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Before the

FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION
U.S. DEPARTMENT OF TRANSPORTATION

FMCSA-2001-11060-14

Comments From

CONSOLIDATED SAFETY SERVICES, INC.

ON

Certification of Safety Auditors, Safety Investigators, and Safety Inspectors

49 CFR Parts 350 and 385

FMSCA Docket No. FMCSA-2001-11060

May 15, 2002

FORWARD

Consolidated Safety Services, Inc. (CSS), with its corporate office located at 10335 Democracy Lane, Suite 202, Fairfax, VA 22030 is a nationwide safety and occupational health company incorporated in 1988. CSS has four operating divisions, one of which has been performing transportation safety consulting services for more than 12 years. The Transportation Safety division of CSS has had the honor, privilege and responsibility of providing contract transportation safety services to the Department of Defense (DoD), Military Traffic Management Command (MTMC), since 1990. Under the Transportation Safety and Security Services (TRANSS) contract and the Passenger Surface Inspection Program (PSIP), CSS has been tasked with monitoring regulatory compliance and evaluating safety performance of all motor carriers under contract with MTMC to transport DoD freight and passengers.

In the performance of our duties, CSS conducts a wide variety of inspection, monitoring, and surveillance activities. Two of these inspection activities, the Facility, Terminal and Equipment (FTE), comparable to a DOT on-site compliance review, and the Standard of Service Safety (SSS), similar to what is commonly referred to as a roadside inspection, are conducted routinely by CSS transportation safety inspectors. As such, although on a smaller scale, CSS is faced with the same issues of uniformity and consistency on our inspection processes as the Federal Motor Carrier Safety Administration (FMCSA).

Throughout the various hearings and testimony on the subject of motor carrier safety, which eventually lead to the formation of FMSCA, one accident in particular was repeatedly referenced. It was that of Custom Bus, in Louisiana on May 9, 1999 in which 22 individuals lost their lives, and 20 more were seriously injured. The investigation and subsequent report from the National Transportation Safety Board pointed to a number of issues within the FMCSA system that may have contributed to the tragedy of this accident. Two in particular are the subject of this Docket.

Therefore, in the interest of innovation, improved highway safety and a more effective and efficient FMCSA, CSS files these comments for consideration regarding the Interim Final Rule; FMCSA Docket No. FMCSA-2001-11060.

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INTRODUCTION

During the past 12 years, CSS has proudly shouldered the responsibility of safety, security, and comfort of military personnel when transported by a MTMC approved passenger motor carrier, and more recently, the safe and secure movement of cargo for the Department of Defense. For those who don't know, MTMC is the traffic manager for DoD.

To meet these responsibilities, CSS routinely inspects, monitors, and holds DoD approved passenger and/or freight motor carriers to a level of compliance and on-road performance that generally exceeds the minimum standards of the FMCSR. In 1992, as a measure to promote safety similar to the spirit and intent of the New Entrant initiative by the FMCSA, CSS introduced the FTE Pre-Qualification Inspection as part of the MTMC inspection program. The FTE Pre-Qualification Inspection is a full on-site compliance review and performance evaluation, which is conducted as the last and final step in the qualification process for those motor carriers seeking MTMC approval. CSS has conducted over 4,000 on-site DOT compatible compliance reviews on motor carriers nationwide for the Department of Defense. Since the inception of the FTE Pre-Qualification Inspection, 40% of those seeking approval have failed to meet even the minimum standards of the FMCSR and thus were not approved. One such carrier was Custom Bus involved in the accident of May 9, 1999 in Louisiana.

In the twelve years that CSS has been conducting motor carrier safety assessments and monitoring for the Department of Defense, not one individual has lost their life while being transported by a regulated MTMC approved passenger carrier. In other words, DoD approved carriers, made up of more than 500 companies operating more than 100,000 vehicles and logging more than a billion combined miles, did so without one fatal accident. It is this fact, plus the circumstances surrounding the Custom Bus Accident that gives CSS a unique perspective and insight regarding the issues of this Docket.

