



NTSB National Transportation Safety Board

Office of Highway Safety

Motor Carrier

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Motor Carrier Issues

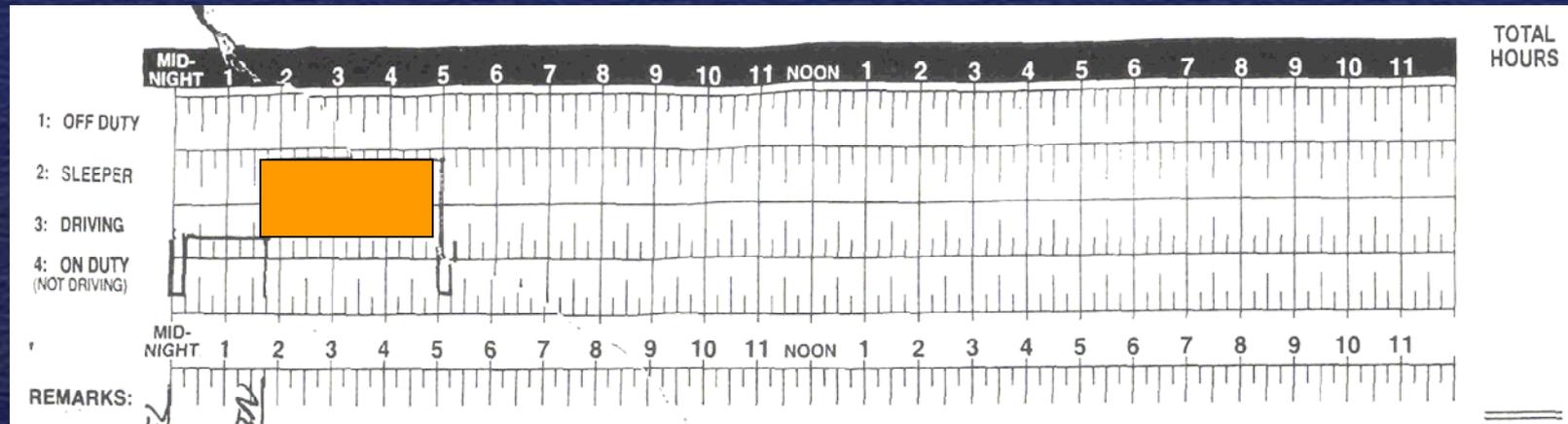
- Paper logs
 - Susceptibility of paper logs to tampering
 - Lack of Federal regulations to keep track of log modifications
- Driver oversight
- Electronic on-board recorders (EOBRs)

Paper Logs

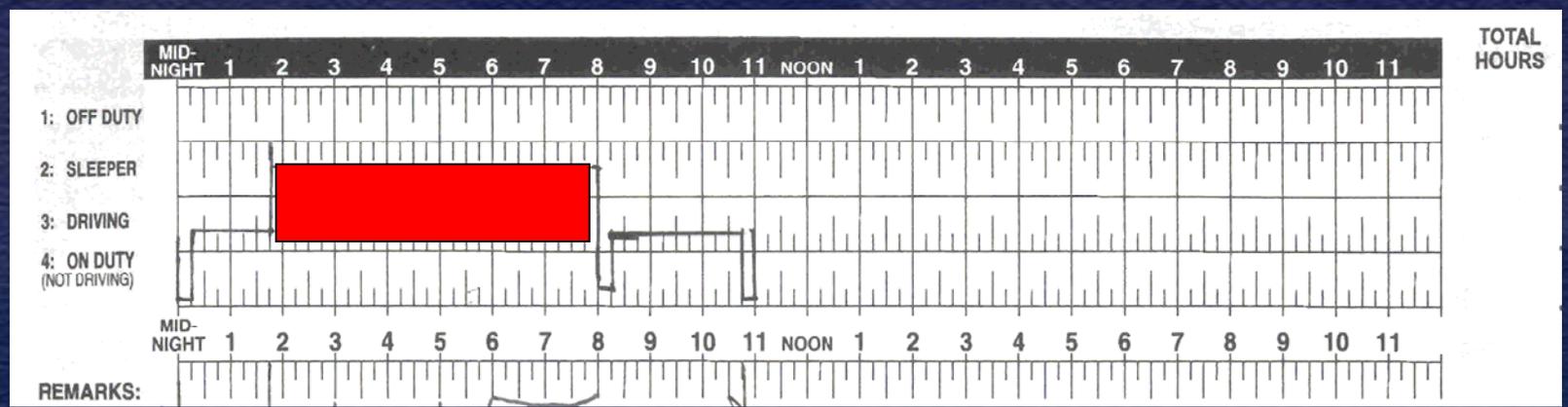
- Interstate drivers are required to complete a daily log
- Logs are handwritten
- Drivers must retain the previous 7 days' logs

