

Pre-Trip Evidence Standard

BOF Logistics Group | Safety & Compliance Division Operational Compliance Policy • Fleet Safety Management

Policy Number: BOF-POL-002 Pre-Trip Inspection Evidence Standard Version 2.0 Effective Date July 16, 2026 Review Cycle Annual Supersedes BOF-POL-002 v1.x (all prior versions) Policy Owner Director of Safety & Compliance Approved By Chief Operating Officer Classification Internal - Controlled Document. Not for external distribution without written authorization.

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1. Purpose and Scope

1.1 Purpose

This policy establishes the minimum evidence standards for documenting pre-trip and post-trip vehicle inspections for all commercial motor vehicles operated by or on behalf of BOF Logistics Group ("the Company"). The policy defines required inspection scope, documentation methods, defect classification, corrective action workflows, photo evidence standards, recordkeeping obligations, and enforcement provisions. The goal of this standard is to ensure the continuous roadworthiness of the Company's fleet, maintain full regulatory compliance with applicable Federal Motor Carrier Safety Regulations (FMCSRs), protect driver and public safety, and produce an auditable, defensible inspection record for

every commercial vehicle trip event.

1.2 Scope

This policy applies to:

- ? All CDL-licensed drivers employed by or contracted to the Company who operate commercial motor vehicles (CMVs) under the Company's operating authority;
- ? All tractors and trailers owned, leased, or controlled by the Company and operating under Company DOT authority;
- ? Any subcontracted or owner-operator equipment hauling loads tendered under Company authority;
- ? All dispatch, operations, safety, and maintenance personnel with responsibilities in the pre-trip inspection workflow;
- ? All yard, drop yard, and terminal locations at which Company equipment is stored, inspected, or serviced.

Policy Note Subcontracted carriers operating under their own DOT authority on Company-brokered loads are subject to their own inspection requirements. This policy does not govern those operations; however, the Company reserves the right to audit inspection records as a condition of carrier qualification under BOF-POL-010 (Carrier Qualification Standard).

2. Regulatory References

This policy is developed in compliance with and informed by the following federal regulations, guidance documents, and internal management frameworks:

Reference	Description / Applicability
49 CFR Part 396	Inspection, Repair, and Maintenance - establishes the overarching federal framework for CMV inspection obligations, recordkeeping, and equipment roadworthiness standards.
49 CFR § 396.11	Driver Vehicle Inspection Reports (DVIR) - mandates driver completion of DVIR after each trip, listing all defects or deficiencies; sets minimum retention period of three (3) months.
49 CFR § 396.13	Driver Inspection of Equipment - requires driver to review prior DVIR before taking possession of a vehicle; driver must certify that defects have been repaired or that no repair was necessary before operating the vehicle.
49 CFR § 396.3	Inspection, Repair, and Maintenance - requires motor carriers to systematically inspect, repair, and maintain all equipment and retain records of inspection and maintenance.
49 CFR Part 393	Parts and Accessories Necessary for Safe Operation - defines minimum equipment and condition standards against which inspection findings are evaluated.
49 CFR Part 392	Driving of Commercial Motor Vehicles - section 392.7 (equipment inspection and use) requires driver pre-trip inspection; section 392.8 (emergency equipment) requires verification of required emergency equipment.
FMCSA SMS - Vehicle Maintenance BASIC	Safety Measurement System scoring methodology for the Vehicle Maintenance Behavior Analysis and Safety Improvement Category (BASIC); DVIR violations, brake defects, tire violations, and lights/reflectors carry weighted severity values affecting carrier safety score.

Reference	Description / Applicability
BOF Safety Management System (SMS)	Company-internal safety framework integrating DVIR data, maintenance records, driver performance, and FMCSA SMS monitoring into continuous safety improvement cycles.
BOF-POL-004	Cargo Seal and Load Security Standard - referenced for seal integrity inspection requirements at Section 4.3.

3. Definitions

For purposes of this policy, the following terms shall have the meanings set forth below:

Term	Definition
Pre-Trip Inspection	A systematic, standardized examination of a commercial motor vehicle and its components conducted by the assigned CDL driver prior to placing the vehicle in operation for any trip or movement. The inspection must encompass all components enumerated in Section 4 of this policy.
Post-Trip Inspection	A systematic examination of the CMV conducted at the conclusion of each work shift or trip segment, documenting the condition of the vehicle at the time it is taken out of service. Required under 49 CFR § 396.11 and must be completed before the next driver takes possession of the unit.
DVIR (Driver Vehicle Inspection Report)	The federally mandated inspection report completed by the driver pursuant to 49 CFR § 396.11. The DVIR must enumerate all parts and accessories inspected, identify any defects or deficiencies affecting safe operation, and bear the driver's signature certifying the accuracy of the report. Acceptable in electronic or paper format pursuant to Section 5 of this policy.
Defect - Minor	A condition that does not render the vehicle or component unsafe for operation but requires monitoring, documentation, and scheduled correction. See Tier 3 in Section 6.
Defect - Safety-Critical	A condition that, if not immediately corrected, presents a probable risk of accident, injury, or regulatory out-of-service citation. Safety-critical defects require immediate vehicle removal from service. See Tier 1 in Section 6.
Out-of-Service (OOS) Condition	Any vehicle defect or driver condition meeting the criteria established by the North American Standard Out-of-Service Criteria (OOSC) published by the Commercial Vehicle Safety Alliance (CVSA), or any condition identified in 49 CFR Part 393 that renders the vehicle unfit for operation. A vehicle with an OOS condition must not be operated until the condition is corrected and certified by a qualified mechanic.
Corrective Action Record (CAR)	Documentation generated by the shop or maintenance function recording the specific repair action taken in response to a DVIR-noted defect, including parts replaced, labor performed, date completed, and mechanic certification. The CAR is linked to the originating DVIR in the Company's maintenance management system.
Equipment Unit ID	The unique alphanumeric identifier assigned to each tractor and trailer in the Company's fleet management system. The Unit ID is the primary reference key for all DVIR records, maintenance records, and photo evidence files associated with a given asset.

Term	Definition
ELD Integration Point	The data interface between the Company's approved Electronic Logging Device (ELD) system and the DVIR management platform, enabling automated DVIR status transmission, open-defect visibility on dispatch dashboards, and synchronized recordkeeping as required by 49 CFR Part 395.
Photo Evidence Standard	The minimum technical and compositional requirements for photographic documentation of inspection findings, defects, cargo conditions, and seal status as defined in Section 9 of this policy. Photos not meeting the standard are considered non-compliant and will not satisfy the documentation requirement.

4. Mandatory Inspection Scope

All pre-trip and post-trip inspections must encompass, at minimum, the components and systems enumerated in this section. The items listed represent regulatory minimums; drivers encountering conditions not specifically enumerated herein that appear to pose a safety risk must document such conditions on the DVIR as a narrative entry.

