



Cargo Securement Harmonization

Public Forum Minutes

Ottawa, Ontario

November 3, 2026

09:00 PM-5:00 PM

Revised Date: October 5, 2026

Chair: Roger Eberle

Vice Chair: Kevin Adkins

Secretary: Carl Bone

CVSA Liaison: Kerri Wirachowsky

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AGENDA

1.	Opening Remarks & Self Introductions
2.	Adoption of Agenda The attendees will be able to add any new business to the agenda.
3.	Review/Approval of Meeting Minutes from Ottawa, Ontario  Attachment 1 – 2026 Chicago Cargo Securement Meeting Minutes.pdf
4.	Review of Committee Structure, Terms of Reference & Business Processes This forum does not have any regulatory or enforcement authority but instead either requests consideration by U.S. and/or Canadian regulators or provides feedback to CVSA's Vehicle Committee, which in turn may effect changes in CVSA policies or Out-of-Service Criteria (OOSC) accordingly. The forum works to facilitate uniform



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policies, regulations, and enforcement for cargo securement in North America. The forum is open to all interested parties.

5. Regulators Group Status Report

Regulators from the U.S. and Canada provide relevant cargo securement regulatory policy or research updates unrelated to the Request for Action issues throughout the agenda. Those will be addressed throughout the meeting.

Request for Action Items (NEW)

6. 26-100-VEH: OOSC, Part II, Item 2. Cargo Securement - Tiedown Defect Table

Submitted By: Dan Voelker, Arizona DPS

Summary of Issue

I found this photograph in some older training material. Can we add this photograph, or a similar photograph to the defect table in the out-of-service criteria to point out the violation to inspectors?

Justification or Need

I think several inspectors are not aware of this defect, as it is not specifically covered in NAS Part B.

Request for Action

Please add this photograph or a similar drawing/photograph to point out this defect to inspectors.





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7. 26-088-VEH: OOSC, Part II, Item 2. Cargo Securement - Automatic Tensioners

Submitted By: Tod H. Shultz, SMART Securements Systems, LLC.



Attachment 2 – SMART SecureLoad Automatic Tensioner

Summary of Issue

SMART Securement Systems, LLC requests CVSA review of the SMART SecureLoad® SS92002 Automatic Tensioner, a battery-powered chain tensioner currently used on U.S. roadways as a component in welded-steel-chain cargo-securement systems. SS92002 uses local Tighten/Loosen controls and Automatic Tension Management (ATM), which can periodically evaluate the established operating condition and retighten when required. Because SS92002 differs from a conventional manual load binder, product-specific guidance would help U.S. roadside inspectors identify the device, determine and apply its marked 9,200-lb WLL within the complete tiedown, inspect its physical load path, and correctly interpret device-status indications relevant to roadside inspection.

Justification or Need

SS92002 is currently in commercial use on U.S. roadways securing heavy equipment and other specialized cargo. As deployment expands, consistent inspector understanding of the device, its 9,200-lb WLL, physical load path and device-status indications will help avoid inconsistent roadside treatment. SS92002 is intended for use in cargo-securement systems subject to the U.S. Federal Motor Carrier Safety Regulations. Drivers and motor carriers remain responsible for cargo inspection and securement under 49 CFR §392.9, and cargo-securement devices and components must remain in proper working order under §393.104. Under §393.108, the WLL of the complete tiedown is determined by its lowest-rated component, including the tensioner, chain, connectors or anchor points. SS92002 is rated at 9,200 lb WLL and accommodates 3/8-in or 1/2-in welded steel chain. When a lower-rated chain or other component is used, that lower rating governs the tiedown. To use the complete tiedown at the SS92002 full 9,200-lb rating, the chain, connectors and anchor points must each have a WLL of at least 9,200 lb. Heavy vehicles, equipment and machinery weighing 10,000 lb or more remain subject to the applicable requirements of §393.130. Use of SS92002 does not alter required tiedown quantity, aggregate WLL, attachment-point requirements, cargo positioning requirements or other commodity-specific securement provisions. Clear product-specific inspection guidance would help inspectors consistently identify and evaluate SS92002 while continuing to apply the existing FMCSRs and CVSA Out-of-Service Criteria. No separate SS92002-specific out-of-service threshold is requested where existing requirements are sufficient.