BACKGROUND

Section 215 of the Motor Carrier Safety Act of 1984 directed the Secretary of Transportation in cooperation with the Interstate Commerce Commission to establish a procedure to determine the safety fitness standard of owners and operators of commercial motor vehicles operating in interstate commerce. As such, the Federal Highway Administration (FHWA) issued Title 49, Code of Federal Regulations, Part 385, which established the procedures to determine the safety fitness of all interstate motor carriers. FHWA also established the "safety fitness standard" which a motor carrier would have to meet to obtain a

satisfactory safety rating. Carriers would receive safety ratings through compliance reviews conducted by FHWA safety specialist and state safety investigators. Beyond the need to rate all motor carriers, the selection process for a compliance review at that time was the result of a complaint, carrier request, or enforcement follow up.

In an attempt to meet the September 30, 1992 deadline (previously July 1990 was the established date), to rate the entire universe of the motor carriers, FHWA established the safety rating review program in October of 1986. The "safety review" was a condensed and shortened compliance review that used a total of 72 questions, covering various rating factors, in an attempt to determine the relative risk of the motor carrier.

In January 1991, the General Accounting Office (GAO) issued a report entitled "Truck Safety; Improvements Needed in FHWA's Motor Carrier Safety Program," in which GAO reported that FHWA had not rated but about 60 percent of the then estimated 130,000 motor carriers in operation, and that it would not meet the September 30, 1992. FHWA did not extend the deadline and indicated that they planned to focus on high-risk carriers using the Selective Compliance and Enforcement (SCE) program[1]. The Inspector General's Audit Report of March 26, 1997 on FHWA's Motor Carrier Safety Program pointed out several serious flaws in SCE system that did not ensure that carriers with the worst safety records were targeted for a compliance review.

In November 1989 Congress granted FHWA authority and funding to hire an additional 150 investigators. In 1995 another 292 were added. During that time from 1990 to 1995 the number of unrated carriers increased from 132,000 to 220,500 for a total of 64% unrated. During 1995 MCSAP funds, used by the states for conducting driver/vehicle inspections and compliance reviews grew to $81.9 million and continues to grow today. Yet more than 70% of the estimated 590,000 motor carrier population today still remain unrated.

In 1993, the FHWA, Office of Motor Carriers, with the assistance of the Volpe Center began development of an improved process for determining motor carrier safety fitness and in early 1995, SafeStat was born. SafeStat, using data collected from driver/vehicle inspection, accidents, and compliance reviews, scores each motor carrier in four individual Safety Evaluation Areas (SEA), provided there is sufficient data to score the carrier. SEA scores are tabulated and each carrier is ranked or classified in order of relative risk and scheduled for a compliance review based upon the classification.

This process is repeated every six months. Yet, as of September 22, 2001 the combined data from the four FMCSA service centers shows that only 1.25% of the total 597,553 census carriers listed were scored. The success of SafeStat is predicated upon data and more than enough to score only 1.25% of the carriers in operation. However, increased data could significantly increase the number carriers who should be subject to a compliance review and tax FMCSA already limited resources. During the Truck and Bus Safety Summit in Kansas City, Missouri in 1995, leadership groups reached a consensus opinion that more inspections were needed, and that collection and appropriate use of more data was necessary to make FHWA efforts viable. Most of the motor carriers in attendance at the summit voiced the same opinions and support for more inspections, because they could not continue to compete against those less than reputable carriers who discount rates by cutting corners and not conforming to regulations.

