



What We Heard
Proposed changes to Weigh
Scale Reporting Exemption
Permit

April 2023



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Summary

This What We Heard report results from industry engagement presentations and industry/stakeholder comments collected on the proposed changes to the Weigh Scale Reporting Exemption Permit (WSREP). These proposed changes are part of a modernization project related to Yukon permits for commercial carriers.

Background

The current WSREP process has been in place for over 20 years and was introduced before the National Safety Code Regulations came into force. Given the growth of the territory since the process was introduced, as well as current enforcement and safety trends, it is appropriate timing to review and update this process to address the safety and infrastructure concerns of our road users while introducing more efficiencies to industry.

As it currently exists, the WSREP is a special permit that can be issued, upon application, to Yukon commercial carriers. The intent of this permit is to ease the burden of reporting to weigh scales for local operators while maintaining appropriate levels of safety and infrastructure security on our roadways. Under the Highways Act, this special permit can be issued 'when it has been determined that safety will not be compromised and there will not be excessive damage to the highway.' Commercial carriers must currently apply for the permit, and the Yukon government has the authority to issue, revoke, refuse or cancel the special permit once issued.

While elements of the existing WSREP process have worked well from the perspective of both industry and government, the permit process itself is cumbersome from an administrative perspective and in terms of the requirements of commercial carriers. A modernized approach can introduce efficiencies and reduce administrative requirements on both sides while concurrently addressing compliance and safety issues.

Administrative Requirements

The current administrative requirements on carriers are quite complex.

Commercial carriers are required to:

- Obtain Periodic Motor Vehicle Inspections (PMVI) for many vehicles that may be otherwise exempt under the current Intra-Territorial exemption.
- Provide details of each vehicle that they wish to have exempt on a yearly basis and update if vehicles were added or removed throughout the year.
- Retain a copy of the exemption in all vehicles that were exempted.
- Submit renewal paperwork in advance to avoid a lapse in yearly exemptions.
- Ensure the list of registered vehicles remains up to date.

The Carrier Compliance unit is required to:

- Manually verify each vehicle.
- Manually enter each vehicle's data into a separate database.
- Maintain paper records of every application on hand for reference.
- Manually run monthly renewal forms and mail out forms to carriers.

Safety and Enforcement

Over the past four years, Carrier Compliance and the RCMP have increased on-road enforcement operations. Concurrently, YuDriv system improvements have allowed for better tracking of enforcement statistics.

Safety Violations

Joint operations with RCMP in recent years have consistently noted significant violation rates among commercial carriers. When only Yukon commercial carriers were considered, they held an average safety violation rate upwards of 50 per cent. This means that more than half of the commercial vehicles inspected using standardized *Commercial Vehicle Safety Alliance (CVSA)* procedures were found to be operating with safety-related issues. Of significant note, most commercial carriers with violations were operating under a WSREP.

Collisions

In Yukon, Light and Heavy commercial vehicles account for 14 per cent of all vehicles registered in Yukon, and yet in 2022 these vehicles were involved in 20 per cent of all collisions (up from 16 per cent in 2021). According to the Traffic Injury Research Foundation (TIRF) of Canada, the per-vehicle fatality and injury rates for heavy trucks are much higher than for all types of vehicles. Given their larger relative size, commercial vehicle accidents have a higher rate of injury and death, disproportionately affecting passengers in other vehicles. ¹

Reporting Violations

Carriers that apply for a WSREP are informed of their reporting requirements whenever entering or exiting the 20km radius from the Whitehorse or Watson Lake Scales. Despite limited on-road enforcement presence, 'failure to report' violations continue to be documented amongst carriers. While most carriers operate within the rules, this is a concerning indicator that despite being aware of the requirements, certain carriers are choosing to take advantage of the current policy and ignore these requirements.

Additional Challenges

In a minority of cases, industry has had apparent confusion regarding the conditions and restrictions at a commercial carrier level. For example, there has been a misconception amongst some carriers that the permit is a complete scale exemption or scale regulation exemption permit, which would allow the carrier to not follow the regulations that are in place and which are monitored and enforced. There is also some apparent confusion between the 20 kilometre reporting exemption of this permit and the 160 kilometre exemption in the Hours of Service regulations for logbook exemptions.

