

EHS CONCEPTS

ROADSIDE TOP 10

The five vehicle and five driver violations cited most at U.S. roadside inspections in 2025, and the fleet leader's fix list for each. A free field guide.

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Keep your people whole.

FROM RYAN

Not just one week in June

The examples in this letter (the lamp, the tire, the log) are composites to show the pattern, not reports of real events.

Our Roadcheck guide covers the 72-hour CVSA blitz. This one covers the whole year. In 2025, nearly 2 million roadside inspections found more than 3.3 million violations, according to J. J. Keller's analysis of FMCSA data.

The vehicle list is led by the same things every year: lamps, tires, and brakes. The driver list is led by speeding, medical cards, and logs. None of it is exotic. Almost all of it would be caught by a real pre-trip inspection and a dispatch system that does not push drivers past their hours.

Every one of these lands on your CSA record. Some of them park the truck or the driver on the spot.

This guide takes the top five vehicle and top five driver violations. For each you get the pain point, the data, why it really happens, the rule in plain words, controls in hierarchy order, a printable self-audit, who owns what, and a toolbox talk question.

Ryan L. Rinehart

Founder, EHS Concepts — The Ways of Safety

Keep your people whole.



EHS CONCEPTS
— THE WAYS OF SAFETY —

THE VERIFIED NUMBERS

What roadside inspectors cited most in 2025

~2M

Roadside inspections in 2025, out of 3.1 million total inspections

3.3M+

Violations of DOT safety regulations found at those roadside inspections

660,792

No. 1 vehicle violation: required lamps broken or obscured (393.9)

133,465

No. 1 driver violation: speeding (392.2)

27%

Of tire violations (393.75) led to an out-of-service order

68%

Of medical certification violations (391.41(a)) led to an out-of-service order

Source: J. J. Keller Compliance Network, "Top 20 commercial vehicle violations of 2025" (Jan. 22, 2026) and "Top 20 CMV driver violations of 2025" (Jan. 8, 2026), compiled from FMCSA roadside inspection data. OOS shares are rounded as published. FMCSA's live roadside inspection data is at ai.fmcsa.dot.gov.

The ten violations in this guide

	VIOLATION	2025 COUNT · OOS	RANK ON ITS LIST
1	Required lamps broken or obscured · 393.9	660,792 · 14%	Vehicle No. 1
2	Tire tread, inflation, or load limit · 393.75	311,932 · 27%	Vehicle No. 2
3	Brake hose or tubing · 393.45	230,677 · 7%	Vehicle No. 3
4	No proof of annual inspection · 396.17	227,662 · 0%	Vehicle No. 4
5	Emergency equipment · 393.95	209,669 · 0%	Vehicle No. 5
6	Speeding · 392.2	133,465 · 0%	Driver No. 1
7	Invalid or no medical certification · 391.41(a)	104,010 · 68%	Driver No. 2
8	Log falsification · 395.8(e)	98,292 · 20%	Driver No. 3
9	No or wrong type of log when required · 395.8(a)	82,616 · 59%	Driver No. 4
10	ELD form and manner · 395.24	76,623 · 0%	Driver No. 5

Counts and OOS shares are as published by J. J. Keller from FMCSA data. Vehicle Nos. 6–10 were conspicuity, brake components, other brake defects, ABS, and lubrication; driver Nos. 6–10 were traffic control devices, CDL, failure to certify logs, hours (8-, 11-, or 14-hour), and seat belts.

BEFORE THE TEN VIOLATIONS

Four basics that sit under all ten

49 CFR 396.13 Pre-trip · VEH	Before driving, the driver must be satisfied the vehicle is in safe operating condition and review the last vehicle inspection report.
49 CFR 396.11 Driver vehicle inspection report · VEH	Drivers of property-carrying CMVs report defects found at the end of the day; carriers repair and certify.
49 CFR 396.3 Systematic maintenance · VEH	Carriers must systematically inspect, repair, and maintain vehicles under their control and keep records.
49 CFR 391.51 Driver qualification file · DRV	Keep a qualification file for each driver, including the medical examiner's certificate where required.

Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Ten-minute foundation check

#	CHECK	YES	NO
1	We pulled our own roadside inspection results and know our top three violations.	☐	☐
2	Drivers do a real pre-trip, and we have watched one this month.	☐	☐
3	Defects reported on DVIRs are fixed and certified before the truck runs.	☐	☐
4	We have a preventive maintenance schedule and we keep to it.	☐	☐
5	Medical card expiration dates are tracked with a reminder before they lapse.	☐	☐
6	Dispatch plans loads inside hours-of-service limits.	☐	☐
7	Drivers can refuse a load that would break the rules without retaliation.	☐	☐
8	A leader reviews CSA scores at least monthly.	☐	☐

HOW TO USE THIS GUIDE

Walk it. Score it. Own it.

1. Start with the violation your own inspection results show most.
2. Print the self-audit page. Walk the yard or ride along. Thirty minutes.
3. Score what you can see or put your hand on: the lamp, the tread, the log.
4. Every "No" gets one owner and one date. A truck with an out-of-service defect does not move until it is fixed.
5. Check again in 30 days. A fix that is not verified is a wish.

USE THIS EVERY TIME

When you find a gap: the eight-step response

1. Stop or contain.	If the defect is out-of-service level (a flat tire, brake hose leak, no valid medical card), the truck or driver does not go. Stop is a right on this site. Restart is a decision. A named person makes it after the fix.
2. Fix the condition first.	Replace the lamp, the tire, the hose. Then fix the paperwork.
3. Find the decision that allowed it.	Ask what made it normal: a rushed pre-trip, a shop backlog, dispatch pressure, no reminder system.
4. One owner. One date.	One name, one date.
5. Verify in the field.	Walk the truck again. Re-check in 30 days.
6. Look sideways.	If one truck had a bad lamp, check the fleet.
7. Protect the person who raised it.	Drivers who report safety problems or refuse unsafe operation are protected under 49 U.S.C. 31105.
8. Get help when you need it.	FMCSA and your insurer's loss-control staff offer free resources.

Leaders own the conditions. Workers make choices inside the conditions we build. When a gap shows up, the first question is not “who did it?” It is “what did we build, fund, schedule, or tolerate that made this normal?”

This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace the Federal Motor Carrier Safety Regulations. Regulatory text is paraphrased. When this guide and a regulation disagree, the regulation controls. Counts are national and will not match any one fleet's experience.

01

Required lamps broken or obscured

49 CFR 393.9 [VEH]

660,792

violations in 2025, No. 1 vehicle violation

14%

led to out-of-service orders

6

CSA severity points

THE PAIN POINT A trailer marker lamp has been out for a week. The driver mentioned it once. The shop never got the write-up. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. Lamp violations were the most cited vehicle violation at roadside in 2025, with 660,792. They are also the easiest for an officer to see from the shoulder, which makes them a common reason to pull a truck in.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Pre-trips skip the walk-around lamp check.
- Defects are reported but not repaired.
- Wiring corrosion causes repeat failures.
- Dirt and snow cover lamps.

REQUIREMENTS AND CONTROLS · REQUIRED LAMPS BROKEN OR OBSCURED

What the rules require, in plain words

393.9(a) · VEH	All required lamps must be capable of being operable at all times.
393.11 · VEH	Lamps and reflective devices must meet the required locations and types.

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Engineer	LED lamps and sealed wiring harnesses.
Inspect	Lamp check on every pre-trip and post-trip.
Repair	Spare bulbs and lamps on every truck.
Administrative	DVIR defects closed before dispatch.
Small-shop fix	Walk the yard at dusk with all lamps on. Fix every dark one before morning.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

01 · Required lamps broken or obscured

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every lamp works on this truck right now.	☐	☐	☐	
2	Lenses are clean and uncracked.	☐	☐	☐	
3	Reflective tape is present and intact.	☐	☐	☐	
4	Spare lamps are in the truck.	☐	☐	☐	
5	Last DVIR lamp defect was fixed.	☐	☐	☐	
6	Drivers check lamps in the pre-trip.	☐	☐	☐	
7	Wiring is secured and not chafed.	☐	☐	☐	
8	Trailer connections are clean.	☐	☐	☐	
9	Lamp failures are tracked by unit.	☐	☐	☐	
10	Repeat failures get a root fix.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · REQUIRED LAMPS BROKEN OR OBSCURED

Who owns it

Owner / fleet manager	Funds LED upgrades and spares.
Dispatcher / supervisor	Holds trucks with lamp defects.
Shop / safety lead	Repairs and tracks failures.
Driver	Checks lamps every pre-trip.

How to verify it is working in the field

- Walk three trucks with lamps on.
- Pull the last five lamp DVIRs and check repairs.
- Watch one pre-trip.

