November 24, 2023

Mr. Jose R Cestero

Vehicle and Roadside Operations Division

Federal Motor Carrier Safety Administration

West Building, 6th Floor

1200 New Jersey Avenue SE, Washington, DC 20590

Re: Docket No. FMCSA-2023-0159. Agency Information Collection Activities; Revision of an Approved Information Collection: Inspection, Repair, and Maintenance.

Introduction: Whip Around is a powerful, yet easy-to-use fleet maintenance software solution that connects drivers, mechanics, and fleet managers to improve the uptime across their fleet operations. Whip Around serves hundreds of thousands of users and assets worldwide across all commercial fleet industry verticals. The company's mission is to keep the world's fleets moving by accelerating information.

Whip Around does this by identifying risks and preventative maintenance issues in real-time to ensure fleets stay ahead of DOT requirements and needed repairs. It allows users to easily conduct inspections, set up automated preventive maintenance scheduling, manage the entire work order process, track parts and inventory, and access detailed service history and important compliance documents at any time from anywhere.

Using Whip Around, fleet managers discover problems before they arise to help avoid unexpected downtime while ensuring their equipment remains in safe working condition and significantly reduces the compliance burden of vehicle maintenance recordkeeping.

Whip Around agrees with the Federal Motor Carrier Safety Administration (FMCSA) statement in the notice that the "motor carrier industry has never questioned the need to keep CMV maintenance records." However, as implied in the information collection request, the process of creating, obtaining, and retaining these documents can be burdensome. That's why Whip

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Around has been committed to helping carriers reduce this burden by digitizing and automating vehicle inspection, repairs, and maintenance recordkeeping.

Whip Around is quickly establishing itself as a leader in helping carriers develop and maintain strong vehicle maintenance files, driving efficiency gains while improving safety outcomes. Based on its knowledge and experience in this environment, Whip Around is pleased to offer a few considerations/suggestions to FMCSA as it analyzes the vehicle maintenance compliance and recordkeeping process.

The trucking industry is rapidly evolving in many ways, and vehicle maintenance recordkeeping is no different. The way carriers collect and maintain vehicle maintenance documents is changing with many fleets adopting electronic recordkeeping either in-house, vis a vis their equipment repair vendor, or by adopting third-party software like the Whip Around platform. This has reduced the compliance burden and is, in many ways, analogous to the transition from paper logs to electronic logging devices for records of duty status relating to hours-of-service compliance.

Advancements in electronic recordkeeping continue to drive several important, quantifiable improvements:

- Improves information sharing across the company and integrations with other carrier partners;
- Reduces the potential for manipulation of records;
- Provides greater accountability for drivers, managers, and maintenance providers;
- Enhances education and training for drivers and maintenance personnel;
- Facilitates easier access to critical records;
- Improves ability to be proactive at identifying and addressing equipment safety and performance issues;
- Increases the completion rate of DVIRs;
- Reduces time spent on internal auditing; and
- Allows for more accurate and timely records

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Electronic recordkeeping may reduce the need for more frequent manual inspections. While FMCSA posits that less frequent inspections would "greatly hinder the ability of FMCSA and State officials and representatives to ascertain that CMVs are satisfactorily maintained," Whip Around believes that the industry's ongoing transition to electronic recordkeeping tools suggests that more accurate and complete inspections – whether electronic or otherwise – are as important, if not more so, than more frequent inspections.

Carriers who adopt integrated electronic recordkeeping significantly reduce their compliance burden. This results from the ease at which documents can be generated, stored, and retrieved. These systems also make it easier and more efficient to verify important compliance information like expiring periodic inspections, systematic maintenance intervals, brake and vehicle inspector qualifications, and much more. Whip Around suggests this efficiency improvement be reflected in future regulatory rulemakings or similar.

The burden calculation could change significantly in the future as roadside enforcement and safety investigation protocols modernize. There are two changes currently being contemplated by the Commercial Vehicle Safety Alliance (CVSA) that could dramatically alter how and when vehicles are inspected and the accompanied paperwork burden.

Enhanced Inspections for Automated Driving System (ADS) Equipped Vehicles: CVSA is currently working on "Enhanced Inspection Procedures" outlining inspection requirements for trucks using automated driving systems. This will significantly impact the burden on motor carriers who may need to train and certify personnel to conduct detailed (Level I) inspections on each ADS-equipped vehicle daily. Electronic recordkeeping will be key to facilitating this, though the addition of daily Enhanced Inspections will increase the overall paperwork burden.

Level VIII Inspections: CVSA and FMCSA are currently working to develop a Level VIII Inspection, which facilitates real-time, in-motion inspections of commercial motor vehicles. The vision is to automatically transmit data from the vehicle's telematics to roadside enforcement to help them identify motor carriers and/or drivers that may not be authorized to operate or may be operating in violation. While it's not immediately envisioned that vehicle maintenance data

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elements will be transmitted at that time, technology is either available or in development that could facilitate this in the future. As this technology continues to evolve, FMCSA should consider any future burden associated with it.

FMCSA should encourage the widespread adoption of vehicle maintenance and inspection software and electronic recordkeeping tools. FMCSA's Techcelerate Now Program may be a good opportunity to encourage that adoption. Indeed, FMCSA's upcoming study, "Truck and Bus Maintenance Requirements and Their Impacts on Safety," will look at the impact of vehicle maintenance practices on overall motor carrier safety. Whip Around believes if, as a part of this study, FMCSA compares fleets with electronic vehicle maintenance and inspection software and related tools to those without, it will find that the technology adopters have stronger maintenance programs, a reduced compliance burden, and improved safety.

Conclusion: Thank you for the opportunity to comment on this notice. The way motor carriers collect and maintain vehicle inspection, repair, and maintenance documents is evolving. Adopting electronic recordkeeping to meet vehicle maintenance compliance requirements significantly reduces the burden associated with these requirements. It also improves fleet safety and should be a part of FMCSA Techcelerate Now which can play an important role in encouraging greater adoption. Finally, as FMCSA reconsiders the burden associated with vehicle maintenance recordkeeping requirements, it should contemplate the impact of changing enforcement strategies.

Sincerely,

Noah Hickey
CEO, Whip Around

North Carolina
6302 Fairview Rd #309,
Charlotte, NC 28210, USA

California
1650 N Coast Highway 101,
Encinitas, CA 92024, USA

Auckland
111 Franklin Road, Auckland 1011
New Zealand

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