

Best Practices for Organizing DOT Maintenance Records

A formal vehicle maintenance program is crucial to the safety of the fleet and is also necessary to maintain regulatory compliance. A quality maintenance program will help reduce operating costs and out-of-service downtime.

You must systematically inspect, repair and maintain all commercial vehicles subject to your control.

Each piece of equipment should have its own separate maintenance file. Typically the first thing a compliance officer will want to see is the annual inspection for the unit. We suggest keeping the most current report and the one previous to that in the front of the file. Place the maintenance repair orders behind the annual inspections in chronological order.

The maintenance file must contain at least one year of maintenance records. Most companies will have records dating back further than this for warranty reasons, but they do not have to be kept in the file for longer than this while you maintain the unit.

Copies of roadside inspections must be retained for at least one year. A good system to retain these records entails keeping two copies of the forms.

1. A file folder for each calendar year with the properly signed off on reports. These reports should be kept in date order. This allows for easy access and analysis of data.
2. Attach a copy of the properly signed off on report to the front of the work order showing the repairs were made to the unit. Keep in unit's maintenance file.

Inspection & Maintenance Record Retention

- ◆ Inspection & Repairs 1 year + 6 months after vehicle is no longer in carrier's control
- ◆ Driver Inspection Reports 3 months
- ◆ Periodic Inspection Reports 14 months
- ◆ Annual Inspector qualification certificates Indefinite
- ◆ Brake inspector qualification certificates Indefinite

Best Practices for Vehicle Maintenance Recordkeeping

Vehicle Inspection Repair and Maintenance records, §396.3:

Compile list of vehicles under your control for 30 or more days, including:

- ◆ An identification of the vehicle including: company number, if so marked, make, serial number, year, and tire size.
- ◆ If the motor vehicle is not owned by the motor carrier, the name of the person furnishing the vehicle (e.g., leasing company, owner-operator)
- ◆ A means to indicate the nature and due date of the various inspection and maintenance operations to be performed;
- ◆ A record of inspection, repairs, and maintenance indicating their date and nature; and
- ◆ ***A record of tests conducted on push out windows, emergency doors, and emergency door marking lights on buses.***

Vehicle Inspection Repair and Maintenance Part §396:

- ◆ Maintenance records:
 - May include simple fixes to preventative maintenance to major repairs must be kept where vehicle is either housed or maintained for at least 12 months
- ◆ Records on vehicles leased or sold are kept for either a) the remaining time left on 12 months, or b) 6 months from when the vehicle leaves your control, which occurs first

Annual (periodic) inspections §396.17 satisfied through:

- ◆ State program,
- ◆ Roadside inspection, or
- ◆ Self-inspection using Appendix G to Part 386

Annual inspections must be:

- ◆ Performed by someone qualified in accordance with §396.19
- ◆ An inspection report must contain:
 - Name of inspector, motor carrier name, date, vehicle, and components inspected
 - A statement certifying accuracy and completeness of inspection

Report is retained for 14 months where the vehicle is housed or maintained

During roadside inspections, the vehicle must have either:

- ◆ A copy of the report, or
- ◆ A decal with the information specified in §396.17(c)(2)

Roadside inspection reports §396.9:

- ◆ Drivers must turn forms into their carriers within 24 hours

- ◆ If not returning within 24 hours, driver must faxed, mail, or transmit the form to the carrier
- ◆ One copy showing repairs is sent to the state, and one copy is kept by the carrier for 12 months at the principal place of business or where vehicle is housed

Driver Daily Vehicle Inspection Report (DVIR)

- ◆ Documents post-trip inspection (§396.11)
- ◆ Referenced during pre-trip inspection (§396.13)
- ◆ Retained, along with certificate of repairs and driver's pre-trip review for 3 months at principal place of business or where vehicle is housed

Evidence of annual inspector credentials (§396.19):

- ◆ Must show he/she is capable of performing an inspection by reason of experience, training, or both.
- ◆ Documentation is kept until 1 year after employee stops performing inspections
- ◆ Unspecified location

Evidence of brake inspector credentials (§396.25):

- ◆ Must show he/she is capable of performing an inspection by reason of experience, training, or both.
- ◆ Documentation is kept until 1 year after employee stops performing inspections
- ◆ Principal place of business or where employee is based

Evidence of brake inspector credentials (§396.25):

- ◆ Must show he/she is capable of performing an inspection by reason of experience, training, or both.
- ◆ Documentation is kept until 1 year after employee stops performing inspections
- ◆ Principal place of business or where employee is based
- ◆ Need to have proof of annual inspector's credentials in the event of an audit
- ◆ Do not need proof of brake inspector qualifications for parties not employed by the motor carrier

Fleet Maintenance Shop Inspectors:

- ◆ Need to have proof of annual inspector's credentials in the event of an audit
- ◆ Do not need proof of brake inspector qualifications for parties not employed by the motor carrier