4.1 Tractor Inspection Points

The following systems and components must be inspected on every tractor prior to each trip:

4.1.1 Brake System

- ? Service brake operation and pedal/treadle response
- ? Parking/spring brake function and application
- ? Air pressure build-up rate and governor cut-out
- ? Air leak check - service and emergency circuits
- ? Low air warning device activation (80-85 PSI threshold)
- ? Brake lines and hoses - condition, routing, securement
- ? Brake chambers, pushrods, and slack adjusters (visible components)
- ? Brake drums/rotors - visible cracks or heat scoring
- ? ABS malfunction indicator lamp (MIL) status

4.1.2 Tires and Wheels

- ? Tread depth - minimum 4/32" steer axle; minimum 2/32" drive axles (per 49 CFR § 393.75)
- ? Tire inflation - visual inspection; cold inflation check if concern noted
- ? Sidewall condition - cuts, bulges, exposed cords, weather cracking
- ? Wheel fasteners - lug nuts/bolts present, no signs of loosening (rust streaks, shine marks)
- ? Valve stems and caps
- ? Dual tire spacing - no contact between dual assemblies
- ? No mismatched tire sizes on same axle

4.1.3 Lighting and Reflectors

- ? Headlights (high and low beam)

- ? Tail lights and brake lights
- ? Turn signals (front and rear, both sides)
- ? Clearance and marker lights (cab top, side markers)
- ? Hazard warning lights
- ? Reverse/backup lights and audible backup alarm
- ? Reflectors - presence, mounting, condition
- ? Identification lights (three-lamp cluster)

4.1.4 Coupling Devices

- ? Fifth wheel - mounting bolts tight; locking jaws closed around kingpin; release handle secured; slide mechanism (if sliding fifth wheel) locked in position
- ? Apron and mounting plate - no visible cracks or excessive wear
- ? Kingpin engagement - pull-test performed; no movement
- ? Safety chains/cables (if applicable)
- ? Air lines (service/emergency) - secured, no abrasion, proper coupling to trailer
- ? Electrical umbilical - fully seated, no damage to connector
- ? Landing gear - fully raised and locked; no binding

4.1.5 Engine Compartment

- ? Engine oil level
- ? Coolant level and condition
- ? Power steering fluid level
- ? Windshield washer fluid level
- ? Drive belts - condition and tension
- ? Radiator hoses - condition, clamps, no visible leaks
- ? Battery - secure mounting, no corrosion, cables intact
- ? Visible leaks - oil, coolant, fuel, DEF, hydraulic fluid
- ? Air filter restriction indicator (if equipped)

4.1.6 Cab Interior

- ? Mirrors - both side mirrors and any convex/spot mirrors clean, properly adjusted, and secure
- ? Windshield - no cracks in driver line of sight; wiper blades functional on both sides
- ? Horn - operational (audible)
- ? Driver seatbelt - retracts freely, latches securely, no fraying or damage
- ? Passenger seatbelt (if occupied)
- ? Gauges - air pressure, oil pressure, coolant temperature, fuel level, DEF level, voltmeter all functional and within normal range
- ? Dashboard warning lights - no active MIL or fault codes
- ? Fire extinguisher - present, charged (gauge in green), securely mounted, within service date

- ? Emergency triangles (3) or flares - present and complete
- ? Spare fuses (if required)
- ? Required documentation - registration, insurance card, IFTA credentials, medical certificate, Driver's License

4.1.7 Steering

- ? Steering wheel free play - maximum 2 inches for power steering systems
- ? Steering column - no looseness or binding
- ? Tie rods and drag link - visible condition check

4.1.8 Suspension

- ? Spring hangers and U-bolts - no visible cracks or shifts
- ? Air ride suspension bags - no visible damage or deflation
- ? Shock absorbers - no leaks, secure mounting

4.1.9 Exhaust System

- ? Exhaust system routing - no contact with fuel, brake, or electrical lines
- ? No excessive smoke (white, black, or blue) at startup
- ? Diesel Particulate Filter (DPF) and SCR system warning lights - no active regeneration faults
- ? DEF tank level adequate

4.1.10 Fuel System

- ? Fuel tank(s) - adequate fuel level; no visible leaks at cap, lines, or fittings
- ? Fuel cap(s) securely closed
- ? Fuel lines - no abrasion or contact with hot surfaces

4.2 Trailer Inspection Points

4.2.1 Doors and Seals

- ? Rear doors - hinges, latches, and seals intact; doors open and close freely
- ? Side doors (if applicable) - same standard as rear doors
- ? Door seals (weatherstripping) - continuous seal, no tears or gaps that would allow intrusion of water or tampering
- ? Security seals - presence, condition, and integrity per BOF-POL-004

4.2.2 Landing Gear

- ? Both legs extended evenly and fully raised for travel
- ? Crank handle present and secured
- ? No visible bends, cracks, or mechanical damage to legs

4.2.3 Tires and Axles

- ? All trailer tire tread depth - minimum 2/32" (per 49 CFR § 393.75)
- ? Sidewall condition - no cuts, bulges, or exposed cord
- ? Wheel fasteners - all lug nuts present and tight
- ? No contact between dual assemblies

? Axle suspension - no visible damage to spring or air suspension components

4.2.4 Lights and Electrical

? Tail and brake lights

? Clearance and marker lights

? Turn signals

? Reflectors - front, rear, and side

? ABS indicator light (where equipped)

4.2.5 Cargo Securement Points

? Cargo anchor points - rings, rails, and load bars in serviceable condition

? Floor condition - no holes, excessive warping, or broken boards

? No unauthorized modifications to cargo space

4.2.6 Placards

? Hazardous materials placards - correct, securely mounted, legible, and properly oriented (if load requires per 49 CFR Part 172)

? Blank placard holders closed if no hazmat load

4.2.7 Mud Flaps and Undercarriage

? Mud flaps - present and properly positioned on all axle positions per state requirements

? Undercarriage frame - no visible cracks, excessive corrosion, or missing fasteners

? Cross members - no damage or visible separation

? No dragging debris, damaged components, or loose attachment points

4.3 Cargo-Specific Checks

? Load Securement Verification: All cargo must be secured in compliance with 49 CFR Part 393, Subpart I. Driver must verify that tie-down assemblies, straps, chains, or blocking and bracing meet minimum working load limit (WLL) requirements for the cargo weight.

? Weight Distribution: Driver must verify that the load is distributed to avoid exceeding axle weight ratings. Concentrate attention on steer axle loading and proper tandem axle positioning on sliding-tandem trailers.