Request for Action

SMART Securement Systems requests that the CVSA Vehicle Committee review the attached proposed bulletin and consider development of a CVSA Inspection Bulletin for the SMART SecureLoad® SS92002 Automatic Tensioner for U.S. application.

The requested guidance would address:

1. Product identification and protected 9,200-lb WLL markings;
2. Determination of the complete tiedown WLL under the §393.108 lowest-component rule;
3. Inspection of the chain, connectors, anchor points, hooks, clevises, pins, and other visible load-path components; and
4. Interpretation of ATM/device-status indications relevant to roadside inspection and battery-power loss, without substituting those indications for physical inspection of the complete tiedown.



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Open Issues/Request for Action Items

8. 26-025-VEH. OOSC, Part II, Item 2. Cargo Securement, a. General Securement

Summary of Issue

Requesting clarification of load securement questions related to vehicles, equipment, and machinery that weigh 10,000lbs or less.

More specifically I am asking for clarification on vehicles such as a skid steer (9,000lbs) or similar construction equipment that is being transported in a dump trailer or trailers with side walls and not just on a flat bed trailer.

It is my understanding this example does not fall under 393.128 securement for automobiles, light trucks, and vans because a skid steer does not meet the definition of any of those vehicles. Similarly, it does not fall under 393.130 because it does not weigh 10000lbs or more. So the vehicle should be secured in accordance with the provisions of §§ 393.100 through 393.114.

Under 393.102 C2 "Equivalent means of securement Transported in a sided vehicle that has walls of adequate strength, such that each article of cargo within the vehicle is in contact with, or sufficiently close to a wall or other articles, so that it cannot shift or tip to the extent that the vehicle's stability or maneuverability is adversely affected; or" What qualifies as walls of adequate strength?

Sided vehicle. A vehicle whose cargo compartment is enclosed on all four sides by walls of sufficient strength to contain articles of cargo, where the walls may include latched openings for loading and unloading, and includes vans, dump bodies, and a sided intermodal container carried by a vehicle.

What qualifies as walls of sufficient strength?

393.102 Performance criteria for devices to prevent vertical movement of loads that are not contained within the structure of the vehicle. Securement systems must provide a downward force equivalent to at least 20 percent of the weight of the article of cargo if the article is not fully contained within the structure of the vehicle. If the article is fully contained within the structure of the vehicle, it may be secured in accordance with § 393.106(b).

What is considered to be "contained within the structure of the vehicle. Does contained means a sided vehicle or something like a van trailer that is fully enclosed box?

Justification or Need:

Clarification of 393.102 C2 "walls of adequate strength". Set a standard for height of walls compared to the vehicle being transported.

Also, clarify 393.102B "contained within the structure of the vehicle."

Request for Action:

Requesting a commodity specific securement requirement for construction vehicles, equipment, and machinery that weigh 10,000lbs or less.

or

Clarification of 393.102 C2 "walls of adequate strength". Set a standard for height of walls compared to the vehicle being transported. Also, clarify 393.102B "contained within the structure of the vehicle."



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Discussion – *The committee discussed the interpretation of cargo being fully contained within a trailer and whether this condition alone satisfies securement requirements. Members noted that the concept of containment is frequently relied upon in practice but is not clearly defined within the regulations.*

Several members raised concerns about the assumption that trailer walls can act as a form of securement. It was noted that many trailer types, particularly enclosed utility trailers and light-duty cargo trailers, are not designed to withstand the forces associated with normal driving conditions such as braking, acceleration, and evasive maneuvers.