Due to this confusion, some carriers were not reporting to the weigh scales at all and not following the required regulations in the Yukon to operate.

¹ TIRF reports that 87 per cent of deaths and 74 per cent of injuries in collisions with heavy trucks were among people other than the truck occupants.

Proposed Policy Options Discussed with Industry

Concerning the safety and compliance issues noted above, two different potential policy approaches with respect to a new WSREP were drafted for discussion and input from Industry.

Option 1

- Vehicles registered over 11,794 kilograms operating within the 20 kilometre radius must report once per day to verify weights and dimensions.
- All vehicles registered over 4,500 kilogram departing the 20 kilometre radius of a stationary scale must report to the nearest scale before leaving the 20km radius.
- All vehicles registered over 4,500 kilograms operating outside of the 20 kilometre radius and returning to within the 20 kilometre radius must report to the nearest scale
- This option treats all Carriers equally

The Yukon government piloted this concept with volunteer carriers for several months. Wait times were found to be minimal, with 98 per cent of the traffic entering, crossing and exiting the scale within a 7-minute timeframe.

Option 2

This approach was developed following feedback from commercial carriers, who wanted an option which rewards safety and compliance. This option comprises a risk-based approach to offering weigh scale reporting exemptions. Specifically:

- PMVI's are not required for goods-carrying vehicles under 11,794 kilograms. A PMVI is still required for passenger-carrying vehicles manufactured with seating over 10, including the driver.
- Goods carriers registered under 11,794 kilograms are automatically exempted within 20 kilometres, regardless of risk factor.
- No annual paperwork requirement.

This option was designed with three risk tiers. The tier each carrier falls into is based on each individual carrier's Safety Profile Rating which is calculated based on accidents, tickets, and inspections.

Tier one: Low-risk – 25 per cent risk factor and under

- Commercial goods carriers over 11,794 kilograms or passenger carrying vehicles manufactured with seating over 10, including the driver are not required to report to a stationary weigh scale when operating within the 20-kilometre radius.

Tier two: medium risk – 26 to 50 per cent risk factor

- Commercial goods carriers over 11,794 kilograms or passenger carrying vehicles manufactured with seating over 10, including the driver are required to report to a stationary weigh scale once per day while in operation.

Tier three: High risk – over 50 per cent risk factor

- Commercial goods carriers over 11,794 kilograms or passenger carrying vehicles manufactured with seating over 10, including the driver are required to report to a stationary weigh scale with every load.

Participation

Presentations on January 7, 2022, January 19, 2022, August 25, 2022, November 30, 2022, and February 13, 2023, included on average 30 individual industry members, representatives from the Yukon Contractors Association and Yukon Transportation Association.

What we heard

Throughout the various virtual and in-person meetings, emails, phone calls and face-to-face meetings with carriers, the following key issues were identified, as summarized below:

1 : Options 1 and 2 Require Further Adjustment

Summary of Issue:

A variety of responses were received from industry, ranging from expressing support (primarily for Option 2 with only one carrier in support of Option 1). In contrast, some carriers/industry representatives were concerned that the options presented would be overly burdensome on the industry. It is clear from industry comments that many carriers want more freedom from inspection, weigh scale reporting, and enforcement. Despite this, only limited alternative suggestions for addressing the safety and enforcement trends of concern were provided.

Our Response:

Of the two options, there was more comprehensive support for a risk-based approach than a one-size-fits-all approach. At the same time, the current risk-based option has raised concerns within the industry regarding operational impacts and being overly punitive, with a desire instead to modify the risk ranges to specifically target high-risk carriers. Given these comments, we will explore an alternative risk-based approach that minimizes the burden on industry while addressing enforcement, safety and infrastructure concerns and trends.

2 : Length of Time to get out of the 'High-Risk' Category

Summary of Issue:

A carrier's risk factor is based on a 24-month sliding window of inspections, tickets and collisions. Some carriers are concerned with the potential time to get out of the 'high risk' category, and the more stringent requirements should a carrier safety profile rating alone be used.

Our Response:

While Carrier Compliance is unable to arbitrarily change carrier safety ratings given the National Safety Code standards followed by all Canadian jurisdictions, we are however committed to developing an approach that provides carriers with an opportunity to be free quicker from the additional reporting requirements that were contemplated under the proposed 'option 2'. Specifically, we are proposing to update the reporting requirements for the higher-risk carriers from up to 2 years down to a minimum of 60 days, subject to these carriers' improvement in their safety and/or reporting trends.

