



U.S. Department
of Transportation

Administrator

1200 New Jersey Ave., S.E.
Washington, D.C. 20590

Federal Motor Carrier
Safety Administration

March 16, 2012

Refer to: MC-ECS

Mr. David Palmer
President, Commercial Vehicle Safety Alliance
c/o: Texas Department of Public Safety
Highway Patrol Division
P.O. Box 4087
Austin, TX 78773

Mr. Palmer:

Thank you for your letter to the Federal Motor Carrier Safety Administration (FMCSA), forwarding the report titled "CSA: Good Intentions, Unclear Outcomes" issued in November 2011, by Wells Fargo Securities, Equity Research Department. You indicated that you received the report from Mr. John Esparza, President of the Texas Motor Transportation Association, and you have asked FMCSA to review and provide comments on the report.

The FMCSA has carefully reviewed the Wells Fargo analysis and does not agree with its main premise that there is insufficient correlation between the Behavior Analysis and Safety Improvement Category (BASIC) scores and crash risk. We believe that our safety program's focus on crash risk helps to prevent and reduce actual accident frequency and that our focus as a safety agency differs from Wells Fargo's focus as an investment and financial institution. The attached document summarizes FMCSA's position on the findings and observations outlined in the Wells Fargo report. I hope you find this information useful.

As you are aware, FMCSA launched its Compliance, Safety, and Accountability (CSA) safety program over one year ago with the nationwide implementation of the Safety Measurement System (SMS) and accompanying CSA interventions. Through the combined efforts of FMCSA, our State partners, the Commercial Vehicle Safety Alliance (CVSA), and the motor carrier industry, understanding of the CSA program and interest in commercial vehicle safety is at an all-time high. We are pleased that the motor carrier industry is closely monitoring their inspection data and working to make safety improvements. In the past year, the CSA SMS website recorded 27 million visits. Safety-based violations found at roadside have decreased 9 percent from the previous year. We are reaching more motor carriers through the use of Focused Onsite investigations and more than 50,000 motor carriers have received CSA warning letters alerting them to early signs of safety performance problems. The CSA is achieving our objective to improve safety through increased accountability and compliance.

As President of the Commercial Vehicle Safety Alliance, your dedication to our partnership to improve commercial vehicle safety has made this success possible. We hope to maintain this momentum as we continue to improve CSA's already-strong foundation. The American people have entrusted us with the responsibility to keep our roads safe, and through the success of programs like CSA, we are saving lives. Thank you for everything you have done to in support of FMCSA's safety mission.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Ferro', with a long horizontal flourish extending to the right.

Anne S. Ferro

Enclosure

cc: Mr. Stephen A. Keppler
Executive Director, CVSA