

CSA 2010: A Good First Step, But . . .

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For more than a decade, the trucking industry has called for an overhaul of the Department of Transportation's safety fitness measurement and rating systems. Fortunately, DOT heard these calls and soon will implement its new system — Comprehensive Safety Analysis 2010. CSA 2010's measurement component will be rolled out in July 2010; the rating component will be implemented after a future rulemaking process is completed.

Currently being tested in several states, the system uses data from roadside inspections, crashes and on-site compliance reviews to continuously monitor and measure each carrier's safety performance in seven key safety-related areas, e.g., vehicle maintenance, hours of service and drug/alcohol testing.

If a motor carrier is found to be deficient when compared with like-sized carriers in any area, DOT will "intervene" with the carrier in one or more of the following ways:

- Send a warning letter.
- Target the carrier for additional roadside inspections.
- Conduct an off-site review of requested records sent to a local DOT office.
- Conduct an on-site review.

Carriers that are continually deficient will face progressive interventions.

For the most part, CSA will be a welcome change from the current rating process, because:

- It will be primarily (though not entirely) performance-based — driven by data generated following roadside inspections and crashes. The current system focuses heavily on compliance with paperwork requirements.
- It will continuously reflect each carrier's current safety posture, based on updated data measurements. The current system posts a safety rating that may reflect the result of a carrier's audit conducted more than a decade ago.
- It will make DOT's investigators more efficient; they will conduct "surgical" interventions to evaluate only those parts of a carrier's operation thought to be deficient. As a result, they will have time to reach more motor carriers.

Under the current system, the typical intervention involves a comprehensive, time-consuming review of a carrier's entire operation — including those parts not thought to be, or likely to be, deficient.

However, the proposed system is far from perfect and will need some fundamental improvement before it can be useful and effective. Here's why:

The planned carrier monitoring system assigns a weight to each

violation based on the violation's proven or perceived tie to crash risk. The weight of some of these violations is based on their statistical relationship to crash risk, as demonstrated through research. The weights of other violations, however, were assigned or modified by a panel of truck enforcement officers based on their opinions and anecdotal experience. As a result, some of the weights seem arbitrary — and even nonsensical.



For example: A commercial driver license holder who is cited for a moving violation in a neighboring state is required by a less than well-known regulation to notify his home state of the violation, in writing. If the driver fails to do so, the resulting violation is assigned a weight of 6 on a scale of 1 to 10, with 10 being the weight most closely associated with crash risk.

In addition, the quality and consistency of the data generated by various jurisdictions are still quite questionable. A primary concern is that carriers often have great difficulty getting roadside inspectors to document clean/good inspections. As a result, their inspection ratios (reflecting favorable to unfavorable inspections) are skewed, which, in turn, will skew their CSA 2010 scores. Also, carriers sometimes have great difficulty getting states to correct erroneous data their respective enforcement agencies have fed into the federal systems.

Finally, the system counts all carrier-involved crashes regardless of fault or preventability. As a result, a carrier that has been involved in several crashes may be considered "deficient," even though its drivers were not to blame for these crashes and/or could not have prevented them (e.g., rear-ended at a traffic signal). DOT has indicated that it intends to modify the system in the future to consider accident culpability as a factor in measuring each carrier's safety fitness, but the current design of the safety measurement system does not do so.

There are a variety of other concerns too numerous to mention here, but they all lead to the same conclusion. CSA 2010 is certainly a step in the right direction and addresses many of the industry's long-standing concerns. However, a truly effective and equitable safety measurement system will require some substantial improvement in how the safety data that feed the system are gathered and used.

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