Existing State Mandatory Vehicle Inspection Programs for Passenger-Carrying Commercial Motor Vehicles (CMVs)

1. Does your State or the States in which you register your passenger carrying CMV conduct mandatory inspections of such vehicles? Please indicate the State(s) in which your passenger-carrying CMVs are registered.

YES. Wisconsin has an annual inspection mandate.

2. What vehicle types are included in the mandatory passenger-carrying CMV inspection program (*e.g.*, motorcoaches, school buses, mini-buses, 9–15 passenger vans, etc.) and which are not included?

Currently inspected in WI: Motor bus 16 or greater, all school buses. Not inspected in WI: mini-bus <16, passenger vans.

3. If your State has a mandatory program, briefly describe your inspection procedures and indicate which vehicle components are inspected.

School bus: Similar to Level 5 NAS Inspection with WI's own out of service criteria used.

Motor Bus: Same as Level 5 using CVSA out of service criteria.

- 4. How many total inspections are performed by your State annually for each of the following types of vehicles?
- a. Motorcoaches-2500
- b. School buses-11000
- c. Mini-buses-0 if less than 16 passenger
- d. 9–15 passenger vans-0
- e. Other-Human Service Vehicles-1500
- 5. What is the estimated time required to complete each vehicle inspection?

School bus 20-25 minutes Motor Bus 30-45 minutes

6. What procedures are used to record the vehicle inspection?

School Bus-Tracs 10 Motor Bus-Tracs 10

7. If a vehicle does not pass an inspection, who addresses the issues? If it is done by someone other than the inspecting entity, is there a second inspection after the issues are addressed? On average, how many follow up inspections does it take to pass a vehicle?

School bus-If vehicle is placed OOS the carrier self certifies. Motor bus-If a vehicle is placed OOS a re-inspection is required by WIDOT. Only one follow up visit is required. 8. Are mandatory vehicle inspections performed by State employees, by third-party inspectors authorized by the State, or by passenger carrier employees through a State-authorized self-inspection program?

By certified Sworn Inspectors employed by WIDOT.

9. If vehicle inspections are conducted by a State-authorized third party or by passenger-carrier employees authorized by the State, are there differences in safety outcomes between those conducted by State employees and those conducted by third-party inspectors or through a passenger carrier's State-authorized self-inspection facilities?

## N/A

10. Are there any specific benefits or concerns related to using third-party inspectors or by others?

Forecasted benefits of using ASE certified third party inspectors would be beneficial due the knowledge they would have.

11. If inspections are conducted by third-party inspectors or by passenger

carrier-employed mechanics or technicians, what oversight is or should be required?

Allow state jurisdictions to conduct "Level 5" terminal spot check inspections.

12. Should self-inspection or third party inspections be options for compliance with a mandatory State inspection?

Yes

13. How does/would the cost of inspections differ between those conducted by State employees or by third-party inspectors?

WI does not charge for school bus inspections. WI does charge \$30 for a motor bus inspection.

14. What might be other preferable options?

If a state received FMCSA funds to complete the inspections.

Measuring Effectiveness of Inspection Programs

15. Does your State have information on violations discovered during inspections that are attributable to maintenance issues that should have

been found during a required vehicle inspection?

Yes

16. Has your State considered implementing a mandatory passenger carrying CMV inspection program, but declined to do so? If so, what are your State's reasons for not implementing a program?

WI does have one.

17. If your State imposes mandatory inspection of passenger-carrying CMVs, how is the effectiveness of that program measured?

It is hard to put a number on the crashes and lives that have been saved by WI's mandatory inspection program. I know of no way to calculate this.

18. What are the most common vehicle defects discovered during these mandatory vehicle inspections? What safety conclusions do you draw from the results of these inspections?

Lights, signs and lettering, tires. Pre-trip inspections not being conducted or drivers are not documenting violations.

19. Has your State or organization collected data related to crashes, injuries, or fatalities attributable to

improperly maintained or inspected passenger-carrying CMVs? If so, please provide summary information or links to detailed data associated with these areas.

