

Transportation Safety

Training ADVISOR

December 2022

Driver Paperwork

Keep your drivers prepared and organized

Electronic v. paper documents

ATRI releases updated crash
predictor behaviors

Results of CVSA hazmat
inspection initiative

Information and resources to help your drivers operate safely



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MESSAGE FROM THE EDITOR

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- Hazardous materials and dangerous goods,
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- Waivers and exemptions,
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Jen Loomis

Jen Loomis joined J. J. Keller in 2021 on the Content & Consulting Services Transportation Team. As an Associate Editor, Jen edits a variety of products including the *Transportation Safety Training Advisor*, *Driver Report*, and *Driver Training Awareness Program* newsletters. She also provides regulatory support in the area of DOT drug and alcohol testing.

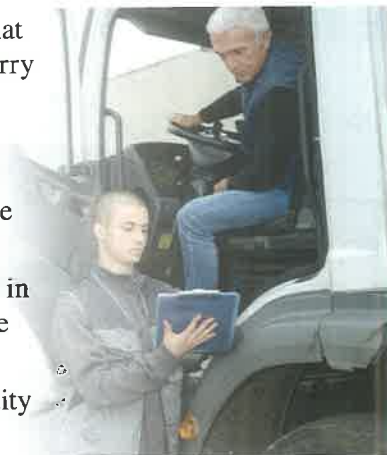


TRAINING BLUEPRINT — PAPERWORK MANAGEMENT

Driver paperwork requirements

The type of paperwork that drivers are required to carry depends on a variety of factors, including:

- Whether you operate as a for-hire or private carrier,
- Whether you operate in interstate or intrastate commerce, and
- The type of commodity you are hauling.



TIP: Make sure drivers understand what can be electronic and what needs to be carried as a hard copy.

The following is a general list of documents drivers would be expected to have available:

- **Operator's/driver's license.** A current, valid license for the type of commercial motor vehicle the driver is operating.
- **Medical card,** if a non-CDL driver. A CDL driver only needs to carry a copy of the certificate for 15 days after it's issued.
- **Permit credentials.** Based on the type of motor carrier operation you have, the driver may need the following:
 - Base state or IRP cab card;
 - IFTA license and decals;
 - State authority credentials;
 - Insurance card, if the carrier's home state requires that proof be carried; and
 - Any necessary trip or special permits.
- **Shipment paperwork.** A for-hire carrier needs a bill of lading, otherwise some type of shipment documentation.
- **Hours-of-service records.** ELD or paper logs if the driver is not using one of the short-haul exemptions in §395.1(e).
- **Hours-of-service supporting documents.** Fuel receipts, toll receipts, etc.
- **ELD documentation:**
 - A user's manual for operating the ELD;

- An instruction sheet with step-by-step instructions for transferring hours-of-service records to an authorized safety official;
- An instruction sheet on reporting ELD malfunctions and recordkeeping procedures during ELD malfunctions; and
- A supply of paper grid graphs to record driver duty status and related information for at least eight days, in case of ELD malfunction.

- **Lease agreement,** if the vehicle is leased.
- **Documentation of annual inspection.** A copy of the annual inspection report or an annual inspection sticker/decal. If complying with a mandatory state inspection program, any required document for that program must be on the vehicle.
- Any **DVIRs** that are on the vehicle (none are required to be on the vehicle, but if there are any, the driver is to present them if requested)

TIP: Talk to drivers about what an electronic signature is — a method used for signing an electronic document that identifies and verifies the person signing the document.

- **Hazardous materials paperwork.** Depending on what hazardous materials are being hauled, the driver may need the following:
 - Shipping paper;
 - Hazardous waste manifest;
 - Emergency response information;
 - Certification of registration with PHMSA if the registration number is not included on another document;
 - Placards;
 - Safety plan;
 - HMSP, if required; and
 - If transporting Division 1.1, 1.2, 1.3:
 - A copy of Part 397,
 - Instructions on what to do in the event of an accident or delay in shipment, and
 - A written route plan. ♦

TIP: Help drivers stay organized by providing them with a document holder to carry in their vehicles.



TRAINING HANDOUT — PAPERWORK MANAGEMENT

Electronic v. paper documents: Do you know the requirements?



These documents can be presented electronically during a roadside inspection:

- Shipping documents,
- Lease agreements,
- Medical cards and medical waiver/exemption paperwork,
- Hours-of-service documents (including electronic versions of paper logs and the required accompanying documentation a driver using an ELD must carry),
- Daily vehicle inspection reports, and
- Annual vehicle inspection reports.



These documents must still be carried by the driver or in the vehicle:

- Driver's license,
- Shipment paperwork for a hazardous materials shipment,
- Vehicle registration,
- Oversize and overweight permits,
- Documents required by a Canadian regulation, and
- Fuel tax permits (recommended, although some jurisdictions may allow electronic fuel tax permits).

Electronic documents must:

- Be legible;
- Be able to be presented during the inspection; and
- Contain the required information, including an electronic signature, if a signature is required on the document.

If the officer requests a hard copy of the document, the driver or carrier must be able to provide it to the officer within 48 hours. ♦



TEST YOUR KNOWLEDGE — PAPERWORK MANAGEMENT

Directions: Read each statement or question carefully and mark the best answer.

