

# Effectively Managing Your Fleet to Stay Off the DOT Radar

Scott Wagner, Cascade Mfg Co

Thomas Balzer, Ohio Trucking Association & Ohio Association of Movers



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# Effectively Managing Your Fleet to Stay Off the DOT Radar

Thomas Balzer, President & CEO, Ohio Trucking Association  
Scott Wagner, Director of Mfg. & Safety, Cascade Mfg Co

## Summary

- Federal Motor Carrier Safety Administration
- FMCSA score
- Electronic logging devices
- Hours of service rule
- Driver attraction & retention

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## Scott Wagner

- Director of Manufacturing and Safety (2005-present)
- Production Manager, Rockwell Collins (1999-2005)
  - LEAN manufacturing and high performance work teams
  - ISO 9001 certified (quality management system)
  - ISO 14001 certified (environmental management system)
- Logistics Manager, Keebler Corporation (1994-1999)
  - Off-site bakery scheduling and dispatch of 85-90 SKU's using up to 15, "co-bakeries"

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## Thomas Balzer

- President & CEO, Ohio Trucking Association
- Director of Administration for Midwest Motor Express, Inc.
- Executive Vice President of the North Dakota Motor Carriers Association

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## Federal Motor Carrier Safety Administration (FMCSA)

- Mission: Reduce crashes, injuries and fatalities involving large trucks and buses
- Separate administration with the U.S. DOT
- Ray Martinez, Administrator
- Regulate over 530,000 trucking companies and approximately 4 million CDL holders



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## FMCSA Strategy

- Develop and enforce data-driven regulations that balance safety with efficiency
- Harness safety information systems to focus on higher risk carriers
- Educational messaging to carriers, commercial drivers and the public
- Partner with stakeholder groups at all levels

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## FMCSA Score

- Your compliance, safety and accountability (CSA) score is used by the FMCSA to identify high risk motor carriers and drivers that may require interventions.
- A carrier's score is based on the performance data of its drivers, including all safety-based roadside inspections and state-reported crashes.

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## Monitoring Your CSA Score

- 7 BASICS Categories - Behavior Analysis & Safety Improvement Categories:
  - Unsafe driving
  - Crash indicator
  - Hours of service compliance
  - Vehicle maintenance/load securement
  - Controlled substances and alcohol
  - Hazardous materials compliance
  - Driver fitness

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## Monitoring Your CSA Score

- Depending on the category, a high score in any of the 7 SMS categories results in DOT inspection and/or audit
- Focus on vehicle maintenance and load securement
  - The threshold score in this category is 80%
  - Results in automatic stop by an enforcement officer
  - It's advertised that this also results in an audit of your DOT records and maintenance processes

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## Monitoring Our CSA Score

- Communicated via email to:
  - Dispatch
  - Maintenance
  - Drivers
  - Division managers, including retail
- Communication also consists of:
  - Roadside inspection(s) data
  - Upcoming DOT road check activity
  - Maintenance “hot spots”
  - Anything else since last update

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# Communication

- CSA score email
- Driver meetings include drivers, maintenance and management
- VIR closed loop process through Omnitracs IVG and email
  - Maintenance has their own email address
- All contribute positively to our company score and helps keep us off the DOT radar



# Cascade SMS Dashboard





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## Automatic On-Board Recording Device (AOBRD) to Electronic Logging Device (ELD)

- Cascade began using Omnitrac's IVG units in Q3 of 2017 in AOBRD mode
- Began changing IVG units to ELD mode in May of 2019
  - Trained and changed two drivers at a time
  - Documented processes and shared with drivers
  - Two drivers helped create training material
  - ELD software patch transmitted "over the air"
- December 16, 2019 mandate

