

A Performance Review of CSA indicates that CSA should be placed Out-of-Service and its Authority Revoked

According to the Office of Management and Budget’s Circular A-123 and the Government Performance and Results Act (GPRA, P.L. 103-62) every Federal Agency is required to undergo a performance review in order to determine if the Agencies’ programs and regulations are effective in meeting the stated mission statement of said Agency. FMCSA’s mission statement for their institution of the CSA program “[is] to implement more effective and efficient ways for FMCSA, its state Partners and the trucking industry to prevent commercial motor vehicle (CMV) crashes, fatalities and injuries.”¹ Through this statement, FMCSA has therefore set the parameters for their performance review.

During a meeting with FMCSA and the National Academy of Science concerning CSA, an FMCSA official stated that the Agency looks at and evaluates the “trends in carrier safety” before issuing a safety rating, or a safety fitness determination, for the motor carrier.

OOFI has thus examined the safety trends that have occurred since the implementation of CSA and has discovered that while the number of fatal, injury, and PDO crashes have consistently decreased by 34 percent, 33 percent, and 26 percent respectively from 2004 to 2009, the overall number of crashes increased from 2010-2014. A look at the following facts demonstrates that between 2009 and 2014 there has been a 14 percent increase in fatal crashes, 55 percent increase in injury crashes, and a 36 percent increase in property damage only (PDO) crashes.

As a partial explanation for the increase in crashes and fatalities involving large trucks in the past five years, FMCSA has stated that both the number of miles driven and the number of registrations for large trucks and buses has increased each year since 2010. According to FMCSA, this increase has led to an increase in exposure and thus the greater number of collisions. What they fail to mention however is that the number of vehicle miles traveled prior to CSA 2010 was higher, and that the number of registered trucks and buses was also greater, and yet with a much lower fatality and injury rate.

Year	M VM T†	Vehicle Registrations†	Crash Rates per 100 M VM T†			
			Fatal	Injury	PDO	Total
2009	302,693	11,815,207	1.05	19.82	0.92	1.13
2014	295,131	11,777,983	1.24	31.51	1.28	1.61
Percent Change	-2.5%	-0.3%	17.2%	59.0%	39.8%	43.0%

Rather than address a program which has proven to be unsuccessful and highly problematic, FMCSA has shifted the crisis of increased fatalities and injuries to fatigue drivers as the primary cause of accidents. Safety advocates and sleep apnea vendors have since taken up the cause and have demanded action from the Agency in order to stem the supposed epidemic. From here, FMCSA, the manufacturer of this crisis, has offered solutions such as stricter enforcement of the hours-of-service through electronic logging devices and a proposal for mandatory sleep apnea testing, thereby appearing to solve the crisis in the trucking industry.

¹ *Carrier Safety Measurement System Methodology, Version 3.0, Revised December 2012, FMCSA pg. 1-1.*

Prior to CSA

Year	Fatal Crashes†	Injury Crashes†	PDO Crashes†	Total Crashes†	M V M T†	Vehicle Registrations†	Fatal Crash rates per 100 M V M T†	Injury Crash rates per 100 M V M T†	PDO Crash rates per 100 M V M T†	Total Crash rates per 100 M V M T†
2005	4,805	89,000	377,000	470,805	229,503	9,289,052	2.09	38.78	1.64	2.05
2006	4,643	87,000	324,000	415,643	229,296	9,640,966	2.02	37.94	1.41	1.81
2007	4,472	82,000	360,000	446,472	318,694	11,586,455	1.40	25.73	1.13	1.40
2008	3,994	74,000	342,000	419,994	325,503	11,716,583	1.23	22.73	1.05	1.29
2009	3,193	60,000	278,000	341,193	302,693	11,815,207	1.05	19.82	0.92	1.13
Total Change	-33.5%	-32.6%	-26.3%	-27.5%	31.9%	27.2%	-49.6%	-48.9%	-44.1%	-45.1%

†Includes Large Trucks and Buses

After CSA

Year	Fatal Crashes†	Injury Crashes†	PDO Crashes†	Total Crashes†	M V M T†	Vehicle Registrations†	Fatal Crash rates per 100 M V M T†	Injury Crash rates per 100 M V M T†	PDO Crash rates per 100 M V M T†	Crash rates per 100 M V M T†
2009	3,193	60,000	278,000	341,193	302,693	11,815,207	1.05	19.82	0.92	1.13
2010	3,512	67,000	247,000	317,512	300,297	11,616,105	1.17	22.31	0.82	1.06
2011	3,593	73,000	252,000	328,593	281,014	10,936,757	1.28	25.98	0.90	1.17
2012	3,726	85,000	282,000	370,726	283,099	11,423,889	1.32	30.02	1.00	1.31
2013	3,821	86,000	299,000	388,821	290,185	11,461,905	1.32	29.64	1.03	1.34
2014	3,649	93,000	379,000	475,649	295,131	11,777,983	1.24	31.51	1.28	1.61
Total Change	14.3%	55.0%	36.3%	39.4%	-2.5%	-0.3%	17.2%	59.0%	39.8%	43.0%

†Includes Large Trucks and Buses

OOIDA

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