



Motor Carrier Attachment 12:

AAAffordable TSX Comprehensive Review

Baltimore, MD; 11/1/2016

HWY17MH007

(14 pages)

TSX Service Center
10301 Democracy Lane
Suite 300
Fairfax, VA 22030
1-855-890-8879
December 15, 2015



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SAFETY EXCHANGE**

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COMPREHENSIVE REVIEW No.: 2015364
COMPREHENSIVE REVIEW DATE: December 9, 2015

Tracey Stephenson
AAAfordable Transportation LLC
46 S Franklinton Road
Baltimore, MD 21223

Dear Ms. Stephenson,

This letter is to notify you of the results of the above referenced Transportation Safety Exchange - Comprehensive Review (TSX-CR) recently conducted at your facility. A copy of the TSX-CR report is attached for your review.

During the TSX-CR investigation, compliance with applicable regulations and safety management controls was evaluated in six rating factors (five factors are applicable for non-HazMat motor carriers) as established by the TSX program. Results were combined with on-road performance information received from FMCSA to calculate overall factor ratings.

The TSX Program factor and overall factor ratings range from 1.00 to 5.00, with 1.00 established as the highest (best) rating. In accordance with TSX program standards, your overall factor rating is **1.00**. This rating entitles you to be listed as a **TSX Approved** motor carrier on the TSX Motor Carrier Network.

The TSX-CR report documents your compliance with safety regulations and management controls. If weaknesses are identified, the report is designed to guide you to initiate appropriate corrective action. In this way, TSX Approved motor carriers will continuously improve their culture of safety.

TSX will continue to monitor your on-road performance each month as reported by FMCSA. This data may impact individual factor ratings and your overall factor rating in the future. In the event that this process affects your TSX approval status, you will be notified immediately.

Congratulations on becoming a TSX Approved motor carrier! Your approval status indicates your dedication to quality and demonstrates to our subscribers your commitment to safety compliance.

If you have questions regarding the TSX-CR or the TSX Program, please e-mail me at [REDACTED] or call me at [REDACTED]

Sincerely,

Brad Watkins,
TSX Program Director



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December 9, 2015
Inspection #: 2015364

TSX Comprehensive Review Report

Inspection Date:
12/8/2015- 12/9/2015

Inspection #:
2015364

Company Name:
AAAFORDABLE TRANSPORTATION LLC

Company Address:
**46 S FRANKLINTOWN ROAD
BALTIMORE, MD 21223**

DBA:

Trade Name:

DOT #:
1982031

Company Phone:
(410) 945-9000

Company Fax:
(410) 945-9000

Contact Name:
TRACEY STEPHENSON,

Company Email:
aaafordable@verizon.net

Investigators: **donald pyne**

Drivers: **16**

Vehicle Inventory: **16**

Annual Mileage: **250797**

Units Inspected: **5**

Safety Rating Summary

Factor	Rating	Factor	Rating
1) General:	1.00	4) Vehicles:	1.00
2) Driver:	1.10	5) Hazardous Materials:	Not Rated
3) Operations:	1.00	6) Accidents Recordable:	1.00

Overall Rating – Approved: 1.00

Disclaimer: This report and the carrier's status cannot be relied upon as assurance that this carrier will not be involved in an accident, will not have mechanical failures, that future drivers and employees will be qualified to operate the vehicles or that its management will continue to maintain its safety standards.



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Executive Summary

This was a Transportation Safety Exchange (TSX) Comprehensive Review (CR) conducted with AAAFordable Transportation LLC at its facility located in Baltimore, Maryland. This is the carrier's only facility where all documents are maintained and vehicles are housed. The inspection was conducted on Tuesday, December 8, and Wednesday, December 9, 2015.

AAAFordable Transportation LLC is a privately owned and operated passenger carrier providing intrastate service from Baltimore, Maryland, to the Howard County and Baltimore City School Districts. The carrier's main operation is home-to-school and school-to-home for the aforementioned school districts. AAAFordable Transportation also provides field trip charter services for the school districts traveling throughout the greater metropolitan Baltimore area and surrounding locations in Maryland. The carrier has also provided services to Towson University, Morgan State, and Coppin University.