Examples were provided where equipment, including skid steers and small machinery, was transported inside sided trailers without any tiedowns. In these cases, the load was considered compliant because it was fully contained within the trailer, despite the absence of any additional securement devices.

It was noted that even if a load cannot exit the trailer, it may still shift significantly within the enclosed space, which can affect vehicle balance and handling.

The discussion also highlighted that there are no clear requirements for assessing the structural strength of trailer walls. Members questioned whether it is reasonable to assume that trailer walls can provide sufficient restraint without any standard.

Jurisdictional inconsistencies were a major focus of the discussion. Some members indicated that their jurisdictions accept containment as sufficient, while others require tiedowns regardless of whether the cargo is within sided walls or not. This inconsistency creates confusion for both enforcement personnel and industry operators.

The attendees agreed that clearer guidance is needed to define what containment means and what is acceptable and when additional securement is required. There was also discussion about the need to consider trailer design, load characteristics, and expected operating conditions when developing such guidance. Further regulatory and interpretive guidance is required to clarify when containment is sufficient and when additional securement is required.



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9. 25-097-VEH. OOSC, Part II, Item 2. Cargo Securement, a. General Securement - Load Shift

 Attachment 3 – 25-097-VEH Pictures

Summary of Issue

This dry van enclosed trailer was loaded with 12 pallets of totes of liquid cane sugar with a total cargo weight of 35,976#, or approximately 3,000# per tote. The pallets were originally loaded down the center of the trailer for stability, but with no side to side shoring of any type. The combination was observed leaning heavily to the right side while in transit, and appeared unstable. During the inspection, it was discovered that the driver had hit a "roundabout" curb with the left side trailer tires in Missouri. This caused the load to shift to the right up against the trailer wall which caused the right wall to bulge out slightly and a weight imbalance over the trailer and drive tandem axles on the right side. The driver stated that he felt a noticeable shift in the load, but continued to drive. Upon inspection of the cargo, it was discovered that all 12 pallets had slide to the right side of the trailer, 10 of which were resting against the right side wall. There was a height difference from side to side of 4" on the trailer axles and 5" on the drive axles. Upon weighing the vehicle, it was determined that the trailers stability had been significantly affected. AX 1 LH 6400#, RH 6400#, AX 2 LH 5900#, RH 10400#, AX 3 LH 4500#, RH 11000#, AX 4 LH 3400#, RH 9600#, AX 5 LH 2850#, RH 10250#. There is a 13,600# difference left to right on the trailer tandem axles alone on a trailer that weighs approximately 15000#.

This is a violation in the FMCSR's under 393.100 (c) but OOSC, Part II, Item 2. a. General Cargo Securement only lists and OOS condition for 393.100 (b) if items can fall to the roadway. I believe that when there is evidence that the cargo has shifted and caused an instability in the vehicle, an imminent hazard exists (i.e. imbalance in the suspension or some other condition that shows compromised stability).

Justification or Need

This type of load shift and weight imbalance is an unsafe condition that should constitute an OOS. A similar issue was presented in action request 16-007-VEH and 21-048-VEH for a similar scenario's. Both items were closed with no action until more evidence could be obtained. This request is not to determine if cargo should or should not be secured inside a enclosed trailer, this scenario is were the cargo has already shifted showing evidence that the trailers suspension is now unbalanced. Should the vehicle need to take an emergency evasive action, it would be at a high risk of rollover due to the suspension already being compromised due to a right side bias from the weight shift.

Request for Action

Amend the OOSC, Part II, Item 2. Cargo Securement a. General cargo securement. Make the current statement under "a." to become subpart (1) under "a." and add (2) Articles of cargo or condition of loading which have shifted to such an extent that the vehicle's stability or maneuverability is adversely affected.