TOOLBOX TALK STARTER

What's the last thing you check before you pull out, and is a lamp on that list?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Fix or replace the lamp before the truck moves. Name the owner and date for the root fix. Then run the eight-step gap response at the front of this guide.

02 Tire tread, inflation, or load limit

49 CFR 393.75 [VEH]

311,932

violations in 2025, No. 2 vehicle violation

27%

led to out-of-service orders, the highest OOS share in the vehicle top 5

4/32 in.

minimum tread on steer tires

THE PAIN POINT A steer tire is worn to the wear bars. The driver figured it had one more run in it. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. Tire violations were No. 2 at roadside in 2025 with 311,932, and 27% led to an out-of-service order.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Tread depth is eyeballed, not measured.
- Pressure is not checked cold.
- Tire replacement is deferred for cost.
- Loads exceed tire ratings.

REQUIREMENTS AND CONTROLS · TIRE TREAD, INFLATION, OR LOAD LIMIT

What the rules require, in plain words

393.75(b) · VEH	Steer tires on power units need at least 4/32 inch tread at any major groove.
393.75(c) · VEH	Other tires need at least 2/32 inch tread at any major groove.
393.75(a), (f)–(h) · VEH	No flat, leaking, exposed-cord, or bulging tires; no operating over the tire's load rating or under-inflated for the load (see the rule for details).

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Engineer	Tire pressure monitoring systems.
Inspect	Gauge tread and pressure on a schedule.
Replace	Replacement thresholds above the legal minimum.
Administrative	Load planning within tire ratings.
Small-shop fix	Put a tread gauge and pressure gauge in every cab.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

02 · Tire tread, inflation, or load limit

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Steer tires have 4/32 in. tread or more.	☐	☐	☐	
2	Other tires have 2/32 in. or more.	☐	☐	☐	
3	Pressure is at spec.	☐	☐	☐	
4	No cuts, bulges, or exposed cords.	☐	☐	☐	
5	No flats or leaks.	☐	☐	☐	
6	Duals are not touching.	☐	☐	☐	
7	Loads are within tire ratings.	☐	☐	☐	
8	Drivers have tread and pressure gauges.	☐	☐	☐	
9	Tire checks are recorded.	☐	☐	☐	
10	Replacement happens before the legal limit.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · TIRE TREAD, INFLATION, OR LOAD LIMIT

Who owns it

Owner / fleet manager	Funds tires and TPMS.
Dispatcher / supervisor	Holds trucks with bad tires.
Shop / safety lead	Measures and replaces.
Driver	Checks tires every pre-trip.

How to verify it is working in the field

- Gauge five tires on two trucks.
- Ask a driver to show their tire check.
- Check tire spend versus deferrals.

TOOLBOX TALK STARTER

When did you last put a gauge on your steer tires, not just your eyes?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Park the truck until the tire is replaced. Name the owner and date for the tire program fix. Then run the eight-step gap response at the front of this guide.

03 Brake hose or tubing

49 CFR 393.45 [VEH]

230,677

violations in 2025, No. 3 vehicle violation

7%

led to out-of-service orders

4

CSA severity points

THE PAIN POINT An air line between tractor and trailer is rubbing on the deck plate. The outer cover is worn through. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. Brake hose and tubing violations were No. 3 at roadside in 2025 with 230,677.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Gladhands and lines are not supported.
- Chafing points are not protected.
- Leaks are heard but not chased.
- Hoses are not part of the pre-trip.

REQUIREMENTS AND CONTROLS · BRAKE HOSE OR TUBING

What the rules require, in plain words

393.45 · VEH	Brake hoses and tubing must be long and flexible enough for movement, secured against chafing, kinking, or other damage, and properly connected.
396.3 · VEH	Parts and accessories must be in safe and proper operating condition at all times.

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Engineer	Hose supports and spring guards; chafe sleeves.
Inspect	Listen and look for leaks every pre-trip.
Maintain	Replace worn lines at PM.
Administrative	Air leak defects close before dispatch.
Small-shop fix	Add hose supports to every tractor that lacks one.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

03 · Brake hose or tubing

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Lines are supported and do not drag.	☐	☐	☐	
2	No chafing or worn cover.	☐	☐	☐	
3	No audible air leaks.	☐	☐	☐	
4	Gladhand seals are good.	☐	☐	☐	
5	Hoses are not kinked.	☐	☐	☐	
6	Lines clear moving parts.	☐	☐	☐	
7	PM checks hoses.	☐	☐	☐	
8	Drivers check hoses in pre-trip.	☐	☐	☐	
9	Leak defects were repaired.	☐	☐	☐	
10	Spare gladhand seals are on the truck.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · BRAKE HOSE OR TUBING

Who owns it

Owner / fleet manager	Funds supports and PM.
Dispatcher / supervisor	Holds leaking trucks.
Shop / safety lead	Repairs and inspects.
Driver	Listens and looks every pre-trip.

