

**ISSUE NUMBER**

19-044-VEH

**ISSUE NAME**

OOSC, Part II, Item 2. Cargo Securement, e. Tiedowns for Length - No Front End Structure

**STATUS**

Closed

Vehicle Committee

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**EMAIL**[john@whitemountaintrucking.com](mailto:john@whitemountaintrucking.com)**SUMMARY OF ISSUE**

In 393.110(b)(3) many of the roadside inspectors are reading that there needs be 2 securement devices within the first 10 feet of the load. They continually insert the word WITHIN. If you look at the law as it is written, no where in it does it state where the tie downs need to be placed. It is only referring to how many tie downs are needed for the length of the article of cargo.

**JUSTIFICATION OR NEED**

If you refer to the OOS criteria it explains (under the notes on page 31 and continued on 32) where the best placement of the cargo securement devices could be placed and it gives 3 separate scenarios.

However it fails to give guidance to loads that are unable to to be contained within the confines of a flatbed trailer. Such as if the load extends beyond the front or the rear of the trailer. Common sense would indicate that you secure the length of the load within the length of the trailer, evenly spacing out the securement devices to get overall securement of the article of cargo.

**REQUEST FOR ACTION**

I would like guidance given in 393.110 to indicate that the "penalty" strap is to be within the first 10 feet of the front of the trailer, or evenly spaced out to give the most resistance to a load shifting or moving during hard braking. Also include the language in the OOS criteria under notes in 393.110 for the spacing of securement devices, but add a special note for the penalty strap.

**SUPPORTING DOCUMENTS/PHOTOS**

- [0731190647.jpg](#)
- [0731190646.jpg](#)
- [0731190645b.jpg](#)
- [0731190645a.jpg](#)
- [0731190645.jpg](#)
- [393.110-queston.docx](#)

## **ACTION TAKEN BY COMMITTEE**

Discussion and question on how can you tie down first 10' if it's all overhang? It would have to be tied down as close as practicable to the front. Question on whether this is a training issue or should there be some changes made. A comment was made that if there is nothing to tie down to, then how can you require them to tie down in the first 10 feet. Comment made that there is language in OOSC that seems clear.

Further comments that all the examples in the NTC Instructor material and in the examples on FMCSA's website they show the "penalty" strap w/in the 1st ten feet. And thinks that the intent is to have the "penalty" strap w/in the first ten feet. Although it was also agreed that if there is nothing to tie to, then how can we make them do that.

Local laws may limit front overhang. The guide to practical load securement says it has to be within the 1st 10' and that may be where some inspectors are looking at. Another comment about the note in OOSC is there is no anchor point within first 10'. NOTE: Item iii. covers the issue. No action was taken.

OOSC NOTE:

NOTE: Tiedowns shall be positioned as follows:

- i. Tiedowns spaced 10 feet (3.04 m) apart along the length of the vehicle; or,
- ii. A tiedown in every 10 foot (3.04 m) segment of the cargo; or,
- iii. To accommodate anchor points or cargo damage considerations, tiedowns may be spaced or grouped at lengths greater or less than 10 feet (3.04 m).