


UNITED STATES DEPARTMENT OF TRANSPORTATION

	US DOT # 551712	Legal: DUNAVANT TRANS GULF TRANSPORTATION LLC Operating (DBA):		
MC/MX #: 203312		State #: 0073634	Federal Tax ID: 27-3987497 (EIN)	
Review Type: Compliance Review (CR)				
Scope: Principal Office		Location of Review/Audit: Company facility in the U. S.		Territory: 0
Operation Types				
Interstate		Intrastate		
Carrier:	HM	HM	Business: Other	
Shipper:	N/A	N/A	Gross Revenue: \$19,049,452.00 for year ending: 12/31/2013	
Cargo Tank:	N/A			
Company Physical Address:				
501 INDEPENDENCE PARKWAY S LA PORTE, TX 77571				
Contact Name: Lance Lamm				
Phone numbers: (1) 832-204-3420			Fax: 832-204-3433	
E-Mail Address:		lance.lamm@dunavant.com		
Company Mailing Address:				
501 INDEPENDENCE PARKWAY S LA PORTE, TX 77571				
Carrier Classification				
Authorized for Hire				
Cargo Classification				
General Freight		Intermodal Containers	Chemicals	
Beverages				
Hazardous Materials				
2.2 Nonflammable gas	Carried	Non-Bulk	6.1 (Poison)	Carried
8 Corrosive material	Carried	Non-Bulk		Non-Bulk
Equipment				
	Owned	Term Leased	Trip Leased	
Truck Tractor	1	119	0	Trailer
				Owned
				Term Leased
				Trip Leased
				0
				301
				0
Power units used in the U.S.: 120				
Percentage of time used in the U.S.: 100				
Does carrier transport placardable quantities of HM? Yes				
Is an HM Permit required? N/A				
Driver Information				
	Inter	Intra	Average trip leased drivers/month: 0	
< 100 Miles:	0	74	Total Drivers: 119	
>= 100 Miles:	45	0	CDL Drivers: 119	





DUNAVANT TRANS GULF TRANSPORTATION LLC
U.S. DOT #: 551712

State #: 0073634

Review Date:
02/02/2015

Part A

Questions about this report or the Federal Motor Carrier Safety or Hazardous Materials regulations may be addressed to the Federal Motor Carrier Safety Administration at:

Address not available

This report will be used to assess your safety compliance.

Person(s) Interviewed

Name: Lance Lamm

Title: Director of Safety

Name:

Title:





Part B Violations

1 STATE	Primary: 395.8(h)(5) CFR Equivalent: 395.8(h)(5)	Discovered 18	Checked 120	Drivers/Vehicles In Violation 1	Checked 4
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Description

Failing to record the name of the city, town, or village, with State abbreviation where each change of duty status occurs

Example

b6, b7c, Trip Date: 07-09-2014. From Houston, TX to Longview, TX. Driver does not list the state where each change of duty status occurs.

2 FEDERAL	Primary: 395.8(h)(5)	Discovered 12	Checked 210	Drivers/Vehicles In Violation 1	Checked 7
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Description

Failing to record the name of the city, town, or village, with State abbreviation where each change of duty status occurs

Example

b6, b7c, Trip Date: 07-11-2014. From Houston, TX to Abbeville, LA. Driver does not list the state where each change of duty status occurs.

Safety Fitness Rating Information:		OOS Vehicle (CR): 0	
Total Miles Operated	8,441,769	Number of Vehicle Inspected (CR): 0	
Recordable Accidents	7	OOS Vehicle (MCMIS): 2	
Recordable Accidents/Million Miles	0.83	Number of Vehicles Inspected (MCMIS): 20	

Your proposed safety rating is : SATISFACTORY	Rating Factors	Acute	Critical
	Factor 1:	S	0
	Factor 2:	S	0
	Factor 3:	S	0
	Factor 4:	S	0
	Factor 5:	S	0
	Factor 6:	S	-

Corrective actions must be taken for any violations (deficiencies) identified on Part B of this report.





