

**Sino-M International LLC DBA Seattle May Travel Safety Management Corrective
Action Plan**

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To: Washington State Utilities and Transportation Commission;
1300 S. Evergreen Park Dr. SW P.O. Box 47250 Olympia WA. 98504-7250

Sino M International U.S. DOT # 2348207 dba, Seattle May Travel is a boutique intrastate private tour company; offering service only to SMT customers. SMT purchases only the best new equipment as safety and service reflect directly on the company and its proud owner. SMT and staff are happy to team with the Washington State Utilities and Transportation Commission to have assistance in providing safe, efficient transportation in following all CFR's, USC's and WAC's.

**This corrective action plan is a request to upgrade Seattle May Travel from
Conditional to Satisfactory per 49 CFR 385.17**

We will address the deficiencies listed in the 6-1-2016 Compliance Review.

- 49 CFR 391.45(a) Using a driver not medically examined and certified –
- 49 CFR 391.51(a) Drivers Qualification file
- 49 CFR 396.3(b) Records of Inspections
- 49 CFR 396.11(a) DVIR
- 49 CFR 396.17(a) Annual Inspection
- 49 CFR 395.8 (a) RODS
- 49 CFR 395.8 (j) (2) 7 day work week form

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Acknowledgement and Correction

49 CFR 391.45(a) Using a driver not medically examined and certified –

Drivers, Zhaoxing Li, Shuxiang Guo, Tong Liu (terminated). Jung Cheng Huang (terminated). Parker Gao (terminated).

Seattle May Travel (SMT) was unaware of the need to medically certify drivers operating a non CDL 8 to 14 passenger vans in intrastate transport. We now have intrastate and interstate medically examined drivers through US Health Works, which are located in each Driver Qualification File (DQF). SMT has obtained medical examination forms and a copy of their current medical card. In the future all drivers will have current medical cards before they perform any safety sensitive functions. Our policy moving forward is a December extensive review of all DQF's along with a quarterly review for 24 month expiration dates and periodic changes in records.

49 CFR 391.51(a) Drivers Qualification file

Seattle May Travel failed to have complete Driver Qualification Files (DQF) for its multiple employed or occasional drivers (per 49 CFR 390.5). As of today August 17, 2016 Seattle May Travel has complete Driver Qualification Files on every driver currently employed. Review and updates of the Driver Qualification Files will be reviewed annually as well as a quarterly for license expiration dates and updates to Motor Vehicle Reports (MVR's).

Occasional Drivers

- Medical Examiners Certificate
- Road Test
- Certification of Road Test
- Controlled Substances Test

Permanent Drivers

- Application for Employment 49 CFR 391.21
- Driver History 49 CFR 391.53
- Inquiry to State Agency's 49 CFR 391.21(a)(1)(b)
- Annual Review of Driving Record 49 CFR 391.25
- Annual Drivers certification of violations 49 CFR 391.27
- Drivers Road Test and Certificate 49 CFR 391.31
- Medical Examiners Certificate 49 CFR 391.42
- Certificate of Training 49 CFR 380.505 & 49 CFR 380.111
- Medical Examiner Verification (Med Card) 49 CFR 391.23(m)

49 CFR 396.3(b) Records of Inspections

Seattle May Travel operates new late model Mercedes sprinter vans. Seattle May Travel is concerned with safety. The Mercedes vans maintenance is taken care of by the dealer that exceeds the requirements of the DOT inspection sheet. This is the reason SMT purchases new vehicles every four years. SMT now understands that as well as keeping all CMV's in safe operating condition this separate "Annual Review" must be documented and kept in the Vehicle Maintenance Files (VMF) per 49 CFR 396.17(a). Beginning August 17th 2016 Seattle May Travel now has complete Vehicle Maintenance Files (VMF) for all CMV's operated by SMT. Records and receipts will be kept for one year and six months after each

van is sold or taken out of service (OOS). SMT also has a preventive maintenance program that will be monitored by office staff for periodic Ma

49 CFR 396.11(a) DVIR

Seattle may travel drivers sometimes failed to complete Driver Vehicle Inspection Reports (DVIR) for each trip. Seattle May Travel now has new DVIR's that include drivers total Hours of Service (HOS) with this change and the drivers pay being connected, it is assurance the DVIR will always completed. In the past SMT did not have compliant Driver Vehicle Inspection reports (DVIR) the new DVIR(1) contains three signatures: one for the driver, one for the mechanic, and an additional signature for a manager or oncoming driver to ensure that corrections noted on the DVIR have been completed. Completed DVIRS are kept on file for 90 days.

