

ISSUE NUMBER

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ISSUE NAME

OOSC, Part II, Item 1. e. Parking Brake

STATUS

Closed

Vehicle Committee

NAME

Rex C. Railsback

AGENCY

Railsback HazMat Safety Professionals, LLC

ADDRESS

312 Lawrence Ave
Lawrence, KS 66049
United States

PHONE

9135683001

EMAILrex@hazmatgeek.com**SUMMARY OF ISSUE**

Inspection Bulletin 2012-04 - Hydraulic Brake System and Trailer Brake Inspection Procedure, utilizes roadside testing conditions for Parking Brakes, that do not match those listed in FMVSS 105, S5.2, which can lead to violations and subsequent OOS being cited in error.

JUSTIFICATION OR NEED

Asking roadside enforcement to conduct parking brake inspection procedures that are not equivalent to or same as those required per FMVSS 105, S5.2, S6 & S7, would be an inappropriate application of 393.41, FMVSS 105 and the OOS. Additionally, FMVSS 105 testing is on 20 or 30% grades with the transmission in neutral and the engine idle is at mfg. recommendations. Testing as currently noted in the Inspection Bulletin can put forces on the park brake system, beyond those required in the FMVSS. Inappropriate application of the noted regulations can lead to unjustly cited violations and OOS, which would then adversely affect a carrier's SMS Vehicle Maintenance BASIC. Incorrectly cited violations and OOS which adversely affect a carrier's SMS scores, can affect a carrier's ability to maintain existing and/or new customers, not to mention the potential for higher insurance rates.

REQUEST FOR ACTION

Change inspection procedure to read "Park brake inspections should be done on grades not exceeding 20% and with the transmission in neutral. If the parking brake does not hold the vehicle, whether on an uphill or downhill grade, cite the violation of 393.41." "Note: Do not inspect park brakes with the transmission engaged, doing so is outside the requirements of FMVSS 105."

ACTION TAKEN BY COMMITTEE

During the discussion in committee, there were concerns that if this recommendation is implemented, there is no way to conduct the new process, and we would eliminate the parking brake inspection from the procedure. There was discussion that it is a training issue, and if done properly according to the training bulletin it's not a problem. Luke Loy stated that the original regulation should not have included FMVSS, but it did. There was discussion that we could add language to the procedure clarifying that if there is no braking action, then it would be a violation. It was the general consensus of the committee not to change the process but to add language to the inspection procedure clarifying when a violation has occurred by adding the words "without resistance" in to the procedure. It was also suggested that an Inspection bitz should be created to outline the proper parking brake procedure test.

4. Inspect the parking brake.

a) Ask the driver to apply the parking brake and attempt to move the vehicle in low forward gear without applying the throttle. The vehicle should not roll without resistance. (For manual transmissions, see NOTE below).

b) Repeat with the driver using reverse gear and no throttle. The vehicle should not roll without resistance. (For manual transmissions, see NOTE below).

NOTE: For manual transmissions, have the driver put the vehicle in low forward or reverse gear and have the driver let out the clutch until it begins to engage. The throttle should not be applied.

c) If the parking brake actuator utilizes air or hydraulic fluid to release the brake, inspect for leaks at the unit.

Motion passed unanimously.