3 : Accuracy of Statistics

Summary of Issue:

Amongst some carriers, there is a concern that the enforcement statistics do not accurately reflect issues affecting WSREP carriers. There is also a desire to understand better the number of carriers in each risk category and the sizes of fleets that are affected.

Our response:

Carrier Compliance statistics are derived from the YuDriv Database and linked to Carrier Compliance inspections, tickets, and court convictions. In some cases, the YuDriv database is limited to separate WSREP-specific numbers; however, wherever statistics have been provided, they comprise a significant majority of those carriers. A chart in the appendix shows the number of carriers by fleet size and risk rating, as requested by the industry.

Statistics of concern include CVSA inspection violation rates (i.e. inspections have consistently found safety issues in over 50 per cent of vehicles), CVSA and Summary Conviction charges by WSREP carriers, and data from the recent 2022 Roadside Survey regarding the use of intoxicants. Fortunately, some statistics have shown recent improvements, which may be due in part to a combination of improving safety cultures

within WSREP carriers and less on-road enforcement in 2022. Some of these are highlighted below.

CVSA Inspections (Yukon only, no out-of-territory carriers included)

2020 – 54 per cent Violation Rate

Out-Of-Service: 44

Requires Attention: 31

Pass: 63

2021 – 56 per cent Violation Rate

Out-Of-Service: 94

Requires Attention: 67

Pass: 123

2022 – 51 per cent Violation Rate

Out-Of-Service: 56

Requires Attention: 53

Pass: 106

2023 (to March 31st) – 52 per cent Violation Rate

Out-Of-Service: 8

Requires Attention: 8

Pass: 15

CVSA Violations amongst WSREP Carriers

2019 – 79

2020 – 64

2021 – 128

2022 – 91

Summary Conviction Charges amongst WSREP carriers

2019 – 37 (8 failure to report violations)

2020 – 65 (2 failure to report violations)

2021 – 116 (8 failure to report violations)



2022 – 45 (2 failure to report violations)

Drug use

In the recent 2022 Roadside Survey, 19.5 per cent of commercial drivers tested positive for drugs. These drugs, for which there is zero tolerance for commercial drivers, included cannabis, cocaine, methamphetamine and amphetamine. Of all drivers who tested positive for drugs, 78 per cent identified their home base as Whitehorse.

4 : Recommendation for Greater Mobile Presence

Summary of Issue:

Some comments were received regarding a desire for more mobile (on-road) enforcement and presence, as well as Carrier Compliance physically attending work locations with portable scales rather than requiring industry to detour to the Scales.

Our Response

The Yukon government shares a desire for more on-road presence of officers, and the Carrier Compliance unit is continuing to grow capacity to increase on-road enforcement on Yukon highways, including joint operations and patrols with RCMP throughout Yukon's Highway system.

With the current workforce and the multiple industry quarries and work locations, travelling to work areas with portable scales would not be feasible. Many jurisdictions have shifted to relying on more on-road enforcement, however, we have yet to be aware of any regularly attending work sites with portable scales as an alternative to standard scales.



5: National Safety Code comments

Summary of Concern (1):

The National Safety Code's points system punishes carriers for driver violations outside management's control.

Our response (1):

National Safety Code's carrier profile pointing system places responsibility on carriers to manage the conduct and safety of their employees. This is a national pointing system adopted by every jurisdiction in Canada. Driver violations vary widely between carriers in this regard and demonstrate that those carriers with a strong safety culture have significantly fewer violations of this kind.

Summary of Concern (2):

Some carriers believe that Carrier Compliance should enable a system that allows carriers to redeem themselves and reduce their cumulative demerit points faster than 24 months, as well as make changes to the demerit system such that it does not punish carriers' NSC rating for driver violations that are clearly outside of management's control such as speeding and seatbelt violations.