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# AOBRD to ELD Change

- Change has been more entailed than originally estimated – trucks and office
  - Driver immediately placed in, “driving” when truck moves
  - Utilizing yard moves more when applicable, saving available driving time
  - Unassigned driving time needs to be audited for overnight yard moves, drivers were given instructions on morning pre-trip and login process if overnight yard moves took place
  - Vehicle Inspection Report (VIR) process requires closed loop communication between driver, maintenance and office
  - If VIR with defect is left open, driver is unable to complete new VIR



# Omnitracs Vehicle Inspection Report

VIR 328244295 | DATE June 28, 2019 5:42 AM | VEHICLE ID 10

**VIR Received** → **Defects Corrected**

**DEFECTS** ● Other

**DRIVER COMMENTS** windshield cracked

**GENERAL**

<b>DRIVER ID</b>	CWHIT	<b>DRIVER NAME</b>	CORY WHITE
<b>OPERATOR NAME</b>	CASCADE LUMBER COMPA NY	<b>ODOMETER</b>	666838.1

**SUBMIT REPAIR**

<b>Resolution</b>	<b>Mechanic/Vendor</b>
Defects corrected ▾	Safelite
<b>Mechanic Notes</b>	
Windshield replaced	

19 / 500



# Hours of Service Rulemaking Process

August 23, 2018

## Advanced Notice of Proposed Rulemaking (ANPRM)

- Document Development
- Public Engagement
- Comment Solicitation / Analysis

August 26, 2019

## Notice of Proposed Rulemaking (NPRM)

- Document Development
- Public Engagement
- Comment Solicitation / Analysis

TBD

## Final Rule

- Awareness

TBD

## Implementation

- Training
- Technical Assistance



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## Background

- FMCSA began work on an Advanced Notice of Proposed Rulemaking (ANPRM) in 2018 in response to widespread congressional, industry, and citizen concerns surrounding existing hours of service (HOS) rules.
- The purpose of the ANPRM was to seek feedback from the public to determine if HOS revisions may alleviate unnecessary burdens placed on drivers while maintaining safety on our nation's highways and roads.
- ANPRM was published and open for comment from August 23-October 10, 2018:
  - More than 5,000 comments were received
  - Considered four areas for revision along with two related petitions
  - Used to develop the Notice of Proposed Rulemaking (NPRM)

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## Goals of the Proposed Rule

- Improve safety by providing additional flexibility for the nation's CMV drivers.
- It will improve safety by:
  - Offering the flexibility drivers need to not feel like they must race the clock
  - Needlessly drive through congestion, or
  - Have troubles finding parking
- Designed to improve safety, but will also provide critical regulatory savings (\$270 million) for the American economy.
- This rule is only a proposal, and an additional comment period is now open.

### GOALS:

- Improved safety
- Increased flexibility

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## Major Provisions

- This proposal would improve efficiency by providing flexibility in five areas:
  1. Short-haul operations
  2. Adverse driving conditions
  3. 30-minute break
  4. Split-sleeper berth
  5. Split-duty provision

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## Short-Haul Operations

- FMCSA is proposing to change the short-haul exception time period from 12 to 14 hours and extending the distance the driver may operate from 100 air-miles to 150 air-miles.
- Example: The driver is based out of Peoria. Under the current rules, the distance the driver could go in a day would not include Chicago or St. Louis. The new proposal would allow that driver to service those two cities, as well as an additional 2 hours.

100 air-mile radius  
(Current Rule)

150 air-mile radius  
(Proposed Rule)



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## Adverse Driving Conditions

- FMCSA is proposing to change the adverse driving conditions exception by extending the duty day by 2 hours.
- This is in addition to the additional 2 hours of driving time already allowed. The proposed change would apply for both property-carrying (14-hour “driving window”) and passenger-carrying (15-hour on duty) operators.