How to verify it is working in the field

- Walk the back of three tractors.
- Listen for leaks with air built.
- Check PM records for hoses.

TOOLBOX TALK STARTER

What part of your air system rubs on something?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Repair the line before the truck moves. Name the owner and date for the support fix. Then run the eight-step gap response at the front of this guide.

04 No proof of annual inspection

49 CFR 396.17 [VEH]

227,662

violations in 2025, No. 4 vehicle violation

12 months

maximum between periodic inspections

0%

OOS, but a direct CSA hit

THE PAIN POINT The annual inspection was done. The sticker fell off the trailer, and the report is in the office. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. No proof of annual inspection was No. 4 at roadside in 2025 with 227,662 violations.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Inspections are done but proof is not on the vehicle.
- Trailer inspections lapse in pools.
- No tracking of due dates.

REQUIREMENTS AND CONTROLS · NO PROOF OF ANNUAL INSPECTION

What the rules require, in plain words

396.17(a) · VEH	Every commercial motor vehicle, including each trailer, must be inspected at least once every 12 months.
396.17(c) · VEH	Keep proof on the vehicle: the inspection report, or a sticker or decal with the required information.

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Track	Due-date tracking for every unit, including trailers.
Proof	Decal plus a copy in the cab.
Audit	Monthly yard check of decals.
Small-shop fix	Make a list of every unit and its next annual date.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

04 · No proof of annual inspection

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every unit had an annual inspection in the last 12 months.	☐	☐	☐	
2	Proof is on the vehicle.	☐	☐	☐	
3	Decals are readable.	☐	☐	☐	
4	Trailers in pools are tracked.	☐	☐	☐	
5	Due dates are tracked.	☐	☐	☐	
6	Inspectors are qualified.	☐	☐	☐	
7	Reports are kept.	☐	☐	☐	
8	Leased equipment is covered.	☐	☐	☐	
9	Reminders go out before due.	☐	☐	☐	
10	Yard audit is monthly.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · NO PROOF OF ANNUAL INSPECTION

Who owns it

Owner / fleet manager	Owns tracking.
Dispatcher / supervisor	Holds units without proof.
Shop / safety lead	Inspects and records.
Driver	Checks the decal.

How to verify it is working in the field

- Walk the yard and check decals.
- Pick two trailers and pull reports.
- Check the tracking list.

TOOLBOX TALK STARTER

Can you show me this trailer's annual inspection right now?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Inspect or place proof before the unit runs. Name the owner and date for tracking. Then run the eight-step gap response at the front of this guide.

05 Emergency equipment

49 CFR 393.95 [VEH]

209,669

violations in 2025, No. 5 vehicle violation

3

warning triangles required

1

charged, secured fire extinguisher

THE PAIN POINT The fire extinguisher is rolling around the sleeper and the gauge is low. One triangle is missing. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. Emergency equipment was No. 5 at roadside in 2025 with 209,669 violations.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Extinguishers are not secured or charged.
- Triangles get lost and not replaced.
- No one checks emergency kits.

REQUIREMENTS AND CONTROLS · EMERGENCY EQUIPMENT

What the rules require, in plain words

393.95(a) · VEH	Carry a properly rated, filled, securely mounted fire extinguisher that is readily accessible.
393.95(f) · VEH	Carry three bidirectional emergency reflective triangles (or allowed alternatives).
393.95(b) · VEH	Carry spare fuses if the vehicle uses fuses.