Our response (2):

This proposed policy change would minimize the period of time a carrier would be subject to increased reporting requirements due to their carrier profile rating to a minimum of 60 days, as long as the carrier is still achieving appropriate safety outcomes. All jurisdictions are however subject to the same requirements and National Safety Code rating implications. The National Safety Code's carrier profile points system intentionally places responsibility on carriers to manage the conduct and safety of their employees. An approach to change our existing structure to reduce carriers cumulative demerit points would not comply with the National Safety Code; would differ from our demerit point standards used for driver's licenses creating a two-tier approach with would no longer be harmonized with North America, which identifies

explicitly that carrier and driver infractions count towards a carrier's safety profile rating.

6 : Officers Issuing Tickets

Summary of Concern

Some carriers believe enforcement staff are writing more tickets to increase violation numbers.

Our response:

As provided in response to #4, recent statistics show a reduction in summary conviction tickets issued in 2022. There is no quota or monitoring of how many tickets are issued by carrier compliance each year, tickets are issued due to seen violations and are issued at the Carrier Compliance Officers or RCMP's discretion. Officers are instructed to use appropriate discretion in issuing warnings (for first non-safety-related offences) in cases where it leads to the same compliance outcome as a ticket. Summary conviction tickets issued by Carrier Compliance are also reviewed by the Manager of Carrier Compliance before being sent to the courts to ensure they are appropriately applied. Carrier Compliance officers exercise discretion as part of their daily duties.

7 : Focus of Enforcement

Summary of Concern

Some industry members believe that heavy-duty pick-up trucks, especially Ford F-550 trucks, are now being stopped by Carrier Compliance even though they have not been stopped in the past for inspections.

Our Response:

No commercial vehicle class is exempt from the Highways Act/Regulations and Motor Vehicles Act requirements. This includes Ford F-550 trucks.

Nothing has changed concerning the focus of enforcement, training or instructions to officers. The travelling public's safety is a top priority for the Yukon government, which involves ensuring the safe operation of all commercial vehicles.

8 : Impacts on Business from More Inspections

Summary of Concern:

With the implementation of the proposed options and potentially more trucks being stopped, companies will lose out on potential business due to the time burden of inspections.

Our response:

Any carrier operating with a good safety record can expect positive impacts in this regard. A risk-based approach to inspection requirements will prioritize reducing the overall industry reporting requirements to the Weigh Scales. As such, low-risk carriers can expect reduced reporting requirements. Under this same approach, carriers not operating safely must report more frequently until they can demonstrate appropriate compliance and safety. Regardless of reporting requirements (and recognizing that travel to the Scales does take time), inspections occur on less than 2 per cent of the trucks that get weighed at the Scales.

9 : Request for Signage

Summary of Issue:

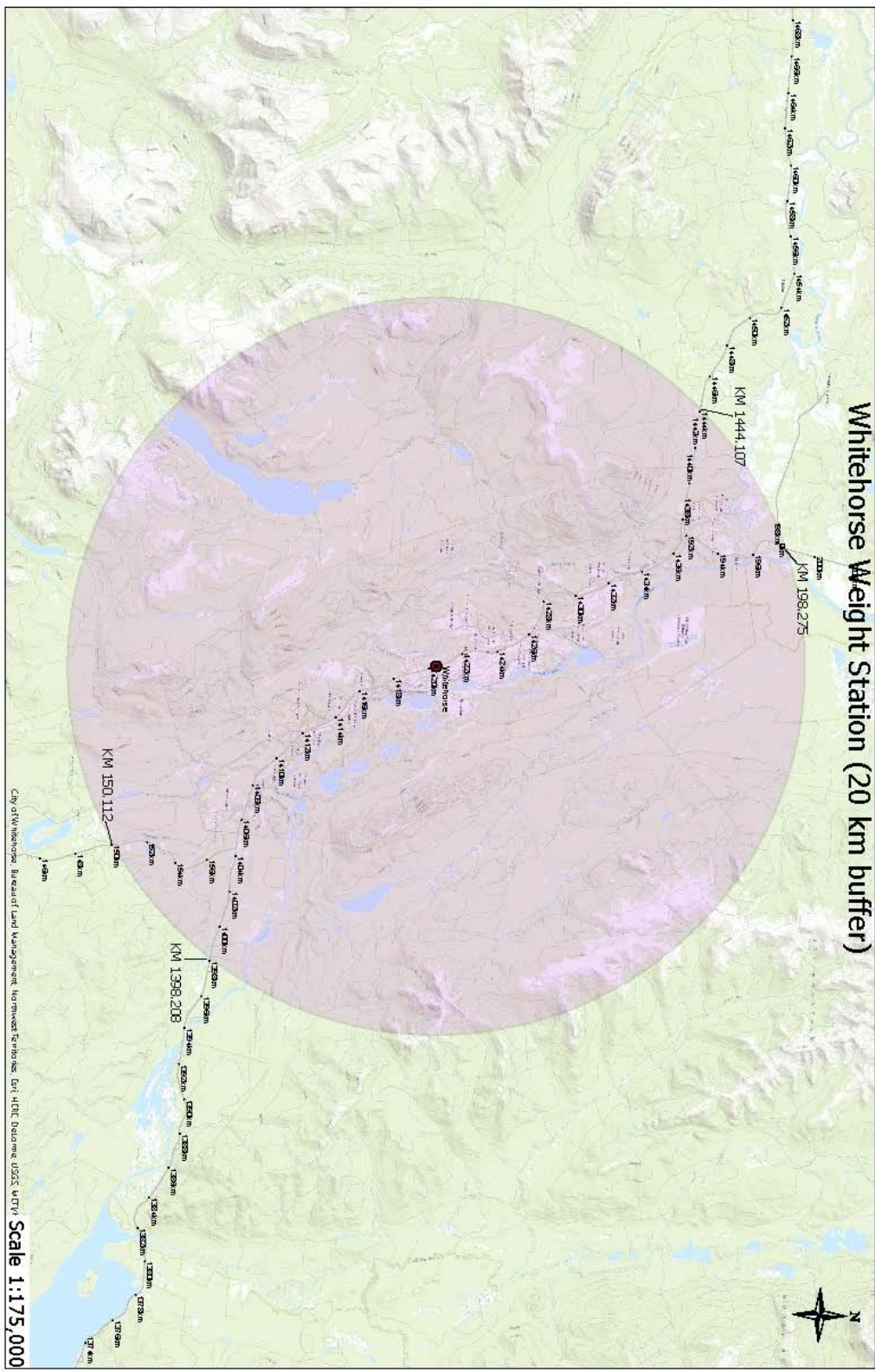
An interest was identified in having proper signage posted at the WSREP limits so commercial drivers can easily identify when leaving or entering the exemption boundary.

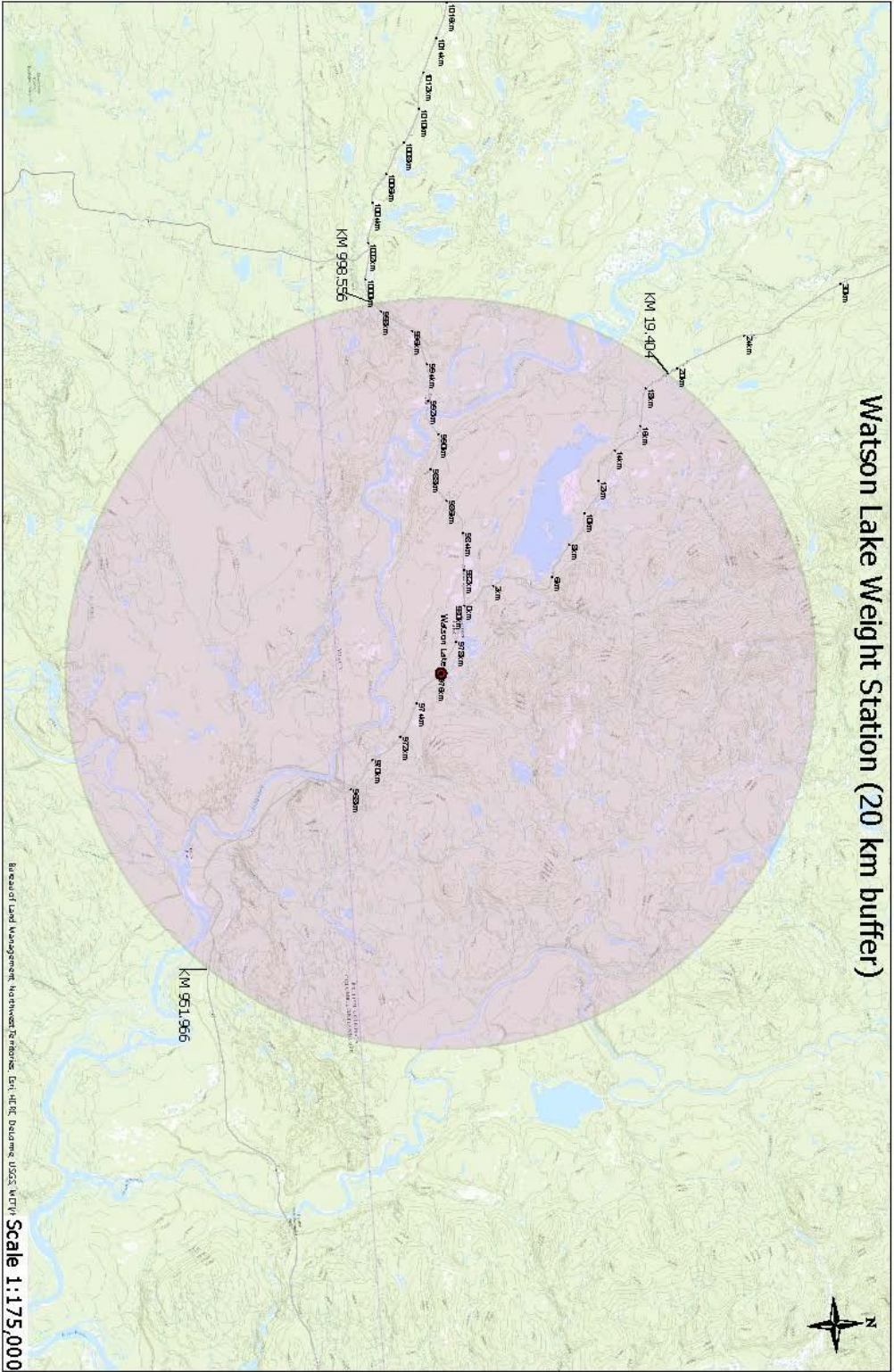
Our Response:

