



**FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION
U.S. DEPARTMENT OF TRANSPORTATION
DOCKET # FMCSA-2018-0189**

**Request for Comment on Information Collection Request:
Truck and Bus Maintenance Requirements and Their Impact on Safety**

SUBMITTED BY:

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The American Trucking Associations (ATA)¹ submits these comments to the Federal Motor Carrier Safety Administration (FMCSA) on the agency's request for comment on *Agency Information Collection Activities; New Information Collection: Truck and Bus Maintenance Requirements and Their Impact on Safety (83 Fed. Reg. 32950)*.

The FMCSA request for comment notes that this new request titled "Truck and Bus Maintenance Requirements and Their Impact on Safety" will allow for a study that focuses on vehicle maintenance and aims to determine the impact of vehicle maintenance requirements on overall motor carrier safety. ATA supports an information collection to accomplish such a study and recommends working with ATA's Technology & Maintenance Council (TMC)² in developing industry widely accepted Recommended Practices (RPs), which TMC has developed over 500 of since 1956.

ATA appreciates FMCSA in developing this information collection activity and understands its importance to general trucking safety and the maintenance assessment score of the Behavior Analysis and Safety Improvement Category of a revamped Compliance, Safety, Accountability program and Safety Measurement System. ATA's TMC concentrates their activities on real-world trucking maintenance and engineering issues,

¹ The ATA is a united federation of motor carriers, state trucking associations, and national trucking conferences and councils created to promote and protect the interests of the trucking industry. Directly and through its affiliated organizations, ATA encompasses over 34,000 motor carriers and suppliers of every type and class of operation in the United States, Canada, and Mexico.

² The TMC is ATA's largest council of industry professionals who work together to improve truck equipment and technology. TMC develops industry-recognized RPs that are used extensively in trucking by fleets, service providers, original equipment manufacturers, component suppliers, and academia.



★ operational efficiencies, workforce development, and safety services throughout each RP developed, annual events, and council benefits.

TMC RPs reflect the consensus of industry stakeholders on those items and methods that have delivered the best actual performance in the field. TMC RPs are voluntary practices that assist equipment users, service providers, vehicle/component manufacturers and industry suppliers in the design, specification, performance, and maintainability of commercial vehicle equipment. TMC RPs also include test methodologies and informational documents that cover technical aspects of advanced safety technology, automated systems, technician training, and maintenance facility conditioning.

While other sources of best practices may provide information and guidance from a concise trade group, the unique characteristics of TMC's compendium are:

- They are compiled in accordance with a disciplined development process, subject to peer review, appeals and formal decision making
- There is access to the process and the ability to comment and contribute by any party of interest in the industry
- They are subject to a review cycle of no more than five years, in which time an RP must be reissued, revised, or if appropriate, withdrawn

In this way, TMC RPs are able to address the most up to date techniques, the newest technologies, and current management methods so as to provide a benchmark for a successful fleet maintenance program. TMC's RP development process, under oversight of its Board of Directors, meets the current needs of the community and maintains a forward look at practices which will need to be developed in the future to address anticipated advances in technology and maintenance/repair protocols.

I. Whether the Proposed Collection Is Necessary for the Performance of FMCSA's Functions

This information collection is necessary as it supports ATA's and DOT's strategic goal for safety. In this request, FMCSA's function to develop regulations should be dependent on valid industry accepted RP developing organizations. The performance should be based on how those RPs strengthen regulation and not restrict industry innovation to safer truck operations.

II. The Accuracy of the Estimated Burden

ATA does not find, at this time, an inaccuracy of the estimated burden.

III. Ways for FMCSA to Enhance the Quality, Usefulness, and Clarity of the Collected Information

ATA's TMC has a broad history with equipment maintenance, management, supporting training materials and certifications. FMCSA's collected information would be enhanced through its management by a recognized association, such as ATA TMC.



IV. Ways that the Burden Could Be Minimized Without Reducing the Quality of the Collected Information

One way the burden could be minimized without reducing the quality of the collected information is to hold working group sessions or private meetings at a TMC event for the targeted audience provided from the information in this request for Phase 1 and Phase 2 surveys. TMC events annually attract an average 7,000 stakeholder attendees, majority of them fleets attracted by TMC's educational/technical sessions, RP development, and large exhibit. Strategies for marketing the surveys, analyzing the collected information, and providing results through this avenue is another way to assist.

Conclusion

ATA supports the FMCSA information collection request and recommends that FMCSA consider existing, well-reputed industry RPs in developing criteria for:

- Minimum standards for inspection intervals, mechanic qualifications and training, and certification of maintenance facilities
- An operational definition of "systematic maintenance"
- Evaluating current regulations and intervention processes to improve compliance for vehicle maintenance requirements

TMC has as its core mission the development and dissemination of RPs to the industry, which are widely recognize by fleets, maintenance service providers and among the academic community as primary reference documents in fleet equipment engineering and maintenance.