Part B Requirements and/or Recommendations

1. HOS COMPLIANCE BASIC PROCESS BREAKDOWN:

Training and Communication

DESCRIPTION OF PROCESS BREAKDOWN

Grid logs provided by Dunavant Trans Gulf Transportation LLC were missing documentation of the state operated at each change of duty status. The carrier should consider providing training on regulations and the proper form and manner of log completion; as outlined in Part 395 of the federal the regulations.

BASIC SPECIFIC RECOMMENDED REMEDIES

Implement Safety Improvement Practices: The following are recommended practices related to Training and Communication.

Form & Manner for Logs:

Date- You must write down the month, day, and year for the beginning of each 24 hour period. (Multiple consecutive days off duty may be combined on one log page, with an explanation in the "Remarks"

Total miles driving today - You must write down the total number of miles you drove during the 24- hour period.

Truck or tractor and trailer number - You must write down either the vehicle number(s) assigned by your company, or the license number and licensing State for each truck (and trailer, if any) you drove during the 24-hour period.

Name of carrier - You must write down the name of the motor carrier(s) you are working for. If you work for more than one carrier in a 24-hour period, you must list the times you started and finished work for each carrier.

Main office address - You must write down your carrier's main office address. The city and State are sufficient.

Your signature - You must certify that all of your entries are true and correct by signing your log with your legal name or name of record.

Name of co-driver - You must write down the name of your co-driver, if you have one.

Time base to be used - You must use the time zone in effect at your home terminal. Even if you cross other time zones, record time as it is at your terminal. All drivers operating out of your home terminal must use the same starting time for the 24-hour period, as designated by your employer.

Remarks - This is the area where you must list the city, town, or village, and State abbreviation when a change of duty status occurs. You should also explain any unusual circumstances or log entries that may be unclear when reviewed later, such as encountering adverse driving conditions.

Total hours - You must add and write down the total hours for each duty status at the right side of the grid. The total of the entries must equal 24 hours (unless you are using one page to reflect several consecutive days off duty).

Shipping document number(s), or name of shipper and commodity - For each shipment, you must write down a shipping document number (such as a shipping manifest number) or the name of the shipper and what you are hauling.

2. I. Copies of the regulations, forms, interpretations, and manuals are available from a variety of sources. Check the FMCSA website for a current list of suppliers. www.fmcsa.dot.gov/safety-security/eta/index.htm

II. A complete Educational and Technical Assistance package entitled "A MOTOR CARRIER'S GUIDE TO IMPROVING HIGHWAY SAFETY" is available free on the FMCSA website to assist you in complying with the safety regulations. It contains many forms and documents useful for improving the safety of your operations. Check:



**Part B Requirements and/or Recommendations**

www.fmcsa.dot.gov/safety-security/eta/index.htm

III. Note: FMCSA information can be found at www.fmcsa.dot.gov. A supplementary handbook published by the Texas Department of Public Safety, entitled "A Texas Motor Carrier's Guide to Highway Safety," also referred to as an MCS-9, has been given to you at the time of the review. Additional copies and updates are available free at the Texas Department of Public Safety website: <http://www.txdps.state.tx.us/cve/publications.htm>. In addition, helpful websites are listed on pages xiii to xvi of the MCS-9. Carriers are also encouraged to visit the above website, click on the "Downloadable Forms", search for Motor Carrier Bureau Forms under the Forms by Section tab, and download the MCS-32. Carriers can fill out and turn in this form to the Department in order to receive email notifications whenever a roadside inspection is conducted on one of the carrier's vehicles.