Carrier Compliance agrees that this signage would be beneficial and will engage with Transportation Maintenance in this regard. In the meantime, the following maps which have been previously provided to industry, identify the appropriate boundaries:

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Out-Of-Scope comments

Several additional comments were commonly heard during industry engagement sessions on WSREP (e.g. modifying the PMVI inspection interval, moving the Whitehorse weigh scale and not counting driver infractions on a carrier profile). Some comments were also heard that were not echoed widely by the industry. As noted, while these comments may be peripherally related to the WSREP, they are not directly and/or exclusively associated with, nor specifically addressable by policy (e.g. non-specific enforcement issues, legislative requirements). Despite this, to the extent possible, responses have been provided below to provide context to the concerns.

10: Periodic Motor Vehicle Inspections (PMVIs)

Summary of Concern (1):

Inspections should be based on a combination of mileage and time rather than arbitrarily twice a year.

Our response (1):

PMVI inspections are performed by certified mechanics who provide a decal to vehicles after mechanical fitness is determined. As required under National Safety Code – Standard 11, in Yukon these are required every six months, consistent with Saskatchewan and BC. The 6-month inspection frequency is appropriate for the Yukon because the weather and driving conditions in a northern environment are challenging on commercial vehicles.

Although, some jurisdictions only require PMVI inspections annually, the majority of such cases require inspections on a much wider weight range of vehicles (e.g. over 4500 kilograms instead of Yukon's 11,794 kilograms). If Yukon were to implement a similar policy, this would result in more PMVI inspections being required than is currently the case.

Summary of Concern (2):

With changes to the certification requirements of PMVI inspectors, there is a concern regarding the number of qualified mechanics to do inspections in the Yukon.

Our Response:

Concerns have been received about the recent changes to qualified inspectors who can perform PMVIs. A significant effort was made to engage with industry and communicate the upcoming changes to certification requirements in order to bring Yukon in line with the majority of other Canadian jurisdictions, as outlined below.

- June 12th 2020:
 - Letter mailed to every facility about new requirements to become a PMVI inspector (Red seal and Journeymen).
 - Survey letter sent to all facilities to track currently working PMVI inspectors.
- Nov 6th 2020:
 - Letter to all PMVI Inspector to verify their training / certification. (Red seal, journeymen or experience)
- Sept 17th 2021:
 - Letter to all PMVI mechanics without a red seal or journeymen certification of notice of decertification on Dec 31st 2022 unless they can provide a red seal or journeymen cert. Trades contact provided in letter.
- Jan 3rd 2023:
 - Letter sent to all non red seal or journeymen decertifying them.