Discussion in Chicago – The requester Derek Malena presented this issue. Discussion focused on distinguishing cargo securement deficiencies from vehicle stability issues caused by load distribution. The current regulatory framework does not provide clear or objective criteria to determine when a load shift constitutes a condition that adversely affects vehicle stability or rises to the level of an imminent hazard. This lack of clarity results in inconsistent interpretation and application across jurisdictions and limits the ability of enforcement personnel to take appropriate action when a safety concern is evident but not clearly captured within existing out-of-service criteria.



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The absence of defined thresholds introduces subjectivity into enforcement decisions and reduces the ability to support or defend out-of-service determinations.

It was recommended that this issue be referred for technical and regulatory review, including engagement with engineering subject matter experts in both Canada and the U.S.

Members identified that current regulations do not clearly define when a load shift becomes severe enough to be considered as adversely affecting vehicle stability. There was also no consensus regarding what constitutes an imminent hazard sufficient to justify an out-of-service condition. As a result, inspectors are often left to interpret these situations based on experience rather than objective criteria.

Several members described real-world scenarios where inspectors encounter loads that had visibly shifted but were still technically secured. The load had moved in such a way that it affected weight distribution, raising concerns about vehicle handling and stability.

A key point of discussion was the challenge in determining whether the issue originated at the point of loading or occurred during transport. Members emphasized that this distinction is critical because a load that was improperly secured at origin is theoretically not a violation, whereas a load that shifts during normal transport conditions is directly attributable to a violation.

*The group concluded that without objective, engineering-based thresholds, enforcement decisions will continue to be subjective and inconsistent. Members also noted that inspectors are frequently placed in situations where a safety concern is evident, but the regulations do not support enforcement action, which creates both a safety gap and potential liability concerns. **FMCSA and CCMTA agreed to take this issue and do some engineering testing to potentially create some criteria and harmonized guidance.***



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10. OOSC, Part II, Item 2. Cargo Securement, a. General Securement - Mobile Home

Attachment 4 – Modular Transport Incidents

Summary of Issue

Nebraska had a modular home that was in transport tip over/become unsecured from the trailer during a cornering maneuver. The house was secured to the trailer with lag screws, and the company indicates this is standard operation for house movers. We can only find anecdotal evidence of the strength of lag screws driven into wood beams, and it is all over the board, from 250# to 800+# per lag screw.

Justification or Need

The house moving industry indicates that lag screws through eyelets on a trailer is the standard method of securement. There is a lack of a documented, standardized, securement technique for this commodity. Additionally, there is a lack of data on the working load limit of lag screws in wooden boards is to make a determination if a modular house is properly secured prior to movement. Lack of guidance on this subject makes congruent North American enforcement impossible.

Request for Action

Nebraska asks for CVSA/FMCSA/CCMTA to coordinate with the house/building mover industry to determine what methods of attachment provide sufficient securement to adequately prevent a house from becoming detached from the trailer during normal driving, to include starting, stopping, cornering, traversing normal grade changes, and exigent evasive driving that is encountered during movement of this type of commodity.

***Discussion** – This issue had been discussed in Ottawa. It was explained that the home was secured using metal tabs attached to the trailer frame, with lag screws driven into the wooden structure of the home. It was discussed that the failure occurred when the lag screws pulled out of the wood, rather than the screws themselves breaking. This highlighted that the issue was not the fastener strength, but the ability of the wood structure to hold the load under dynamic conditions.*

There was discussion about the lack of engineering data related to pull-out strength of lag screws in wood, particularly under transport-related forces such as lateral movement and torsion during turning.

Additional concerns were raised about variability in trailer construction, including the use of non-standard or homemade trailers. The lack of consistent inspection and oversight was also identified as a contributing factor.

The attendees emphasized the need for engagement with the manufactured housing industry and the development of standardized, engineering-based securement methods. It was also noted that without clear standards, enforcement will remain inconsistent and difficult to apply.