No

20. Has the occurrence of passenger carrying CMV-involved crashes, injuries, or fatalities before and after the implementation of a mandatory inspection requirement been evaluated? If so, please provide summary information or links to detailed data associated with these areas.

No

21. After a State inspection requirement was instituted, what changes were observed over time in the number of safety violations discovered during inspections, if any.

Unable to answer. Mandatory program has been around for over 40 years.

22. Do programs that inspect only a sample of vehicles have significantly different outcomes than those where all vehicles are inspected, please provide examples of how they differ?

We inspect all.

Inspection Facilities and Locations 23. Where does your State conduct mandatory passenger-carrying CMV inspections (e.g., State owned/leased facility, third party facility, carrier's place of business, or other type of facility)?

Carrier's place of business.

24. Where should mandatory passenger-carrying CMV inspections be performed?

Where ever the "state" requires them to be done.

25. If mandatory passenger-carrying CMV inspections are conducted at the carrier's place of business, what accommodations must be made to ensure appropriate access (*e.g.*, pits, lifts, etc.) to conduct full inspections of motorcoaches and other large passenger vehicles?

WI requires pits or a lift for motor buses. Nothing but a creeper is needed for school buses. The creeper is provided by the state.

26. How does facility location or accessibility for mandatory inspections impact inspections or compliance?

Long travel distance may be costly. A mandated inspection program requires strategic location of personnel that may not support MCSAP initiatives.

27. What delays may the State experience in completing mandatory inspections (*e.g.* lack of sufficient number of inspection facilities)?

Lack of personnel and funding.

Costs

28. What is the cost per mandatory vehicle inspection to the carrier?

School bus inspection is free to the carrier. Motor bus costs \$30.

29. Do inspection fees differ based on the type of vehicle being inspected?

Yes

30. Do vehicle inspection fees differ based on location of the inspections?

NO

31. How much does it cost the State to establish and run inspection programs on an annual basis?

School bus inspection program: \$645,626 Motor bus inspection program: \$116,301

32. If a vehicle does not pass an

inspection, is there an additional cost for the second inspection?

No.

33. If fees are collected by the State, does the State dedicate the revenue to the administration of the program?

No.

Uniformity of Mandatory Vehicle Inspection Programs
34. What qualifications should be applicable to individuals authorized to perform mandatory passenger-carrying CMV inspections?

School bus: State training program

Motor bus: NTC PVI course

Third Party: Industry excepted certifications (ASE)

35. Should minimum training elements be required for passenger carrying CMV inspections? If so, how much training should be required and who should administer the training?

Yes. 24 hours classroom, 32 inspections with a trained officer.

36. What should be the minimum vehicle components inspected under a mandatory bus inspection program?

School bus: Similar to a NAS L5 and/or additional items required by a

state law.

Motor bus: Follow L5 inspection procedure.

37. How does the existence of different vehicle inspection requirements among the States affect carrier business practices?

School bus: There is no nationwide standard for school buses so carriers

that operate in several states must adapt to the individual state laws.

Motor bus: No issue

38. How might business practices change under a uniform mandatory bus inspection program?

Industry in WI has adapted their scheduled without an issue.

Current Federal Standards
39. How effective are existing Federal standards for the inspection of passenger-carrying CMVs in (1) mitigating the risks associated with improperly maintained vehicles and (2) ensuring the safe and proper operating condition of the vehicles?

The level 5 inspection program maintains a satisfactory level of safe and proper operating condition.

40. What is an effective and efficient way for the FMCSA to track inspected carriers to reduce burden on States and carriers?

Create a Level 8 inspection and upload data similar to a Level 5.

## Federal Authority

41. How should FMCSA incentivize the States to establish mandatory passenger carrying CMV inspection programs.

Mandating an annual inspection program is labor intensive and costly. Establishing a third party inspection program in conjunction with a FMCSA funded spot check enforcement program will meet or exceed the expectations of an annual inspection program.