



# CSA and Forest Products Trucking

## *How Will Implementation of the Comprehensive Safety Analysis Program Affect Wood Supply Chain Management?*

The Federal Motor Carrier Safety Administration introduces its new “Comprehensive Safety Analysis” Program thus:

*“Since the 1970s, Federal and State enforcement agencies, in partnership with many other stakeholders, have progressively reduced the rate of commercial vehicle crashes resulting in injuries or fatalities on our Nation’s highways. As the rate of crash reduction slowed, the FMCSA has been prompted to take a fresh look at how the agency evaluates the safety of motor carriers and drivers and to explore ways to improve its monitoring, evaluation, and intervention processes. Comprehensive Safety Analysis 2010 (CSA 2010) is the result. CSA 2010 introduces a new enforcement and compliance model that allows the FMCSA and its State Partners to contact more carriers earlier in order to address safety problems before crashes occur. The ultimate goal of CSA 2010 is to establish a new nationwide system for making the roads safer for motor carriers and the public alike.”*

Since the program is new, and is still in the process of implementation, there are many questions about how CSA 2010 will change the regulatory, enforcement, and administrative environment in which drivers, trucking firms, and their customers operate. FRA has developed this brief “Myth vs. Fact” document to help clarify points about which confusion exists.

**Myth:** *CSA 2010 has been changed to just “CSA” because it’s no longer going to take effect in 2010.*

**Fact:** CSA 2010 is now known simply as CSA, or Comprehensive Safety Analysis, and although the FMCSA temporarily delayed portions of the program into 2011, and is periodically “tweaking” it, implementation is moving forward. There has been no indication from the agency that the program will be further delayed or suspended. Enforcement is expected to begin December 6, 2010, with a gradual “ramping up” over 2011.

**Myth:** *There are hundreds of new rules and regulations under CSA 2010.*

**Fact:** CSA 2010 is not a package of new rules; it’s just a change in how the old rules are enforced. However, because CSA 2010 “removes ambiguity from existing rules,” the driver or fleet manager may find a new level of accountability is required.

For example, many drivers would get a warning when a roadside inspection revealed a tire tread depth less than 2/32”. Authority to regulate tire tread depth isn’t new, but under the previous system the inspecting officer had discretion to enforce the overall intent of the law. Under CSA 2010, although the tire tread depth regulation isn’t new, the enforcement of the regulation has changed significantly. CSA 2010 arranges each section of the applicable law into discrete categories and assigns a point value to each violation. The effect is that, although the driver still gets a warning, under CSA 2010 he will also get 25 points added to his DOT number. Once the driver accumulates more points than his or her peer group, the intervention process begins. However, FMCSA asserts that trucks and drivers that are in compliance today and pass roadside inspections without incident today should not experience significant burdens under CSA 2010.

**Myth:** Even if I'm in compliance today, CSA will unfairly single out forest product haulers, because we're inspected more frequently and tend to haul overweight more than businesses that don't load in the woods.

**Fact:** CSA determines a carrier's "safety event group" to correspond to each BASIC ("Basic Analysis Safety Improvement Categories"), generally based on the **number of trucks** that operate under that carrier's DOT number, the **mileage reported** on form MCS-150, and normalized by the **number of inspections the carrier receives**.

Safety Event Group Category	Number of Relevant Inspections
1	5-10
2	11-20
3	21-100
4	101-500
5	501+

From the CSA 2010 rule: "The safety event grouping allows CSA 2010 to handle the widely diverse motor carrier population, while ensuring that similarly situated carriers are treated with the same standards." CSA 2010 methodology accounts for inspections that list no violations as well as inspections that reveal violations, so the more good inspections a business's trucks get, the better the business's CSA 2010 score will be. Although all businesses in a given "safety event group" may not be in the same industry, they are businesses FMCSA deems to be similar in size and characteristics.

**Myth:** A crash/accident/speeding ticket/warning will only appear in the CSA scoring system if I am found to be at fault or it results in a conviction.

**Fact:** CSA 2010 gives authority to all qualified state and local law enforcement officials to conduct roadside inspections at any time. Consequently, whenever you interact with law enforcement, the officer has the option to document that interaction in the CSA system. All information in the CSA system is included as part of a fleet's or business's score, regardless of whether the driver (or vehicle) was at fault or a ticket was issued.

**Myth:** The CSA program will mean a bunch of new safety rules and paperwork requirements.

**Fact:** CSA 2010 tracks and enforces compliance with the existing regulations. However, because CSA removes ambiguity in rule enforcement, *all* the paperwork necessary to comply with existing rules will be part of any inspection. Consequently, drivers or fleet managers may find paperwork is requested that they are not accustomed to keeping up with.

In states where CSA 2010 has already been implemented, common deficiencies in the timber industry include providing documentation of an adequate drug testing program, documenting driver hours of service, documenting preventative maintenance, documenting driver pre- and post-trip inspections, and documenting compliance with Unified Carrier Registration requirements.