On March 26, 1997, the Associate Deputy Inspector General issued his report to the Federal Highway Administration on its Motor Carrier Safety Program. In that report, it was recommended that FHWA augment the compliance review process by implementing the use of third-party contractors to perform initial and periodic safety evaluations. FHWA agreed that more data/information was needed on more motor carriers, but stated concerns about enforcement, cost, and complexity of monitoring contractor inspection programs. FHWA indicated that they planned on reviewing Canada's progress in using a third-party program and planned to reach a decision by the end of calendar year 1998. Interestingly, it was representatives from Canada who contacted CSS for the purpose of evaluating the effectiveness of our third-party inspection program performed for DoD in support for their third-party initiative.

FHWA further stated that implementing third-party contractors would expand safety evaluations to the entire motor carrier population and provide FHWA with needed information on the safety fitness of each motor carrier. They further acknowledged that the use of third-party contractors would allow FHWA to use its limited resources on higher priority enforcement and safety improvement efforts. These statements were made 5 years ago.

January of 2000 saw the establishment of the new Federal Motor Carrier Safety Administration. This was hailed as a major achievement for highway safety and is still considered as such today. Yet many of the same issues are present today. Without debating the issues surrounding why the new administration was established, there is one issue relevant to the administration's current request for comments on the certification program and third-party auditors.

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[1] In October 1994 FHWA discontinued the safety reviews (the shortened compliance review).

On February 12, 1996, a Louisiana State inspector had completed his on-site compliance review on Custom Bus under the MCSAP program. A satisfactory safety rating was issued March 28, 1996 as a result of that audit. As mentioned previously, carriers seeking approval my MTMC first had to have a satisfactory safety rating issued by DOT to even be considered. On July 10, less than five months after the DOT inspection, CSS was commissioned to conduct a Pre-Qualification Inspection on Custom Bus. The carrier failed our inspection, with our inspector siting a serious lack of compliance and safety management controls associated with driver qualifications, the medical certification process, and the carrier's drug and alcohol testing program. Thus, Custom Bus was not approved to do business with MTMC. In fact, the CSS inspection revealed 60% more violations than those found by the Louisiana State inspector. The Custom Bus accident of May 9, 1999 in which 22 individuals lost their lives and 20 more were seriously injured, brought to light two of the primary issues of this Docket: The significance of inspector qualifications in determining effectiveness and uniformity of the inspection process and,
The potential overlooked value of qualified third-party inspectors.

The discrepancies between the CSS inspection of Custom Bus and those of the DOT representative are truly one example of many that CSS can point to over the past 12 years, and clearly demonstrate how critical inspector qualifications and inspection uniformity are in managing a successful safety inspection program. This is not said with arrogance or with any malice, only to support the current efforts to improve the value of the inspection process and to once again consider the value of properly qualified and certified third-party inspectors.

To provide better clarity and understanding of our comments we will list each issue and our comments independent of one another.

INSPECTOR CERTIFICATION

ISSUE ONE: Establishment of three types of certifications.

CSS Comments: CSS does not support a distinction for a certification between those capable of conducting "safety audits" and those conducting "compliance reviews". This distinction implies that the experience, skills and knowledge required to conduct a safety review are less than those required to conduct a compliance review. We understand that there are more stringent documentation requirements for a compliance review, due to subsequent enforcement actions, but believe that similar inspector qualifications are required for both activities.

It is our interpretation, based upon the language in the IFR that the primary difference in the "safety review" and the "compliance review" is the depth in which records are selected and reviewed. If the safety review will also be used to evaluate a motor carrier's safety management controls, then it is most critical that an inspector not only be fully qualified, but that they understand the spirit and intent of the regulations as well. The FMCSR are written to provide the motor carrier with minimum standards and criteria, not necessarily how they are to meet and manage the requirement. A carrier's safety management controls, as defined under Part 385, are the key to whether or not they can maintain compliance and thus the desired on-road performance. It appears obvious to CSS that an inspector conducting a "safety review" should have superior knowledge and understanding of the regulations. In addition, that inspector should have useful knowledge of the day-to-day operation of a motor carrier to effectively evaluate that carrier's safety management controls and relative risk. As such, we support a certification program. However, we do not support having different standards for certification to perform the compliance review and the safety review. They should be the same. Thus there would be only two categories of certifications, that for conducting compliance/safety reviews and the other for conducting driver/vehicle inspections.