IV. IMPORTANT: The Department's primary method for contacting carriers is by e-mail. If you have provided e-mail to the Department investigator, ensure that you regularly check this e-mail account for correspondence. If you discontinue using this e-mail account, or change e-mail account addresses, immediately notify the Department by calling 512-424-2335, or by e-mail at mcb.mcca@txdps.state.tx.us. If you change your physical address, mailing address, or phone numbers, you must notify us in the same manner.

V. This review will result in a Safety Rating. The findings indicate you are currently operating at a SATISFACTORY level of safety compliance. Therefore, this review will result in a SATISFACTORY Safety Rating. Nevertheless, this report contains citations of regulations that are deemed serious in nature and could result in penalties against your company.

VI. Within 15 days, send a letter to the Motor Carrier Bureau describing what actions you have taken in response to this review to ensure that you are complying with the Federal Motor Carrier Safety Regulations.

If, in Factor 4 (Vehicle/Maintenance) of the Safety Fitness Rating Explanation, you have a vehicle out of service rate of 34% or higher, describe your efforts to increase driver awareness of out-of-service violations and how to prevent them. A list of out-of-service violations may be obtained from the Commercial Vehicle Safety Alliance at <http://cvsa.stores.yahoo.net/>, or by contacting them directly at Commercial Vehicle Safety Alliance, 1101 17th Street, NW, Suite 803, Washington DC 20036, Tel: 202-775-1623, Fax: 202-775-1624.

You may use the MCS-34 form provided by the investigator as your letter. Submit this letter, and any additional evidence necessary to prove the corrective action has been taken to:

Manager, Motor Carrier Bureau
Texas Department of Public Safety
6200 Guadalupe, Building P
Austin, TX 78752
FAX 512-424-5712

3. • Understand Why Compliance Saves Time and Money: Compliance with FMCSRs will not only save lives, but also saves your business time and money. Tracking how much your business spends on non-compliance activities can help you understand the many benefits of compliance to your business and why safety is good business.
- Document and Follow Through on Action Plans: Document and follow through on action plans to ensure the actions you are taking are creating improvement in safety management and compliance.
- NOTICE: A pattern and/or repeated violations of the same or related acute or critical regulations (violations of the same Part in Title 49, Code of Federal Regulations) will cause the maximum penalties allowed by law to be assessed under Section 222 of the Motor Carrier Safety Improvement Act of 1999 (MCSIA). A pattern of violations means two or more violations of acute and/or critical regulations in three or more Parts of Title 49, Code of Federal Regulations discovered during any eligible investigation. Repeated violations means violation(s) of an acute regulation of the same Part of Title 49, Code of Federal Regulations discovered in an investigation after one or more closed enforcement actions within a six year period and/or violation(s) of a critical regulation in the same Part of Title 49, Code of Federal Regulations discovered in an investigation after two or more closed enforcement actions within a six year period.





Part B Requirements and/or Recommendations

- NOTICE: 49 CFR Part 391.23 requires prospective employers to, at a minimum, investigate a driver's employment information, crash record, and alcohol and controlled substances history from all employers the driver worked for within the previous 3 years.

The Pre-Employment Screening Program (PSP) is a screening tool that assists motor carriers in investigating crash history and roadside safety performance of prospective drivers. The PSP allows motor carriers to purchase 5 years of crash data and 3 years of roadside inspection data from the Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS). Records are available 24 hours a day via Web request. Motor carriers should visit the following website for more information:
<http://www.psp.fmcsa.dot.gov/Pages/default.aspx>

- All motor carriers and truck drivers are needed to fight against terrorism and hijacking. You could be a target. Protect yourself, your trucks, your cargo, and your facilities. Discuss with your employees/drivers the "Security Measures for Truck Drivers and Companies" which were provided and reviewed with motor carrier official. Motor carriers should visit the following website for more information:
<http://www.fmcsa.dot.gov/documents/Hijacking-Brochure.pdf>

Information on your compliance status, roadside inspections, regulatory changes, accident countermeasures and hazardous material incident prevention manual is available on the Internet at the Federal Motor Carrier Safety Administration's web site at <http://www.fmcsa.dot.gov/> and <http://www.safer.fmcsa.dot.gov/>.





