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SAFETY BULLETIN



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How to Properly Mark a Commercial Motor Vehicle

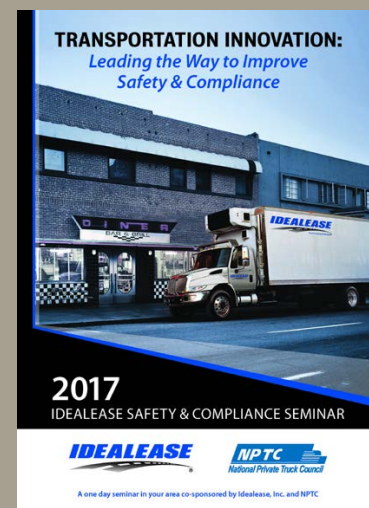
A common question I receive from customers is "What size does the letters and numbers need to be on the placard or marking on the side of my commercial vehicle?" Ironically, there is NO size designation by measurement. Keep reading to determine how the Federal Motor Carrier Safety Administration (FMCSA) addresses the marking of a vehicle.

Every self-propelled CMV, as defined in CFR 390.5, greater than 10,000lbs MGWVR must be marked and display the following information:

1. The legal name or a single trade name of the motor carrier operating the self-propelled CMV, as listed on the motor carrier identification report (Form MCS-150) and submitted in accordance with CFR 390.19.
2. The motor carrier identification number issued by the FMCSA, preceded by the letters "USDOT".
3. The City and State of the motor carrier is no longer required to be displayed.

The marking must:

1. Appear on both sides of the self-propelled CMV.
2. Be in letters that contrast sharply in color with the background on which the letters are placed.
3. Be readily legible during daylight hours, from a distance of 50 feet (15.24



Idealease and the National Private Truck Council NPTC will again be hosting safety seminars in 2017. The one day seminar this year will focus on the new Electronic Logging Device (ELD) regulation, basic safety and compliance, regulation changes and CSA. The seminars will be provided to all Idealease customers, potential customers and NPTC members at no charge. The seminar provides important information applicable for both the novice and experienced transportation professionals. To register for an upcoming seminar in 2017 click on the following link:

meters) while the CMV is stationary.

4. Be kept and maintained in a manner that retains the legibility of the above requirements.

Construction and Durability

The marking may be painted on the CMV or may consist of a removable device, if that device meets the identification and legibility requirements above.

Marking of Rented CMVs from Idealease

A motor carrier operating a self-propelled Idealease CMV under a rental agreement having a term not in excess of 30 calendar days meets the requirements of this section if:

- The Idealease CMV is marked in accordance with the provisions of the marking requirements as stated above.
- The legal name or a single trade name of the Idealease location is displayed.
- The Idealease location identification number preceded by the letters "USDOT" is displayed.

The Idealease rental agreement entered into by the Idealease location and the customer renting motor carrier conspicuously contains the following information:

1. The name and complete physical address of the principal place of business of the Idealease customer renting the CMV.
2. The identification number issued the Idealease customer by the FMCSA, preceded by the letters "USDOT," if the Idealease customer has been issued such a number. In lieu of the identification number required in this paragraph, the following may be shown in the rental agreement:
 - Information which indicates whether the Idealease customer is engaged in "interstate" or "intrastate" commerce; and
 - Information which indicates whether the Idealease customer is transporting hazardous materials in the Idealease rented CMV;
3. The sentence: "That Idealease cooperates with all Federal, State, and local law enforcement officials nationwide to provide the identity of Idealease customers who operate the Idealease rental CMV". The rental agreement entered into by Idealease and the Idealease customer is carried on the Idealease rental CMV during the full term of the rental agreement.

