



**U.S. House of Representatives**  
**Committee on Transportation and Infrastructure**

**John L. Mica**  
Chairman

Washington, DC 20515  
October 12, 2012

**Nick J. Rahall, III**  
Ranking Member

James W. Coon II, Chief of Staff

James H. Zola, Democrat Chief of Staff

The Honorable Calvin L. Scovel III  
Inspector General  
U.S. Department of Transportation  
1200 New Jersey Ave SE  
West Bldg, 7th Floor  
Washington, DC 20590

Dear Mr. Scovel:

I am writing to request an audit and evaluation by your office of the Federal Motor Carrier Safety Administration's (FMCSA) safety monitoring and measurement system, *Compliance, Safety Accountability* (CSA). On September 13, 2012 the Subcommittee on Highways and Transit held a hearing on FMCSA's implementation of CSA. During this hearing, data and methodology concerns were raised that may be undermining CSA's effectiveness. I am requesting these concerns be fully explored in a near-term audit conducted by your office.

According to a report by FMCSA, "[t]he goal of CSA is to implement more effective and efficient ways for FMCSA, its State partners, and the trucking industry to reduce commercial motor vehicle (CMV) crashes, fatalities, and injuries."<sup>1</sup> FMCSA uses CSA to prioritize motor carriers for government interventions (e.g., warning letters, audits) by scoring them in each of seven measurement categories. Motor carriers' scores represent percentile ranks compared to fleets of similar size and exposure. FMCSA makes these scores publicly available on a website so that stakeholders involved with the motor carrier industry can make safety-based business decisions.<sup>2</sup>

Witnesses at the September 13<sup>th</sup> hearing raised concerns that a lack of adequate safety data, inappropriate weighting of violations, and other scoring problems are causing CSA to erroneously label carrier safety performance. Witnesses also cited an analysis by the University of Michigan Transportation Research Institute which revealed that motor carriers' CSA scores in some categories did not bear a strong relationship to crash risk.<sup>3</sup> These, and other concerns, call into question whether CSA enables FMCSA to properly prioritize the least safe carriers for intervention. This is of concern since

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<sup>1</sup> *Safety Measurement System Methodology Version 2.2, January 2012*, Federal Motor Carrier Safety Administration, Washington, D.C.

<sup>2</sup> *Ibid.*

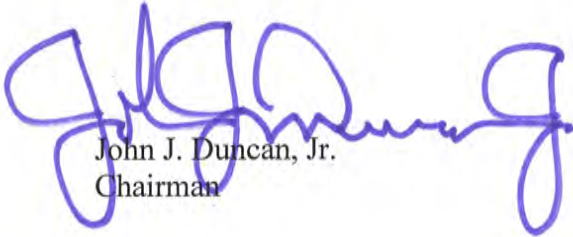
<sup>3</sup> University of Michigan Transportation Research Institute, *Evaluation of the CSA 2010 Operational Model Test*, (2011), <http://csa.fmcsa.dot.gov/Documents/Evaluation-of-the-CSA-Op-Model-Test.pdf>

third parties that utilize CSA scores to evaluate carriers may be making ill-guided safety-based decisions.

I have enclosed a list of questions relating to concerns I have with CSA. During your audit, I urge you to fully explore the reliability, accuracy, and significance of carriers' CSA scores. As discussed above, these scores impact not only the effective and efficient use of Federal and State government resources, but the safety-based decisions made by those who ship our nation's freight with motor carriers.

Thank you for your assistance in this important matter. I look forward to receiving a report from your office by August 1, 2013.

Sincerely,



John J. Duncan, Jr.  
Chairman



Peter A. DeFazio  
Ranking Member

Enclosures

DOT INSPECTOR GENERAL AUDIT QUESTIONS  
FMCSA'S COMPLIANCE SAFETY ACCOUNTABILITY PROGRAM  
OCTOBER 2012

What percent of active motor carriers have sufficient data in FMCSA's Safety Measurement System to generate a score in *any* of the seven measurement categories?

What percent of active motor carriers have sufficient data in FMCSA's Safety Measurement System to generate scores in *all* of the seven measurement categories?

In each of the BASICs, do carriers with scores above the threshold pose a greater risk (higher crash rate) than those with scores below the threshold (and had sufficient data to generate a score) in that same BASIC?

In each BASIC, please characterize the relationship between scores and future crash risk.

Is the weight of *each* violation assigned based on data analysis tying the violation to the strength of its relationship to future crashes or increased crash severity?

Are carriers' scores impacted by jurisdictional and regional disparities in enforcement practices?

Has FMCSA been transparent with respect to the *data* on which violation severity weights are based?

Is it possible for carriers to have high scores that erroneously reflect the fleet's safety performance?

Is it possible that some carriers with potential safety problems may not be identified and targeted by CSA?

FMCSA makes carrier's scores public so that third parties involved in the transportation industry can make safety-based business decisions. Given your findings, is a carrier's CSA score an accurate portrayal of the safety of the carrier? If so, is this accurate for all BASICs?

How effective has FMCSA been in working with the States to properly implement CSA?