

ISSUE NUMBER

22-007-VEH

ISSUE NAME

OOSC, Part II, Item 9.b.(4) - Electrical Lighting System

STATUS

Closed

Vehicle Committee

NAME

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AGENCY

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Recently we had an inspection on 1/25/22 where both turn signals (393.9(a)TS *6 points and OOS), both brake lights (393.9(a)BRKLAMP *6 points and OOS) and both taillights (393.9(a)T *6 points) were inoperative during the inspection, the clearance/marker lights appeared to be operative. A service truck was sent to weigh station, and it was discovered that the seven-way plug (pig tail) prongs were not making a good connection to the trailer light box, the prongs were spread / fixed, and all defective lights worked. A DataQ was submitted requesting the multiple light defects be changed to a single 393.23 (required lamp not powered by vehicle electricity *2 points) violation which was verified by the repairman on the RO and pictures taken of the trailer at the weigh station. The DATAQ was denied because of the current wording of the Out of Service criteria. Currently the OOS criteria reads as followed in vehicle section 9 b(4) "ALL electrical systems on towed vehicle(s) inoperative due to no electrical connection (e.g., unplugged or loose pigtail). (393.23)"

JUSTIFICATION OR NEED

Currently the North American Standard Out of Service Criteria vehicle section 9 b(4) states All electrical systems on towed vehicle(s) inoperative due to no electrical connections (unplugged or loose pigtail) (393.23) note: after electrical connection is re-established all towed vehicle(s) systems shall be inspected and if applicable recorded as Operational Policy 14,

Since it is possible that all lights may not be inoperative because of a faulty power cord (pigtail) that this root cause could result in some, but not all lights not working, the word All should be changed. A recent inspection indicated by the trooper that both trailer turn signals, both brake lights and both tail lights were inoperative but trailer clearance/marker lights were working. A service repairman from TA truck stop checked the seven way plug (pig tail) where the prongs were spread and a better connection was made the All lights worked. The service technician documented the RO and took pictures and the documentation was submitted as part of a DataQ to change the multiple light violations to a single power cord violation which is 393.23, the DataQ was rejected because All of the lights were not inoperative, as the clearance lights still worked.

REQUEST FOR ACTION

I would like to suggest that the word "All" be changed to "any" and that the rest of the wording in the section remain the same, it is clear this was not a light defect(s) but a faulty power cord/pigtail, I think it is important when possible and supported by documentation that the correct defective part be identified with the correct CFR code

SUPPORTING DOCUMENTS/PHOTOS

- [Work-Order-058-323452-TA-Truck-Service-eSHOP.pdf](#)
- [Action-Item-inspection.jpg](#)

ACTION TAKEN BY COMMITTEE

Discussion in committee was unanimous in that entertaining this request would essentially be asking roadside inspectors to diagnose a mechanical issue rather than allowing the inspector to focus on the inspection, and it was clear from all parties that the intent of a roadside inspection is not for the inspector to be trouble-shooting mechanical issues. In addition, this issue should/could have been discovered during a pre-trip inspection.