<http://www2.idealease.com/e/36492/safety-seminar-registration/5812sd/551629747>

Idealease 2017 Safety Seminar Schedule

Date	Location
March 2	San Martin, CA
March 22	Dallas, TX
March 28	Harrisburg, PA
March 29	Mobile, AL
March 29	Baltimore, MD
April 4	Milwaukee, WI
April 5	Lexington, KY
April 6	Altoona, IA
April 12	Memphis, TN
April 13	Birmingham, AL
April 18	Chattanooga, TN
April 19	Atlanta, GA
April 20	Tampa, FL
April 25	Youngstown, OH
April 26	Weirton, WV
May 3	Grand Rapids, MI
May 4	Fort Wayne, IN
May 4	Aurora, CO
May 10	Greensboro, NC
May 11	Ontario, Canada
May 17	San Leandro, CA
May 18	Los Angeles, CA
September 12	Santa Rosa, CA
October 3	Charlottesville, VA
October 4	Erie, PA



Safely getting In or Out of a Commercial Motor Vehicle

Now is a good time to remind drivers to follow the 3 Point rule while getting in and out of their trucks. During the winter months footing conditions are compromised and the chance of slipping or falling is increased. The 3 Point rule is simply that you keep three out of four of your contact points (hands and feet) secured to keep from slipping or falling. When exiting a truck, for example, one hand on the cab handle, one hand gripping interior door handle and one foot on a step while the other foot is in transition, by doing this you always maintain three points of contact.

Recent DOT rules appear to be excluded from regulatory freeze

With the change in Administration, some are left wondering what the status of recent transportation rulemakings will be under President Trump.

Reince Priebus, Assistant to the President and Chief of Staff, sent a memorandum to the heads of executive departments and agencies on behalf of the President asking for a regulatory freeze pending review of certain rulemakings. This will give the President's appointees and designees a chance to familiarize themselves with agency activities.

What rules are affected?

The new Administration is asking for the immediate withdrawal of any regulations that have not been published in the *Federal Register*.

For those that have been published in the *Federal Register* and have not taken effect, the Administration is asking for a 60-day postponement from the date of the Memorandum. These are rules that have not officially been incorporated into the Code of Federal Regulations (CFR). For motor carrier safety, it would be the Federal Motor Carrier Safety Regulations (FMCSRs) and/or Hazardous Materials Regulations (HMR).

In many instances, a final rule becomes a part of the CFR immediately upon publication in the *Federal Register*. However, in some situations, the final rule is published, but not incorporated into the CFR until a later date.

These rules are not to be confused with those that have been incorporated into the CFR with a future implementation/compliance date. Those final rules are not affected by this Memorandum.

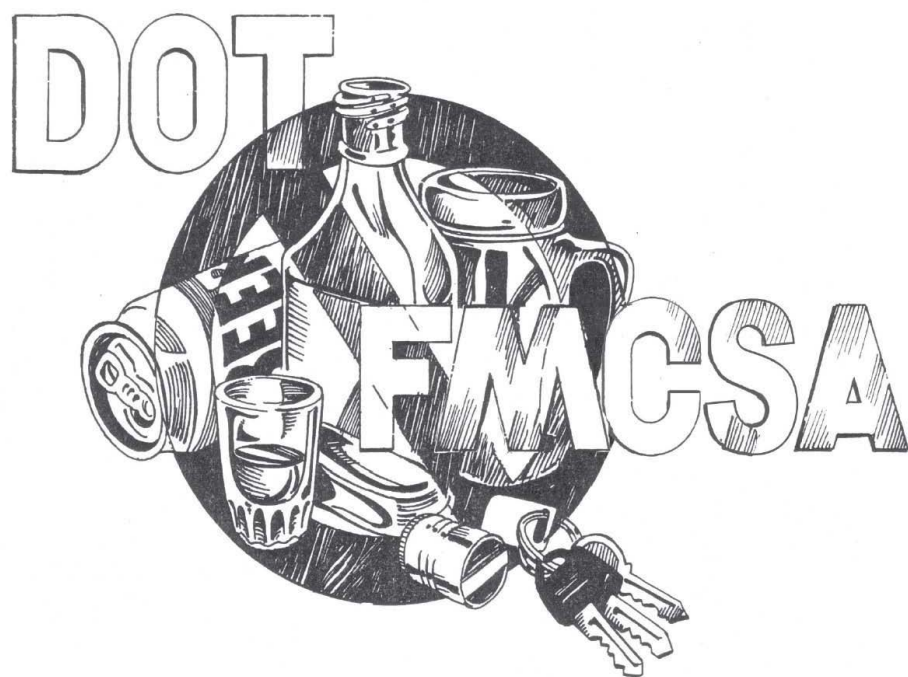
The Memorandum also stated that any regulation that is subject to a statutory or judicial deadline is excluded from this request.

Recent FMCSRs

Recent examples of rules with future implementation dates that are currently a part of the FMCSRs — *and therefore not affected by the President's request* — include:

- Electronic logging device (ELD) mandate,
- Unified Registration System (URS), and
- CDL Drug and Alcohol Clearinghouse.

A recent example of a rule with a future effective date (i.e., future incorporation into the FMCSRs) is entry-level driver training for drivers wishing to obtain or upgrade their commercial driver's license (CDL). Even though it has an effective date of February 6, 2017, it was given a deadline by Congress in MAP-21. Based on this statutory deadline, it appears that the entry-level driver training rule is also not affected by the regulatory freeze.



DOT proposes to add four substances to its drug panel

Four additional opioids will become a part of the U.S. Department of Transportation's (DOT's) drug panel for safety-sensitive positions if a proposed rulemaking is finalized.

The Notice of Proposed Rulemaking — published January 23, 2017 — would change lab procedures in 49 CFR Part 40 to harmonize with recent revisions to the “Mandatory Guidelines for Federal Workplace Drug Testing Programs.” The Department of Health and Human Services (HHS) revised its Mandatory Guidelines also on January 23, 2017, with an effective date of October 1, 2017.

USDOT is mandated under the “Omnibus Transportation Employee Testing Act” to follow the HHS Mandatory Guidelines for the drugs for which it tests. Part 40 testing procedures are used by all modes of transportation, including highway, air, pipeline, transit, rail, and maritime.

Proposed changes

In the proposed rulemaking, DOT drug screens would check for the presence of:

- hydrocodone,
- hydromorphone,
- oxycodone, and
- oxycodone.

In addition, labs would add methylenedioxyamphetamine (MDA) as an initial test analyte and remove methylenedioxyethylamphetamine (MDEA) as a confirmatory test analyte.

The proposal also:

- Clarifies certain drug-testing program provisions where necessary,
- Removes outdated information in the regulations that is no longer needed, and
- Proposes to remove the requirement for employers and Consortium/Third Party Administrators to submit blind specimens.

Want to submit comments?

It is important to include agency name and Docket Number or Regulatory Identification Number (RIN) at the beginning of your comments. This is to ensure it is assigned to the appropriate *Federal Register* document.

For this specific rulemaking, “Procedures for Transportation Workplace Drug and Alcohol Testing Programs: Addition of Certain Schedule II Drugs to the Department of Transportation’s Drug-Testing Panel and Certain Minor Amendments,” you must include:

- Agency name: Office of the Secretary of Transportation (OST), U.S. Department of Transportation; and
- Docket Number DOT-OST-2016-0189 or the RIN 2105-AE58.

To avoid duplications, submit comments by only one of the following means:

- Federal eRulemaking Portal: Go to [regulations.gov](https://www.regulations.gov) and follow the online instructions for submitting comments.
- Mail: Docket Management Facility, U.S. Department of Transportation, 1200 New Jersey Ave. SE., West Building Ground Floor Room W12-140, Washington, DC 20590-0001.
- Hand delivery: West Building Ground Floor, Room W-12-140, 1200 New Jersey Ave. SE., between 9 a.m. and 5 p.m., Monday through Friday, except

federal holidays. The telephone number is (202) 366-9329.

Comments on this proposed rulemaking should be submitted by March 24, 2017.

Late-filed comments will be considered to the extent practicable.

REMINDER

OSHA 300A Log posting February 1, 2017

The OSHA 300A log is to be posted between February 1, 2017 and April 30, 2017 for all employees to view.

The Idealease Safety Bulletin is provided for Idealease affiliates and their customers and is not to be construed as a complete or exhaustive source of compliance or safety information. The Idealease Safety Bulletin is advisory in nature and does not warrant, guarantee, or otherwise certify compliance with laws, regulations, requirements, or guidelines of any local, state, or Federal agency and/or governing body, or industry standards.

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