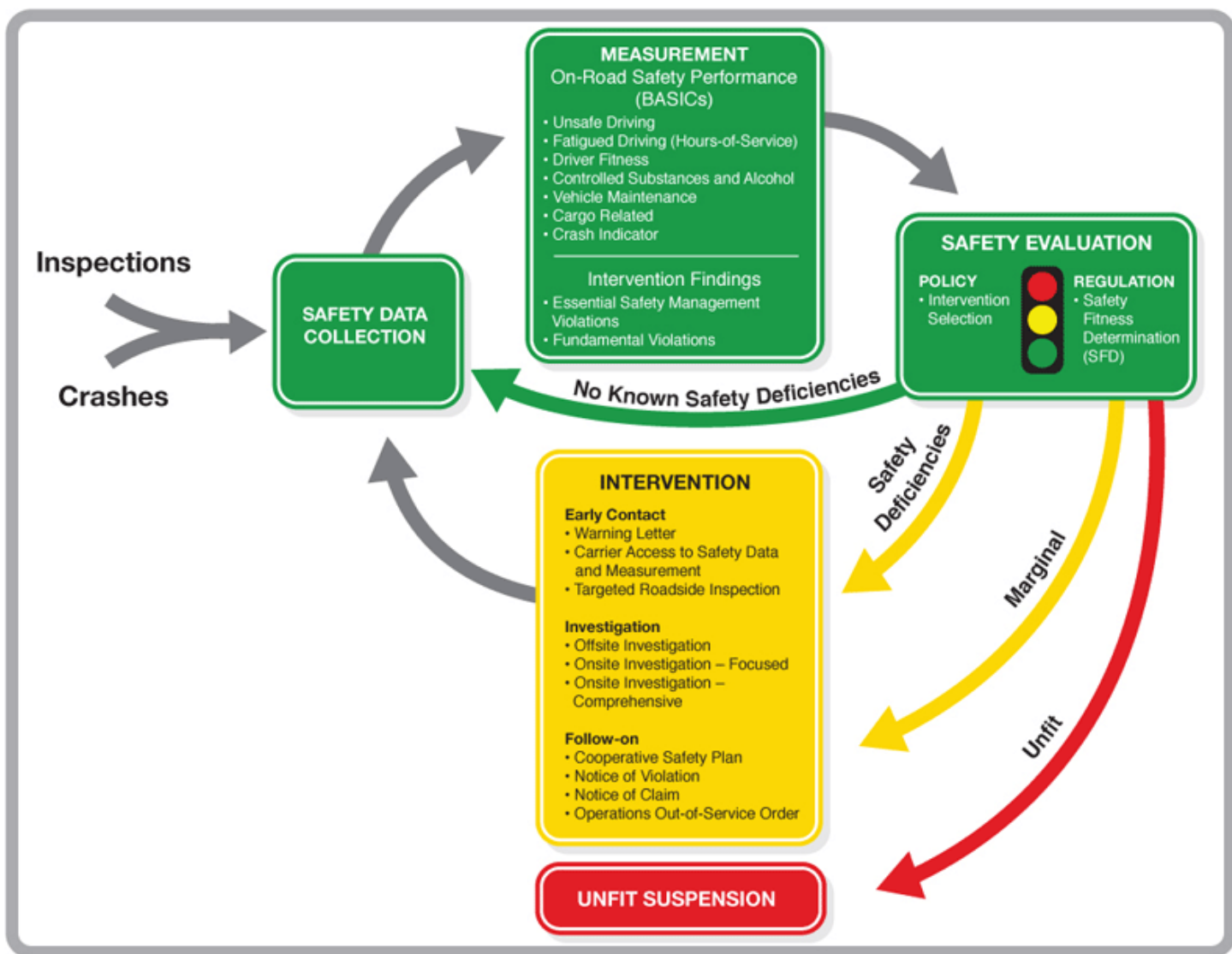
**Myth:** Tickets/inspections/accidents "only count against the driver" (or "only count against the carrier").

**Fact:** Every violation recorded in the CSA system, during roadside inspections or traffic stops, will count against BOTH the driver and the carrier. The driver will retain his or her points for 36 months, even if the driver is employed by a different carrier during that time, and the carrier will likewise retain those points for 24 months. Points assessed to contract carriers that operate under their own DOT number will not count against the business they contract with. However, because CSA 2010 removes ambiguity from enforcement, independent contractors will be subject to the same standards and intervention processes as larger fleets. Numerous white papers predict a reduction in independent contract carriers across the transportation industry.

**Myth:** CSA 2010 doesn't apply to carriers that never cross the state line.

**Fact:** Most states have laws in place providing that all federal transportation rules or regulations automatically apply as state laws. If your state requires a DOT number, even for intra-state operation, then it is prudent to assume that CSA 2010 will apply to you. However, since there is no intervention process available to the FMCSA for carriers that never cross state lines, it's up to local law enforcement to act on FMCSA recommendations concerning safety intervention and compliance issues.

The allocation of revenues generated from FMCSA recommended audits is still under consideration at this time.



**Figure: CSA 2010 Operational Model**

**More information at:**

<http://csa2010.fmcsa.dot.gov/Documents/SMSMethodology.pdf>

[http://csa2010.fmcsa.dot.gov/Documents/industry\\_factsheet\\_Web\\_tagged.pdf](http://csa2010.fmcsa.dot.gov/Documents/industry_factsheet_Web_tagged.pdf)

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Jim Angel of PeopleNet ([www.peoplenetonline.com](http://www.peoplenetonline.com))

Kenny Price of the Federal Motor Carrier Safety Administration ([www.fmcsa.dot.gov](http://www.fmcsa.dot.gov))

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