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Equipment	Mounted extinguisher bracket in every cab.
Inspect	Check extinguisher and triangles on pre-trip.
Restock	Spares at the terminal.
Small-shop fix	Check every cab this week and restock.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

05 · Emergency equipment

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Extinguisher is mounted and secured.	☐	☐	☐	
2	Gauge is charged.	☐	☐	☐	
3	Rating is correct.	☐	☐	☐	
4	Three triangles are present.	☐	☐	☐	
5	Spare fuses if needed.	☐	☐	☐	
6	Driver knows where they are.	☐	☐	☐	
7	Equipment checked in pre-trip.	☐	☐	☐	
8	Spares at terminal.	☐	☐	☐	
9	Used extinguishers are replaced.	☐	☐	☐	
10	Equipment is reachable.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · EMERGENCY EQUIPMENT

Who owns it

Owner / fleet manager	Funds kits.
Dispatcher / supervisor	Holds trucks without kits.
Shop / safety lead	Restocks.
Driver	Checks every pre-trip.

How to verify it is working in the field

- Check three cabs.
- Ask a driver to set triangles.
- Check spare stock.

TOOLBOX TALK STARTER

If you broke down on a dark curve tonight, what would you grab first?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Restock before the truck moves. Name the owner and date for kit checks. Then run the eight-step gap response at the front of this guide.

06 Speeding

49 CFR 392.2 [DRV]

133,465

violations in 2025, No. 1 driver violation

Up to 10

CSA severity points, depending on speed

392.2

requires obeying state and local laws

THE PAIN POINT The load is due at 6 a.m. The driver left two hours late because the shipper was slow. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. Speeding was the most cited driver violation at roadside in 2025, with 133,465.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Dispatch schedules do not allow for delays.
- Pay rewards speed.
- No speed monitoring.
- Drivers fear missing appointments.

REQUIREMENTS AND CONTROLS · SPEEDING

What the rules require, in plain words

392.2 · DRV

Operate commercial motor vehicles in line with the laws, ordinances, and regulations of the jurisdiction where they operate, including speed limits.

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Engineer	Speed governors and telematics alerts.
Plan	Realistic schedules with buffer for delays.
Administrative	Coaching on speed events; no punishment for reporting delays.
Small-shop fix	Set governed speed and review speed alerts weekly.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

06 · Speeding

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Trucks are governed.	☐	☐	☐	
2	Speed alerts are reviewed weekly.	☐	☐	☐	
3	Drivers are coached on events.	☐	☐	☐	
4	Schedules include buffer.	☐	☐	☐	
5	Dispatch does not push late loads.	☐	☐	☐	
6	Pay does not reward speed.	☐	☐	☐	
7	Drivers can report delays without penalty.	☐	☐	☐	
8	Speeding citations are reviewed.	☐	☐	☐	
9	Leaders see speed trends.	☐	☐	☐	
10	Customers are told of delays.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · SPEEDING

Who owns it

Owner / fleet manager	Sets governors and pay.
Dispatcher / supervisor	Plans realistic loads.
Shop / safety lead	Reviews telematics.
Driver	Drives the limit.

How to verify it is working in the field

- Pull a week of speed alerts.
- Look at one late load's dispatch timeline.
- Ask a driver what happens when they're late.

TOOLBOX TALK STARTER**What happens here when you're going to be late?**

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Coach the driver and fix the schedule. Name the owner and date for dispatch changes. Then run the eight-step gap response at the front of this guide.

07

Invalid or no medical certification

49 CFR 391.41(a) [DRV]

104,010

violations in 2025, No. 2 driver violation

68%

led to out-of-service orders

24 months

maximum certificate period

THE PAIN POINT A driver's medical card expired last week. Nobody noticed until he was pulled in. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. Invalid or missing medical certification was No. 2 for drivers in 2025 with 104,010 violations, and 68% led to out-of-service orders.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Expiration dates are not tracked.
- Short-term certificates (for conditions) are missed.
- CDL holders' state medical status is not updated.

REQUIREMENTS AND CONTROLS · INVALID OR NO MEDICAL CERTIFICATION

What the rules require, in plain words

391.41(a) · DRV	A driver may not operate a CMV unless medically certified as physically qualified, with a current medical examiner's certificate (for CDL holders, the medical status on the state driving record).
391.45 · DRV	Drivers must be re-examined at least every 24 months, or sooner if the examiner certifies for a shorter period.