? Seal Integrity: Security seal number must be recorded on the DVIR and in the TMS load record. Reference BOF-POL-004 (Cargo Seal and Load Security Standard) for complete seal handling procedures.

? Hazmat Placard Accuracy: If the load contains any quantity of hazardous materials as defined by 49 CFR Part 171, the driver must verify that placards displayed correspond exactly to the materials listed on the shipping papers and that the placards are correct in classification, position, and condition.

5. Evidence Documentation Requirements

5.1 DVIR Completion Standard

The driver must complete and sign a DVIR before placing a vehicle in operation for each trip. The following fields are mandatory on every DVIR submission, whether electronic or paper:

Required Field	Standard / Acceptable Entry
Equipment Unit ID (Tractor)	Company-assigned unit number; must match asset registration
Equipment Unit ID (Trailer)	Trailer number; required on every DVIR regardless of whether defects are noted
Odometer Reading	Actual odometer at time of inspection; no estimated entries
Date and Time	Date and time inspection completed; must precede first on-duty movement of vehicle
Driver Name and CDL Number	Full legal name; CDL number as issued on license
Inspection Items Reviewed	All applicable checklist items must be affirmatively checked; blank fields are not acceptable
Defects Noted	If defects exist, specific description using standardized defect codes (see Appendix C); "No Defects" certification permissible only when all items pass
Driver Certification	Driver signature certifying that inspection was personally performed and all findings are accurately recorded
Prior DVIR Review	Driver must certify that prior shift DVIR was reviewed and all open defects have been corrected or noted as requiring no repair

5.2 Photo Evidence Requirements

Photographic documentation is mandatory at the following inspection events. Photos must be captured at the time of inspection and uploaded to the approved platform before departure:

Trigger Event	Required Photo Content
Any defect noted on DVIR (Tier 1 or Tier 2)	Close-up of defect area showing defect clearly; wide-angle establishing shot showing unit number and defect location in frame
Seal condition - pre-departure	Seal intact on door or latch; seal number visible and legible; door or container number in frame
Tire condition - concern noted	Affected tire(s) with tread area, sidewall, or defect visible; wheel position identifiable
Cargo securement - notation required	Securement arrangement, tie-down points, and cargo visible; wide enough to show context
Pre-existing trailer damage at hook	All pre-existing damage annotated; unit number visible; all four corners of trailer documented if any damage present
Hazmat placard (if applicable)	All four sides with placards visible; legibility of hazard class and UN number confirmed

Each photo must include the unit ID and timestamp visible in the image or embedded in the file metadata. Filters, crops, or any post-capture image manipulation are prohibited (see Section 9.4).

5.3 Electronic DVIR Platforms

The Company has approved the following categories of electronic DVIR platforms. Specific approved vendors are maintained on the Safety Intranet (updated annually):

- ? ELD-Integrated DVIR: DVIR completed within the ELD driver interface; data transmitted to Company telematics platform in real time; preferred primary method.
- ? Standalone Mobile Application: Company-approved mobile DVIR application used when ELD integration is unavailable; must support cloud sync and photo upload.

Electronic DVIR platforms must meet the following requirements:

- ? Capture all mandatory fields enumerated in Section 5.1;
- ? Support photo attachment with metadata (timestamp, GPS coordinates) preserved;
- ? Sync completed DVIRs to the cloud platform within 15 minutes of completion when connectivity is available;
- ? Offline mode: platform must allow complete DVIR entry without connectivity and sync automatically upon restoration of network access;
- ? Retain data in compliance with Section 9.3 retention requirements;
- ? Provide read access to dispatch and Safety Coordinator in real time.

5.4 Paper DVIR Continuity

Paper DVIRs are permitted only when the electronic system is confirmed unavailable (connectivity failure, device failure, or approved exception per Section 13). When paper is used:

- ? Driver must use the Company-issued pre-printed paper DVIR form (Form BOF-F-011); improvised forms are not acceptable;
- ? All fields must be completed in ink; no pencil entries;
- ? Completed paper DVIR must be submitted to the Safety Office or Terminal Manager within 24 hours of trip completion;
- ? Safety Coordinator or designated terminal staff must scan and upload paper DVIR to the document management system within 24 hours of receipt;
- ? Original paper form must be retained for a minimum of 30 days before destruction.

5.5 Defect Notation Standards

Defect entries must be specific, accurate, and sufficient to allow a mechanic to locate and assess the condition without further driver explanation. The following standards apply:

Prohibited - Non-Compliant Defect Entries The following entry types will be rejected as non-compliant and trigger a corrective action for the driver:

- "Tire looks ok" - vague; does not document what was observed
- "Checked brakes" - not a defect notation; use only in "no defects" context
- "Something seems off" - non-specific; unacceptable
- Blank entries on required fields
- Use of symbols or abbreviations not in the approved defect code list

Required - Compliant Defect Entry Format All defect entries must follow the format: [Defect Code] - [System] - [Location/Position] - [Description of Condition] Example: "BK-03 - Brake System - LR Axle, Driver Side - Brake chamber pushrod travel at limit; slack adjuster requires adjustment. Vehicle pulled from service."

Standardized defect codes are enumerated in Appendix C. Drivers must be trained on defect code usage during initial orientation and at each annual recertification.

6. Defect Classification and Response Workflow

All defects identified during pre-trip or post-trip inspections must be classified according to the following three-tier severity system. Classification determines the immediate operational response and escalation requirements.

Tier	Classification	Criteria	Required Response
Tier 1	Safety-Critical / Out-of-Service	Any condition meeting CVSA OOSC criteria or 49 CFR Part 393 minimum standards. Vehicle operation presents immediate risk of accident or regulatory OOS citation.	Vehicle must NOT be operated. Driver secures vehicle and notifies dispatch immediately. Shop or roadside service notified within 30 minutes. Safety Coordinator notified within 1 hour. No dispatch or load movement until defect repaired and certified by qualified mechanic. Mandatory photo documentation.
Tier 2	Significant Defect (Non-OOS)	Condition that does not meet OOS threshold but represents a material deficiency in a safety-related system requiring prompt attention. Vehicle may be operated only with specific authorization.	DVIR completed with full defect notation. Operations Manager must provide written sign-off before dispatch. Shop appointment scheduled within 24 hours. Operations notified; load planning adjusted as needed. Safety Coordinator notified within 4 hours. Photo documentation required.
Tier 3	Minor Defect	Cosmetic or non-safety-system deficiency that does not affect safe vehicle operation or create regulatory exposure. No operational restriction required.	DVIR completed with defect notation. Scheduled for next available maintenance cycle. No operational restriction; no special authorization required. Photo documentation at driver discretion unless specifically required by Section 5.2.