The attendees in the meeting were asked if they knew of any industry standard and if this was a widespread issue or local. Seth Turner from New Hampshire State Police suggested that he would contact his state's industry to see if he could obtain best practices for securement of manufactured homes. He would send information before the next meeting in Ottawa.

Meetings were held with the Tiny Home Alliance and information was received [Modular Homes](#)



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Discussion in Orlando in September 2026 - From FMCSA - There is a distinction between mobile home, manufactured home, and modular homes. Mobile homes and manufactured homes are manufactured on a frame. Axles are placed under the frame and just the axles are removed, leaving the frame behind once at it's destination. Modular homes are built at a factory location, placed on a trailer, and delivered to the destination. Once a modular home is at it's destination, the modular home is lifted off the trailer and set in place. Therefore, the trailer is a vehicle and is subject to the regulations just as any other trailer. Cargo securement rules apply to modular homes as with any other freight. An adhoc committee has been developed to create a bulletin on the difference between the three types of homes. The Cargo Forum will discuss the next steps to deal with modular home securement.



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11. 25-086-VEH: Inspection Bulletin 2025-02 Exte Com90 Log Securement System

 Attachment 5 – 2025-02 ExTe Com90 Load Securement

Summary of Issue

To discuss the applicability of the Exte Com90 log securement system in Canada including the inspection bulletin 2025-02.

Justification or Need

For consistency of the acceptance of this system in Canada and appropriate enforcement taken by roadside officers. It's unclear if the bulletin applies in Canada. It is my understanding that this system has been tested and has engineering documents that state the system meets the requirements of NSC 10. If a system is designed to meet Section 5, it is considered as meeting the standard. I am not sure why we wouldn't accept this system if the manufacturer provides documentation, it meets section 5? The performance criteria is the same in both countries.

Request for Action

Confirm acceptance in Canada and include NSC references in the bulletin and Canadian training materials.

***Discussion** - Canadian CCMTA representative Zaki Hussain indicated they are waiting on engineering specs from the manufacturer. Abe Dunivin stated that he would contact the manufacturer to have those sent for review by Canada.*

Canada will update on the status of their work with the manufacturer and if the bulletin should be amended.



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12. 23-018-VEH: OOSC, Part II, Item 2. Cargo Securement, m. Automobiles, Light Trucks and Vans – Winch as Tiedown

Summary of Issue

Our commercial officers have had an ongoing question regarding vehicle securement under 49CFR 393.128 and slide back tow trucks.

128(b) requires two tiedowns:

393.128 What are the rules for securing automobiles, light trucks and vans?

(a) Applicability. The rules in this section apply to the transportation of automobiles, light trucks, and vans which individually weigh 4,536 kg. (10,000 lb) or less. Vehicles which individually are heavier than 4,536 kg (10,000 lb) must be secured in accordance with the provisions of § 393.130 of this part.

(b) Securement of automobiles, light trucks, and vans.

(1) Automobiles, light trucks, and vans must be restrained at both the front and rear to prevent lateral, forward, rearward, and vertical movement using a minimum of two tiedowns.

(2) Tiedowns that are designed to be affixed to the structure of the automobile, light truck, or van must use the mounting points on those vehicles that have been specifically designed for that purpose.

(3) Tiedowns that are designed to fit over or around the wheels of an automobile, light truck, or van must provide restraint in the lateral, longitudinal and vertical directions.

(4) Edge protectors are not required for synthetic webbing at points where the webbing comes in contact with the tires.

Our question: Can a powered winch (used for loading or unloading) be considered a tiedown? Winch manufacturers seem to indicate they are for loading or unloading but not securement.

Justification or Need

Discuss use of loading winch for roll backs - whether it should be used as a tiedown or whether the regulations should identify that loading winch is NOT to be used for subsequent load securement during transport.

FMCSA will update on the status of the Omnibus bill. The likely direction is that winches may be used as supplementary devices but not as primary securement.