AAAFordable Transportation operates 16 school buses, employees 16 drivers, and four office staff workers in addition to Carol Williams, Tracy Stephenson, and Aminu Dabo. The carrier began operation in 2004 under the leadership of Carol Williams (CEO) and Tracy Stephenson (CFO). Aminu Dabo was hired in January, 2013, to be Operations and Safety Manager, as well as a driver. Carol Williams and Aminu Dabo oversee all compliance with the Federal Motor Carrier Regulations (FMCSR). Corporate offices are located at 46 South Franklinton Road, Baltimore, MD. The facility is a large two (2) story brick building that houses administration offices on the second floor and a maintenance area on the ground level, which is only used to do minor repairs and cleaning. All other maintenance is outsourced to local vendors. All vehicles are parked at the South Franklinton Road location. The building and parking area are totally fenced and secured. AAAFordable Transportation LLC operates under authority granted by the Federal Motor Carrier Safety Administration (FMCSA) using DOT #1982031. Present during the inspection were Carol Williams, Tracy Stephenson, and Aminu Dabo. All were present at the out briefing.

AAAFordable Transportation belongs to the Maryland School Bus Association. On June 10 - 12, 2013, the carrier was the subject of a Transportation Safety Exchange Comprehensive Review (TSX) subsequently receiving an approved rating. The carrier has not yet had a DOT Compliance Review.

AAAFordable Transportation has good management controls in place that have resulted in the company being predominately compliant with the Federal Motor Carrier Safety Regulations (FMCSR) during this inspection. A minor violation was found in Factor Two (Driver) during this review. The violation, although not serious in nature, should be addressed as soon as possible before it develops into a more serious violation.



Factor One - General

This Factor will evaluate the carrier's knowledge of the regulations and its ability to properly instruct employees and drivers about their responsibilities. Furthermore, this Factor examines whether the carrier has proper operating authority for INTERSTATE and/or INTRASTATE commerce, as well as the required levels of financial responsibility.

In order to meet a high level of safety fitness, the motor carrier must demonstrate that adequate safety management controls are in place and are functioning effectively to ensure acceptable levels of compliance and performance. These controls are defined as systems, policies, programs, practices, and/or procedures used by the motor carrier to ensure compliance with all applicable regulations and to ensure the safe use of vehicles and drivers to avoid unnecessary crashes.

The carrier provided copies of all requested information for this inspection as requested in the inspection checklist that was sent to the carrier in advance of this inspection. Evidence of financial responsibility documentation was provided showing \$1,000,000.00 of auto liability insurance issued by National Indemnity Company. Since the carrier is an intrastate provider of transportation, the MCS-90B is not required for insurance documentation. Other documentation included Form MCS-150 taken from the FMCSA's web site, controlled substances and alcohol testing policy, chain of custody documents pertaining to random controlled substances and alcohol testing for 2014, and other operational documents.

The carrier has current editions of the Federal Motor Carrier Safety Regulations (FMCSR) and is familiar with how to use FMCSA's web site. AAAFordable Transportation hires only drivers who possess a valid CDL license with a P (passenger) and S (school bus) endorsement and have at least two years' experience operating a passenger carrying vehicle. Every newly hired driver must participate in an orientation training session that includes a road test, a comprehensive review of all company policies and procedures, proper procedures for conducting a pre-trip and post-trip inspection, a comprehensive review of the company's controlled substances and alcohol testing policy, and a complete review of Part 395 (Hour-Of-Service) of the FMCSRs. All newly hired drivers are required to attend a Certification Class conducted by Baltimore City School District or Howard County School District.

Safety meetings are conducted approximately every quarterly and are documented. Upper management attends outside safety seminars at least once a year. .

There were no issues found regarding this factor.



Factor Two - Driver

A motor carrier's compliance with applicable regulations, as well as its policies, procedures and controls as they relate to qualifying and hiring potential drivers, is evaluated in this Factor. The process of data collection from the carrier's program of testing for controlled substances and alcohol is also reviewed and evaluated.

An audit of selected driver qualification files is conducted in order to determine the effectiveness of the carrier's procedure. It is also a means of determining the extent of management's knowledge of the regulations and how they apply to operations.

Eight (8) DQ files were randomly selected for review. All were found to be complete, well organized, and compliant with Part 391.51 of the FMCSR's. Carol Williams and Aminu Dabo are responsible for managing DQ files and assuring compliance with applicable regulations. There was a vast improvement in the DQ files compared to past inspections. There were no issues with those DQ files that were reviewed.