6.1 Defect Classification Examples

Tier	Example Conditions
Tier 1 (OOS)	Brake adjustment out of OOS limits; brake lining below minimum thickness; cracked brake drum; steer tire tread below 2/32"; tire with exposed cord; non-functional headlights or brake lights; fifth wheel not locked; broken steering component; fuel leak proximate to heat source; inoperative service brakes on any axle
Tier 2	Brake adjustment approaching OOS limits but not at threshold; drive tire tread approaching 2/32"; marker or clearance light inoperative (non-OOS count); wiper blade torn but not completely non-functional; minor air leak with pressure maintained; landing gear bent but functional; DPF fault code active but engine functional; load bar damaged but cargo secured
Tier 3	Minor cab interior cosmetic damage; non-structural trailer scuff or dent; clearance light lens cracked but light functional; minor rust on non-structural body panel; door seal with minor gap not affecting security; windshield crack outside driver sight lines per 49 CFR § 393.60

Classification Uncertainty When a driver is uncertain whether a defect meets Tier 1 or Tier 2 criteria, the condition must be treated as Tier 1 until evaluated by a qualified mechanic. Drivers are never required to operate a vehicle they have a good-faith belief is unsafe, regardless of management direction. See Section 7.3.

7. Defect Resolution and Sign-Off Process

7.1 Mechanic / Shop Certification

All Tier 1 and Tier 2 defects require mechanic certification before the vehicle is returned to service. The mechanic or shop must:

- ? Review the DVIR defect notation prior to beginning work;
- ? Complete all required repairs or, where the inspection reveals no defect, document that the condition was examined and no defect was found (with supporting explanation);
- ? Sign and date the DVIR or electronic repair certification record, confirming that the enumerated defects have been corrected;
- ? Link the Corrective Action Record (CAR) to the originating DVIR in the maintenance management system;
- ? Notify the Safety Coordinator upon completion of Tier 1 repairs before vehicle is released.

7.2 Driver Re-Inspection

After repairs are completed on any Tier 1 or Tier 2 defect, the driver taking possession of the vehicle must:

- ? Review the mechanic's certification on the DVIR;
- ? Physically re-inspect the repaired system or component;
- ? Complete a new pre-trip DVIR entry for the vehicle before departure;
- ? Sign the prior DVIR certifying that the noted defects have been repaired to the driver's satisfaction (as required by 49 CFR § 396.13).

If the prior DVIR was completed by a different driver, the taking driver must still complete the review and certification. The review must not be bypassed due to time pressure from dispatch.

7.3 Rejected Repairs - Driver Refusal to Operate

A driver has the right and obligation to refuse to operate a vehicle that the driver believes in good faith remains unsafe after repairs are represented as complete. In the event of a rejected repair:

- ? Driver documents the specific concern in a supplemental DVIR entry;
- ? Driver notifies their immediate supervisor and the Safety Coordinator;
- ? Safety Coordinator escalates to the Director of Safety for final determination;
- ? Vehicle remains out of service pending resolution;
- ? No adverse employment action will be taken against any driver for a good-faith safety refusal in compliance with this section and applicable provisions of 49 U.S.C. § 31105 (surface transportation assistance act whistleblower protections).

7.4 DVIR Closure Procedure

A DVIR is considered "closed" when all of the following conditions are satisfied:

- ? All noted defects have been either repaired (with mechanic certification) or documented as no defect found;

- ? The taking driver has signed the certification field on the prior DVIR;
- ? The electronic system has been updated to reflect "Closed" status; and
- ? Any linked Corrective Action Records have been finalized in the maintenance management system.

Open DVIRs with unresolved Tier 1 or Tier 2 defects will remain visible on the dispatch dashboard and block load tender for the affected unit until closure is confirmed per Section 8.1.

8. Integration with Dispatch and TMS Workflow

8.1 Pre-Dispatch Verification

No load may be tendered to a driver, and no dispatch order may be issued for a commercial motor vehicle, unless the following conditions are satisfied and confirmed in the Transportation Management System (TMS):

- ? A completed, signed DVIR for the tractor and trailer is on file for the current day or the most recent operational period;
- ? No open Tier 1 defects exist on the assigned tractor or trailer;
- ? Any Tier 2 defects have been authorized by the Operations Manager with written documentation on file;
- ? The DVIR status indicator in the dispatch dashboard shows "Compliant" for the assigned units.

The TMS will be configured to display a hard block on load tender assignment for any unit showing an open DVIR or unresolved Tier 1 defect. Dispatchers do not have authority to override a Tier 1 DVIR block. Requests to override must be escalated to the Director of Safety.

8.2 ELD Linkage

The DVIR status from the ELD-integrated platform must synchronize with the Company's dispatch dashboard in real time. The following data elements must be visible to dispatch and safety personnel at all times:

- ? DVIR completion status for each active unit (Complete / Incomplete / Overdue);
- ? Open defect tier designation for each unit with an unresolved defect;
- ? Timestamp of most recent DVIR submission per unit;
- ? Driver name associated with the most recent DVIR;
- ? Alert flag for any unit with an open Tier 1 defect.

8.3 Trailer Drop / Hook Evidence

A DVIR is required on every trailer hook event, not only at the start of a driver's day. When a driver hooks a new trailer at any point during a shift:

- ? Driver must inspect the trailer per Section 4.2 and record the trailer Unit ID and inspection results on a new DVIR entry;
- ? Any pre-existing damage observed on the trailer must be documented with a specific notation and photographic evidence at the time of hook - failure to document pre-existing damage before departure may result in the driver being held responsible for undocumented damage;
- ? Drop yard and interchange locations require photographic documentation of the trailer condition (all four sides and rear) at the time of drop, uploaded to the platform before departure from the yard;
- ? Trailers dropped at drop yards must have DVIR status updated to "Dropped - Awaiting Re-Inspection" in the TMS.

8.4 Post-Trip DVIR

A post-trip DVIR is required at the end of each driver's work shift. The post-trip DVIR must be completed and submitted before the driver logs off duty. Requirements:

- ? Driver must inspect the vehicle upon arrival at the final destination or yard;
- ? All defects or deficiencies observed during the trip or at the time of post-trip inspection must be recorded, regardless of whether they were present at pre-trip;
- ? The final location (city and state, or yard name) must be noted;
- ? Post-trip DVIR is the primary document reviewed by the next driver taking the unit - incomplete post-trip DVIRs create a compliance gap and will be treated as non-compliance per Section 12.