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Petitions

13. 21-013-VEH: OOSC, Part II, Item 2. Cargo Securement-Working Load Limit/Breaking Strength-393.102

Summary of Issue:

393.102 (a)(1) and (2) (a)(1) is discussing Breaking strength. This information is not readily available. Clarification needs to be made to better understand the requirements of this section. Even the "Practical Cargo Securement" guidebook, states that cargo must be secured to the rear (preventing forward movement) .8g of deceleration. It muddies the water even more in (a)(2) (a)(2) talks about WLL and does not clearly define that to comply with this number you must follow the guidelines of 393.106(d) which states that 1/2 of the weight of the cargo must be covered by the WLL of the securement devices. It goes on to say that .43g deceleration and .5g acceleration need to be covered... that is not quite consistent with (a)(1). If the driver has access to the breaking strength numbers or uses the WLL=1/3 of the breaking strength (which is an industry standard but not the rule and typically not labeled on the securement device) then when you work out the math it normally comes out to close to the same requirements. BUT, it is not exact, so why have it in there? it just makes the regulation difficult to understand and be in compliance. Maybe someone can explain it better, but I have worked the numbers several times (see attached) and they just don't make sense. It leaves carriers to make their own assumptions/rules on the requirements.

Justification or Need:

To better clarify the cargo securement regulations and make a distinction/unification of the two conflicting regulations.

Request for Action:

Amend 393.102, to unify (a)(1) and (a)(2), reflecting equalized results from using either method, OR remove (a)(1) because the breaking strength is not readily available information to the end user... the driver. Also reflect greater protection against forward movement of the cargo, .435g protection against deceleration and .5g protection against acceleration is backward, it should, at a minimum, be the other way around.

FMCSA will update the forum on the status of the petition.



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14. 21-002-VEH: OOSC, Part II, Item 2. Cargo Securement, Friction Mats-WLL

Summary of Issue

Currently 393.108(g) states friction mats which are not marked or rated by the manufacturer shall be considered to provide resistance to horizontal movement equal to 50 percent of the weight placed on the mat. There is no further guidance for their use as far as when they can and cannot be used in determining the working load limit (WLL) under 393.106. There needs to be guidance added to Operational Policy 15 or regulatory guidance added to the FMCSRs to allow for uniformity in determining the WLL when friction mats are used as well as when and what types of cargo can friction mats be used on.

Justification or Need

A recent inspection of an oversize load with a shipping weight of 120,000 lbs. was secured with a total of 4 chains – 2 on the front and 2 at the rear per cargo specific requirements in 393.130(c) that had a total working load limit of 40,000 lbs. aggregate WLL. The driver claimed he was using friction mats that were located under the front axle of the machine to meet the requirements of 393.106. (See the attached pictures). With no clear guidance on the use of friction mats, we had no choice but to count the friction mats towards the WLL of the machine being transported. However, there is no way of knowing the amount of weight being placed on the mat to determine what the mat is worth, and it is unclear if the friction mat can be used at all in this situation.

Request for Action

Operational Policy 15 or regulatory guidance needs to be created to address the use of friction mats and when they can or cannot be used when determining the WLL under 393.106 and if they can be used to meet cargo specific requirements. Some suggestions would be: A friction mat cannot be used to replace a tiedown required by the cargo specific sections in 393.116 to 393.136. A friction mat cannot be the sole means of load securement in any application. Friction mats can only be used on items that weigh less than 10,000 lbs. Over 10,000 lbs., they can only be used as a supplement means of securement (blocking and bracing) but will not count towards the WLL.

FMCSA will update the forum on the status of the petition.



