

ISSUE NUMBER

18-048-VEH

ISSUE NAME

OOSC, Part II, Item 2. a. General Securement - Binders and Tiedowns

STATUS

Closed

Vehicle Committee

NAME

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This is in regard to using binders and chains to secure cargo,

1. Can the binder attach directly to an anchor point instead of both ends attaching to just the chain (see pic. 1).
- 2.. If using one chain and two binders, is this considered one securement system or two separate securement systems (see pic 2).

JUSTIFICATION OR NEED

Due to limited information on binders in the FMCSR, we need clarification on the two points above. We are an open-deck company and use chains and binders on a regular basis. We want to be in compliance at all times. To our knowledge, the manufacturers intent on the use of these binders is to ONLY tighten the chain/take up the slack from the chain, not be used as a direct securement to an anchor point.

REQUEST FOR ACTION

We would like a review and response of our concerns with regards to binders and their use.

SUPPORTING DOCUMENTS/PHOTOS

- [Pic2.JPG](#)
- [Pic1.JPG](#)

ACTION TAKEN BY COMMITTEE

Clarification was needed on two points. Can the binder be connected directly to an anchor point and is there anything in the regulations that prohibits this method of attachment? They can be connected to chains, a vehicle, or the load.

The second question was with one chain and two binders, is this one securement system or two? The loose chain in the middle is not relevant. This is not the first time this question has been asked and it is unknown why the enforcement community often considers this not be two tiedowns or a loose tiedown.

There are pictures in the Part B lesson plan and it is up to the instructor to focus on this issue, but it is unknown as

to whether it is focused on during training. It was suggested that it could be covered in a webinar to see if the situation can be rectified but it does not hit all inspectors. Other things were discussed such as Inspection Bitz, etc.

After a lengthy discussion it was determined that an addition to Operational Policy 15 would be the best, it is permanent and a good reference point. The forum agreed on language to reflect the following:

b.(9) Can a single chain can be used to form two tiedowns with two binders and can the binder be directly attached to the transport unit or the load?

ANSWER: Yes, a single chain can be used to create two tiedowns (the excess chain in between the two tiedowns may be loose) and the binder may be attached to the transport unit or the load.

There was also a picture included in the Policy.