9. Photo Evidence Standards and Retention

9.1 Image Quality Requirements

Requirement	Standard
Minimum Resolution	1080p (1920 × 1080 pixels) or equivalent minimum; images captured at device's native camera resolution preferred
Lighting	Subject must be clearly visible without motion blur, overexposure, or excessive shadow obscuring the defect or identifier. Use device flashlight or additional lighting in low-light conditions.
Unit Number Visibility	The Equipment Unit ID (tractor or trailer number) must be legible in at least one image per inspection event, either in the same frame as the defect or in a separate wide-angle establishing shot uploaded as part of the same DVIR submission.
Timestamp	Device timestamp must be embedded in image EXIF metadata. If device clock is not synchronized, the driver must note the discrepancy in the DVIR text field.
Focus	Defect area must be in sharp focus. Out-of-focus photos will be rejected during audit review and driver will be required to resubmit or provide supplemental documentation.
Framing	Close-up of defect plus one wide-angle establishing shot (showing vehicle context) required for all Tier 1 and Tier 2 defects. Single shot acceptable for Tier 3 and seal/cargo documentation.

9.2 Naming and Filing Convention

All photo files uploaded to the platform must conform to the following naming schema to ensure auditability and retrieval:

Standard Photo File Naming Schema [UNITID]_[MMDDYYYY]_[HHMM]_[TYPE]_[SEQ] TYPE codes: DVIR-PRE (pre-trip), DVIR-POST (post-trip), DEFECT, SEAL, CARGO, DAMAGE, HAZMAT, HOOK Example:
TRK0247_07162026_0615_DEFECT_001.jpg Example: TRL1188_07162026_0620_SEAL_001.jpg

Where the electronic platform auto-generates file names upon upload, the platform must apply the above schema automatically. Drivers uploading from paper-continuity processes must apply this naming convention manually before submission to the Safety Office.

9.3 Retention Period

Document Type	Minimum Retention Period
DVIR records - all (regulatory minimum)	3 months (49 CFR § 396.11(c))
Photo evidence - routine inspections (no defect)	90 days
Photo evidence - Tier 3 defect documentation	6 months
Photo evidence - Tier 1 or Tier 2 defect documentation	12 months minimum; indefinitely if associated with an accident, claim, or regulatory inquiry
DVIR records - associated with accident or OOS event	Indefinitely or until all claims and proceedings are resolved, whichever is later
Corrective Action Records (CAR)	12 months from date of repair, or duration of regulatory inquiry if applicable
Paper DVIR originals (pre-scan)	30 days after scanning and upload confirmation

9.4 Evidence Integrity

Inspection photographs are legal and regulatory evidence. The following integrity requirements apply absolutely:

- ? No Editing: No cropping, color adjustment, brightness/contrast modification, or any filter may be applied to inspection photos after capture. Photos must be uploaded as-captured directly from the device camera roll.
- ? No Retouching: Defects may not be obscured, minimized, or made to appear different from their actual condition in any image.
- ? Metadata Preservation: EXIF metadata (including GPS coordinates, timestamp, device model, and capture settings) must be preserved through the upload and archival process. The platform must be configured to preserve metadata; stripping of metadata is prohibited.
- ? Chain of Custody: Once uploaded to the Company platform, photos may not be deleted by drivers, dispatchers, or operations personnel. Deletion requests must be submitted to the Director of Safety with documented justification.
- ? Falsification: Any manipulation of inspection photos to misrepresent vehicle condition constitutes falsification of safety records and will result in immediate termination and potential criminal referral per Section 12.

10. Roles and Responsibilities

Role	Responsibilities Under This Policy
CDL Driver	Complete and sign pre-trip DVIR before each trip and post-trip DVIR at end of each shift Accurately and specifically document all defects observed; use standardized defect codes Capture and upload all required photos per Section 5.2 and 9.1 Review prior DVIR before taking possession of any vehicle Refuse to operate any vehicle with an unresolved OOS condition Complete DVIR on every trailer hook event Participate in annual DVIR recertification training
Dispatcher / Operations	Verify DVIR completion and status in TMS before assigning or releasing any load Not dispatch any vehicle with an open Tier 1 defect under any circumstances Obtain written Operations Manager sign-off for all Tier 2 dispatch authorizations and file documentation in TMS Escalate unresolved DVIR issues to Safety Coordinator Notify Safety Coordinator of any driver DVIR non-compliance within 1 hour of discovery

Role	Responsibilities Under This Policy
Shop / Maintenance	Repair all Tier 1 and Tier 2 defects promptly; prioritize OOS conditions for same-day resolution Sign mechanic certification on DVIR upon completion of each repair Document all work in Corrective Action Record linked to originating DVIR Notify Safety Coordinator when Tier 1 repairs are complete and vehicle is released Escalate parts delays or inability to repair to Operations and Safety Coordinator immediately Maintain shop repair records per Section 9.3 retention requirements
Safety Compliance Coordinator	Monitor DVIR completion rates daily; generate exception reports for incomplete submissions Conduct weekly photo evidence audit per Section 11.2 Manage and maintain the electronic DVIR platform; coordinate with vendors Escalate non-compliance to Director of Safety per Section 12 enforcement matrix Maintain all DVIR and photo records per retention requirements Track FMCSA SMS Vehicle Maintenance BASIC score; alert Director of Safety to adverse trends Coordinate driver DVIR training and recertification
Director of Safety & Compliance	Policy ownership, oversight, and annual review DVIR audit report review - monthly minimum Final authority on DVIR-related regulatory inquiry and FMCSA correspondence Approve all exceptions under Section 13 Authorize escalated enforcement actions under Section 12 Review and approve policy amendments; manage version control and distribution

11. Audit and Compliance Monitoring

11.1 DVIR Completion Rate KPI

The Company's target DVIR completion rate is 100%. Completion rate is defined as the percentage of required DVIR events (pre-trip and post-trip) for which a valid, signed DVIR was submitted within the required timeframe.

Metric	Target	Monitoring Frequency	Reporting Audience
Overall DVIR Completion Rate	100%	Daily (automated platform report)	Safety Coordinator, Director of Safety
DVIR Completion Rate by Driver	100%	Weekly	Safety Coordinator, Operations Manager
DVIR Completion Rate by Terminal	100%	Weekly	Terminal Manager, Director of Safety
Defect Documentation Quality Score	>95% compliant entries	Weekly sample audit	Safety Coordinator
Tier 1 Defect Notification Compliance	100% within 1 hour	Per-event review	Director of Safety

11.2 Photo Evidence Audit

The Safety Coordinator will conduct a weekly review of a random sample of photo submissions (minimum 10% of all photo submissions from the prior week). Each photo will be scored against the following criteria:

- ? Resolution meets minimum standard (Section 9.1);
- ? Subject clearly visible with appropriate lighting;
- ? Unit ID legible in frame or in accompanying establishing shot;

- ? Timestamp embedded in metadata within acceptable range of DVIR submission time;
- ? No evidence of editing or filter application.

Photo submissions scoring below 80% on the quality criteria will trigger a driver coaching event. Submissions showing evidence of manipulation will be escalated as a potential falsification under Section 12.

