



IANA Operations and Maintenance & Repair Committee
Roadability Compliance - Recommended Practices
(Updated 4/21/09)

I) Administration and Equipment Identification

A. MCS – 150C Form

1. The IEP will file MCS – 150C Form with the FMCSA, requesting a USDOT identifying number.
2. The IEP will file its periodic update according to the FMCSA requirements.

B. Marking of Equipment

1. The IEP will identify all trailers and chassis with either a physical mark or label reflecting the IEP legal name or single trade name, USDOT, and USDOT issued identification number. (Example: XYZ (legal name) USDOT 123456). [The requirement for marking or labeling equipment may not be required dependent on the FMCSA's acceptance of the use of the IANA Global Intermodal Equipment Registry system].
2. The IEP will register their chassis and/or trailers with IANA's Global Intermodal Equipment Registry. Included in the registration will be 1. USDOT identification number 2. VIN number 3. Alpha numeric identifier 4. 4-character SCAC, with potential for other data requirements. (See Attachment A – GIER Data Fields).

II) Terminal Operations and Procedures - Recordkeeping

A. In Gate – Electronic or Manual EIR

1. Driver either reports:
 - a) Roadability Component Defect (RCD) as defined in Attachment "B", on chassis and/or trailers to the facility operator at the time of in gate.
 - Or
 - b) Reports no Roadability Component Defect (RCD) on chassis and/or trailers to the facility operator at the time of in gate. (See Attachment B for a list of RCDs)
2. Facility operator records the specific information from the driver onto the Driver Vehicle Inspection Report (DVIR).
3. Facility operator furnishes copy of Drivers Vehicle Inspection Report (DVIR) to driver reflecting Roadability Component Defect or No Roadability Component Defect.
4. Facility operator furnishes copy of completed DVIR to the IEP or their agent.
5. Chassis and/or trailers that have been identified as having Roadability Component Defects should be reported by the Facility Operator to the IEP as Bad Order.
6. Chassis and/or trailers identified with RCD's will be held and not released until the IEP releases the equipment from bad order status prior to the outgate.

B. In Gate – Reports

1. Driver information containing any reported Roadability Component Defects or stating No Roadability Component Defects at the time of In Gate are documented on DVIR.
2. The Drivers inspection document (not DVIR) is not required to be collected by the Facility operator. Refer to item A 2. Above.
3. Facility operator furnishes the original inbound DVIR to the applicable IEP or its agent. The IEP will be identified using IANA's Global Intermodal Equipment Registry.
4. IEP will use the reported Roadability Component Defects listed on the DVIR to determine inspection and/or repair actions.
5. IEP will certify on the DVIR that the repairs were made and /or unnecessary.
6. Certification of repairs must be retained by the IEP for a minimum of 3 months from the point of the Driver's in gate reporting.

C. Pre Trip Inspection – Pre-Outgate – Repairs

1. The IEP and/or the facility operator will provide sufficient space for drivers to perform the required pre-trip inspection of chassis and/or trailers. The space should provide an area that promotes the safe and efficient inspection by the driver.
2. Driver inspects the components of the chassis and/or trailers as provided for in Attachment B.
3. If driver finds Roadability Component Defects (refer to Attachment B) requiring repairs which could alter the safe operation of the chassis and/or trailer, or result in their mechanical breakdown, the driver will report these items to the IEP or its agent prior to out-gating the equipment.
4. IEP or its agent will review the items reported by the driver, determine if the items require repair and make repairs or substitute another piece of equipment.
5. If chassis and/or trailer is substituted, the defective chassis and/or trailer will be held pending repairs.

D. Out Gate – Electronic or Manual EIR

1. Driver has performed pre-trip inspection/repairs prior to the outgate as required and as described in II.C above.
2. Driver proceeds Out-Gate through the normal process

E. Roadside Inspection - Handling of Reports – Driver Vehicle Examination Report (DVER)

1. DVER will be furnished to the Motor Carrier's Facility by the Driver.
2. The Motor Carrier will forward the DVER to the appropriate IEP within 24 hours of receipt.
3. The IEP is responsible to certify on the DVER that the required repairs were corrected. The completed DVER must be returned by the IEP or its agent, to the issuing agency within 15 days from the inspection date.

