



May 30, 2011 is
Memorial Day.
Please remember
all men and
women who
have died in
military service
to the
United States.

CSA & Tires - An Update

The latest Safety Measurement System (SMS) Methodology document has been published by FMCSA and can be downloaded at csa2010.fmcsa.dot.gov/about/basics.aspx. This 123- page document details and quantifies how the SMS score is calculated. The SMS score allows the enforcement community to identify specific safety problems for fleets, and will be used to continuously monitor on-road performance to determine whether a carrier's safety performance has improved or if intervention is warranted.

Tires have a major impact on a fleet's SMS score. They fall into the vehicle maintenance category of the Behavior Analysis & Safety Improvement Category (BASIC) system. The violations associated with tires can be found on pages A19 – A20 in the appendix of the referenced SMS Methodology document. FMCSA tire violations are found in Section 393.75 of their code. FMCSA has attached a violation severity number to be used in calculating the SMS score; depending on the specific tire issue either an (8) or a (3) will be applied for each violation.

Violations that carry the (8) severity rating include:

- Flat tire or fabric exposed
- Ply or belt material exposed
- Tread &/or sidewall separation
- Flat tire &/or audible air leak
- Cut exposing ply &/or belt material
- Steer tire tread depth less than 4/32"
- Drive, trailer, dollie tire tread depth less than 2/32"

It is obvious that a walk-around vehicle inspection that includes tires should easily identify these high severity violations.

Tires which show cuts and exposed steel or fabric are not recommended to be run-

ning on your vehicles. Tires with tread depths below 4/32" for a steer and 2/32" for all other wheel positions have been in effect for just about forever. A simple tread depth gauge will identify low tread depth tires. A tire with an audible air leak must have a large puncture and will lead to an eventual tire failure. Just looking at a tire on a vehicle will not determine if a tire is "flat". It must be measured with a calibrated tire inflation gauge. The Commercial Vehicle Safety Administration (CVSA) considers a tire flat when the measured air pressure is less than 50% of the maximum tire pressure molded into the tire sidewall. The current industry standard followed by most fleets in considering when a tire is flat and needs to be removed is 20% below the fleet air pressure specification.

Violations that carry a (3) severity rating include:

- Tire underinflated based on load
- Regrooved tire on the steer axle
- Weight exceeds tire load limit

Regrooved tires are primarily used by bus fleets and are not an issue for trucking fleets. Exceeding a tire load capacity is never suggested for tires and is clearly illegal. The violation on this list that can and probably will affect many fleet SMS scores is tire underinflation. Every industry study shows that tire underinflation is a widespread issue, especially on inside duals and trailer tires. The dilemma here is that nobody has clearly delineated a definition of underinflation. Is it 10%, is it 15%, or maybe 20% or even higher? And, is it based on what is written on the tire sidewall or is it based on the fleets tire air pressure specification? Because of the ambiguity surrounding how underinflation is determined, a fleet could rack up points fairly quickly as enforcement officers use their criteria to determine that tires on an 18-wheel rig are underinflated assigning three points for each one.

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