

**ISSUE NUMBER**

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**ISSUE NAME**

Enhanced CMV Inspection Standard - Rear Impact Guards

**STATUS**

Closed

Enforcement and Industry Modernization Committee

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The CVSA Enhanced CMV Inspection Standard currently includes elements that may conflict with CVSA's current enforcement guidance and as a result, could benefit from further clarification and revision.

**JUSTIFICATION OR NEED**

The Enhanced CMV Inspection Standard would require that the manufacturer's certification label be affixed to the rear impact guard at dispatch inspection. Confirming alignment of the rear impact guard dispatch inspection procedure in the Enhanced CMV Inspection Standard with existing enforcement guidance would help clarify and promote consistency for carriers, law enforcement, and roadside inspectors.

**REQUEST FOR ACTION**

Clarify alignment of the rear impact guard certification label requirement currently stated in the Enhanced CMV Inspection Standard with current CVSA enforcement guidance and practices.

**SUPPORTING DOCUMENTS/PHOTOS**

- [CVSA\\_Torc\\_Submission\\_03-2024\\_1.0\\_Ltr.pdf](#)

**ACTION TAKEN BY COMMITTEE**

This label, placed on rear-end protection guards, often gets damaged, leading to violations, even though the carrier cannot replace the label and it is really no longer relevant after the first point of sale of the vehicle.

To address this, guidance was added to Ops 15 policy, advising officers not to cite this issue during roadside inspections until the regulation is amended, as per their March 13, 2019 petition to FMCSA. It was further clarified that the concern lies in the inconsistency between the enhanced inspection procedure and roadside inspector guidance, proposing to align the enhanced inspection with Ops 15 temporarily.

The motion aims to align the enhanced inspection standard with Operational Policy 15.

The CVSA Enhanced CMV Inspection Standard will be amended to remove the defect on the Dispatch Inspection for a missing certification label.