



Continue To Operate

CSA 2010 – An Action Plan

The New Safety Performance Ranking System
“Carrier Safety Management System”
November 23, 2009

CSA 2010 – The Big Picture

During the summer of 2010, the Federal Motor Carrier Safety Administration will transition from the SafeStat safety performance ranking system to the CSA 2010 ranking system. When the transition occurs, CSA 2010 will be populated with your fleet’s safety data from the previous 24 months. At that time, your fleet’s new safety performance ranking will be public information. Understanding the new rating system and taking steps in January 2010 can improve your safety rankings on the transition date.

Only the Carrier Safety Measurement System will be rolled out in June. Later, the FMCSA will roll out the Driver Safety Measurement System. This action plan applies only to the Carrier Safety Measurement System.

Important Details

- The FMCSA will be able to review the safety performance of 250,000 motor carriers every month. The data comes from roadside inspections, moving violations, and crash reports.
- This will be public information, available to drivers, insurance underwriters, attorneys; the entire public.
- Each trucking company will be ranked against peers, based on number of power units or number of inspections. Fleets with 50-500 power units are in the same peer group.
- There are six safety improvement categories plus a crash indicator, for a total of seven sections. Each of the seven sections is scored independent of the others, and listed independently. If your fleet is ranked as deficient in any section, the FMCSA will send a warning letter and may intervene to make safety improvements. Failure to improve a deficient section may result in an unfavorable Safety Fitness Rating.

- The FMCSA plans to intervene whenever a fleet has one or more deficient categories, or has a high crash indicator, or a complaint has been received, or a fatal crash occurs.
- Three sections (unsafe driving, controlled substances/alcohol, and crashes) use number of power units as the basis for rankings. Fleet mileage in the 24-month period is not a factor in the ranking.
- The data collection can be viewed as a perpetual negative exception report. Violations are recorded; they are compared to total power units or number of inspections.
- In the future, the data will be used as the basis for Safety Fitness Ratings. Currently, the best safety rating is “Satisfactory”. Under CSA 2010, the best safety rating will be “Continue to Operate”.
- All violations are listed as a negative finding. Currently, SafeStat notes out-of-service violations as the important concern. CSA 2010 assumes that all violations are important, even if the vehicle could continue or if the driver did not receive a citation.
- More than 3,500 violations have been assigned a weight based on the assumed correlation to crashes. According to the assigned weights, “improper headlamp aiming” is a greater crash risk than “insufficient brake linings”. Weightings are non-negotiable.
- Hours of service violations are all described as fatigued driving. The weighting system assumes that “driver’s record of duty status not current” is only slightly better than “requiring or permitting a driver to drive more than 11 hours”.
- A fleet may have an excellent DOT-crash rate and still be deficient in any or all of the six safety improvement categories. Having a low crash rate is no guarantee of good ranking in any other category.
- FMCSA will be determining a threshold that you must meet for each of the seven sections. At this time, that threshold has not been stated. I view this as target shooting while blindfolded.