Paper Logs

Original July 16 log



Modified July 16 log



Paper Logs

- Neither log corresponded with GPS data
- Driver was on duty for 19.75 hours, exceeding Federal hours-of-service limits

Paper Logs

- Difficult to determine validity of information on unbound logs
- Federal regulations
 - Allow corrected logs to be submitted at any time
 - Do not require corrected logs to be attached to original logs
- Better system is needed to account for changes to a driver's log

Paper Logs Summary

- Paper logs are susceptible to tampering
- Paper logs are often inaccurate
- Paper logs require time-sensitive supporting documents to verify
- FMCSA should require all motor carriers and drivers to account for all log sheets and entries

Driver Oversight

- Equity was prohibited from permitting its drivers to exceed hours-of-service limits
- Equity was required to have a management system to detect hours-of-service violations

Driver Oversight

Equity log review program

- All logs scanned and checked for hours-of-service violations
- 50% of logs verified against supporting documents
- Hours-of-service violators disciplined

Driver Oversight

- Inspection history for hours-of-service violations
 - 76 drivers OOS
 - 73 drivers OOS for hours-of-service violations
- Enforcement action for false logs
 - February 1996
 - February 2003
 - July 2004

Driver Oversight

Compliance reviews

- Rating at the time of the accident
 - Satisfactory
- Rating postaccident
 - Conditional
- Equity cited for 20% log falsification rate

Driver Oversight

Postaccident compliance review

- Scheduled prior to the accident
- Allegations that Equity compelled drivers to violate hours-of-service limits

Driver Oversight

After compliance review

- 17 of 17 Equity drivers checked had violated hours-of-service regulations during a 1-month period
- Verified with receipts, GPS, and electronic messages

Driver Oversight

- Many supporting documents were not time-stamped
- GPS data was automatically time-stamped but was not used to verify logs
- Collection of electronic supporting documents was not required by FMCSA

Driver Oversight Summary

- Equity claims to have a safety management program
- Equity's history of hours-of-service violations dating back 11 years shows program is deficient
- Equity operated with disregard for Federal hours-of-service regulations

Electronic On-Board Recorders

- Equity had log review system that was ineffective
- Equity had electronic GPS messaging system in its trucks

Electronic On-Board Recorders

NTSB previous recommendations

- 1977 - advocated study of on-board recorders
- 1990 - recommended that on-board recorders be mandated
- 1998 - recommended that industry phase out paper logs in favor of on-board recorders

Electronic On-Board Recorders

January 2007 EOBR NPRM

- Offers incentives to carriers to voluntarily adopt EOBRs
- Mandates EOBRs only for “pattern violators”

Electronic On-Board Recorders

NTSB concerns with EOBR NPRM

- Not mandated for all carriers
- Relies on ineffective compliance review process to identify “pattern violators”
- Uses EOBRs as a form of punishment

EOBR Summary

- Hours-of-service regulations can be circumvented with paper logs
- FMCSA's NPRM will not lead to industry-wide adoption of EOBRs
- FMCSA should mandate EOBR use to improve hours-of-service compliance



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