

# National Safety Code Standard 13: Daily Trip Inspection

## CCMTA Interpretation Guide (Q&A)

### **Part 1 – General Requirements**

#### ***Q1. Carrier to issue inspection schedules***

Can carriers customize schedules?

**A1.** Yes. Schedules may be modified as long as they contain the applicable elements. As per Section (2), footnote 1, carriers may add ‘optional’ items that are not mandated under the schedule but that they deem important to the safe operation of the vehicle, or delete items that are not present or required to be present on the equipment. Strict adherence to the format and layout of the schedules is not required.

For ease of roadside enforcement and to avoid any possibility of confusion on the part of drivers, carriers are encouraged to make any added optional inspection item easily identifiable (e.g. through separate section, different colour).

#### ***Q2. Reporting of optional items***

Do the reporting requirements of the standard apply to added optional items?

**A2.** No. Any defects related to optional inspection items added to the schedule by the carrier are not subject to the reporting requirements of the standard. As such they do not have to be recorded on the inspection report as per Sections (9) and (11), or repaired as per the provisions of Section (14).

#### ***Q3. Report to be given to carrier***

Does the requirement under Section (15) for the driver to forward all original inspection reports to the carrier within 20 calendar days meet the HoS requirements?

**A3.** Yes. It is intended that the requirements be in line with HoS record-keeping provisions.

#### ***Q4. Schedule 4 inspections to be conducted by qualified person***

Who is qualified to perform Schedule 4 inspections as per Section (17)?

**A4.** The qualifications to conduct Schedule 4 inspections are up to each jurisdiction to determine; a number of jurisdictions will require the inspection to be performed by a licensed mechanic, others may allow other types of certification, training or apprenticeship. All jurisdictions agreed to honour other jurisdictions’ certification requirements.

### **Part 2 – Schedules**

#### ***Q5. Air Brake System – Audible air leak***

Under the standard an audible air leak is shown as a defect; however, under the CVSA and PMVI standards certain air leaks (e.g. a leak in an air hose at other than a proper connection) are considered out of service.

**A5.** Any air leak at other than a proper connection, e.g. in a hose or at chamber, is a major defect in line with the CVSA OOS criteria. If the leak is audible, the onus is on the driver to determine if it exceeds the prescribed limit (the carrier has ultimate responsibility to set company policy and train drivers on acceptable limit, referring to CVSA standards, PMVI requirements, air brake training program material, etc.).

*Note: Throughout the standard, reference is made to prescribed limits. The TI standard itself will reference PMVI criteria. However when the standard is made into regulation it is expected that it will refer to the jurisdiction's vehicle equipment regulations.*

**Q6. Air Brake System – Slow pressure build-up rate**

To which standard does the build-up rate have to comply with?

**A6.** As determined based on PMVI criteria.(See Note above.)

**Q7. Air Brake System – Pushrod stroke of any brake exceeds adjustment limit**

Are drivers expected to crawl under their trucks every day to check the brakes?

**A7.** The requirement is outcome-based: pushrod stroke must not exceed the adjustment limit. How that is arrived at is up to the carrier, ideally through a reliable preventative maintenance program, electronic in-cab or mechanical indicators, by having a mechanic verify the brakes before dispatch, etc.

**Q8. Air Brake System – Inoperative towing vehicle (tractor) protection system**

How is the driver/person doing the inspection supposed to proceed to verify compliance?

**A8.** The carrier has the ultimate responsibility to set company policy on driver diligence and train drivers on acceptable process.

**Q9. Air Brake System – Clearance between disc brake pads and rotor exceeds manufacturer's specified limit (Schedule 4)**

Does this section require the wheels to be pulled off the vehicle?

**A9.** When conducting a check of the clearance between disc brake pads and rotor, technicians should follow manufacturer's standards, which may or may not require a wheel pull.

**Q10. Suspension System – Cracked or broken main spring leaf or more than one broken spring leaf**

There seems to be a discrepancy between the CVSA OOS criteria and the Trip Inspection standard (1/4 of leaves broken vs 'more than one').

**A10.** It is recognized that there could be such differences between standards and that the TI standard may have higher requirements in some instances.

**Q11. PMVI vs Schedule 4**

Does a PMVI inspection qualify as a Schedule 4 inspection?

**A11.** In cases where the timing of a Schedule 4 inspection coincides with a mandated semi-annual PMVI inspection, a PMVI inspection can be accepted in lieu of a Schedule 4 inspection provided Schedule 4 requirements are met including signature and brake pushrod measurement.

**Q12. Motorcoach switching of schedules**

Can a motorcoach operator switch from Schedule 3 & 4 inspections to Schedule 2 inspections mid-trip?

**A12.** For flexibility purposes, most jurisdictions allow operators the option of reverting to Schedule 2 inspections should a Schedule 4 report expire mid-tour on a charter trip (*please check with individual jurisdiction*).

**Q13. Schedule 4 validity**

For how long is a Schedule 4 valid?

**A13.** A Schedule 4 report is valid for 30 days including the day of inspection or 12,000 km, whichever comes first.