



## MOTOR CARRIER SAFETY ADVISORY COMMITTEE

C/O: Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue, SE  
Room W64-232  
Washington, DC 20590

February 28, 2014

Mr. Stephen C. Owings  
Chairman, Motor Carrier Safety Advisory Committee  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Owings:

As instructed by the Federal Motor Carrier Safety Administration (FMCSA), the Motor Carrier Safety Advisory Committee (MCSAC) created the Compliance, Safety, Accountability (CSA) Subcommittee (Subcommittee) and tasked the Subcommittee with providing feedback and suggestions on the CSA program and how it could be more effective as a tool for identifying unsafe motor carriers. The Subcommittee was tasked with providing periodic letter reports to the MCSAC recommending prioritized actions, with supporting data, to improve the CSA program.

In a public meeting on February 12, 2014, the Subcommittee discussed a CSA-related reauthorization suggestion that the MCSAC had developed in its February 10-11, meeting on Task 14-01: "Direct that an objective review all current regulations (and Safety Measurement System (SMS) methodology) be conducted to determine each regulation's impact and relation to safety and effectiveness." Attached is the Subcommittee's recommended addendum to that MCSAC reauthorization recommendation.

On behalf of the Subcommittee, I submit this recommended addendum to the MCSAC for its consideration.

Sincerely,

//signed//

David R. Parker  
Chairman, CSA Subcommittee

Enclosure

**MCSAC Task 12-03: Evaluation of and Recommendations on the Compliance, Safety,  
Accountability (CSA) Program  
Subcommittee Meeting, February 12, 2014**

MCSAC Reauthorization Suggestion:

- I. Direct that an objective review all current regulations (and Safety Measurement System (SMS) methodology) be conducted to determine each regulation's impact and relation to safety and effectiveness.
  - A. Would set priorities regarding where the Agency should be focusing resources.
  - B. This could improve enforcement because they could focus on what affects safety.
  - C. The Agency already does Section 610 retrospective reviews of regulations, but this could be a more broad review that involves input from various stakeholders.
  - D. Regarding SMS methodology, there are some Behavior Analysis and Safety Improvement Categories (BASICS) with little or no correlation to crashes (i.e., safety), for example, Driver Fitness. Some of the public is misinterpreting the data.
    1. Advocates for Highway and Auto Safety: Some violations may be related to safety although they may not necessarily be correlated with crashes.

CSA Subcommittee Recommended Addendum:

- I. FMCSA should continue to validate the correlation of BASICS to crash risk and work towards changing SMS to improve the BASICS correlation to crash risk.
  - A. Such a review should include evaluating the predictive value of SMS violations weightings.
- II. DATTCO (Supina): Address data insufficiency in reauthorization, particularly in regards to motorcoaches. For example:
  - A. FMCSA could work to utilize data from certain States that already exists (e.g., California).
    1. FMCSA should find out what States are doing to collect potentially useful data that could be added to data used in SMS.
- III. Amalgamated Transit Union (Hamilton): More funding for inspections.
  - A. Changing the MCSAP match would give States more flexibility to accept more MCSAP funding.

[Observation by Bill Quade, FMCSA: The recent Government Accountability Office (GAO) review of CSA looked at SMS methodology and correlation of certain violations to crashes, but did not examine weighting of violations in SMS.]