

ISSUE NUMBER

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ISSUE NAME

Operational Policy 4 - Certification for Level III Inspections on Passenger Carrier Vehicles

STATUS

Closed

Training Committee

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NASI Part A course content has recently been changed to add modules instructing on ELDs. This addition caused time constraints with the 40-hour course and subsequently the HOS block regarding passenger carrier vehicles was removed. This now removes any instruction/certification in Part A for conducting a Level III on a bus, which was previously allowed under the prior versions. With the removal of this course content, Ops Policy 4 description of a Level III should address in some context that a Level III may not be conducted on a passenger carrier vehicle without being PCVI certified.

JUSTIFICATION OR NEED

Clarification should be made to coincide with the changes made to the NASI Part A course content on what types of CMV's may be inspected by whom to avoid liability of conducting levels of inspections of those not certified to do so.

REQUEST FOR ACTION

Update Ops Policy 4, specifically the description of a Level III inspection, to the extent of, inspectors may not conduct a Level III on a passenger carrier vehicle without being certified in PCVI. Also consider adding content to NASI Part A that addresses that Level III inspections may be conducted on what types of CMV's upon completion of this course.

ACTION TAKEN BY COMMITTEE

This issue was discussed during the 2023 Workshop to update CVSA Operational Policy 4, specifically the description of a Level III inspection, to outline that inspectors may not conduct a Level III on a passenger carrier vehicle without being certified in PCVI.

Some members of the committee wanted one slide added to NASI Part A outlining the HOS for passenger vehicles to allow for Level III inspections to be conducted on passenger carrier vehicles. The topic and request to add a summary of the HOS rules to the Part A curriculum without actually instructing HOS was presented to the board at end of the workshop, and that idea was not approved. The issue was then discussed and presented in the Passenger Carrier Committee during this fall conference and they agreed that unless an inspector has been through training specific to Passenger Carrier Vehicles, no level of inspection should be conducted on these vehicles.