49 CFR 396.17(a) Annual Vehicle Inspections

Seattle May Travel's Mercedes Sprinter vans have all completed DOT+ Annual Vehicle Inspection Report (AVIR) (August 17, 2016). In the future annual inspections for all SMT vehicles are scheduled between December 1st and Dec 31st of each year. A current copy of the Annual Vehicle Inspection Report is kept in the vehicles maintenance log book in the office and on-board in the bus book.

49 CFR 391.15(a) Driving while disqualified

Ping Gao (Parker) was driving without knowledge of a suspended license due to domestic child support payment issues. Mr. Gao has been terminated.

49 CFR 395.8 (a) Record of Duty Status

Failing to require a driver to make a record of duty status: SMT generally uses the Short Haul Exemption however, when traveling outside of the Intrastate 150 air mile radius or the Interstate 100 mile radius from the office or exceeding a 12-hour duty day SMT now uses a log book (pages included in their driver's trip packet). Our policy moving forward is our operations managers and dispatchers will review planned millage and time before dispatching the trip

49 CFR 395.8(j)(2) 7 day Work Week

Failing to obtain from driver a seven day work week schedule: SMT employs several multiple employed drivers. These drivers are now required to fill out the seven day work week form (see attachment) before driving for SMT. Office personal or SMT dispatch will monitor hours worked before working for SMT and before dispatching the multiple employed driver on a SMT trip.

Office Staff

SMT office staff will be retrained to implement and maintain all policies and procedures. May Zhang will oversee and be responsible for all operations of SMT. SMT may divert to a consultant from time to time to assist with implementation of policies and programs ie; Drug

& Alcohol testing, Pre-employment, annual and random. Office personal will monitor and track Drivers files expiration dates, Hours of Service, maintenance logs, schedule periotic maintenance etc. SMT will name office personal "Safety Officer" who will also be responsible for training in emergency evacuation, fire safety among other things.

Drivers

SMT drivers, in addition to office personal, monitor their own license and Med card and annual Drug and Alcohol renewal dates. Drivers are also responsible to complete a 7 day work week form, time cards, log books, RODS, DVIR's and Out Of Service (OOS) issues, 90 day emergency exit check.

Maintenance Plan

SMT's periotic maintenance is scheduled every 5,000 miles by Mercedes Benz or 8,000 by SMT staff. Annually or at 8000 miles the Mercedes Sprinters will receive the equivalent or better of a DOT Annual Inspection although Annual Inspections are scheduled December 1st thru December 30th of each year.

Driver Training

Driver training (office staff) will be conducted quarterly to include safe driving skills, accident avoidance, hours of service, completing Driver Vehicle Inspection Reports, log books and what to look for, warning signs when checking the vehicles.

SMT to Implement a Progressive Disciplinary Policy – Seattle May Travel is working on a Progressive Disciplinary Policy to include verbal warning, written warnings, suspensions, restrictions, penalties up to termination.

- 1st violation – verbal warning
- 2nd violation - written warning
- 3rd violation - written warning with financial consequences and suspension
- 4th violation – termination from employment
- Management reserves the right to immediately terminate an employee for serious violations of law or company policy even if they only occur once.

Drug and Alcohol Company Policy – SMT operates vehicles less than 10,001 Lbs. or 16 passenger seats. SMT therefore is not required to have in place a Drug & Alcohol testing program.

Sincerely,



Hongsheng Zhang (May Zhang)
President
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