We do believe however, that within those two primary categories there could be further distinctions similar to the endorsements on a driver's CDL. For example, inspectors with the knowledge and experience required to conduct inspections on HAZMAT or passenger carriers. Generally speaking, the knowledge and skills required to conduct on-site inspections, whether classified as a "safety review" or "compliance review" for a HAZMAT carrier or a passenger carrier are different. An individual who is not completely knowledgeable of the hazardous materials regulations should not be allowed to conduct an inspection on a motor carrier who transports hazardous materials. Equally important are the unique differences between the freight motor carriers and passenger motor carriers. The nature of the passenger motor carrier's business compared to that of a freight motor carrier are significantly different and requires a completely different set of investigative skills and understanding of the day-to-day operation. Without this knowledge, proper guidance and assistance in developing effective safety management controls can not be provided, which we understand to be an essential component of the review, whether it be a compliance or safety review.

With regard to certifications for those qualified to conduct driver/vehicle roadside or destination inspections, we also believe separate qualification distinctions could be valuable. The obvious distinction again could be between those qualified to conduct inspections on HAZMAT and passenger carriers and

those not qualified. Obviously, additional regulations involving HAZMAT carriers and the vast structural difference in passenger carriers require special knowledge and skills to conduct vehicle/driver roadside inspections. CVSA has recognized the differences and trains and qualifies individuals to conduct motor coach inspections independent of truck inspections.

As such, CSS would like to see FMCSA support inspector certifications as follows:

- Compliance/Safety Reviews
  1. General Freight Endorsement
  2. HazMat Endorsement
  3. Passenger Motor Carrier Endorsement
- Driver/Vehicle Inspector Certification
  1. General Freight Endorsement
  2. HazMat Endorsement
  3. Passenger Motor Carrier Endorsement

ISSUE TWO: Grandfather Provision

CSS Comments: CSS does not agree with the grandfather provision of the IFR. To assume that every inspector who currently conducts inspections for the federal government meets or exceeds the spirit and intent of a professional certification program is laughable. Furthermore, it is akin to saying there is not a current problem with inconsistencies and uniformity in the inspection process. To implement such a "Grandfather" provision would invalidate the entire certification program. One of the reasons a certification program was introduced was do to the inconsistencies found between the inspection results of the compliance review conducted by the Louisiana State inspector and that found by CSS on Custom Bus. This was made apparent by the legislation introduced by Senator Breaux, S. 1524, the Motor Carrier Safety Specialist Certification Act. If there is any hope of establishing consistency and uniformity in the inspection process through certification, then there has to be a way to include existing inspectors in the education and evaluation process.

CSS agrees with the FMCSA that there is no need to repeat training for those who have already completed training. However, there is certainly the need for determining some kind of baseline proficiency, before "granting" immunity to those who may otherwise qualify. An important component of any certification program is to create and monitor minimum levels of competency. To eliminate this

component would jeopardize the integrity of the process. Implementation of a proficiency test would not only determine the level of competency, but would also identify specific areas of weakness which may be improved with minimal training expense. A proficiency test would not be threatening to a qualified motor carrier safety inspector, whether they are a federal, state or private employee. To the contrary, a qualified safety inspector would take comfort in knowing their strengths and weaknesses, and would take pride in their dedication to improvement. The assumption that merely conducting a specific number of inspections will make an inspector more competent is incorrect and dangerous. Obviously, repetition doesn't make an incorrect process correct. There are many examples of inspectors making the same mistakes for years, but none more salient than the issues surrounding the DD-3 braking system on MCI motorcoaches. CVSA certified driver/vehicle inspectors, meeting all the certification requirements, routinely placed motorcoaches out-of-service assuming that the DD-3 brake chamber was a type 30-clamp type brake chamber[2]. It took nearly two years and the combined efforts of the United Motorcoach Association (UMA), American Bus Association (ABA), and CSS to correct this deficiency. The end-point being that merely conducting a specific number of inspections does not necessarily mean the individual will keep pace with the rapid change affecting the motor carrier industry. The CSS training program, for inspectors conducting motor carrier safety inspections for DoD, is a dynamic process, supported by repeated field evaluations and an annual week-long training session and proficiency evaluation. A standardized proficiency test developed for motor carrier safety inspectors will significantly improve and maintain uniformity and consistency in all inspection activities.

