
Technical Bulletin

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Topic: FMCSA Completion

Recent audits have revealed that most vendors and virtually all of the mechanics do not fully understand the FMCSA inspection process and the form for recording FMCSA inspections.

It is the purpose of this document to provide guidance in the proper performance of an FMCSA inspection and how to properly complete the form.

FMCSA Inspections

The FMCSA inspection is the annually required inspection of all over the road commercial equipment to ensure that it is in safe operating condition for use on interstate highways. This inspection must be performed by qualified inspectors only and all inspectors must have certification on file. **Under no circumstances are untrained personnel with no verifiable qualifications to be allowed to perform FMCSA inspections on CCM managed equipment.** The entire purpose of this inspection is to identify latent defects in the equipment that may cause a collision. For this reason it is imperative that only well qualified mechanics perform these inspections and properly record all conditions observed.

FMCSA Forms

The form that CCM uses to record FMCSA inspections is designed to allow the recording of both its current condition and what defects have been corrected to bring the unit to **49CFR part 396 and Appendix G subpart B** requirements. With this in mind it is important that the form be completely and correctly filled out. In this section we will present a guide to the proper completion of a CCM FMCSA inspection form

The first thing all parties must keep in mind is that this is a **legal document**. For this reason all information entered **MUST** be legible. Illegible entries will result in violations and possible legal penalties for all parties including the mechanic performing the inspection.

Header

The header contains the basic information on the chassis itself. This is necessary for matching with the license with the VIN number and matches the inspection form to the particular chassis. Required information in this section includes

1. Chassis number – all alpha and numeric characters as listed on the chassis
2. VIN # - all 17 alpha and numeric characters are required. **NOTE Partial numbers are unacceptable**
3. Owner – the owner as listed on the registration
4. License Plate – all alpha and numeric characters as posted on the plate attached to the chassis
5. Expiration – the date the plate on the chassis expires
6. State Registered – the two alpha abbreviation for the plate attached to the chassis
7. Manufacturer – the original manufacturer as stated on the VIN plate attached to the chassis
8. Manufacture year – the date the chassis was originally built as stated on the VIN plate
9. Remanufacture date – if the unit was remanufactured there will be either a second VIN plate or a modified single VIN plate that will list the company that did the remanufacture and the date the unit was remanufactured. **Record only the year the unit was remanufactured**
10. Size /Type – Please circle the size and type of unit that matches the unit being inspected

Component/System Inspection

This section of the form is designed to record both the current condition of the equipment and any repairs required and made to the unit to bring it back into compliance. This is where most mechanics and repair vendors begin filling out the form improperly. It is common practice by mechanics to do the inspection, repair any items required then fill out the paperwork with OK listed for all items. In the eyes of the DOT this is highly suspect and in most cases leads to a more lengthy detailed inspection.

Again, the form that CCM employs to record FMCSA inspections is designed to allow the recording of **both** its current condition and what defects have been corrected. As such it is preferred that the mechanic use the form as part of his initial inspection of the unit. As each component is inspected the appropriate box denoting either **OK** or **DEFECT** is checked. Defects identified should be listed in the column marked “**Description of Defect/Repair**”. After the complete inspection has been performed, the sheet can then be used as a check sheet to ensure that all defects identified are corrected by the mechanic. As each defect is corrected the mechanic checks off the repair column indicating that the repair has been performed. **NOTE: completing the form in this manner is the method prescribed by the FMCSA.**

Using the form as described above is also advantageous for the repair vendor and the mechanic. By doing the complete inspection and using the form as a check sheet for the repairs

- The mechanic is less likely to miss a repair that he noted on his initial inspection but did not write down
- Allows mechanic to be more productive by eliminating them starting on a unit only to discover major suspension or brake work after they have already worked lights and twist locks
- Allows repair vendor to better organize work.
- Minimizes the need for supplemental repair orders as additional work is identified

Problem areas

The following is a list of particular areas to watch when completing FMCSA inspections

- Based on our recent audits it was noticed the FMCSA officials pay particular attention to the accuracy of the brake stroke and brake pad thickness notations on the inspection form. The existing practice of noting 1 ½” for the stroke of all 4 wheels is not acceptable. Brake stroke must be accurately recorded to the 1/8th inch when the **final** brake stroke measurement is listed in the spaces provided. **NOTE: if the brakes were readjusted at the time of inspection, a notation needs to be entered in the space provided on the brake stroke line stating “Brakes readjusted”**
- We have noted a considerable number of completed inspections where
 - The registration was missing
 - The registration had been tampered with (someone wrote the unit number on it by hand)
 - The registration was totally illegible

All of these conditions are violations and must be addressed i.e. replace the registration in conjunction with the FMCSA inspection

- ABS systems – we have encountered many cases where audits of recently completed FMCSA inspections have revealed the following ABS system issues
 - Indicator light not functioning
 - Indicator light flashing but not noted
 - Improper light replacement
 - Non ABS embossed light
 - No ABS decal adjacent to the light

All repair vendors and mechanics need to be reminded that these inspection documents are legal documents. By signing the inspection form the mechanic is completing an affidavit that he has inspected and repaired the unit as necessary to bring it into compliance with **49CFR part 396 and Appendix G subpart B**. Falsification of this document is considered fraud and is subject to fines and/or civil penalties.

Any questions regarding the FMCSA form or how to complete one should be directed to either the CCM Director of Maintenance Jim Reo or the CCM Chassis Technical Services Manager