AAAFordable Transportation has a program in place for randomly testing its drivers for controlled substances and alcohol. The carrier uses American Business Medical Services as its Consortium/Third Party Administrator (C/TPA). Collections are done by Concentra Urgent Care. Concentra Urgent Care conducts DOT physicals for the carrier. The carrier is well aware of Part 391.41 of the FMCSR concerning Medical Examiner Certification and is checking the certification numbers of the examining doctors to assure they are on the National Registry of Certified Medical Examiners. Updated driver rosters for the random testing program are provided to the C/TPA on a quarterly basis. All of the carrier's records were reviewed for the calendar year 2014 in order to verify that the proper random testing percentages were met pursuant to Part 382.305(b)(2) and Part 382.305(b)(1) of the FMCSR. The carrier's records indicated that all required percentages were met.

AAAFordable Transportation provides every driver with a copy of its controlled substances and alcohol testing policy. Each driver is required to sign a statement that he/she has received the policy and the signed statement is placed in respective drivers' qualifications files.

Carol Williams is trained in reasonable suspicion recognition. Documentation showing proof of attendance to the training session was presented for examination. It is recommended that the carrier have the dispatcher and other management personnel be trained in reasonable suspicion recognition.

There was one minor issue found regarding this factor. Although minor in nature, the carrier should take corrective action before this issue develops into a more serious violation.



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Factor 2 - Questions & Citations

Question Number - Type: 01 -	Citation: OOS RATE(DRIVER)
What is the carrier's DRIVER OOS RATE for drivers who have been declared OOS for violations involving qualifications, medical, or NON-HOS issues?	
Inspections: 0	
OOS Inspections: 0	
During the previous 12 months to the date of this CR, the carrier's drivers underwent no roadside inspections where drivers were specifically inspected for drivers' qualifications (DQ) issues. Consequently, the carrier's DQ OOS rate is zero (0%).	



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Question Number - Type:

49 - GENERAL

Citation:

40.111

Has the carrier obtained semi-annual aggregate statistical summaries from its controlled substance-testing laboratory, when required, and is it retaining them for the required period of time?

Investigation Results:

No. The carrier was unable to provide a record of its laboratory's semi-annual aggregate statistical summary reports. A copy of the consortium's MIS reports was provided for examination which showed that the consortium was in compliance with the controlled substances and alcohol random testing.

Under the regulations, the laboratory must send statistical reports to the employer or their consortium by July 20 and January 20 for the preceding complete six-month period, and the reports are required to be retained by the motor carrier for five years.



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Factor Three - Operational

In this Factor the motor carrier's management controls relating to drivers' hours-of-service are evaluated. The primary document used for recording time is the record of duty status (RODS or driver's log) as defined in Part 395 of the FMCSR. Part 390 addresses additional training and instructional requirements deemed the responsibility of the motor carrier.

AAAFordable Transportation's operation falls within the 100 air-miles radius exemption found in Part 395.1(e) of the FMCSRs. An examination of time sheets prepared by eight (8) drivers for the months of October and November, 2015, revealed them to be in compliance with the regulation.

There were no issues found regarding this factor.



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Factor 3 - Questions & Citations

Question Number - Type: 01 -	Citation: OOS Rate (Driver)
What is the carrier's DRIVER OOS RATE for drivers who have been declared OOS for hours of service (HOS) violations?	
Inspections: 0 OOS Inspections: 0 During the previous 12 months to the date of this CR, the carrier's drivers underwent no roadside inspections where drivers were specifically inspected for hours of service (HOS) issues. Consequently, the carrier's HOS OOS rate is zero (0%).	



Factor 4 - Questions & Citations

Question Number - Type: 01 -	Citation: OOS RATE (VEHICLE)
What is the carrier's VEHICLE OOS rate percentage? (3 inspection minimum, previous 12 months) _____ %	
Inspections: 7 OOS Inspections: 0 During the previous 12 months to the date of this CR, the carrier's vehicles underwent two (2) roadside/terminal inspections where vehicles were specifically inspected according to CVSA criteria. During this CR, five (5) vehicles were inspected. Total inspections included seven (7) vehicles. Of the total number of inspections, none resulted in vehicle OOS violation(s). Consequently, the carrier's vehicle OOS rate is zero (0%).	



Factor Four - Vehicle

The motor carrier's policies, procedures and controls as they relate to vehicle maintenance, inspection and repair are evaluated in this Factor. Also, training, reporting, monitoring and maintenance of records for vehicle inspections, routine maintenance and repair of known defects are also evaluated. The primary documents reviewed are driver vehicle inspection reports (DVIR), roadside inspection reports, and vehicle maintenance files. A number of vehicles are also inspected. Part 396 of the FMCSR defines the requirements for a systematic vehicle inspection, repair and maintenance program and what constitutes required records.