CERTIFYING NON-GOVERNMENT EMPLOYEES TO CONDUCT SAFETY REVIEWS.

FMCSA and the various state enforcement communities have voiced integrity-based concerns regarding this issue. Recommendations to the Administration to consider qualified third-party inspectors go back as far as 1996, if not earlier. In late 1995, CSS at the urging of UMA and the passenger motor carriers who underwent vehicle inspections as part of the DoD Inspection Program, tried to introduce the concept of third-party inspections to CVSA. As part of our on-site compliance review for DoD, CSS conducted CVSA Level V North American Standard Inspections on a number of vehicles in the carrier's fleet, based upon the military's Mil Standard. During the course of any given year, CSS would inspect an estimated 800 to 1,000 motorcoaches. In fact, FHWA sent representatives to our corporate headquarters to evaluate our training program for the purpose of accepting our motorcoach inspection data, which was approved, but later discontinued by MTMC, not DOT.

[2] The brake stroke allowed for a type 30-clamp type brake chamber is 2 inches, DD-3 is 2 and ¼.

The primary purpose of our effort was to identify vehicles that had passed the standard, and affix the international accepted CVSA decal. This of course would provide savings of both time and money for the enforcement community, as well as a benefit to the taxpayers. If the vehicle passed the inspection to the established standard, conducted by a qualified individual, why subject the vehicle to another inspection simply because the first inspection was not conducted by an enforcement officer? We believe that CSS has, over the last 12 years proven that properly trained, qualified third-parties can provide a valuable service in promoting highway safety.

Below we will attempt to provide the logic and rational for the use of third-party inspectors and address those issues and/or concerns generally voiced by state and federal officials.

ISSUE ONE: Potential for Corruption

This is probably the most noted argument against the use of third-parties. The assumption goes something like this: "Any inspector who is paid by the carrier would likely overlook safety violations and non-compliance issues, so as not to upset their client". The more recent iteration of that assumption is to add "unless they are law enforcement personnel". Corruption is possible in any industry, in any company, and in any government. The point being that there are tradeoffs, and hopefully controls designed to minimize such activities. If the benefits significantly outweigh the "potential for corruption" then clearly there may be merit in the concept. For example, if FMCSA could increase the number of safety inspections by 200-300% through the use of qualified private inspectors, at no additional cost to the government, and 2-3% of that data ended up being corrupted, does that cancel out the merits of the usable information? The answer should be obvious. The goal is, and always has been, to increase highway safety through the most effective and efficient processes possible... not limit opportunities for private sector entrepreneurs and concerned industry stakeholders.

ISSUE TWO: Enforcement

Frankly, this is a moot argument against the third-party concept. Enforcement should be reserved for the federal and state officers who are tasked with that responsibility. CSS believes that third-party inspections should be used to provide valuable information on motor carriers which can be used by FMCSA to "target" enforcement activities. Third-party inspections also provide an opportunity to educate the carrier on strengths and weaknesses in regulatory compliance and safety efforts.

