**TIA Recommendations to Administrator Ferro  
and Chairman Parker, MCSAC CSA Subcommittee**

On behalf of myself, my company and the Transportation Intermediaries Association (TIA), and at the request of Chairman Parker, I offer the following recommendations to Chairman Parker and FMCSA Administrator Anne Ferro in regard to Compliance, Safety and Accountability:

1. FMCSA immediately remove the “FMCSA Data – Information for Safety Stakeholders” from the public website. Furthermore, TIA requests that FMCSA cease and desist from publicly posting additional resources with the intent to guide shippers, brokers, and/or insurance companies in reading SMS for the purposes of carrier selection.
2. FMCSA provide the public with an electronically downloadable list which is updated monthly, of those carriers that are considered by FMCSA to be “high-risk” and label those carriers as “high-risk” under the Safety Measurement System (SMS) company snapshot page.
3. FMCSA add the safety ratings of a motor carrier to the SMS company snapshot page to differentiate between the actual safety rating and the SMS data. Additionally, provide the public with a daily public feed of motor carrier’s safety rating through the licensing and insurance daily feed.
4. FMCSA expedite or at a minimum maintain the June 2013 timeframe for the release of the notice of proposed rulemaking (NPRM) for the Safety Fitness Determination (SFD). TIA supports addressing industry concerns before the NPRM is released.
5. In the interim, remove the controlled substance and alcohol abuse and driver fitness BASICs from the public view, until a positive correlation to crash risk is found. The remaining three public BASICs seem to demonstrate some positive correlation to crash risk and are an essential tool for the Agency to prioritize intervention levels for motor carriers.

Respectfully submitted,

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