Currently, the Yukon has a total of 222 certified inspectors who can perform PMVIs, and 104 certified PMVI inspection facilities in 11 Yukon communities as listed below. To date, approximately 20 active non-Red Seal / Journeymen that were decertified due to lack of credentials, with many other inspectors having challenged the Red Seal exam and becoming recertified.

Active Periodic Motor Vehicle Inspections (PMVI) Facilities by community:

- Carmacks: 1



- Dawson City: 10
- Destruction Bay: 1
- Faro: 3
- Haines Junction: 4
- Mayo: 1
- Pelly Crossing: 1
- Ross River: 2
- Teslin: 2
- Watson Lake: 5
- Whitehorse: 74

11: Electronic Logging Devices

Summary of Concern:

Industry wants the Yukon to have its own territorial enforcement strategies instead of strictly abiding by federal Electronic Logging Device (ELD) regulations so that enforcement rules can be tailored to the needs of Yukon businesses and climate.

Our response:

The Canadian Electronic Logging Device (ELD) mandate is a new federal requirement replacing paper logs with automated electronic logging devices. Yukon is following the same approach as most jurisdictions in Canada, including Ontario, Quebec, Manitoba, Nova Scotia, Newfoundland & Labrador, Prince Edward Island, New Brunswick, and British Columbia, for ELD requirements.

Fatigue is a major safety problem in the transportation industry, with some estimates that 15 per cent of large truck crashes involving death or serious injury are due to driver fatigue. To keep Yukon's roads and the travelling public safe, commercial drivers are required to only operate a certain number of hours per day; these hours must be tracked accurately. The ELD mandate is a critical step to establishing an industry standard for fleets that promotes safe driving and encourages Hours-of-Service compliance for truck drivers. Entry-level compliant ELD devices can be purchased for as

little as \$200 and a \$30/month subscription. ELD's save time by freeing drivers from the lengthy and at times confusing record-keeping requirements of paper logs.

Significant effort was made to engage with industry on the upcoming federal ELD requirements despite the challenges of COVID. These efforts are listed below:

- In June 2021, Highways and Public Works began providing information on ELDs and the new regulations to carriers and the public.
- Handouts were given to carriers who passed through the weigh stations.
- Information cards were distributed through Carrier Compliance at the following locations:
 - The Whitehorse Weigh Scales;
 - The Watson Lake Weigh Scales; and,
 - The National Safety Code office via email requests.
- A website with information on the new regulations was developed.
- In November 2022, a Zoom presentation was provided to industry. This presentation was advertised, and industry was informed via email invite.
- Beginning on January 1, 2023, Carrier Compliance started issuing ELD warnings exclusively to continue to educate industry about these requirements. Just over 60 warnings had been issued by March 20.
- Beyond these educational activities, Carrier Compliance has provided ELD handouts when performing Commercial Vehicle Safety Alliance inspections. Over 1300 inspections were completed in the last 24 months.

Of note to commercial carriers, several exemptions from the requirement to install an ELD exist, as listed below:

Yukon-specific Exemptions

- Vehicles that carry commercial goods under 11,794 kilograms and operate solely in the Yukon, as long as the carrier maintains a record-of-duty status and drivers have 8 hours of rest between shifts.



Federal Exemptions:

- Drivers of commercial buses who carry ten passengers or more, or drivers who carry commercial goods, do not need an ELD if:
 - The model of their vehicle is made in 2000 or earlier;
 - The vehicle operates within a 160-kilometre radius of its home terminal and returns to its home terminal at the end of each day. This exemption only applies if the driver has a minimum of eight hours off between their next shift and if the carrier maintains a record of on-duty hours;
 - The vehicle is subject to a rental of no more than 30-days without extension or renewal;
 - The vehicle is operating under a motor carrier permit, typically an oilfield exemption or emergency declaration;
 - Drivers are exempt if the vehicle is operated by a motor carrier for which Transport Canada has issued an exemption. Currently, Transport Canada has one exemption for tow-away vehicles, which is a vehicle being delivered to a client from a manufacturer where the vehicle itself is the product.