Part C

Reason for Review: Compliance Review
Planned Action: Compliance Monitoring

Parts Reviewed Certification:

325	382	383	387	390	391	392	393	395	396	397	398	399	171	172	173	177	178	180
	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓	✓	✓

Prior Reviews **Prior Prosecutions**

Unsat/Unfit Information

Is the motor carrier of passengers subject to the safety fitness procedures contained in 49 CFR part 385 subpart A, AND does it transport passengers in a commercial motor vehicle?

Does carrier transport placardable quantities of hazardous materials? Yes - Interstate and Intrastate

Unsat/Unfit rule: 45-Day - Interstate Placardable HM

Corporate Contact: Lance Lamm
Corporate Contact Title: Director of Safety

Special Study Information:

Remarks:

DATE AND TIME OF INITIAL CONTACT: 01-08-2015 at 10:05 AM
 HOW CONTACT WAS MADE: Phone
 NAME OF PERSON CONTACTED: Lance Lamm, Director of Safety
 DATE OF REVIEW: 01-16-2015 at 9:30 AM and 01-26-2015 at 1:00 PM
 INITIAL MEETING LOCATION: 501 Independence Parkway, La Porte, TX 77571
 REASON(S) FOR INITIATING THE REVIEW: Complaint on hours of service
 ALERTED BASICS: No alerts
 TYPE OF REVIEW: full

OWNER: Dunavant Transportation Group LLC
 DATE THE COMPANY BEGAN OPERATION: 12-31-2010
 TYPE OF COMPANY: For-hire carrier
 TYPE OF OPERATION: Intrastate and interstate
 COMMODITY TRANSPORTED: General freight, intermodal containers, chemicals, and beverages
 CARRIER MILEAGE: 8,441,769 - Provided by Lance Lamm, Director of Safety
 GROSS REVENUE: \$19,049,452 - Provided by Lance Lamm, Director of Safety. The 2013 gross revenue was used instead of 2014 because the carrier has not calculated gross revenue for 2014.

ADDITIONAL INFORMATION: No previous enforcement. Carrier advised to update MCS-150.

NAME OF PERSON(S) THAT PROVIDED REQUESTED DOCUMENTS: Provided by Lance Lamm, Director of Safety

RED FLAG DRIVERS: There was one red flag driver. On 04-02-2014, b6, b7c was cited for operating without glasses when required to wear them. Per carrier, the driver was wearing his glasses when stopped, but took them off before the officer saw him wearing them. The carrier stated that he instructed the driver to always wear his glasses when operating, and if he needs to remove them for any reason after stopped and no longer driving, he must ensure the officer is aware of his actions. There were no additional roadside inspections CDL violations for this driver. No further investigation required.

FACTOR 1/PART 387
 Amount of coverage: \$1,000,000. MCS-90 verified.





Part C

FACTOR 1/PART 390 - The carrier was involved in 7 recordable accidents within the previous 365 days. There were no fatalities; however, 3 accidents required post-accident controlled substances and alcohol testing. Post-accident testing conducted as required. One accident was not reported on the carrier's profile. This accident occurred on 12-08-2014. The driver of this accident, b6, b7c, was cited for failing to control speed; and included the tow-away of a disabled vehicle and a bodily injury. This driver required immediate medical attention due to bodily injury, and was transported by emergency vehicle to the hospital. Post-accident alcohol testing was not conducted due to the driver being hospitalized; notation of the circumstances on file, as required. Post-accident controlled substances testing conducted within the required time frame. The accident report is in the miscellaneous documents.

To address the multiple occurrences of accidents, the carrier replaced its previous accident preventability program with an interactive program that requires the driver to actively participate throughout the training. This program is conducted in response to every accident that occurs. The carrier also conducts a remedial training that includes accident preventability and defensive driving twice a year.