F. Motor Carrier / Driver

1. Driver will prepare a written document of pre-ingate inspection items and maintain for motor carrier records
2. Driver will prepare a written document for pre-trip inspections which will include items contained in Attachment B and all items contained in Exhibit A of the UIIA.

G. Repair Invoicing

1. The DVIR must record repairs completed and/or inspection results (including items not needing repairs) and attach to the invoice certifying the completed repairs (paper or electronically) back to the IEP.

III) Definitions:

Intermodal Equipment Provider (IEP)

Intermodal Equipment Provider means any person that interchanges equipment with a Motor Carrier pursuant to a written Interchange Agreement or that has contractual or legal responsibility for the maintenance of the equipment.

Roadability Component Defect (RCD)

Any component that affects the safe operation of the equipment or could result in a mechanical breakdown of the equipment.

Driver Vehicle Examination Report (DVER)

Prescribed inspection report used to record results of motor vehicle and IEP inspections conducted by authorized FMCSA personnel.

Driver Vehicle Inspection Report (DVIR)

Report that the Facility Operator completes at the time of ingate reflecting any RCD 's as reported by the Driver.

Global Intermodal Equipment Registry (GIER) Required Data Fields

No.	Data Field Name	Data Field Description	Mandatory or Optional	Comments
1	Equipment Initial	SCAC code (e.g. APLZ, PONZ, KNLZ, etc.)	M	
2	Equipment Number	6 digit chassis number	M	
3	Equipment Type Code	ISO or other equipment code to be determined.	M	Such as 45EX for 45' extendable chassis
4	Owner SCAC	SCAC code of owner of equipment in case needed to resolve discrepancies between current IEP	M	
5	Lessee SCAC	SCAC code of equipment lessor in case needed to resolve discrepancies between current IEP	M	
6	VIN	Vehicle Identification Number	M	
7	Year Built New	Year Number	M	
8	Year Rebuilt	Year Number	O	
9	Outside Length	Length of chassis (e.g. 40, 45, 53)	M	
10	Tare Weight	The weight of the chassis.	O	
11	Load Limit	Maximum Load Limit	O	
12	License State/(Province)	State or Province Issuing License Plate	M	
13	License Plate Number	License Plate Number	M	
14	License Plate Expiration	Expiration date of License Plate	O	
15	FHWA Inspection Date	Date of Last FHWA Inspection	O	
16	Remark / Remanufacture Flag	Yes or No flag (Y or N)	M	
17	IEP / DOT Number	US DOT Company Number	M	Not currently available. New required data anticipated on FMCSA MCIS-C form.
18	IEP Contact Name	Primary Contact Name for USDOT IEP Equipment questions.	M	Not currently available. New required data anticipated on FMCSA MCIS-C form.
19	IEP Contact Phone Number	Primary Contact Phone Number for USDOT IEP Equipment questions.	M	Not currently available. New required data anticipated on FMCSA MCIS-C form.
20	IEP Contact Email	Primary Contact Email for USDOT IEP Equipment questions.	M	To be used for GIER notifications.

Roadability Component Defects (RCDs)

1. Coupling - King pin upper coupling device
2. Frame - Rails or support frames
3. Bolster - Tie down bolsters
4. Fastener - Locking pins, clevises, clamps, or hooks
5. Slider - Sliders or sliding frame lock
6. Wheel - Wheels, rims, lugs, tires
7. Lights - Lighting devices, lamps , markers, and conspicuity marking material
8. Air Line - Air line connections, hoses, and couplers
9. Brakes - Brakes

IMPLEMENTATION TIMELINE

June 17, 2009	Final Rule becomes effective
December 17, 2009	IEP requirement to establish systematic inspection, repair, and maintenance programs, recordkeeping systems, and for submitting Form MCS - 150C
December 17, 2010	IEP requirement to mark intermodal chassis with a USDOT identification number
December 17, 2010	Full implementation of the Federal Rules

INSPECTION TYPES

General: Documentation of all maintenance and repair programs is required. Inspections should be carried out periodically pursuant to the IEP's inspection program and may include preventive maintenance checks as well as inspection for damage of unsafe conditions.

