



Parents Against Tired Truckers and Citizens for Reliable and Safe Highways

The FMCSA's Compliance, Safety, Accountability (CSA) Program

To address the unacceptable number of annual truck crashes, which, on average, claim the lives of 4,000 people and injure 80,000 more each year, the FMCSA replaced its SafeStat program with the CSA program to utilize data more efficiently in order to focus on intervention and prevent crashes before they occur. CSA rates drivers and carriers based on several safety categories, called BASICS. The Crash Indicator BASIC uses prior crash history, which is a good indicator of future crash involvement, as one aspect of the overall rating system. Members of the trucking industry want to eliminate crashes from the Crash Indicator database by having the FMCSA make secret determinations of crash causation in crashes challenged by the industry.

The TSC urges you to oppose adding a process to eliminate crash data. This unnecessary process will open the door for tampering with the crash data and will reduce the efficiency of FMCSA's CSA program.

Agency determinations of causation in order to eliminate crash data are:

Unnecessary: CSA Crash BASIC is working – If it's not broken, don't fix it

- The current CSA method of including all crashes in its data is accurate and it works because crash involvement regardless of fault, accurately predicts future crash risk.
- Research sponsored by the American Trucking Associations (ATA) showed that **a past truck crash, regardless of fault, increased the likelihood of involvement in a future crash by 87 percent.** The Crash BASIC, as is, has the highest correlation to future crashes of all the BASIC categories.

Costly: Making determinations of crash causation will require significant resources

- Police Accident Reports (PARs) are insufficient as a sole source of information for determining causation, fault or preventability – the information may be incomplete or inaccurate, and some PARs do not even contain information indicating who was at fault in a crash.
- Often, it is only after a complete accident reconstruction and / or a trial has taken place that additional crash factors and crucial evidence are revealed.
- The FMCSA is ill-equipped to make determinations of causation and should not enter the realm of the court system. **It would require a time consuming bureaucracy of costly professionals including: engineers, accident reconstructionists, law enforcement and legal experts.**
- As there is no detriment for a motor carrier or truck driver to challenge a crash, theoretically every crash could be challenged in the hope of having the agency eliminate the crash from the data record. The number of challenged crashes would quickly overwhelm the agency's resources.

Corrupts Data: Removal or reclassification of data will affect the use of the whole database

- Tampering with the crash data skews the accuracy of the data and pollutes the database.
- FMCSA requires all of the crash data to identify patterns of conduct and trends in behavior of motor carriers and drivers that may contribute to a crash so that the agency can develop safety procedures and countermeasures, and can focus limited enforcement resources on poorly run operations.
- Allowing motor carriers to petition to remove crash data will corrupt the data, and reduce the FMCSA's use of the data both for intervention, as well as other long-term studies.
- **The efficiency of the CSA Program, its intended purpose, will be reduced.**

Preserve Crash Data

Prevent Future Truck Crashes

Protect our Families