When CSS created the inspection program for DoD in 1990, nearly 85% of the carriers inspected could not score above a Safety Performance Rating of "3"[3]. Nearly all of the carriers inspected failed to understand the regulations that governed their operation. As such, our inspection program took on the additional burden of educating the carrier. Today over 80% of the DoD Approved Passenger Motor Carriers score a Safety Performance Rating of 2 or better. A point worthy of mentioning is that in our twelve-year history of conducting inspections on motor carriers, DOT has never issued an unsatisfactory rating to a carrier who we have issued a CSS rating of 3 or better. To the contrary however, carriers possessing a Satisfactory DOT rating, seeking approval through the DoD Pre-Qualification Inspection, fail the CSS inspections 37% of the time.

Although the intent is to use third-party inspectors for the performance of the limited "safety review" it is anticipated that there will be times where critical and/or acute violations will be found. In those instances, the data submitted by the third-party inspector to the FMCSA should flag those carriers for a more in-depth compliance review by the enforcement community. During the first three years of the DoD inspection program, MTMC forwarded our inspection reports of those carriers failing our inspection to the Office of Motor Carriers within FHWA. Our reports were considered a valid written complaint and an on-site inspection was initiated by OMC. Federal and state inspectors conducting inspections under the MCSAP program would use our reports as a guide to focus on the areas of deficiencies and in virtually every case, our findings were substantiated. In fact, we routinely received phones calls from federal or state inspectors who were preparing to inspect the carriers we failed to gain a better understanding of the violations we found.

It was this process that made DoD approved passenger carriers take the CSS inspections seriously. They quickly learned that if they failed a CSS inspection they could expect a visit from DOT. CSS did not initiate any enforcement action, we only did the leg work for the state and/or federal inspector. It seems as though this is precisely the intent for the use of third-party inspectors envisioned by FHWA in their comments to the Inspector General's March 26 Audit Report on their Motor Carrier Safety Program.

We therefore recommend that enforcement be removed from the equation and not considered as part of the safety reviews conducted by third-parties.

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[3] The CSS rating system has established three levels to the FMCSA traditional safety rating of Satisfactory. Thus a rating of 1, 2, or 3 are acceptable with the rating of 3 representing only marginal performance and compliance. Rating of "4" equal the DOT conditional and the "5" rating equals the DOT unsatisfactory safety rating.

ISSUE THREE: Cost

The cost associated with such a program would of course require an infusion of funds to get the program off the ground, as does any undertaking. However, the program could be self-sustaining by simply increasing the fees for registration to an amount sufficient to cover the cost of the program.

Deregulation has apparently created a huge influx of individuals entering the motor carrier business. All an individual has to do is purchase a vehicle, pay a small registration fee, obtain insurance, and certify that they will abide by all the regulations, and they are in business. It is estimated that roughly 30,000 new motor carriers enter the motor carrier business each year while some 20,000 close their doors. Most that leave the business are those that were probably poorly managed and in many cases potential hazards on the highway. This by itself is a rather significant and costly burden on the Administration and the taxpayer that ultimately foots the bill. What we are advocating is a reversal in the perspective of how individuals are allowed to enter into the motor carrier business. In other words, increase the requirements to operate a commercial motor vehicle in a business venture on our nation's highway and increase the fees to support third party inspectors.

An excellent example of the success of this process is again found within MTMC and their Passenger Surface Inspection program. Although this is probably more related to issues of the New Entrant Program, it does have relevance to the issue of cost. Prior to November 1992, MTMC also had an administrative qualification process for passenger motor carriers seeking to do business with military. Our inspection would find a deficient carrier, and they would be removed from the program. Yet, in six months, we would end up conducting an inspection on the same carrier that had just been removed six months earlier, with a new name and new DOT Number. So, similar to the current process used by FMCSA, as long as the carrier had equipment, insurance, authority, and was party to the MBA agreement and certified to abide by the provisions of the FMCSR and the MBA they were "administratively approved". MTMC processed about 25 applications per month under this process, and the number of approved carriers grew to more than 750. CSS proposed conducting an on-site pre-qualification inspection, making approval decisions contingent upon successful results of the inspection. During the first three months of the pre-qualification inspection program, MTMC received no applications to become a DoD approved passenger motor carrier. Since November of 1992, and up through today, the average number of applications MTMC receives from passenger motor carriers seeking approval on a monthly basis, has remained about 2.8 compared to previous 1992 numbers of 25 a month. This is about 11% of what MTMC had to deal with administratively prior to November 1992. If the FMCSA had an 89%