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15. 16-020-VEH: Amend 393.118(d)(3) of the FMCSR's requiring belly straps on loads over 2 tiers high

16. 12-010-VEH: Cargo Securement - Dressed lumber or Similar Building Products

These issues were combined as they both relate to how the commodity specific regulation requires belly straps on dressed lumber. The securement issue arises when trailers are loaded from home improvement stores with several different types of building materials. The material does not make even levels for material placed beside each other which makes the use of belly straps ineffective. The Regulators have discussed that when the rules were developed it was never intended to include stacks of uneven goods, only goods that were even and stacked the same and were actually dressed lumber or similar building products. They further indicated these items in the pictures were all different types of materials and not specifically dressed lumber. FMCSA is working towards regulation that will not require belly straps on loads that are 6 feet or less, however, there is nothing in the model regulation to deal with loads over 6 feet high. Pictures have been shown of tiedowns that are going through the middle and they are not even because it is not possible. The model regulation and testing for the specific commodity section did not contemplate the uneven loads. The study was done for loads coming from the mill, it was never really intended for the loads coming from a retail store to the end user. It has further been discussed that most retail outlets indicate that they can live with staying under the 6 foot level in order to avoid the use of belly straps. Mike indicated that FMCSA reached out to the regulators in Canada to see what sort of testing was done in Canada to affect the revision that was made. It was determined that there was no testing done but other issues that caused the amendment. FMCSA will likely draft a notice to the federal register requesting comments on certain aspects of this issue. They are hoping to harmonize with Canada. The second issue is for belly straps on tiers that are not the same height. The mixed loads do not always allow for belly straps as they are not always equal from side to side. In some cases, belly straps will make the load less secured than if there were no belly straps present. This may or may not be addressed in the upcoming notice regarding the 6-foot belly strap issue. FMCSA will report on the status of the petition

FMCSA will update the forum on the status of the petition.



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17. 11-043-VEH: Marking and Rating of Tiedowns – Working Load Limit (WLL) on Hooks

National Association of Chain Manufacturers (NACM) finalized a document that outlines the performance specifications and marking of removable hooks used in tiedown assemblies. This issue has been outstanding for several years, so the forum decided to ask the Vehicle Committee to ask the Board of Directors to petition FMCSA to make an update to the regulations. The Board of Directors agreed in Portland to direct CVSA staff to petition FMCSA. FMCSA sent an acknowledgement letter and is processing the petition and will decide whether to grant or deny the petition. If they grant it, this means that they will decide whether to publish a public Notice for Comment. FMCSA will report on the status of this petition.

Discussion in Previous Meetings

Dave Sutula provided an update on this issue. The US would need to come up with a performance standard to ensure the hooks are acceptable. Canada does not have this as a requirement in NSC Standard 10 at this time to have the hooks marked yet. This request to reference removable hooks and has been around since 2011. The goal is to have the hooks marked similarly to chains. Canada should look into updating the NSC Standard 10 to reflect these markings similar to what the US is working on. This can be contemplated by the adhoc when the omnibus bill is reviewed.

FMCSA will update the forum on the status of the petition.



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18. 11-030-VEH: Securing Metal Coils in Sided Vehicles

The question was raised several meetings ago regarding 393.120(e) and NSC 10(58) which articulate the requirements for securing metal coils in a sided vehicle without anchor points. It could be interpreted to exclude the use of sided vehicles with anchor points, which does not seem to be its intent. This section should be interpreted to mean that metal coils transported in sided vehicles with anchor points should be loaded a manner to prevent shifting and tipping consistent with either 393.120(b), 393.120(c), 393.120(d) or 393.120(e), or in a vehicle without anchor points consistent with 393.120(e). CVSA sent a letter to FMCSA requesting clarification. The regulators indicated new wording is being considered that would stipulate when there are anchor points in a sided vehicle, it will not be mandatory to use them if they are not the most suitable way to secure cargo.

The regulators worked on draft language for the model regulation in Montreal that will trickle down into NSC Standard 10 and the FMCSRs. This language will make it clear that metal coils transported in sided vehicles with or without anchor points will be able to be secured by adequate blocking and bracing. The regulators were to get together and draft the next revision of the model regulation. They reported that possibly by this meeting but no later than the fall meeting of 2019, they should have revised language for the model regulation referencing this issue and a few others that are on the agenda.