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## Adverse Driving Conditions

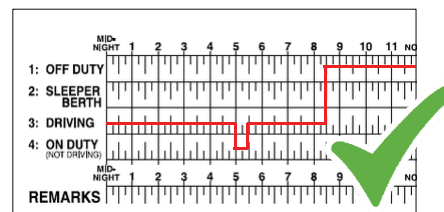
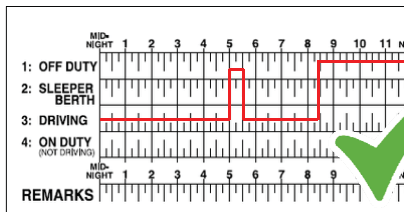
- Example: A driver is 15 miles from his destination when he hears of a gravel spill on the bridge ahead (the bridge is the only access to the destination). He has 1 hour left of driving time and 1 hour left in his “driving window” / duty time. Under the new proposal, this driver can stop at the rest stop at the next exit (for up to 2 hours) to wait for the road clean-up crew to complete work and still have time to get to his destination without violating the HOS rules.



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## 30-Minute Break

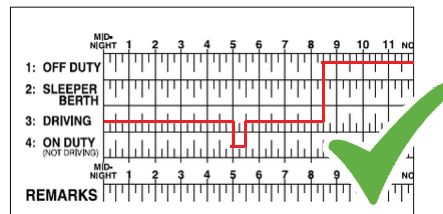
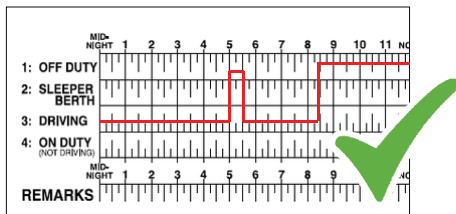
- FMCSA is proposing to change the 30-minute break rule by allowing the requirement to be satisfied by an on-duty break (in addition to an off-duty break).
- The requirement for property-carrying drivers would be applicable in situations where a driver has driven for a period of 8 hours without at least a 30-minute interruption.



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## 30-Minute Break

- The examples below assume the driver has driven for 8 hours and needs to take a 30-minute break. Currently, only the log on the left is in compliance with the HOS rules. Under this proposal, both examples are compliant.



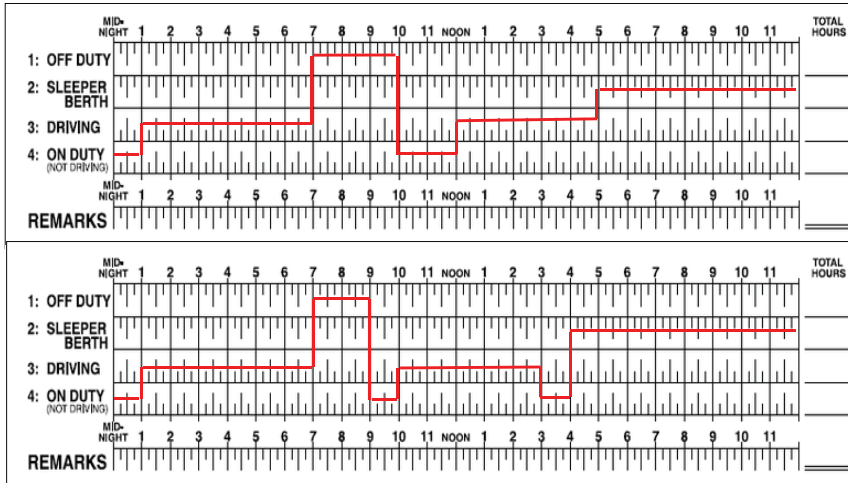
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## Split-Sleeper Berth

- FMCSA is proposing to change the sleeper berth exception so that neither part of the split would count against the 14-hour driving window.
- Drivers would be required to have at least 7 consecutive hours in the sleeper berth.
- The other period must be at least 2 hours off-duty (in or out of the sleeper berth) and must total a minimum of 10 hours in the two periods (e.g., 7/3 or 8/2 split).