1. You can present your driver's license electronically to an inspection official.
 - A. True
 - B. False

2. You (or your carrier) have five business days to provide a hard copy^{CDL} to an officer who requests it.
 - A. True
 - B. False

3. HOS documents, DVIRs, and lease agreements are examples of documents that _____ as electronic documents.
 - A. May be acceptable
 - B. Are not acceptable

4. The vehicle registration and oversize/overweight permit are examples of documents that _____ as electronic documents.
 - A. May be acceptable
 - B. Are not acceptable

5. When are signatures required on electronic documents?
 - A. Always
 - B. Never
 - C. When the document requires a signature
 - D. When an inspection official requests a signature

NAME: _____ DATE: _____



ATRI releases updated crash predictor behaviors

The American Transportation Research Institute (ATRI) has released its updated Crash Predictor report and once again has concluded that driver behaviors are a key predictor of future crashes.

The institute's most recent research identifies the top five driver behaviors that predict the increased likelihood of that driver being involved in a crash:

1. A Failure to Yield Right-of-Way violation (141 percent)
2. A Failure to Use / Improper Signal conviction (116 percent)
3. A past crash (113 percent)
4. A Reckless Driving violation (104 percent)
5. A Failure to Obey Traffic Sign conviction (85 percent)

ATRI released previous Crash Predictor Models in 2005, 2011, and 2018. When comparing results across all four years, ATRI found that the following are the most "stable" predictors of a future crash:

1. Reckless Driving violation (114 percent)
2. Failure to Use / Improper Signal conviction (89 percent)
3. Past crash (88 percent)
4. Failure to Yield Right-of-Way violation (85 percent)
5. Improper or Erratic Lane Changes conviction (79 percent)

In addition, ATRI found that:

- Drivers with any out-of-service violation were 29 percent more likely than their peers to be involved in a future crash;
- Drivers with a moving violation were 43 percent more likely to be involved in a future crash; and
- Any conviction increased future crash likelihood by 46 percent.

This most recent analysis looked at a sample of 583,805 drivers in the United States who hold a Class A, B, or C commercial driver's license (CDL). ♦



CVSA announces results of hazardous materials inspection initiative

The Commercial Vehicle Safety Alliance (CVSA) has released the results of its five-day unannounced hazardous materials/dangerous goods (HM/DG) inspection initiative. Over June 13-17, inspectors in Canada and the United States inspected over 6,200 vehicles transporting HM/DG and over 6,600 HM/DG packages.

The top three most common violations discovered during this year's initiative are the same as last year's top three:

1. Shipping papers violations
2. Non-bulk/small means of containment packaging violations
3. Bulk packaging/large means of containment placarding violations



Drivers and vehicles that were put out of service (OOS) were not allowed to resume travel until all OOS violations were corrected. OOS orders can be issued for a wide variety of serious violations, including not having shipping papers that identify the HM/DG in the vehicle, missing more than half of required hazard class placards, or transporting forbidden materials. CVSA has not disclosed how many OOS orders were issued during this year's initiative, but it did reveal that 43 HM/DG packages were found to be leaking, which is an automatic OOS condition. ♦

Union Pacific's new intermodal seal requirements

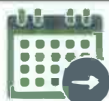
Transporters who move intermodal containers via Union Pacific (UP) in the United States must comply with new intermodal seal requirements, according to a policy change announced by UP on October 5, 2022.

As of December 5, 2022, Union Pacific will require high security "H" seals on all intermodal shipments.

UP indicated that "H" seals will help reduce industry thefts and "provide the highest level of protection from unauthorized entry into intermodal containers or trailers during all levels of logistic transportation from the shipper." Furthermore, UP indicates a minimum seal requirement of "1/8 cable or bolt seal," which means a high security "H" cable or bolt seal as defined by ISO 17712. A "1/8 cable" is a cable seal with a 1/8-inch (3.25 millimeter [mm]) diameter cable. Smaller diameter cable seals would **not** meet this requirement.

The policy change is expected to reduce theft and loss claims for shippers. Indicative seals do not deter theft, but high security seals provide protection against unwanted intrusion.

UP customers can no longer use indicative "I" seals or security "S" seals for intermodal shipments beginning December 5, 2022. Examples of "I" seals include plastic seals and metal (tin) strap seals. Examples of "S" seals include cable seals with smaller than 1/8-inch (3.25 mm) cables. ♦



Next Month's Topic: Visual Search

Professional drivers need to be aware of what is going on around their vehicles at all times. Conducting an effective visual search is important when it comes to gathering all of the necessary information needed to make safe driving decisions. ♦



Expert Help: Questions of the Month

Question: We have the annual inspection decal on our trucks along with digital access to the annual inspection paperwork. In a market of ours recently, a roadside inspector found a truck to have a faded decal that has become illegible. Our driver produced the annual inspection paperwork, however the inspector still cited him for no decal. Are both the decal and paperwork required?

Answer: The federal regulation involved (§396.17) states that the vehicle must have *either* a copy of the report or a decal containing specific information on board as proof the vehicle was annually inspected. If the driver presented the officer with a paper or electronic version of the annual inspection report when the officer stated the decal was illegible, there should have been no violation written and the violation should be challenged through DataQs, using the regulation as support.

Question: Commercial trailers have permanent license plates. As these are non-expiring, is trailer registration required to be kept in the document holder on the bulkhead of the trailer? In the event of an accident, an officer would ideally want to see tractor registration/cab card, COI, and probably even verify that the equipment is up to date on the Federal inspections. However, I am unsure if trailer registration is needed since they have permanent plates.

Answer: The trailer registration is not included on the list of documents checked during a DOT Level III Driver/Credential/Administrative inspection. However, some states do mention trailer registration as something they look for. Therefore, we recommend making sure the documentation is accessible, especially when traveling through states that may require it. ♦

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