11.3 Defect Trend Analysis

The Safety Coordinator will prepare a monthly Defect Trend Report for review by the Director of Safety. The report must include:

- ? Defect frequency by system (brakes, tires, lights, coupling, etc.);
- ? Defect frequency by unit (identification of high-defect assets for prioritized maintenance);
- ? Tier 1 and Tier 2 event count and resolution time;
- ? Comparison to prior month and prior year same period;
- ? Maintenance scheduling recommendations based on defect trends;
- ? Fleet health index (percentage of active fleet with open defects at month-end).

11.4 FMCSA SMS Score Impact

DVIR-related violations have a direct impact on the Company's FMCSA Safety Measurement System (SMS) Vehicle Maintenance BASIC score. The Safety Coordinator must monitor the SMS portal no less than monthly and report any deterioration in the Vehicle Maintenance BASIC percentile to the Director of Safety within 48 hours of identification. Key DVIR-related violation categories affecting SMS include:

- ? Failure to have driver prepare a DVIR (49 CFR § 396.11(a)) - Severity Weight: 1
- ? Failure to correct out-of-service defects before operating vehicle (49 CFR § 396.11(c)) - Severity Weight: varies by defect type
- ? Brake system violations identified during roadside inspection - highest severity weights in Vehicle Maintenance BASIC
- ? Tire OOS violations - significant severity weight contributing to SMS percentile degradation

The Company targets a Vehicle Maintenance BASIC percentile at or below 50 (intervention threshold) at all times. When the percentile exceeds 50, the Director of Safety must implement a written corrective action plan within 30 days.

12. Non-Compliance and Enforcement

Non-Compliance Type	Personnel	Consequence / Enforcement Action
Failure to complete pre-trip DVIR before departure - first occurrence	Driver	Written warning; mandatory DVIR retraining within 5 business days; documented in driver safety file
Failure to complete pre-trip DVIR - second occurrence within 12 months	Driver	Final written warning; 1-day suspension without pay; remedial coaching
Failure to complete pre-trip DVIR - third occurrence or pattern	Driver	Termination of employment; potential DOT violation citation reported by Company if roadside inspection reveals DVIR absence
Failure to complete post-trip DVIR	Driver	Same progressive discipline schedule as pre-trip failure above

Non-Compliance Type	Personnel	Consequence / Enforcement Action
Vague or incomplete defect notation (non-compliant entry format)	Driver	Coaching and retraining - first occurrence; progressive discipline for repeat non-compliance
Operating vehicle with known OOS condition	Driver	Immediate suspension pending investigation; termination upon confirmation; potential referral for DOT civil penalty action
Dispatching vehicle without confirmed DVIR completion	Dispatcher / Operations	Documented corrective action; formal counseling; Operations Manager notification; repeat occurrences - progressive discipline up to termination
Overriding Tier 1 DVIR block without Director of Safety authorization	Dispatcher / Operations Manager	Immediate escalation to COO; potential termination; Company regulatory exposure for carrier liability
Falsification of DVIR records or inspection photos	Any personnel	Immediate termination; potential criminal liability under 18 U.S.C. § 1001 (false statements to federal regulators) and applicable state statutes; DOT referral

Regulatory Exposure Notice DVIR non-compliance is a directly citable violation under 49 CFR Part 396. Individual drivers may receive civil penalty notices from FMCSA or state enforcement agencies. The Company will cooperate fully with regulatory investigations and will not indemnify any employee for penalties arising from willful DVIR non-compliance or falsification.

13. Exceptions

The following limited circumstances may qualify for exception from standard pre-trip DVIR procedures. All exceptions must be documented in writing and approved by the Director of Safety or designee prior to the excepted operation:

Exception Category	Conditions and Requirements
Emergency Operations	Government-declared emergency or natural disaster response where vehicle movement is required immediately for humanitarian operations. Driver must complete abbreviated inspection documentation at the earliest safe opportunity; full DVIR must be completed within 24 hours. Director of Safety must be notified within 2 hours.
Shop/Yard Vehicle Moves	Intra-yard movement of vehicles for maintenance, fueling, or positioning where the vehicle does not enter public roadways. Movement must be authorized by yard supervisor; a simplified yard-move log entry is sufficient in lieu of full DVIR. Speed limited to yard speed limits; no load carried.
Ferry or Rail Transport Segments	Segments where vehicle is transported as cargo aboard ferry, rail car, or similar carrier and is not operated under its own power. DVIR required at each end of the non-driven segment before vehicle resumes active operation. Notation in DVIR of ferry/rail segment and carrier name required.
Electronic System Outage	Covered under Section 5.4 paper continuity procedures; not a general exception from DVIR requirement - paper DVIR is mandatory during outages.

Exceptions do not waive any regulatory obligation under 49 CFR Part 396. The exception documentation must be retained with the associated DVIR record for the full applicable retention period.

14. Policy Review and Amendment

14.1 Scheduled Review

This policy is subject to annual review by the Director of Safety and Compliance, with the review cycle concluding no later than the anniversary of the effective date. The review must include assessment of regulatory changes, FMCSA guidance updates, platform changes, defect trend data, and audit findings from the prior year.

14.2 Trigger Reviews

In addition to the annual cycle, an unscheduled policy review must be initiated within 30 days of any of the following trigger events:

- ? FMCSA compliance review or safety audit of the Company that identifies DVIR-related deficiencies;
- ? Any out-of-service event attributable to a condition that should have been identified at pre-trip inspection;
- ? Any accident or incident in which DVIR adequacy is identified as a contributing or relevant factor;
- ? Company SMS Vehicle Maintenance BASIC score exceeding the FMCSA intervention threshold;
- ? Material change to approved electronic DVIR platform or ELD provider;
- ? Significant change in fleet composition, operating territory, or cargo type.

14.3 Version Control and Distribution

All amendments to this policy require approval by the Chief Operating Officer before taking effect. Approved amendments will be assigned an incremented version number and effective date. Superseded versions will be archived in the document management system and marked as inactive. Upon release of a new version:

- ? All personnel within policy scope will receive electronic notification with a link to the updated document;
- ? Drivers must acknowledge receipt and review via the electronic acknowledgment workflow in the Safety Management System within 14 days of distribution;
- ? Acknowledgment records will be retained for the duration of the driver's employment plus 3 years.

Policy Approval

This policy has been reviewed for regulatory accuracy and operational applicability and is approved for immediate effect as of the date indicated in the metadata block.

Role	Signature	Date
Director of Safety & Compliance Policy Owner		July 16, 2026
Chief Operating Officer Approving Authority		July 16, 2026

Appendix A | DVIR Completion Checklist - Tractor

Unit ID: _____ Date: _____ Odometer: _____

Driver Name: _____ CDL #: _____ Time: _____

Instructions: Inspect each item. Mark S = Satisfactory | D = Defect Noted | N/A = Not Applicable. All defects must be described in the defect notation section using codes from Appendix C.