reduction, from 30,000 to 3,300, in the number of motor carriers seeking to enter the transportation business, the administration would see a significant cost savings

Another consideration of cost is the sheer numbers of carriers in operation compared to the available resources of the FMCSA. Even with a pool of 1,000 inspectors, compared to a motor carrier population of nearly 600,000, it is literally impossible to inspect all carriers within a reasonable amount of time. A more realistic concept might be to train a portion of the enforcement community to provide oversight and monitor third-party inspectors. To take this thought one step further, it seems reasonable to consider allowing responsible carriers to pay for routine safety and compliance inspections, with the understanding that an acceptable safety rating is necessary to continue in business. We see the use of third-party inspectors as the only viable and cost-effective method to meet the demand, provided proper oversight and controls are in place.

CSS proposes an oversight process similar in scope to the one we have used successfully for more than a decade. The process is as simple to execute as it is to maintain. Project management personnel randomly select inspections completed by individual inspectors, and then complete a quality control audit to evaluate the inspectors findings using the same records identified in their reports. We will also occasionally go outside of the records selected by the inspector to ensure that a proper evaluation methodology was used. This process accomplishes several goals. First, it keeps the inspector honest in his routine. There is a chance that if he or she overlooks an important aspect of the inspection, it will be caught during a subsequent QC audit. Second, it helps to identify strengths and weaknesses in knowledge and practice, so that we can focus training on specific weaknesses and trends. Additionally, it provides everyone with a certain peace of mind that the process is in a continual improvement mode.

OTHER POTENTIAL BENEFITS

Increased Data and Information

Acceptable performance is always judged by the way the performance is defined. While it may not appear to be acceptable for FMCSA to conduct 5,000 to 6,000 compliance reviews annually on a carrier population nearly a hundred times that, it may be perfectly acceptable to perform a combination of 5,000 to 6,000 "enforcement inspections" and "quality control compliance reviews on qualified third-party inspectors" during the same year. In other words, if there is a will and a way to augment the efforts of FMCSA through the use of qualified private-sector inspectors, without the overwhelming concerns of

cost and integrity, then why not just do it. At the very least, this concept has the potential to increase valuable data and information to FMCSA at an astounding rate. SafeStat was a major undertaking whose underlining philosophy for detecting at-risk motor carriers is viewed as valid and fundamentally sound. However, to realize the full value and potential of that system significant more data are required.

CONCLUSION

Consolidated Safety Services, Inc. has been conducting safety assessments and inspections since 1988. Our Transportation Safety Division has performed more than 5,000 motor carrier compliance reviews over the past 12 years, more than 4,000 of those under contract with the Military Traffic Management Command as their third-party contractor. Additionally, our inspectors have conducted destination, roadside and on-site vehicle inspections on more than 10,000 commercial motor vehicles over the past 12 years. During this period, motor carriers under contract with DoD traveled in excess of a billion miles without a fatal accident by a qualified carrier. These statistics should stand on their own in defending the capability of a third-party to perform as a qualified inspector. However, CSS supports having a valid certification program for ALL transportation safety professionals to enhance quality and uniformity of the inspection/audit/review process.

There are challenges and issues to resolve in developing a process that will be effective and dynamic, but none so complicated to cause FMCSA to waste an opportunity to improve their goal of reducing accidents by 50%. CSS stands ready to support and assist FMCSA in their efforts to create a professional certification program for transportation safety specialists.