12 : A Desire to Revisit the 20-kilometer Reporting Radius

Summary of Issue:

Several concerns we heard related to the current reporting radius and carriers having to travel out of their way to report to scales.

Our Response:

The existing 20-kilometre reporting radius is a requirement of the Highways Act Regulations and therefore outside the scope of this policy review to address. The Yukon government is however committed to reviewing the reporting radius as part of a future Highways Act review.



13 : Weigh Scale Locations

Summary of Issue:

Weigh scales do not belong in the middle of the urban centre.

Our Response:

The placement of the Whitehorse and Watson Lake Weigh Scales is not unique in Canada with there being at least 95 weigh scales located within municipalities across the country. The location of the scale does however create a situation whereby vehicles operating within city limits may be required to report multiple times per day as they pass the scales on their daily routes. This issue is mitigated in Whitehorse and Watson Lake by the introduction of policy which exempts local carriers operating within 20 km of the scales from reporting.

14 : Requests for Special Vehicle Exemptions

Summary of Issue:

There was an interest raised that tow trucks and farm equipment such as tractor trailer combination units, dump or flat deck farm use trucks should be exempted from reporting to the Scales.

Our Response:

The types of vehicles that are required to report to the Scales are defined in legislation and therefore outside the scope of this policy review. Yukon Highways Act regulations 9(1) establishes that a vehicle exceeding a registered gross vehicle weight of 4500 kilograms or a farm vehicle on a highway must report to each scale designated by the Minister.

15 : Directions from Carrier Compliance Officers

Summary of Concern:

Carrier Compliance's practice of waving trucks into the scales is dangerous for employees, drivers and increases risks for the travelling public.

Our response:

Under the Motor Vehicles Act 134(3) drivers are required to comply with all directions of peace officers when directing traffic, whether or not these officers are in vehicles. The safety of enforcement staff and commercial drivers is a priority, and Carrier Compliance will continue to make every effort to ensure that drivers are provided adequate stopping distances from the point of being flagged in.

16 : Sharing Warnings Given to Drivers by Officers

Summary of Issue:

A request that carriers be notified whenever one of their drivers receives a warning from Carrier Compliance.

Our Response:

Following a privacy review, it was determined that it would be a privacy breach to share such warnings with a driver's employer. A warning that is given to a driver is not treated, in a privacy sense nor under the privacy legislation, in the same way a ticket is. For example, a ticket affords a driver a right to appeal the conviction. A warning has no such mechanism associated with it. Convictions are public information partly because they can be appealed, and the accused person has the right to due process. It is up to the Carriers to determine how they work with their employees to receive this information if they wish to know it. Carrier Compliance will soon be developing a plan on how they will be sharing non-carrier-specific trends they are seeing at the Scales in terms of infractions that are resulting in warnings to better inform industry.



17 : A Desire for Increased Partnerships

Summary of Issue:

Industry wants greater partnership between regulators and would like to investigate ideas as to how communication and support could improve.

Our response:

Carrier Compliance also supports greater partnerships in this regard. In an effort to encourage ongoing discussions we are currently committed to continuing meeting with the Transportation Industry at the monthly meeting hosted by the Yukon Transportation and Trucking Association. Carrier Compliance is also considering additional opportunities for working in collaboration with industry and would accept any invitations to work with additional industry stakeholder groups such as TIAY and YCA on the same level.



Next Steps

Based on industry feedback, it is apparent that of the two options presented, a risk-based approach which targets efforts on carriers with poor safety records while providing less oversight on carriers with good safety records is preferred. At the same time, we heard that the risk-based option presented should be refined further, specifically emphasizing allowing a high-risk carrier to earn earlier release from the high-risk designation and associated enhanced oversight and reporting requirements.

Carrier Compliance is committed to undertaking the significant challenge of concurrently reducing the administrative burden on industry while also addressing enforcement and safety trends that are being observed. To do so, a risk-based adaptive management approach will be developed which focuses the majority of Carrier Compliance efforts on the commercial carriers with safety and compliance issues while simultaneously providing a more streamlined process with reduced reporting requirements and costs for the carriers that are operating with a good safety and compliance record.



Appendix A – Fleet Size vs. Risk Factor

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