



Owner-Operator's Business  
Association of Canada

Association professionnelle des  
routiers autonomes du Canada

*...from the  
director's chair*

## CSA 2010: Learn the rules

By now, most of you have heard about Comprehensive Safety Analysis 2010, aka CSA 2010, the new safety enforcement and compliance measuring system about to roll out south of the border. It's a sea-change in the way the US DoT tracks enforcement data, and then uses the information to rate and measure carrier and driver performance.

The new initiative will put added pressure on both drivers and carriers to comply, and it really raises the stakes and the cost of non-compliance. The bad guys will hate it; the good guys should be quite happy that there's finally a fair way to separate the two.

At this stage, I'm prepared to give the program a passing grade, because I like the idea of sanctioning underperforming carriers and drivers. In a free market, operators who do everything right are up against those who cut corners, bend and twist the rules, and use other nasty practices to get the business. If we can put an end to that behaviour, I believe we'll be better for it, and stronger in the long run. But how well the new system really works remains to be seen. And, make no mistake, I do have some reservations about CSA 2010.

It's all about on-road performance, and enforcement officials have spent many months applying a rating system to various types of violations and driver behaviour, all based on their propensity for causing heavy truck crashes.

The higher a violation or defect is on a scale of its likelihood to cause or contribute to a wreck, the more points it carries.

Since drivers and carriers are rated based on accumulated points (weighted against fleet size and mileage), you won't want to fail a roadside inspection or be subject to any traffic enforcement activity.

There are seven evaluation categories called BASICs (Behavioural Analysis and Safety Improvement Categories): unsafe

driving; fatigued driving; driver fitness; controlled substances and alcohol; vehicle maintenance; cargo-related; and crash indicators. The two that concern me most are vehicle maintenance and cargo-related. The others demand some personal accountability, and I figure you're all big enough to take responsibility for your actions there.

Because CSA 2010 tracks driver performance, and builds a compliance record that fleets will have access to, it will be very easy to weed out bad or non-compliant drivers. But if you work for a fleet with poor maintenance practices, for example, you could be accumulating points for equipment defects that are essentially beyond your control – except a refusal to go, which comes with its own immediate penalties.

The Safety Measurement System (SMS) Methodology – the violation weighting table – indicates that bald or underinflated tires are worth three points, for example.

Missing or defective suspension or steering components carry seven points. Brakes out of adjustment are worth four points, and there are many, many more defects on the list. Shoddy equipment could cost drivers big time.

Almost all cargo securement violations are worth the full 10 points, which is huge, considering how easy it is to get into trouble on this one. There are just too many differences in the way our so-called North American Harmonized Cargo Securement regulations are interpreted and enforced. That's not good enough, and it worries me.

The principle of an enforcement program like CSA 2010 is that all drivers and carriers in a peer group are treated equally, so the violation thresholds become meaningful comparisons.

Now, more than ever, it's essential that our governments stop to-ing and fro-ing and get to work harmonizing more of our common regulations. Cargo securement and HoS



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come immediately to mind.

Interestingly, the most common reason Canadian drivers are put OOS in the US is a violation of the American 14-hour daily working limit. That data comes from a summary of NAFTA enforcement statistics archived on the FMCSA Web site. The summary shows that 29.1% of Canadian drivers put out-of-service at roadside are in violation of the 14-hour rule, compared to just 15.5% of US drivers.

I'm only speculating here, but could it be that we occasionally confuse the US 14-hour rule and our 16-hour rule? That violation, by the way, is worth seven points, so it's a significant mistake.

On the vehicle inspection front, our new requirements allow the vehicle to be operated with certain "minor defects" as noted on the vehicle inspection paperwork.

The US currently requires full compliance with vehicle condition regs, so there's no allowance for minor defects or violations. I haven't had a chance to compare the lists, but considering the comprehensive nature of the new 64-page SMS violation weighting table, there are bound to be conflicts in there.

CSA 2010 could work well for trucking's serious players, and it may finally rid us of the bad actors. I really hope, though, that good – but uninformed – drivers aren't caught up in the net too.

Drivers will need to know the rules, and take steps to ensure they are compliant. Get up to speed on this quickly, assume nothing when it comes to compliance, and don't accept 'no' for an answer when it comes to vehicle maintenance.