FMCSA will update the forum on the status of the petition.



Cargo Securement Harmonization

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Old Business

19. 23-039-VEH: OOSC, Part II, Item 2. Cargo Securement, n. Heavy Vehicles, Equipment and Machinery - Flatbed Trailers

Summary of Issue

Newer manufactured trailers, both 48 and 53 foot in length, are now coming in empty weights of under 10,000 lbs. When securing a trailer to a flatbed trailer, per 393.130 it would require a minimum of 4 tiedowns to properly secure. However, if the item is below 10,000lbs according to 393.130, it can be secured under 393.128 or 393.100-393.114. If securing under 393.128, it would only require 2 straps on a 48-foot trailer for proper securement if under 10,000lbs.

Justification or Need

If the trailer was secured under length and width, it would require 6 straps if 48 foot and no header board. 7 for 53 feet. The trailer if over 10,000lbs can be secured with 4 tiedowns, but if under it can be secured with just 2 per 393.128? Two would be enough to cover the weight, but it doesn't make logical sense to have 48 feet and only 2 straps on an item of a trailers size. Trailers are defined as a motor vehicle in 390.5 which fits into the wording of 393.130 as it is a heavy vehicle under Ops Policy 15 Cargo Securement (b)(10).

Request for Action

Request guidance on what securement is required for a trailer under 10,000lbs that is transported on a flatbed trailer? 393.130 allows for vehicles under 10,000 lbs. to be secured by either 393.130, 393.128, or 393.100-393.114. One is 4 tiedowns, one is 2, the other could be 6 or 7 depending on trailer length. What is correct securement minimum requirements?

Discussion - *This is strictly a US problem. Manufacturers are producing trailers that are weighing less than 10,000 lbs. and therefore, falling out of the heavy vehicle/machinery commodity specific regulations. The current provision in 393.130 allows equipment under 10,000 lbs. to be secured using light vehicle securement requirements creating unintended scenarios where large or lengthy items may be secured with only minimal tiedowns. While compliant by weight, these loads may still present significant securement risks due to their size and configuration. This represents a regulatory gap where compliance does not necessarily result in a safe outcome. The flexibility to apply either light vehicle or general securement provisions was likely not intended for large items and creates inconsistency in application.*

It is recommended that this issue be advanced to FMCSA for regulatory review, including consideration of revising or removing the provision allowing large items to be secured under light vehicle requirements. Consideration should also be given to establishing criteria that require large or lengthy items to follow general securement rules regardless of weight. A formal petition to the appropriate regulatory authority may be required to address this issue.

Several examples were discussed, including trailers and equipment frames that are long in dimension but relatively light in weight due to modern materials. In these cases, loads may technically comply with the weight threshold but still present significant securement challenges due to their size and geometry. Members expressed concern that securing such loads with only two tiedowns does not align with safe practices.

The discussion focused on the regulatory language that allows carriers to choose between light vehicle securement and general securement provisions. Members agreed that this flexibility likely was not intended to apply to large items and creates a loophole that can result in under-secured loads.



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Members also noted that while many operators exceed minimum requirements in practice, the regulation still permits minimal compliance that may not be sufficient for safety.

Canadian representatives confirmed that this issue does not exist within NSC Standard 10, which does not provide the same flexibility. This difference was noted as a potential source of inconsistency between jurisdictions.

The committee discussed whether the regulation should default to general securement requirements for large items regardless of weight. There was strong agreement that the current provision represents a regulatory gap that needs to be addressed.

FMCSA will update the forum on the status of the Omnibus bill.



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20. New Business

Working Load Limit Tags in Quebec – Kenny Newman, Kinedyne

Question in regard to WLL tags in Quebec.

Secure Your Load Day

Group will discuss potential of working with the organization. <https://www.secureyourload.com/>

Securement of Garbage Bins

Roger will address the securement of garbage bins