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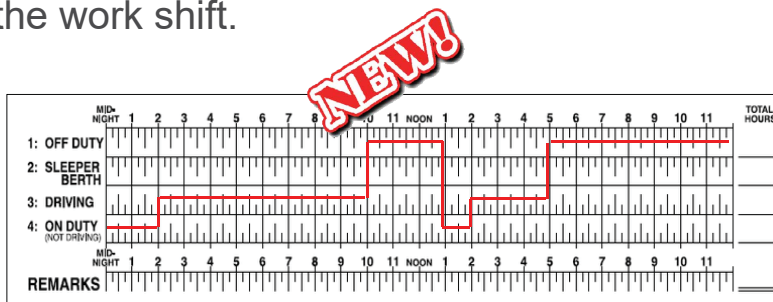
# Split-Sleeper Berth



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# Split Duty Period

- FMCSA is proposing to allow one off-duty break of 30 minutes up to a maximum of 3 hours, that would “pause” a driver’s 14-hour driving window, provided the driver takes 10 consecutive hours off duty at the end of the work shift.



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## Focus Questions

- FMCSA continues to seek input and data from industry and the public on a number of questions included throughout the NPRM such as the following:
  - Any comments and/or supporting data on the possibility of a 6 and 4 hour split-sleeper berth break?
  - What operations would benefit from multiple off duty periods totaling 3 hours?

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## Focus Questions

- FMCSA continues to seek input and data from industry and the public on a number of questions included throughout the NPRM such as the following:
  - How often do work shifts require an individual to drive more than 8 hours without at least a 30-minute change in duty status?
  - Understanding adverse conditions cannot be predicted, will drivers utilize this provision more often after the proposed changes?

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## Comments

- Federal eRulemaking Portal:  
<https://www.regulations.gov>
- Enter the Docket Number in the Search box (FMCSA-2018-0248)
- Ability to view the full NPRM and other comments submitted
- For additional information:
- <https://www.fmcsa.dot.gov/regulations/fmcsa-hours-service-proposed-rule>

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## Driver Attraction & Retention

- Good drivers add to the team mentality
  - Work individually
  - One mistake reflects poorly on the group and company
- Excessive turnover:
  - Reduces group flexibility
  - Exposes the team and company to unnecessary risk
- Attracting and retaining good drivers helps keep Cascade Manufacturing Company off the DOT radar!

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## Driver Attraction & Retention

### ➤ Prior to job offer:

- Background check
- MVR
- Drug and alcohol test

### ➤ Onboarding

- 2-week ride along
  - Equipment
  - Jobsite requirements
  - Load securement
  - Paperwork
  - Log devices
- Establishes group connection

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## Driver Attraction & Retention

- People practices
- PTO, schedule, company benefits
- GPS reimbursement
- Steel toe boot reimbursement
- Annual safety day
- Company issues (high visibility) t-shirts replaced annually
- No exception approach to maintenance and load concerns (reinforce they are a professional driver)
- Mobile wash service every other week
- Listen

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## Final Thoughts

- Communicate, communicate and communicate
- Understand what your drivers experience while they are in the yard, on the road and at jobsites

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## Questions?

- Scott Wagner
  - [sgwagner@cascade-mfg-co.com](mailto:sgwagner@cascade-mfg-co.com)
- Thomas Balzer
  - [Tom@ohiotrucking.org](mailto:Tom@ohiotrucking.org)

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## SBCA Resources

➤ For more resources on this topic, visit [www.sbcindustry.com](http://www.sbcindustry.com) and search for the below titles:

- [SBCA Truck Program](#)
- [Transporting Trusses: Navigating Regulation & Enforcement](#)
- [Transporting Trusses: Size, Weight & Reducible Load Issues](#)
- [Transporting Trusses: Load Securement & Driver Responsibility](#)

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## Learning Labs


- 12:00 pm – Knowing Your People to Keep Your People
- 1:30 pm – Safety
- 3:00 pm – Cybersecurity

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Please Fill Out Your Session Evaluation

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