A critical performance element of this segment of the inspection is the carrier's roadside inspection performance for vehicles that have undergone inspection by various Federal, State or local jurisdictions. A motor carrier's vehicle out-of-service rate is based on the number of vehicles that have been inspected and how many of those inspections resulted in a vehicle being placed out-of-service (OOS). A carrier's vehicle out-of-service rate relates to the effectiveness of the carrier's preventive maintenance program and the quality of the pre-trip and post-trip inspections performed by their drivers.

AAAFordable Transportation operates 16 school buses. All vehicles are parked at the carrier's facility. The carrier has a maintenance facility that is on the ground level of the two store brick building in which they operate. Only minor maintenance and vehicle cleaning are conducted at their facility. All major maintenance, including brake inspections and repairs, are outsourced to larger maintenance companies such as American Bus and West End International located in the Baltimore area.

Six (6) maintenance files were examined for completeness and compliance with the FMCSR. There was no deferred maintenance found to have occurred. The carrier has established maintenance intervals of 10,000 miles. All maintenance records were properly identified in accordance with Part 396.3(b)(1).

Over the past 12 months, AAAFordable Transportation underwent two (2) roadside inspections done by the City of Baltimore. During this inspection, five (5) vehicles were inspected. This brings the total number of vehicles conducted to seven (7) over the past 12 months. There were no OUT-OF-SERVICE (OOS) violations found.

Drivers' Vehicle Inspection Reports (DVIRs) for seven (7) buses (approximately 254 DVIRs) for the months of October and November, 2015, were examined. All DVIRs examined were found to be in compliance with Parts 396.11(a) and 396.13 of the FMCSR. AAAFordable Transportation uses a two (2) part DVIR. The first page (white) is turned in to the dispatcher at the end of a driver's tour of duty and the second page (Yellow) remains in the DVIR book in order for the on-coming driver to examine the previous day's DVIR before preparing a new one for the day. Of particular note is that the same driver is always assigned to the same bus, therefore the driver would know if a safety defect is noted. When the white copy is turned in to the dispatcher, the dispatcher examines the DVIR for any defects noted. If there is a defect noted, a repair order is prepared and the DVIR in question is attached to the repair order. Once repaired, the mechanic who makes the repair signs off on the DVIR. The on-coming driver will sign off on the previous day's DVIR once he/she are satisfied that repairs are made.

Emergency exits are tested and inspected as part of the regular program and documentation is in accordance with Part 396.3(a) (2) and Part 396.3(b) (4) of the FMCSR. All emergency exit inspections were done pursuant to Part 396.3(a)(2). All documentation was presented for examination.

There were no issues found regarding this factor.



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Factor Six - Crashes

This Factor addresses the carrier's rate of recordable crashes per million miles during the past 12 months, as well as other regulations related to crash record keeping. A crash rate is calculated by multiplying the number of crashes by one million then dividing that number by the number of miles traveled for the same period. A rate will be calculated only when a motor carrier incurs two or more recordable crashes within the 12 months prior to the inspection. A recordable crash rate greater than 1.5 per million miles for most carriers, other than urban (100 air-mile radius) carriers, is considered significant. A determination of preventability and non-preventability is NOT considered to determine the rate per million miles determination process. However, a motor carrier may request a review of those crashes the carrier believes were preventable if the crash rate severely impacts the overall inspection rating. A crash review will be conducted on a case by case basis to determine preventability based on information submitted by the carrier.

A recordable crash, as defined in 49 CFR 390.5 means a crash involving a commercial motor vehicle (CMV) operating on a public road in interstate or intrastate commerce which results in a fatality; bodily injury to a person who as a result of the injury immediately receives medical treatment away from the scene of the crash; and/or one or more motor vehicles incurring disabling damage as a result of the crash requires the motor vehicle to be transported away from the scene by a tow truck or other motor vehicle. Additionally, CMV fires are considered "crashes" according current interpretations to the crash definition found in Part 390.5.

A review of AAATransportation's Accident Register revealed that none of the carrier's vehicles had been involved in a recordable accident within the past 12 months of the date of this inspection.



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Factor 6 - Questions & Citations

Question Number - Type: 01 -	Citation: CRASH RATE
What is the carrier's recordable crash rate per million miles for the previous 12 months?	
Annual Mileage: 250797	
Crashes Recorded: 0	
During the last calendar year, the motor carrier reported they traveled 250,797 miles with no recordable accidents. Subsequently, the motor carrier's accident rate is zero.	