

ISSUE NUMBER

19-038-VEH

ISSUE NAME

OOSC, Part II, Item 2. Cargo Securement, Tiedown Defect Table - Cordage (Fiber Rope)

STATUS

Closed

Vehicle Committee

NAME

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We have had questions from inspectors, as well as debate/discussion with drivers/companies regarding the ability to secure cargo with cordage/rope. The major issue relates to knots, including a slip knot type attachments and whether using this type of attachment would meet the requirements under 393.112, and be considered "adjustable".

The second issue relates to a tie-down being defective if it contains knots. For example, knots are specifically noted in chains and synthetic webbing, but appear to be allowed for rope due to the following defect description in the OOS Criteria: "Ineffective knots formed for the purpose of connecting or repairing binders." This also ties in to the previous issue of whether a slip knot would qualify as adjustable. This could be interpreted that in order to use rope as an authorized tie-down, a binder or similar device must be used to meet the adjustable criteria?

JUSTIFICATION OR NEED

Clarification is needed to ensure uniform enforcement by inspectors.

REQUEST FOR ACTION

I request that this item be discussed to determine the appropriate uses and guidelines for use of cordage/rope for securement of cargo on/within a CMV.

I have attached a few photos for reference of the issue(s).

Thank You!

SUPPORTING DOCUMENTS/PHOTOS

- [Rope-Securement2.jpg](#)
- [Rope-Securement1.jpg](#)
- [Rope-Securement.jpg](#)

ACTION TAKEN BY COMMITTEE

FMCSA indicated they did testing of ropes and knots in ropes when they did the testing of straw, hay, and agricultural bins with the tilt testing in California around 10 years ago. From all the testing, it was indicated that it holds remarkably well if it is knotted correctly and there is tension on the tiedown. If you are going to use rope as your device and knots as your securement technique, as long as it has sufficient tension and it is not loose, then it is considered sufficient as a tiedown. For added clarification, knots cannot be used as a means of repair to the tiedown.

Canada indicated that NSC Standard 10 reflects the same allowance for ropes to be knotted for the sake of securement. The concern came up that inspectors will not be able to tell if the knot is adequate. There was discussion as to whether guidance should be put into Operational Policy 15 based on the regulation stating there shall not be knots. The other issue was trying to determine if a knotted rope is adjustable.

Industry in Canada indicated that there is not a lot of rope being used that they can say is being knotted. It was also noted that Canada requires the working load limit for rope, so it is likely that the concern is more prevalent in the U.S. than in Canada.

The forum concluded that there is nothing to add to Operational Policy 15 and this needs to be addressed on a case by case basis. The Vehicle Committee took no further action.