No significant findings.

FACTOR 2/PART 382

Consortium: DSI Medical - random testing conducted at applicable annual rates. 97 drivers hired within the previous 12 months. No significant findings.

FACTOR 2/PART 383 - CDLs were ran through Mobile cad and CDLIS. No significant findings.

FACTOR 2/PART 391 -

Driver: b6, b7c
CDL#: b6, b7c
DOB: b6, b7c
MEs: 55155-1A
Issue date: 11-16-2013
MEC Check - Confirmed

Driver: b6, b7c
CDL#: b6, b7c
DOB: b6, b7c
MEs: 100175-1A
Issue date: 05-19-2014
MEC Check - Confirmed

No significant findings.

FACTOR 3/PART 392

No significant findings

FACTOR 3/PART 395 - The carrier utilizes both times records and grid logs for RODs. Time records are utilized as required. One set of driver logs listed the city only; instead of city and state as required. Per carrier, he will provide additional training on the proper form and manner for completing logs. The carrier provided electronic logs for one vehicle selected, Unit 1278. The system used for the electronic logs is called XRS. The entries changed from auto to manual without any pattern. Upon review I noticed a discrepancy. On 12-03-2014, the driver went into the sleeper berth at 11:27 PM in Amarillo, TX, then returned from the sleeper berth in Lamar, CO to on-duty not driving from 11:09 AM to 2:23 PM. However, the unassigned activity report shows a 15:08 hour gap in driver log-on time; whereas the vehicle traveled 139.6 miles between 9:37 PM on 12-03-14 and 12:46 PM on 12-04-2014 (during the period in the sleeper berth and on-duty not driving). This was a manual entry. Per carrier the system failed, causing the driver to be reported driving when not, and intermittently changing between auto and manual entries. Lance Lamm stated that his driver did not falsify his logs because he does not have access to the capability of manipulating log entries and does not go into manual mode. He further stated that he is the only person with this capability. I stated that there is a possibility that the driver logged out and kept driving; in response, Lance Lamm said that was not possible because he would have recognized the change. He later sent an email stating that the system is new to him, and the person monitoring logs quit without notice. He further stated that he supplied the driver of Unit 1278 paper logs to complete from now on.

I contacted the XRS technical department for operational information on the equipment, and confirmed that when in manual





Part C

mode entries for driving cannot be made; which could explain the reasoning for the driver returning to on-duty not driving after returning from the sleeper berth instead of driving. However, I did not learn of any evidence that could disprove the carrier's claim of a equipment malfunction, and the supporting documents provided did not document the driver and/or equipment in Colorado during this period; so this was not cited. This was the only piece of equipment and/or driver which utilized electronic logs.

Supporting documents used to verify time records and logs: BOLs, fuel records, and payroll documents
Person who supplied supporting documents: Lance Lamm, Director of Safety
Location of time records/supporting documents maintained: Principal place of business
No other significant findings.

FACTOR 4/PART 393 - No significant findings

FACTOR 4/PART 396
No significant findings.

FACTOR 5/HM
Number of HM employees: 32
The training for HM employees provided by Lance Lamm. Proper materials for training were used, was properly documented.
The SSV Talking points were covered and left with the carrier
HM Registration#: 053113 550 046VW
No HM tanks.
No significant findings.

SUMMARY

PART 380 - No entry level drivers.

The closeout was conducted with designated official, Lance Lamm, Director of Safety, on 02-02-2015. A copy of the compliance review was mailed to Billy Keys, President, on 02-02-2015.

Items provided to assist with corrections of violation: Investigator Lakysa Linzy provided the carrier a MCS-9 Texas Guide to Motor Carrier Safety and SMS cycles for Hours of Service.

Upload Authorized:	Yes	No	
Authorized by:			Date:
Uploaded:	Yes	No	Failure Code:
Verified by:			Date:

