


REDACTED PER RCW 42.56.230

	US DOT # 1952611	Legal: JESUS E ALVARADO Operating (DBA): 2 BROTHERS MOVING SERVICES	
MC/MX #:		State #: THG-063594	Federal Tax ID: [REDACTED]
Review Type: Compliance Review (CR)			
Scope: Principal Office		Location of Review/Audit: Company facility in the U. S.	
Territory:			
Operation Types			
Interstate	Intrastate		
Carrier: N/A	Non-HM	Business: Corporation	
Shipper: N/A	N/A	Gross Revenue: \$89,551.00	
Cargo Tank: N/A		for year ending: 12/31/2018	
Company Physical Address:			
1729 194TH ST SE #38 BOTHHELL, WA 98012			
Contact Name: Jesus Alvarado			
Phone numbers: (1) 206-407-8280		(2) 206-326-0787	Fax
E-Mail Address: bthers2@hotmail.com			
Company Mailing Address:			
1729 194TH ST SE #38 BOTHHELL, WA 98012			
Carrier Classification			
Authorized for Hire		Private Property	
Cargo Classification			
Household Goods			
Equipment			
	Owned	Term Leased	Trip Leased
Truck	1	0	0
Power units used in the U.S.: 1			
Percentage of time used in the U.S.: 100			
Does carrier transport placardable quantities of HM? No			
Is an HM Permit required? N/A			
Driver Information			
	Inter	Intra	Average trip leased drivers/month: 0
< 100 Miles:	1		Total Drivers: 1
>= 100 Miles:	0		CDL Drivers: 0



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Part A

QUESTIONS regarding this report or the Federal Motor Carrier Safety or Hazardous Materials rules may be addressed to the UTC attn: Edward Steiner

PO Box 47250
Olympia, WA 98504-7250
[Phone: 360-701-1608](tel:360-701-1608) [email: edward.steiner@utc.wa.gov](mailto:edward.steiner@utc.wa.gov)

This report will be used to assess your safety compliance.

<u>Person(s) Interviewed</u>	
Name: Jesus Alvarado	Title: Owner
Name:	Title:



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Part B Violations

1 STATE CRITICAL	Primary: WAC 480-15-555 Secondary: RCW 81.80.130 CFR Equivalent: 392.2	Discovered 2	Checked 2	Drivers/Vehicles In Violation 2 Checked 2
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Description

Failing to conduct or retain paperwork containing criminal background check for a household goods carrier in the state of Washington as required.

Example

Driver name: Jesus Alvarado

Trip date: 4/29/19

Description of violation: Carrier failed to investigate employee's criminal background prior to hiring and using on household goods jobs.

In violation:

Luis Alvarado

Cristian Godinez

2 STATE CRITICAL	Primary: 395.8(a)(1)	Discovered 8	Checked 30	Drivers/Vehicles In Violation 1 Checked 1
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Description

Failing to require a driver to prepare a record of duty status using the appropriate method

Example

Driver name: Jesus Alvarado

Trip date: 4/29/19

Description of violation: Carrier failed to require driver to complete accurate records of duty status.

3 STATE	Primary: 391.51(a)	Discovered 1	Checked 1	Drivers/Vehicles In Violation 1 Checked 1
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Description

Failing to maintain driver qualification file on each driver employed.

Example

Driver name: Jesus Alvarado

Trip date: 4/29/19

Description of violation: Carrier failed to maintain driver qualification file for each driver.

4 STATE	Primary: 396.3(b)	Discovered 1	Checked 1	Drivers/Vehicles In Violation 1 Checked 1
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Description

Failing to keep minimum records of inspection and vehicle maintenance.

Example

Vehicle identification number: 1HTSDPNL2PH505819

Trip date: 4/29/19

5 STATE	Primary: 396.17(a)	Discovered 1	Checked 1	Drivers/Vehicles In Violation 1 Checked 1
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Description

Using a commercial motor vehicle not periodically inspected.

Example

Vehicle identification number: 1HTSDPNL2PH505819

Trip date: 4/29/19



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	<p align="center">Part B Violations</p>		

Safety Fitness Rating Information: Total Miles Operated 5,000 Recordable Accidents 0 Recordable Accidents/Million Miles 0.00	OOS Vehicle (CR): 0 Number of Vehicle Inspected (CR): 1 OOS Vehicle (MCMIS): 0 Number of Vehicles Inspected (MCMIS): 0
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Your proposed safety rating is : <p align="center">CONDITIONAL</p>	Rating Factors			Acute	Critical
	Factor 1:	S	0	0	
Factor 2:	S	0	0		
Factor 3:	U	0	3		
Factor 4:	S	0	0		
Factor 5:	N	0	0		
Factor 6:	S	-	-		



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1. The Washington Utilities and Transportation Commission (UTC) adopted the Federal Motor Carrier Safety Administration (FMCSA) rules of 49 CFR and regulations pertaining to the Commercial Motor Vehicle's Safety along with the Revised Code of Washington and Washington Administrative Codes pertaining to Commercial Motor Vehicle Safety and Regulations.

How to request an upgrade to your INTRASTATE safety rating based on corrective actions:

Within sixty (60) days from receipt of your proposed safety rating, you may request in writing, a change in the rating based on corrective actions. You should do so as soon as possible so the UTC has the opportunity to review your corrective actions and make a final decision. Your Safety Management Plan should be submitted within the first 30 days after receiving this report.

Your submission should be as detailed as possible:

You must develop a safety management plan:

1. The plan must address each all violations on the most recent Compliance Review. Corrective actions to address other violations noted on your review must also be included.
2. Identify why the violations were permitted to occur.
3. Discuss the actions taken to correct the deficiency or deficiencies that allowed the violations to occur. Include actual documentation of this corrective action. (For example: documentation may include items such as new policies and procedures, training programs and sign-in lists, or copies of new forms.
4. Outline actions taken to ensure that similar violations do not reoccur in the future. YOU MUST DEMONSTRATE THAT YOUR OPERATIONS CURRENTLY MEET THE SAFETY STANDARD AND FACTORS SPECIFIED IN 49 CFR 385.5 and 385.7. To do so, you must demonstrate that you now have adequate safety management controls in place which function effectively to ensure acceptable compliance with applicable safety requirements.
5. If your request includes actions that will be conducted in the near future, such as training, reorganization of departments, purchasing of computer programs, etc, include a detailed description of the activity or training and a schedule of when that activity will commence and when it will be completed.
6. Include any additional documentation relating to motor carrier safety and the prevention of crashes that you believe supports your request.
7. Include a written statement certifying the carrier will operate within federal and state regulations and the carrier's operation currently meets the safety standard and factors specific in 49 CFR 385.5 and 385.7. A corporate officer; partner, or the owner of the company must sign the statement.

You must submit your request to:


Investigator Edward Steiner
Email: Edward.Steiner@UTC.WA.GOV

2. Understand Why Compliance Saves Time and Money: Compliance with FMCSRs will not only save lives, but also saves your business time and money. Tracking how much your business spends on non-compliance activities can help you understand the many benefits of compliance to your business and why safety is good business. Document and Follow Through on Action Plans: Document and follow through on action plans to ensure the actions you are taking are creating improvement in safety management and compliance.

NOTICE: A pattern and/or repeated violations of the same or related acute or critical regulations (violations of the same Part in Title 49, Code of Federal Regulations) will cause the maximum penalties allowed by law to be assessed under Section 222 of the Motor Carrier Safety Improvement Act of 1999 (MCSIA). A pattern of violations means two or more violations of acute and/or critical regulations in three or more Parts of Title 49, Code of Federal Regulations discovered during any eligible investigation. Repeated violations means violation(s) of an acute regulation of the same Part of Title 49, Code of Federal Regulations discovered in an investigation after one or more closed



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enforcement actions within a six year period and/or violation(s) of a critical regulation in the same Part of Title 49, Code of Federal Regulations discovered in an investigation after two or more closed enforcement actions within a six year period.

NOTICE: 49 CFR Part 391.23 requires prospective employers to, at a minimum, investigate a driver's employment information, crash record, and alcohol and controlled substances history from all employers the driver worked for within the previous 3 years.

The Pre-Employment Screening Program (PSP) is a screening tool that assists motor carriers in investigating crash history and roadside safety performance of prospective drivers. The PSP allows motor carriers to purchase 5 years of crash data and 3 years of roadside inspection data from the Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS). Records are available 24 hours a day via Web request. Motor carriers should visit the following website for more information:
<http://www.psp.fmcsa.dot.gov/Pages/default.aspx>

All motor carriers and truck drivers are needed to fight against terrorism and hijacking. You could be a target. Protect yourself, your trucks, your cargo, and your facilities. Discuss with your employees/drivers the "Security Measures for Truck Drivers and Companies" which were provided and reviewed with motor carrier official. Motor carriers should visit the following website for more information:
<http://www.fmcsa.dot.gov/documents/Hijacking-Brochure.pdf>

3. HOS COMPLIANCE BASIC PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN - Company representative Jesus Alvarado failed to accurately record Record of Duty Status.

BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.


- Develop a policy and procedure describing how management will monitor and track logs for falsification.
- Establish a policy that prohibits dispatchers from assigning a load to drivers without hours available to complete the load on time.
- Develop a policy stating that drivers should not violate their Hours-of-Service (HOS) Out-of-Service (OOS) order under any circumstances, and immediately contact the carrier when a driver is placed OOS.
- Develop a policy requiring drivers to report their available hours to dispatch during "check-in" calls.
- Develop policies and procedures for ensuring proper retention of Record of Duty Status (RODS) according to regulations.
- Establish a policy requiring drivers to submit copies of all roadside inspections to carrier management within 24 hours.
- Develop a policy stating that drivers are required to submit all Records of Duty Status (RODS) and supporting documentation, such as expense receipts, within 13 days of the end of the trip.
- Establish a policy stating that drivers are required to check with their supervisor, manager, or dispatcher to review their "fit-for-duty" status before starting a job, and that drivers who are ill to the extent that their ability and/or alertness is impaired are prohibited from working on safety-sensitive assignments.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows Hours-of-Service (HOS) violations.

4. Require all drivers to prepare complete and accurate records of duty status for each day, and to submit them within 13 days. Maintain all duty status records on file, with all supporting documents, for at least 6 months.

5. Ensure that all documents supporting records of duty status (such as toll, fuel repair and other on-the-road expense



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receipts, as well as invoices, bills of lading, dispatch records, etc.) are kept on file for at least 6 months.

6. DRIVER FITNESS BASIC PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN - Company representative Jesus Alvarado failed to maintain driver qualification files on commercial drivers.

BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.

- Develop a policy for the periodic review (at least twice per year) of driver qualification files. The motor carrier should not rely on third-party sources, such as insurance agencies. The procedure should include controls to ensure that documents requiring renewals are in place, to remind drivers of expiration dates on medical certificates, so they can schedule another physical examination in advance, and to prevent falsification of documents related to driver qualification.
- Establish a policy requiring drivers to submit copies of all vehicle and roadside inspections and moving violations to carrier management within 24 hours, and to notify management of suspended or revoked Commercial Driver's Licenses (CDLs) immediately following notification of suspension/revocation.
- Establish a policy requiring all new (since 2003) Commercial Driver's License (CDL) drivers to submit documentation of entry-level driver training in - for example, driver qualification requirements, Hours of Service (HOS), driver wellness, and whistleblower protection - or to take entry-level training provided by the carrier.
- Develop a policy for document retention and recordkeeping, including documents that are to be in the possession of the driver as proof of credentials.
- Develop a process to ensure that operations will always have the proper amount of fit drivers. This process would address how to deal with issues such as sick leave, vacation, training, suspension, and termination.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows Driver Fitness Violations.

Seek Out Resources:

- You are encouraged to review your company's record at the following website: <http://ai.fmcsa.dot.gov/SMS>. You will need to use your PIN Number that has been provided by the FMCSA.
- Contact industry associations to get resources and ideas on safety improvement practices from other carriers in the industry

7. VEHICLE MAINTENANCE BASIC - INSPECTION-REPAIR-MAINTENANCE PROCESS BREAKDOWN: Policies and Procedures

DESCRIPTION OF PROCESS BREAKDOWN - .Company representative Jesus Alvarado failed to have policies and procedures in place to systematically repair, inspect and maintain its commercial motor vehicles.


BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Policies and Procedures.

- Develop a system of preventive maintenance for compliant, safe, and efficient fleet operations, including a schedule for periodic maintenance, inspection, and recordkeeping. This system should be attuned to manufacturer recommendations, the carrier's own experience, and regulatory requirements.
- Develop a procedure ensuring that vehicle defects that impact safety and/or safety compliance are reported, repaired, and certified before the vehicle is operated.
- Develop procedures to ensure that management is notified of vehicle defects through the use of Driver Vehicle Inspection Records (DVIRs) and other communication channels, such as driver call-in and e-mail from mechanics.
- Develop a policy ensuring that drivers are qualified to complete thorough and timely Driver Vehicle Inspection Records (DVIRs) by the end of the day of the trip and prior to a subsequent assignment.



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- Establish a policy requiring drivers to submit copies of all roadside inspections to carrier management within 24 hours.
- Develop policies and procedures requiring drivers to immediately notify appropriate management of any roadside vehicle Out-of-Service (OOS) order.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows vehicle maintenance violations.



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Part C

Reason for Review: Compliance Review
Planned Action: Compliance Monitoring

Parts Reviewed Certification:

325	382	383	387	390	391	392	393	395	396	397	398	399	171	172	173	177	178	180
			ü	ü	ü	ü	ü	ü	ü									

Prior Reviews Prior Prosecutions

Unsat/Unfit Information

Is the motor carrier of passengers subject to the safety fitness procedures contained in 49 CFR part 385 subpart A, AND does it transport passengers in a commercial motor vehicle?

Does carrier transport placardable quantities of hazardous materials?

Unsat/Unfit rule: Not Applicable

Corporate Contact: Jesus Alvarado

Corporate Contact Title: Owner

Special Study Information:

Remarks:

INVESTIGATIVE REPORT RECEIVED BY:

Name: Mr. Jesus Alvarado

Title: Owner

Carrier/Shipper Name: Jesus Alvarado (DBA - 2 Brothers Moving Services)

Date: June 26, 2019

REASON FOR THE INVESTIGATION:

As part of the 2019 Motor Carrier Safety work plan, this investigation was assigned to Special Investigator Edward Steiner. This carrier operates in intrastate commerce.

SCOPE OF THE INVESTIGATION:

This investigation is a comprehensive intrastate investigation and was assigned to Special Investigator Edward Steiner on May 17, 2019. The carrier was contacted on May 17, 2019 and a full investigation was set for May 31, 2019, with Mr. Jesus Alvarado, at 1729 194th St SE, Bothell, WA, at the carrier's principal place of business. Present at the start of the investigation was Special Investigator Edward Steiner along with 2 Brothers Moving Services representative Mr. Jesus Alvarado (Owner). SMS was checked on May 30, 2019 and it was noted that no BASICS were in alert status.

CARRIER OPERATION DESCRIPTION:


2 Brothers Moving Services is a provisional household goods carrier that operates in Bothell, WA. The carrier began operations in the area in May 2017. Mr. Alvarado attended household goods training on August 17, 2017. The carrier currently owns one vehicle and employs one driver. The carrier's gross revenue as reported on their Annual report filed with the Utilities and Transportation Commission for fiscal year ending December 31, 2018, was \$89,551.00. The carrier is not and has not been involved in any emergency relief efforts in the last 365 days. Mr. Alvarado reported 5,000 miles were driven in the past 12 months.

PRE-INVESTIGATION:

On May 17, 2019, a carrier information packet was emailed to the carrier listing the records that would need to be reviewed and the information the carrier would need to make available. The carrier was requested to fill-out and return a carrier information packet with a list of all commercial motor vehicle drivers utilized in the past 12 months and a list of all commercial motor vehicles utilized in the last 12 months prior to the start of this investigation. The carrier packet was returned on May 25, 2019. On Friday, May 31, 2019, documents requested that were available were provided to the investigator for review. The document request included a list of all accidents for the past 365 days from the date of review,



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driver qualification files for all drivers used within the past 12 months, insurance documentation, all records of duty status (log books/time cards) for the previous six months, all maintenance files and records for each unit. A copy of the carrier's profile was obtained through MCMIS on May 30, 2019.

CDLIS (DRIVER LICENSE) CHECK:

In accordance with the eFOTM, all CDL drivers were required to be checked. 2 Brothers Moving Services employed one non-commercial driver in the past 365 days. Driver license for Jesus Alvarado was checked through the Washington State Department of Licensing on June 19, 2019 revealing the license to be current.

AUTHORITY:

The carrier is an authorized household goods carrier operating in intrastate commerce. The carrier operates under the USDOT Number 1952611. 2 Brothers Moving Services has intrastate authority through the commission under provisional permit number THG-063594.

INSURANCE:

2 Brothers Moving Services is required to maintain a minimum level of public liability of \$750,000. A check with the carrier's insurance agent shows a \$750,000 Auto Liability effective January 5, 2019 through January 5, 2020 with Continental Divide Insurance. See Part 387 below for details.

RED FLAG DRIVERS:

A&I (SMS) was checked through Portal on May 30, 2019 and the carrier has no drivers with red flag violations in the last 365 days.

DRUG AND ALCOHOL SUPPLEMENTAL REVIEW:

This is a full comprehensive investigation therefore a Drug and Alcohol Supplemental Review was not required.

HAZARDOUS MATERIALS SUPPLEMENTAL REVIEW:

2 Brothers Moving Services does not transport any hazardous materials. A Hazardous Materials Supplemental Review was not required.

INVESTIGATION:

The following investigation is a comprehensive investigation that checked Parts 376, 380, 382, 383, 387, 390, 391, 392, 393, 395 and 396.

Part 376 Lease and Interchange of Vehicles:

2 Brothers Moving Services currently does not lease any vehicles.

Part 380 Special Training:

2 Brothers Moving Services does not operate long combination vehicles (LCVs). The carrier has not employed drivers that meet the definition of entry level driver.

Part 382 Controlled Substance and Alcohol Testing:

2 Brothers Moving Services does not operate vehicles with a GVWR above 26,001 lbs. and is not required to have a controlled substance and alcohol program.

Part 383 Commercial Driver's License:

The carrier does not currently employ CDL drivers.

Part 387 Financial Responsibility:


The carrier's automobile liability is insured through Continental Divide Insurance. The local agent company is Orion Insurance Group, Inc. Insurance agent Eric Heideman was contacted at telephone number (425) 771-5197. Mr. Heideman verified the carrier had no history of claims on file and maintained \$750,000 in Auto Liability coverage (policy # 05 TRM 020321-03). Mr. Heideman further verified the carrier maintained the minimum \$20,000 in cargo insurance (policy # 05 TRM 020321-03) through Continental Divide Insurance. The company has a current Form E on file with the commission dated January 29, 2019.

Part 390 General FMSCR:

The carrier has not been involved in any DOT-recordable accidents within the last 365 days.



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MCS-150 form was last updated on February 26, 2019.

Part 391 Qualification of Drivers:

The carrier employed a total of one driver that operated in the state of Washington during the last 365 days. Per eFOTM guidelines, a sample size of one Driver's Qualification File was to be inspected based on the number of current drivers. The driver checked was Jesus Alvarado. The following violations were discovered:

One critical violation of 391.51(a) occurred when the carrier failed to maintain driver qualification files on each driver employed.

In accordance with FMCSA Memorandum MC-ECS-2012-004 medical certificates for 25 percent of the driver qualification file sample size. The one driver was selected for verification.

Driver Name: Jesus Alvarado
Date of Birth: [REDACTED]
Driver License Number: [REDACTED]
ME's License/Certificate Number: AP 30005339
Date of Issuance of the MEC: March 29, 2018
National Registry Identification Number: 8695674372
Phone Number: (425) 742-9119
Date and Time Contacted: June 19, 2019 @ 3:12 pm
Person Contacted: Fatima
Results: MEC Check Confirmed

Part 392 - Driving of Commercial Motor Vehicles:

2 Brothers Moving Services is operating in intrastate commerce. The carrier filed an annual report with the commission on April 11, 2019. Carrier advised on no handheld cellphones and texting.

Two critical type violations of WAC-480-15-555 for failing to acquire a criminal background check for prospective employees.

Part 395 - Hours of Service:

The carrier employed one driver during the last 365 days. In accordance with eFOTM procedures, a sample size of one Record of Duty Status (RODS) based on the number of current drivers is required to be checked for a 30 day period. 2 Brothers Moving Services operated most service under the short-haul exemption of Part 395.1(e) within the last 365 days.

For this investigation a 30-day period was chosen from April 1 - April 30, 2019. This required that 30 RODS be checked. The driver checked was Jesus Alvarado. Mr. Alvarado stated he documented his RODS on his company Bill of Ladings informing investigator the times included total on duty time for each day. Eight days out of the 30-day period were discovered to have inaccurate total daily hours. The days with inaccurate RODS are April 2, 4, 6, 9, 13, 22, 24, 29.

Eight critical violations of 395.8(a)(1) occurred when the carrier failed to require driver to make a record of duty status.

Part 393 & 396 - Maintenance and Inspection:

The carrier owns one vehicle that is classified as a commercial motor vehicle in intrastate commerce for the last 365 days. The carrier failed to complete an annual DOT inspection of the vehicle.

One critical type violation of 396.17(a) occurred when the carrier utilized a commercial motor vehicle not periodically inspected.

Vehicle Maintenance Records:


In accordance with eFOTM, a sample size of one vehicle maintenance file was requested for review, however, 2 Brothers Moving Services failed to retain vehicle maintenance files.

One critical violation of 396.3(b) occurred when the carrier failed to keep minimum records of inspection and vehicle maintenance.

Driver Vehicle Inspection Reports (DVIRs):



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The carrier owns one vehicle not requiring DVIR's to be completed.

Vehicle Inspections:

No out of service violations noted on Aspen reports.

CLOSING INTERVIEW:

The closing interview was conducted on June 26, 2019 with Mr. Jesus Alvarado. This investigation resulted in a proposed "Conditional" rating. Mr. Alvarado was cooperative throughout the entire scope of this investigation. Mr. Alvarado was provided with instructions for completing a safety management plan and requesting a safety rating upgrade. Technical assistance was also provided to the carrier during the process of this review.

DOCUMENTS PROVIDED TO THE CARRIER:

The carrier was informed on how to access an electronic copy of "Achieving a Satisfactory Motor Carrier Safety Record" and "Fitness Rating Explanation."


FOLLOW-ON ACTION:

Recommend administrative penalties for critical violations and requiring company to submit a Safety Management Plan.

Upload Authorized:	Yes	No	
Authorized by:			Date:
Uploaded:	Yes	No	Failure Code:
Verified by:			Date:



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Safety Fitness Rating Explanation		


This report lists the facts which were used to determine the Safety Fitness Rating for the above motor carrier. Federal and State violations are combined for rating purposes. However, only the federal or federal equivalent section number is shown below. A check mark identifies the range within which the data fell when determining the Safety Fitness Rating. All information within a FACTOR block relates only to that FACTOR.

FACTOR 1	General (CFR Parts 387, 390)	û 0 Point = Satisfactory 1 Point = Conditional >1 Point = Unsatisfactory
VIOLATIONS AFFECTING RATING	POINTS	
NONE	-----	
TOTAL POINTS: 0 = SATISFACTORY		
FACTOR 2	Driver Qualification (CFR Parts 382, 383, 391)	û 0 Point = Satisfactory 1 Point = Conditional >1 Point = Unsatisfactory
VIOLATIONS AFFECTING RATING	POINTS	
NONE	-----	
TOTAL POINTS: 0 = SATISFACTORY		
FACTOR 3	Operational/Driving (CFR Parts 392, 395)	0 Point = Satisfactory 1 Point = Conditional û >1 Point = Unsatisfactory
VIOLATIONS AFFECTING RATING	POINTS	
S 392.2	1 (C)	
S	1 (C)	

TOTAL POINTS: 3 = UNSATISFACTORY		
FACTOR 4	Vehicle/Maintenance (CFR Parts 393, 396, Performance Data (OOS%))	
VIOLATIONS AFFECTING RATING	POINTS	Fewer than 3 inspections
NONE	-----	
TOTAL POINTS: 0 = SATISFACTORY		
Fewer than 3 Inspections	3 or more Inspections	
Rate same as other Regulatory Factors 1, 2, and 3	OOS Less than 34%	OOS 34% or Higher
	Satisfactory	Conditional
û 0 Point = Satisfactory 1 Point = Conditional >1 Point = Unsatisfactory	Conditional	Unsatisfactory
	If a pattern of Non-Compliance with a Critical or an Acute Violation	If a pattern of Non-Compliance with a Critical or an Acute Violation
FACTOR 5	Hazardous Material (CFR Parts 397, 171, 172, 173, 177, 180)	
Not Applicable - Not a carrier of Hazardous Material		
NONE		
FACTOR 6	Accident (Recordable Accident Rate)	
((Recordable Accidents) X (1 million)) ÷ (Total Miles) = Rate (0 X 1,000,000) ÷ 5,000 = 0 = SATISFACTORY URBAN CARRIER - All Driver operate within <100 air miles		
	ACCIDENT RATE	FACTOR RATING
	û 0.000 - 1.700 =	Satisfactory
	>1.700 =	Unsatisfactory



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Safety Fitness Rating Explanation																							
OVERALL SAFETY FITNESS RATING Number of Factors (1-6) shown above as less than satisfactory <table style="width: 100%; border: none;"> <tr> <td style="text-align: center;">Unsatisfactory</td> <td style="text-align: center;">Conditional</td> <td style="width: 20px;"></td> <td style="text-align: center;">=</td> <td style="text-align: center;">CONDITIONAL</td> </tr> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">0</td> <td></td> <td></td> <td></td> </tr> </table>			Unsatisfactory	Conditional		=	CONDITIONAL	1	0														
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