Item	Inspection Item	Status	Defect Code / Notes
1	Service Brakes - Operation and Pedal Response	—	
2	Parking / Spring Brake Function	—	
3	Air Pressure Build-Up Rate and Governor Cut-Out	—	
4	Low Air Warning Device	—	
5	Air Lines and Hoses - Condition and Securement	—	
6	ABS Malfunction Indicator Lamp	—	
7	Steer Tires - Tread Depth (min. 4/32"), Condition, Inflation	—	
8	Drive Tires - Tread Depth (min. 2/32"), Condition, Inflation	—	
9	Wheel Fasteners - All Present, No Loosening Signs	—	
10	Headlights - High and Low Beam	—	
11	Tail Lights and Brake Lights	—	
12	Turn Signals - Front and Rear, Both Sides	—	
13	Clearance and Marker Lights	—	
14	Hazard Warning Lights	—	
15	Reflectors - Presence and Condition	—	
16	Fifth Wheel - Locked, Jaws Closed, Handle Secured	—	
17	Air Lines - Service and Emergency, Coupled to Trailer	—	
18	Electrical Umbilical - Fully Seated, No Damage	—	
19	Engine Oil Level	—	
20	Coolant Level	—	
21	Belts and Hoses - Condition, No Visible Leaks	—	
22	Mirrors - Clean, Properly Adjusted, Secure	—	
23	Windshield - No OOS Cracks; Wipers Functional	—	
24	Horn - Operational	—	

Item	Inspection Item	Status	Defect Code / Notes
25	Seatbelt - Retracts, Latches, No Damage	—	
26	Dashboard Gauges - All Functional, Normal Range	—	
27	No Active Warning/Fault Codes (MIL Off)	—	
28	Fire Extinguisher - Present, Charged, In-Date	—	
29	Emergency Triangles (3) - Present and Complete	—	
30	Required Documents - Registration, Insurance, IFTA, Medical	—	
31	Steering - Free Play, Column Secure, No Binding	—	
32	Suspension - Springs/Air Bags, No Visible Damage	—	
33	Exhaust - Routing Clear, No Excessive Smoke, DPF OK	—	
34	Fuel System - Level Adequate, No Leaks, Caps Secure	—	
35	Prior DVIR Reviewed - All Defects Repaired or Certified	—	

Defect Notations: _____

■ No Defects Found ■ Defects Noted Above

Driver Signature: _____ Date / Time: _____

Appendix B | DVIR Completion Checklist - Trailer

Trailer Unit ID: _____ Date: _____ Hook Time: _____

Driver Name: _____ Seal Number (if applicable): _____

Instructions: Inspect each item. Mark S = Satisfactory | D = Defect Noted | N/A = Not Applicable. Record all pre-existing damage before departure.

Item	Inspection Item	Status	Defect Code / Notes
1	Rear Doors - Hinges, Latches, Door Seals Intact	—	
2	Side Doors (if applicable) - Hinges, Latches, Seals	—	
3	Security Seal - Present, Intact, Number Matches Bill	—	

Item	Inspection Item	Status	Defect Code / Notes
4	Landing Gear - Fully Raised, Crank Handle Present	___	
5	Landing Gear - No Bends, Cracks, or Damage to Legs	___	
6	Trailer Tires - Tread Depth (min. 2/32"), All Positions	___	
7	Trailer Tires - Sidewall Condition, No Cuts or Bulges	___	
8	Wheel Fasteners - All Lug Nuts Present, No Loosening	___	
9	Axle Suspension - No Visible Damage	___	
10	Tail Lights and Brake Lights	___	
11	Clearance and Marker Lights	___	
12	Turn Signals	___	
13	Reflectors - Front, Rear, Side	___	
14	Trailer ABS Indicator - No Fault Lamp Active	___	
15	Cargo Anchor Points - Rings, Rails, Load Bars Serviceable	___	
16	Trailer Floor - No Holes, No Broken Boards	___	
17	Hazmat Placards - Correct, Mounted, Legible (if applicable)	___	
18	Mud Flaps - Present, Properly Positioned	___	
19	Undercarriage Frame - No Cracks, Missing Fasteners	___	
20	Cross Members - No Damage or Separation	___	
21	No Dragging Debris or Loose Components	___	
22	Pre-Existing Damage Documented with Photo	___	

Pre-Existing Damage Description: _____

■ No Defects Found ■ Defects Noted Above ■ Pre-Existing Damage Documented

Driver Signature: _____ Date / Time: _____

Appendix C | Defect Code Reference Table

Use the codes below in the defect notation field of the DVIR. Codes must be followed by position (e.g., LF = Left Front, RR = Right Rear) and a plain-language description.

Code	System / Component	Default Tier	Description / Notes
BK-01	Brakes - Service Brake	Tier 1	Brake inoperative or fails to apply/release on any axle
BK-02	Brakes - Air Leak	Tier 1	Air leak causing pressure loss exceeding CVSA OOS criteria
BK-03	Brakes - Slack Adjuster	Tier 1	Pushrod travel at or beyond OOS limit
BK-04	Brakes - Lining/Pad	Tier 1	Lining below minimum thickness or contaminated
BK-05	Brakes - Drum/Rotor	Tier 1	Cracked drum or rotor with heat cracking
BK-06	Brakes - ABS	Tier 2	ABS fault lamp active; system functional but fault recorded
TI-01	Tires - Tread (Steer)	Tier 1	Tread depth below 4/32" on steer axle tire
TI-02	Tires - Tread (Other)	Tier 1	Tread depth below 2/32" on drive or trailer axle tire
TI-03	Tires - Sidewall	Tier 1	Exposed cord, bulge, or cut through sidewall
TI-04	Tires - Inflation	Tier 2	Visibly flat or significantly underinflated; not at OOS level
TI-05	Tires - Wheel Fasteners	Tier 1	Missing lug nuts; loose wheel assembly
LT-01	Lights - Headlights	Tier 1	One or both headlights inoperative
LT-02	Lights - Brake/Tail	Tier 1	Required brake or tail light inoperative
LT-03	Lights - Turn Signal	Tier 2	Turn signal inoperative on any corner
LT-04	Lights - Clearance/Marker	Tier 2	One or more clearance/marker lights inoperative
CP-01	Coupling - Fifth Wheel	Tier 1	Fifth wheel not locked; jaws not closed around kingpin
CP-02	Coupling - Air Lines	Tier 1	Gladhand not secured or air line damaged
ST-01	Steering - Free Play	Tier 1	Steering free play exceeds maximum
ST-02	Steering - Component	Tier 1	Damaged or loose steering linkage component