Fleets at Risk for Poor Ranking

- **Longhaul truckload carriers** who operate more miles per power unit than LTL carriers. You are at a disadvantage when CSA 2010 calculates your crashes, unsafe driving violations, and controlled substance/alcohol violations; CSA 2010 uses power units as the basis, not mileage.
- **Flatbed carriers** who are frequently inspected for improper loading and cargo securement. Since this is one of the six safety improvement categories, you will have more violations than a fleet that operates dry vans and has fewer inspections for loading and securement.
- **Hazardous Materials carriers** will be assessed extra negative points when a crash involves a hazardous release. Non-haz-mat carriers have low exposure to releases, but your haz-mat fleet will be ranked against non-haz-mat carriers. Your crash rankings can suffer as a result.
- **Team operators** who drive more miles per power unit than solo drivers. You are at a disadvantage when CSA 2010 calculates your crashes, unsafe driving violations, and controlled substance/alcohol violations.
- **Intermodal carriers** pulling non-owned chassis. You do not have control over the condition and maintenance of non-owned equipment and are likely to have more vehicle violations than a fleet operating owned equipment.
- **Independent contractor fleets** that do not require annual-level vehicle inspections every 90 days. You are likely to have more vehicle violations than company units that are inspected more frequently.
- **Independent contractor fleets** that have limited their safety controls that apply to drivers. You are likely to have more unsafe driving violations, fatigued driving violations, and vehicle maintenance violations compared to fleets with more safety management controls.
- **Refrigerated fleets** transporting fresh food and produce. Your operations have to constantly evaluate hours of service compliance against the risk of damaged produce. You may have more fatigued driving violations (log violations) than fleets that are not transporting fresh foods.
- **Small fleets** with 60 power units who are compared to fleets with 500 units. The larger fleet will have a larger safety staff, an experienced safety director, and better cooperation between safety and operations departments.
- **Multiple-trailer fleets** where trailers are distant, staged at client locations, and are not inspected frequently. You may have more vehicle violations.

- **All fleets** that have gone to 30,000-mile oil change schedules and extended service intervals. Your vehicles are not inspected as frequently as some other fleets, and you may have more vehicle violations. Remember that all violations are noted; not just the out of service violations.
- **Any fleet** that currently has vehicle and driver out of service violations that exceed the national average. Your fleet does not have sufficient management controls to pass all six safety improvement categories. You will be ranked against other carriers that are already performing better than the national average.
- **Any fleet** that has not solved important hours of service violations; log not current, failure to retain and disclose previous 7-days logs, false logs, no log. These violations are weighted as more serious violations and your fleet will be compared to other fleets that have solved these problems. You may not pass the fatigued driving category.

Action Plan

1. Understand that this is a new safety ranking system and new rules apply. A ranking system that lists all violations is much tougher than one that only lists out-of-service violations.
2. Get ready for a warning letter from the FMCSA— even the safest fleets will need to swallow a little pride. With seven sections, new standards, and monthly ratings, few fleets will go through 2010 with perfect scores.
3. Educate all drivers about CSA 2010 and how their safety performance (as measured by the seven sections) affects the safety ranking for the fleet. Restate company expectations, and counsel drivers with any violation. Remind drivers that the next step in CSA 2010 is the Driver Safety Measurement System. The end result of DSMS is that fleets will not be able to retain drivers with unsafe habits. Educate all employees about the new system and request their ideas for improvements.
4. Prepare to increase safety department staff, or pay for outsourced services. The additional compliance efforts take extra time, plus more time spent counseling and educating drivers.
5. Begin to counsel drivers with moving violations, even if there is no citation. Under CSA 2010, a violation is all that is required--- it will be listed as a negative report for your fleet.
6. Tighten your driver selection standards and retention standards so you are selecting and retaining drivers with fewer moving convictions, citations, violations and crashes. All negative reports about a driver's safety performance that are noted in CSA 2010 are shown as a negative report about your fleet.

7. Establish new corporate safety goals that include the seven sections of CSA 2010. You will want excellent scores, since this is public information and will be the basis for future safety ratings. You will need a “Continue to Operate” rating, just as you need a “Satisfactory” rating today.
8. Find other ways to proclaim your excellent safety performance. Your business needs to show shippers, insurance underwriters, attorneys, and the entire public that you are a safe company. Remember that CSA 2010 never measures workplace injuries or damage-free cargo, but excellent performance in these areas is very important to your business. You will benefit by having other ways to prove that your safety performance is better than average. Consider using Aon’s SafeFleet Evaluation and Certification program that compares your crash and injury rate to the national average. It’s a great way to show how your fleet compares to other fleets in the areas that really show safety performance--- DOT crashes, and workplace lost-time injuries.
9. Continue to operate. America really does depend on trucks.

Feel free to contact me if you have questions, comments, or want to discuss Aon’s safety and loss prevention consulting services.

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