

ISSUE NUMBER

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ISSUE NAME

OOSC, Part II, Item 2, Cargo Securement - Trailer Rear-Mounted Fork Lifts

STATUS

Open

Vehicle Committee

NAME

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Inspectors are encountering trailer rear mounted forklifts with various methods on how they are secured to the vehicle. This has led to discussions/questions on how they should be secured and has opened the possibility of different enforcement practices and confusion to industry of the correct method. In support of the continued efforts of harmonization and standardization, I ask guidance on how these machines are defined within the regulations for the purpose of securement.

JUSTIFICATION OR NEED

These forklifts are machines (generally under 10,000 lbs) primarily used in the support of the work of the truck (e.g. unloading sod, sheetrock etc.). The industry standard in securing these to the vehicle generally involves either a chain or bar strap, one on each side. Roadside inspectors are encountering these with either 1 or both tie downs left off and/or the tie downs meet conditions of tie down defect table in the OOSC. Locally we have found differences in enforcement method if these are treated as cargo or dunnage/vehicle equipment. If treated as cargo, then the tie down defect table would apply. If treated as dunnage, then in the U.S. the defect table would not apply and essentially a tarp strap would be sufficient. While I agree that the machine is used to support the work of the vehicle, the analogy can be made that a skid steer sitting on the deck of a trailer loaded with the same product and equipped with forks is also only used to support the work of the vehicle. Both machines have the primary purpose of unloading the product and are just carried on the vehicle in different ways. With the machine on top of the deck it is held to cargo securement rules.

REQUEST FOR ACTION

I cannot find if this has been discussed in the past. For the purpose of uniformity, I request the Cargo Securement Harmonization Program discuss this and possibly provide guidance in Operational Policy 15 section 2. Cargo Securement if these trailer mounted forklifts should be considered as cargo or dunnage/vehicle equipment for the purpose of securement.

SUPPORTING DOCUMENTS/PHOTOS

- [Picture-Examples.pdf](#)