Code	System / Component	Default Tier	Description / Notes
EX-01	Exhaust - Routing	Tier 1	Exhaust contact with fuel, brake, or electrical components
EX-02	Exhaust - DPF/SCR	Tier 2	DPF fault active; engine functional but fault must be addressed
FL-01	Fuel - Leak	Tier 1	Fuel leak at any point; proximity to ignition source
CB-01	Cab - Seatbelt	Tier 1	Driver seatbelt non-functional or missing
CB-02	Cab - Mirrors	Tier 2	Mirror missing or positioned so required sight lines are obstructed
CB-03	Cab - Wipers	Tier 2	Wiper inoperative or blade severely degraded
SU-01	Suspension - Leaf Spring	Tier 1	Broken or missing leaf spring; U-bolt shifted
SU-02	Suspension - Air Ride	Tier 2	Air bag deflated or visibly damaged; vehicle may not be at OOS level
CR-01	Cargo - Securement	Tier 1	Cargo not secured per 49 CFR Part 393; load at risk of shift
CR-02	Cargo - Seal	Tier 1	Security seal missing, broken, or number mismatch
GM-01	General - Minor Cosmetic	Tier 3	Non-structural damage; dent, scratch, or minor body panel damage
GM-02	General - Minor Equipment	Tier 3	Non-safety equipment deficiency; requires scheduled attention

Appendix D | Photo Evidence Standards Guide

D.1 Required Photo Elements - Summary Reference

Element	Acceptable	Not Acceptable
Unit ID Visibility	Unit number clearly legible in at least one photo per inspection event	No unit number visible in any submitted photo
Timestamp	Device clock synchronized; EXIF metadata intact; timestamp within 15 minutes of DVIR submission	Timestamp missing from metadata; photo taken at a different time than the inspection
Focus / Clarity	Defect or subject in sharp focus; all text and visual details distinguishable	Blurry, out-of-focus, or motion-blurred image where defect is not clearly visible
Lighting	Adequate natural or artificial light; subject not silhouetted; flash used if in low-light conditions	Image so dark that subject is indistinguishable; overexposed white-out obscuring detail

Element	Acceptable	Not Acceptable
Image Manipulation	Unedited, direct-from-camera image; no filters applied; full original resolution	Any cropping, filtering, brightness adjustment, or retouching; screenshots of photos rather than originals
Framing - Defect	Close-up showing defect clearly PLUS wide-angle showing defect in context of vehicle system	Only a wide-angle where defect is too small to assess; close-up so extreme that location on vehicle is ambiguous
Framing - Seal	Seal number fully legible; lock mechanism or door latch visible in same frame	Seal number partially obscured; photo taken from angle making seal type ambiguous

D.2 Photo Submission Workflow

- ? Take photo(s) at the time of inspection - do not defer photo capture until after departure.
- ? Review each photo immediately for clarity, focus, and required elements before uploading.
- ? Upload directly from camera roll through the approved platform - do not screenshot, share, or re-compress the photo before upload.
- ? Link each photo to the corresponding DVIR entry in the platform (select DVIR event, then attach photo).
- ? Confirm upload success before departing - check for green confirmation indicator in platform.
- ? If upload fails due to connectivity, retain photo on device in original quality; sync will occur automatically when connectivity is restored.

D.3 Naming Convention Quick Reference

Scenario	File Name Example
Pre-trip, no defects, seal documented	TRL1188_07162026_0615_SEAL_001.jpg
Defect - brake issue on Tractor 0247	TRK0247_07162026_0615_DEFECT_001.jpg (close-up)
Same defect - establishing shot	TRK0247_07162026_0615_DEFECT_002.jpg (wide)
Pre-existing trailer damage at hook	TRL0854_07162026_1430_DAMAGE_001.jpg
Hazmat placard documentation	TRL0854_07162026_1430_HAZMAT_001.jpg
Cargo securement documentation	TRL0854_07162026_1430_CARGO_001.jpg

Appendix E | DVIR Defect Classification Matrix

This matrix provides a rapid-reference decision tool for classifying defects at the time of inspection. When a defect falls in a "borderline" category, classify upward (more severe) and contact the Safety Coordinator for guidance before departure.

System	Tier 1 - OOS / Safety-Critical	Tier 2 - Significant / Non-OOS	Tier 3 - Minor
Brake System	Inoperative brake on any axle; pushrod at OOS travel limit; lining below minimum; cracked drum; air loss rate above threshold	Slack adjuster approaching limit; minor air leak maintaining pressure; ABS fault code with system functional	Minor brake dust accumulation; cosmetic brake component surface rust (non-structural)

System	Tier 1 - OOS / Safety-Critical	Tier 2 - Significant / Non-OOS	Tier 3 - Minor
Tires	Steer tire below 4/32"; drive/trailer below 2/32"; exposed cord; bulge; flat tire; missing lug nuts	Approaching minimum tread; significantly underinflated but not flat; minor sidewall cracking (no cord exposure)	Minor weather cracking on sidewall; valve cap missing; cosmetic scuff on wheel
Lighting	Headlight inoperative; required brake light inoperative; side marker out creating OOS count	Turn signal out; single clearance lamp out (non-OOS count); reverse light out	Lens cracked but light functional; lens faded but meeting brightness standard
Coupling	Fifth wheel not locked; gladhand not coupled; kingpin pull-test fails	Fifth wheel shows wear but passes pull-test; gladhand seals worn but sealed	Minor cosmetic wear on fifth wheel plate; landing gear crank handle slightly bent but operable
Steering	Free play exceeds maximum; broken or missing steering component; loose tie rod	Free play approaching maximum limit; minor looseness in column	N/A - any steering concern at minimum qualifies as Tier 2
Cargo / Seal	Cargo unsecured or at risk of shift; seal broken or number mismatch; hazmat placard absent or incorrect	Securement marginal but load not at immediate risk; seal intact but recording discrepancy	Minor load shifting within acceptable tolerance; documentation gap in seal record (no physical seal issue)
Engine / Fuel	Fuel leak; catastrophic fluid loss; overheating at startup; DPF fire risk	DPF fault requiring attention; minor coolant seep; low fluid warning illuminated	Minor external engine grime; minor exhaust soot around pipe (no routing concern)
Cab / Interior	Seatbelt non-functional; windshield crack in driver sight line; no emergency equipment	Mirror adjustment compromised; wiper significantly degraded; dashboard gauge malfunction	Minor cab interior wear; non-safety storage area damage; cosmetic crack in dashboard trim

Matrix Notes: This matrix is a decision-support tool only. CVSA Out-of-Service Criteria and 49 CFR Part 393 are the definitive regulatory references for OOS determination. When in doubt, err toward the more conservative (higher severity) classification and consult the Safety Coordinator before operating the vehicle.

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