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Track	Expiration dates with 60- and 30-day reminders.
Verify	Check state driving records for CDL medical status.
Administrative	No dispatch with an expired card.
Small-shop fix	List every driver's card expiration this week.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

07 · Invalid or no medical certification

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every driver has a current certificate.	☐	☐	☐	
2	Expirations are tracked.	☐	☐	☐	
3	Reminders go out early.	☐	☐	☐	
4	Short-term certificates are tracked.	☐	☐	☐	
5	State medical status is current for CDL drivers.	☐	☐	☐	
6	Copies are in qualification files.	☐	☐	☐	
7	Dispatch checks status.	☐	☐	☐	
8	Drivers know their date.	☐	☐	☐	
9	Exams are scheduled ahead.	☐	☐	☐	
10	Audits are monthly.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · INVALID OR NO MEDICAL CERTIFICATION

Who owns it

Owner / fleet manager	Owens tracking.
Dispatcher / supervisor	Blocks dispatch on expired cards.
Shop / safety lead	Audits files.
Driver	Knows and renews their card.

How to verify it is working in the field

- Check five drivers' expiration dates.
- Ask dispatch how they'd know.
- Check the reminder list.

TOOLBOX TALK STARTER**Without looking, when does your medical card expire?**

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Take the driver off duty until certified. Name the owner and date for tracking. Then run the eight-step gap response at the front of this guide.

08 Log falsification

49 CFR 395.8(e) [DRV]

98,292

violations in 2025, No. 3 driver violation

20%

led to out-of-service orders

7

CSA severity points

THE PAIN POINT A driver logs off-duty while waiting at a dock, then drives longer that night to make the load. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. Log falsification was No. 3 for drivers in 2025 with 98,292 violations.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Loads are planned beyond legal hours.
- Detention time pushes drivers to misreport.
- Personal conveyance is misused.
- Nobody audits logs against other records.

REQUIREMENTS AND CONTROLS · LOG FALSIFICATION

What the rules require, in plain words

395.8(e) · DRV	No driver or carrier may make a false record of duty status, and carriers may not permit or require it.
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Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Plan	Dispatch within hours; account for detention.
Audit	Compare logs to fuel, GPS, and delivery records.
Administrative	No retaliation for refusing loads that break the rules.
Small-shop fix	Audit five logs against GPS this month.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

08 · Log falsification

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Loads are planned within hours.	☐	☐	☐	
2	Detention is tracked and planned for.	☐	☐	☐	
3	Logs are audited against supporting documents.	☐	☐	☐	
4	Personal conveyance rules are trained.	☐	☐	☐	
5	Drivers can refuse illegal loads.	☐	☐	☐	
6	Pay does not push falsification.	☐	☐	☐	
7	Findings are coached.	☐	☐	☐	
8	Dispatch is trained on hours.	☐	☐	☐	
9	Leaders review audit results.	☐	☐	☐	
10	Unassigned time is reviewed.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

Who owns it

Owner / fleet manager	Sets pay and policy.
Dispatcher / supervisor	Plans legal loads.
Shop / safety lead	Audits logs.
Driver	Logs truthfully.

How to verify it is working in the field

- Audit three logs against GPS.
- Ask a driver how detention is handled.
- Ask dispatch how they check hours.

TOOLBOX TALK STARTER

Has a load ever made you feel you had to fudge your log?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Correct the record and fix the dispatch cause. Name the owner and date. Then run the eight-step gap response at the front of this guide.

09

No or wrong type of log when required

49 CFR 395.8(a) [DRV]

82,616

violations in 2025, No. 4 driver violation

59%

led to out-of-service orders

ELD

required for most drivers who keep logs

THE PAIN POINT A local driver went over the short-haul limits for the day but didn't log because he never does. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. No or wrong type of log was No. 4 for drivers in 2025 with 82,616 violations, and 59% led to out-of-service orders.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Short-haul exception limits are misunderstood.
- Old trucks or exemptions are assumed to cover everyone.
- ELD malfunctions are not handled correctly.

REQUIREMENTS AND CONTROLS · NO OR WRONG TYPE OF LOG WHEN REQUIRED

What the rules require, in plain words**395.8(a) · DRV**

Drivers must record duty status using the method the rules require, generally an ELD, unless an exception applies.

Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Train	Short-haul and ELD exception rules.
Track	Flag drivers who exceed short-haul limits.
Equipment	ELDs installed where required; paper logs for malfunctions.
Small-shop fix	List every driver and the logging method that applies.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

09 · No or wrong type of log when required

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every driver uses the right logging method.	☐	☐	☐	
2	Short-haul limits are tracked.	☐	☐	☐	
3	Exceptions are documented.	☐	☐	☐	
4	ELDs are installed where required.	☐	☐	☐	
5	Malfunction procedures are known.	☐	☐	☐	
6	Paper logs are in the cab.	☐	☐	☐	
7	Dispatch knows the rules.	☐	☐	☐	
8	Records are kept.	☐	☐	☐	
9	Audits are monthly.	☐	☐	☐	
10	New drivers are trained.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · NO OR WRONG TYPE OF LOG WHEN REQUIRED

Who owns it

Owner / fleet manager	Funds ELDs.
Dispatcher / supervisor	Knows exception limits.
Shop / safety lead	Audits methods.
Driver	Logs as required.

