



# Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

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July 2, 2025

Dockets Operations  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
West Building, Ground Floor  
Washington, DC 20590-0001

**RE: Docket Number: FMCSA-2025-0116**  
***Driver Vehicle Examination Report Disposition***

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments in response to the notice of proposed rulemaking (NPRM) published in the Federal Register by the Federal Motor Carrier Safety Administration (FMCSA) on May 30, 2025, seeking comments on the agency's proposal to revise the requirement that motor carriers and intermodal equipment providers sign and return a completed roadside inspection form to the issuing state agency, Docket No. FMCSA-2025-0116.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

CVSA thanks the agency for responding to the Alliance's petition, which was submitted to FMCSA on April 2, 2024. As noted in the petition, currently, Title 49 CFR § 396.9(d)(3) requires that motor carriers and intermodal equipment providers return inspection reports to the issuing agency within 15 days of issuance, certifying that all necessary repairs have been made.

According to FMCSA's Analysis and Information Online database, in 2023, states issued 2,937,535 inspection reports, of which 1,666,282 included a violation(s).<sup>1</sup> Motor carriers were required to sign and return those 1,666,282 inspection reports to the issuing agency. While the regulations require the motor carrier sign and return the inspection report, there is no corresponding requirement that the issuing agency use the returned form for any purpose. As such, the majority of jurisdictions simply file the forms away or dispose of them, without taking any additional action that would benefit or improve safety. In some instances, the motor carrier is faxing or mailing

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<sup>1</sup> Roadside Inspection Activity, Calendar 2023, Analysis & Information Online, Federal Motor Carrier Safety Administration, [https://ai.fmcsa.dot.gov/EnforcementPrograms/Inspections?type=RoadsideInspectionActivity&time\\_period\\_id=2&report\\_date=2023&vehicle\\_type=1&acute\\_critical=0&state=NAT&domicile=ALL](https://ai.fmcsa.dot.gov/EnforcementPrograms/Inspections?type=RoadsideInspectionActivity&time_period_id=2&report_date=2023&vehicle_type=1&acute_critical=0&state=NAT&domicile=ALL) (last visited March 29, 2024)

a physical copy of the form to the issuing agency, which must then scan the form for digital record keeping or file the form with physical files, creating an unnecessary administrative burden for both the motor carrier and the state. Further, the state jurisdictions have access to Query Central to view past inspections, should they need to for enforcement purposes, making this requirement antiquated and redundant. Removing this requirement would eliminate an unnecessary administrative burden on both the motor carriers and the state agencies who receive them, with no reduction in safety, given that, as noted above, most jurisdictions do not use the forms for any purpose once they are returned.

While the majority of jurisdictions do not use the signed forms, some have processes in place to use the forms as a mechanism to identify motor carriers that require additional intervention. As such, CVSA supports FMCSA's proposed change to remove the requirement that the forms be returned to the issuing agency, unless the jurisdiction requires the motor carrier to do so. This provides regulatory relief for industry while still allowing jurisdictions the flexibility to require the forms be returned, should they see a safety benefit to doing so. As noted in the NPRM, the proposed change would remove an unnecessary burden on industry without negatively impacting safety.

CVSA works to closely monitor, evaluate, and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the opportunity to provide feedback to the agency.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or [collin.mooney@cvsa.org](mailto:collin.mooney@cvsa.org).

Respectfully,

A handwritten signature in black ink, appearing to read 'Collin B. Mooney'.

Collin B. Mooney, MPA, CAE  
Executive Director  
Commercial Vehicle Safety Alliance