education; invite DOT/CVSA to talk to your group (be sure management is in attendance); have managers attend a CVSA seminar or webinar; subscribe to industry associations (state trucking, industry segment, heavy haulers, etc.) and stay on mailing list to receive latest information to share with drivers and shippers on cargo safety.
- 5) Ensure that Oversize/Overweight/Overdimensional loads have been permitted properly for each jurisdiction(s) they will enter; verify all paperwork prior to moving the load; Overdimensional loads must be properly marked (signs, flags, flashing beacon, etc.) as required by jurisdiction of travel.
- 6) Flatbed loads will be scrutinized more than enclosed van or reefer freight; conduct a thorough examination of headache rack, chains, tie-downs, slings, webbing, rub rails, blocks, braces, and all other load securement devices; replace defective equipment; check for holes and weak spots in trailer floors; replace/repair as needed.
- 7) Container loads will be scrutinized closely for frame/suspension and lighting infractions; drivers should conduct a thorough examination of lighting, signals and reflectors, brakes, suspension and frame prior to departure; communicate with container shippers and ports regarding the need for sound container trailer inspection, repair and maintenance procedures and work towards up front agreement prior to accepting loads.



***Did you know? Cargo violations correlate to the number of speeding/moving convictions.***