- 1) **Periodic** – In accordance with the Federal Motor Carrier Safety Regulations (390.17) every commercial motor vehicle, including each vehicle in a combination vehicle (chassis and trailers) are required to be inspected on an annual basis. This type inspection is commonly referred to as the “Annual FHWA” inspection. Many states provide for an annual inspection that is an accepted equivalent to the annual federal requirement.
- 2) **Systematic** – A regular or scheduled program to keep vehicles in safe operating condition. Federal Motor Carrier Safety Regulations do not specify time frame or intervals for this requirement due to the unique operating characteristics of vehicles and fleets. A systematic program is in addition to all other federal requirements.



Roadability – FAQ's

updated - 4/16/09

- 1) **Q: Which entity is considered to be the Intermodal Equipment Provider (IEP)?**
A: Any person that interchanges equipment with a motor carrier pursuant to a written Interchange Agreement or that has contractual or legal responsibility for the maintenance of the equipment.
- 2) **Q: Under question number 1, how is the IEP identified?**
A: The USDOT number identifies the IEP. In the event that the FMCSA accepts the industry's GIER electronic solution to marking equipment, the Task Force also endorses this method for identifying the IEP.
- 3) **Q: Can the IEP assign a party to perform the maintenance to the equipment and not be considered the IEP?**
A: The IEP can assign an Agent (M&R Vendor or other third party) to perform the M&R for the equipment and not be considered as the IEP.
- 4) **Q: What equipment is regulated under the new Roadability Rule?**
A: Trailers, chassis and other associated devices when used in intermodal service. Containers are not included in this Rule.
- 5) **Q: Are Motor Carriers required to submit a written report (DVIR) of Roadability Component Defects at the time of In-Gate to either the Facility Operator or IEP?**
A: Motor Carriers are required to either submit a written or verbal report to the Facility Operator and or IEP. If a verbal report is given by the Motor Carrier, this information must be transferred onto the DVIR document.
- 6) **Q: Are Motor Carriers required to submit a written report of Roadability Component Defects at the time of Outgate to either the Facility Operator or IEP?**
A: No, Motor Carriers are not required to submit a written report to either the Facility Operator or IEP prior to outgate. Drivers must inspect to insure that equipment does not have any RCD's prior to outgate of equipment.
- 7) **Q: Which party is responsible to apply for the USDOT identification number?**
A: The authorized IEP as explained in questions 1 and 2 above. In most cases the owner or lessee of equipment will be the IEP and will have accountability for filing for the USDOT identification number.

- 8) Q: How are trailers and chassis to be identified with the USDOT number?**
A: While the Rule provides for four different methods of identifying the USDOT number for the equipment, the Roadability Operations Task Team recommends that all chassis and or trailers be identified with either a stencil or label affixed to the curb side of the chassis or trailer. In the event that the FMCSA accepts the industry's GIER electronic solution to marking equipment, the Task Force also endorses this method for identifying the IEP.
- 9) Q: Will there be a centralized national data base where the IEP, equipment identification, and USDOT identification can be queried and located?**
A: IANA is working with the FMCSA for the use of a new Global Intermodal Equipment Registry (GIER) for this purpose.
- 10) Q: Can an electronic signature be used in lieu of the actual Motor Carrier Driver signature?**
A: Yes, electronic signatures are acceptable to certify documentation under the Federal Rule.
- 11) Q: How often is the IEP required to file for a USDOT number?**
A: Regardless of change in equipment, each IEP is required to file every 24 months. The month of filing will be governed by the USDOT ending digit.
- 12) Q: What provisions of the Federal Regulation becomes effective on June 17, 2009 prior to the December 17, 2009 requirement for the registration of equipment?**
A: On or before December 17, 2009, the regulations require IEPs to:
1) to establish systematic inspection, repair and maintenance programs;
2) develop recordkeeping systems; and
3) to obtain an IEP USDOT number through submission of an MCS 150-C.
The regulatory requirement to mark equipment with the IEP USDOT number must be done on or before December 17, 2010.
- 13) Q: What is the difference between the DVIR and the Drivers Inspection document?**
A: The DVIR is the document prepared by the Facility Operator which records the RCD's reported by the Driver. The Drivers inspection document is prepared by the driver and used to complete the DVIR by the Facility Operator.
- 14) Q: Must an IEP do inspection, repair and maintenance work itself, or may it contract with others?**
A: An IEP may enter into agreements with others ("designated agents") to perform inspection, repair, and maintenance on its behalf. The IEP however, is responsible for the work performed by its agents and for ensuring the safety of the IME it tenders to motor carriers and drivers.