How to verify it is working in the field

- Check three drivers' methods.
- Ask about the short-haul limits.
- Check for paper logs in the cab.

TOOLBOX TALK STARTER

Do you know exactly when you have to switch from short-haul to a log?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Correct the logging method now. Name the owner and date for training. Then run the eight-step gap response at the front of this guide.

10 ELD form and manner

49 CFR 395.24 [DRV]

76,623

violations in 2025, No. 5 driver violation

0%

OOS, but a CSA hit

395.24

driver ELD obligations

THE PAIN POINT The ELD shows unassigned driving and missing trailer numbers. The driver never learned how to edit them. (illustrative)

What the data says

Source: J. J. Keller analysis of FMCSA roadside inspection data, calendar year 2025. ELD form and manner violations were No. 5 for drivers in 2025 with 76,623.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Drivers are not trained on the device.
- Required entries are skipped.
- Carrier staff do not review unassigned time.

REQUIREMENTS AND CONTROLS · ELD FORM AND MANNER

What the rules require, in plain words

395.24 · DRV	Drivers must enter required information, review and respond to unassigned records, and certify records as the ELD rules require.
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Paraphrased from the Federal Motor Carrier Safety Regulations on eCFR. Read the regulation itself before you rely on it. States enforce matching rules for intrastate carriers. Tags: VEH = vehicle (49 CFR Parts 393 and 396). DRV = driver (49 CFR Parts 383, 391, 392, and 395). OOS = share of these violations that led to an out-of-service order in 2025. CSA = severity points in FMCSA's Compliance, Safety, Accountability system.

Controls that work, in hierarchy order

Train	Hands-on ELD training for every driver.
Review	Weekly unassigned time review.
Support	Quick reference card in each cab.
Small-shop fix	Run a 15-minute ELD refresher this week.

Leaders own the conditions. If the lamp, the tire, or the log only gets fixed after an officer finds it, it is not a control. Build it into the pre-trip, the shop schedule, and dispatch.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

10 · ELD form and manner

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Drivers enter all required fields.	☐	☐	☐	
2	Records are certified daily.	☐	☐	☐	
3	Unassigned time is reviewed.	☐	☐	☐	
4	Trailer and shipping numbers are entered.	☐	☐	☐	
5	Drivers can show an officer the data.	☐	☐	☐	
6	ELD instructions are in the cab.	☐	☐	☐	
7	Malfunctions are handled correctly.	☐	☐	☐	
8	Edits are annotated.	☐	☐	☐	
9	Training is current.	☐	☐	☐	
10	Audits are weekly.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · ELD FORM AND MANNER

Who owns it

Owner / fleet manager	Funds training.
Dispatcher / supervisor	Reviews unassigned time.
Shop / safety lead	Audits records.
Driver	Completes entries.

How to verify it is working in the field

- Pull one week of ELD data.
- Ask a driver to do a roadside transfer.
- Check the cab for instructions.

TOOLBOX TALK STARTER

Could you show an officer your ELD records in under two minutes?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Correct records and train. Name the owner and date. Then run the eight-step gap response at the front of this guide.

CHECK OUR WORK

Sources

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<https://www.ecfr.gov/current/title-49/section-391.51>
15. 49 U.S.C. 31105, Employee protections (STAA)
<https://www.law.cornell.edu/uscode/text/49/31105>

Sources retrieved and checked October 13, 2026. This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace the Federal Motor Carrier Safety Regulations. Regulatory text is paraphrased. When this guide and a regulation disagree, the regulation controls. Counts are national and will not match any one fleet's experience.

FREE FIELD TOOL · NEXT STEP

ONE TRUCK. SEVEN MINUTES.

The free 7-Minute Safety Walk is a one-page field tool. Pick one truck in the yard right now. Check the lamps, tires, hoses, and paperwork. Then ask the driver what they would fix first.

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EHS CONCEPTS
— THE WAYS OF SAFETY —

Keep your people whole.

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