

Table of Contents

I. Introduction	2
Bennett Core Values-----	2
Bennett DriveAway Corporate Office Contacts-----	3
Field Office & Agent Listing-----	4
II. Operations	5
Overview-----	5
Contractor Control Number and Driver Qualifications-----	5
Bills of Lading/Inspection Sheets-----	5
Field Offices and Agents-----	6
Corporate Office Personnel-----	6
On Time Deliveries-----	6
Accepting Dispatch and Service Commitment-----	7
Daily Check Calls-----	7
Release Numbers-----	7
Unauthorized Passengers-----	7
General Policies-----	8
III. Safety	9
Devices-----	9
Vehicle Breakdowns-----	9
Diesel Exhaust Fluid “DEF” -----	9
Accidents-----	10
Claims-----	10
CSA-----	12
Safe Driving Incentive Plan-----	13
Hitch/Tow Bar Safety-----	14
Medical Disqualification-----	16
IV. Drug and Alcohol Policy	17
V. Financials	22
EFS-----	22
Advances and Settlement-----	22
Escrow Deductions-----	23
VI. Logs	24
Hours of Service Regulations-----	24
General Logging Procedures-----	27
Internal Log Violations -----	28

INTRODUCTION

As a contractor for Bennett DriveAway, there are basic requirements and responsibilities that must be met. This handbook is provided to the contractor in an effort to ensure most of his/her questions are answered prior to transporting the first vehicle.

The instructions and information in this handbook are intended to familiarize the contractor with important safety requirements and responsibilities of every contractor contracting with Bennett DriveAway. Each contractor is expected to closely follow all procedures outlined in this handbook, and failure to do so may result in contract termination. The contractor should have a thorough understanding of Bennett DriveAway policies, procedures, and structure in order to provide the greatest efficiency for him/herself and Bennett DriveAway.

This handbook is based on federal law pertaining to transport companies and individuals driving for the respective carriers. The contractor is responsible for having a thorough understanding of all law regarding his/her responsibilities as a commercial driver and in no way do the instructions herein supersede the contractor's responsibility to fully understand and abide by Federal law. This handbook is an overview of company policy and procedure. If, at any point in time, there are questions on the instructions provided within this handbook, please do not hesitate to call Bennett DriveAway Operations.

Bennett's Core Values

INTEGRITY - We are committed to doing what is ethically correct and to being honest with ourselves and with others at all times

RESPECT – We value one another's time, perspectives and differences, and demonstrate respect by being approachable, responsive and supportive of each other

QUALITY SERVICE – We listen and respond to the desires of our customers and we are committed to the Continuous Quality Improvement (CQI) of our processes and systems

SAFETY CULTURE – Bennett companies operate within a safety culture where safe practices, security, environment and safety awareness influence every action every day

SPIRITUAL COMMITMENT – Bennett is founded on and operates with the belief that our blessings come from God, and we give thanks for receiving and sharing them

FAMILY CULTURE – We are committed to an inclusive, passionate, enjoyable, and healthy working environment, where we honor our extended family relationships, and our civic and social responsibility

LEARNING AND DEVELOPMENT– We are committed to personal and professional development, and to driving out and overcoming fear that destroys innovation and creativity

DIVERSITY– We honor and value the differences in people, thoughts, principles and business endeavors

LOYALTY– We are committed to continuously growing the loyalty of our family, customers and culture

RESPONSIBILITY– We empower our people to take ownership for their actions and not be fearful of the outcomes

PATRIOTISM – We love and support our country, pledge our allegiance, and honor the service and sacrifice of our military service members who defend our country and protect our freedom

FINANCIAL STRENGTH – We ensure financial strength, for the benefit of our employees, customers, community, and business partners

On behalf of Bennett DriveAway, welcome. Together, we can and will put the drive in DriveAway!

Bennett DriveAway Corporate Office Contacts

<u>Name</u>	<u>Title</u>	<u>Ext</u>	<u>Email</u>
Amy Stookey	Operations Manager	7393	amy.stookey@bennettig.com
Barbara Bennett	Area Manager	7229	barbara.bennett@bennettig.com
Bob Leedy	Manager of Business Development	7783	bob.leedy@bennettig.com
Dave Rivers	President	7276	dave.rivers@bennettig.com
Debra Perdue	EFS Coordinator	7331	debra.perdue@bennettig.com
Donielle O'Haver	Director of Safety	7823	donielle.ohaver@bennettig.com
Gerald Fitzgerald	Director of DriveAway	7242	gerald.fitzgerald@bennettig.com
Kasey Hill	Navistar Account Manager	7607	kasey.hill@bennettig.com
Karen Hamby	Area Manager	7797	karen.hamby@bennettig.com
Kathy Fitzgerald	Driver Compliance	7286	kathy.fitzgerald@bennettig.com
Leif Outlaw	Contractor Relations and Compliance Manager	7232	leif.outlaw@bennettig.com
Mandy Garner	Legalization	7534	mandy.garner@bennettig.com
Melissa Doggett	Logs	7326	melissa.doggett@bennettig.com
Steven Pond	Area Manager	7547	steven.pond@bennettig.com
Stephanie Mclemore	Settlements	7447	stephanie.mclemore@bennettig.com
Tom Woodall	Vice President of Operations	7334	tom.woodall@bennettig.com
Tracy Bragg	Dispatch Assistant	7730	tracy.bragg@bennettig.com
Wayne Woodall	Area Manager	7732	wayne.woodall@bennettig.com

Accident and/or Claim Contacts

Christine Johnson	Claims	<i>During & after business hours: (855)-330-1558</i>	christine.johnson@bennettig.com
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Breakdown Contacts

During business hours:	<i>Penske – (800) 526-0798</i>
	<i>Contact the dispatching terminal for any other breakdowns.</i>
After business hours:	<i>Penske – (800) 526-0798</i>
	<i>Winnebago – (888) 324-3143</i>
	<i>Contact the dispatching terminal (if they handle their own breakdowns).</i>
	<i>Call FleetNet America at (866) 258-8669 for all others</i>

Field Office & Agent Listing

<u>Terminal</u>	<u>Terminal Manager</u>	<u>Telephone No.</u>	<u>Fax No.</u>	<u>City</u>	<u>ST</u>
ATX	Sergio Cantu	903-875-1991	903-872-3305	Corsicana	TX
BCA	Ronald Schmidt	510-475-9002	510-475-9016	Union City	CA
CMN	Carrie Cook	707-998-5223	866-236-0522	Crescent City	CA
DCM	Jack Walston	507-663-6100	507-663-6111	Dodge Center	MN
DNY	Ken Morey	607-756-4557	607-756-1702	Cortland	NY
FCO	Megan Conley	719-588-9813	-	Fort Lupton	CO
GMC	Gary Comstock	256-231-2888	256-342-5385	Anniston	AL
GMI	Sandy Griffiee	269-651-2638	269-651-9376	Sturgis	MI
JNC	Joyce Outlaw	843-623-5461	843-623-2952	Chesterfield	SC
MCA	Corporate Office	800-866-4600	800-365-2266	Mcdonough	GA
MDN	Jill Rumble	800-433-0414	574-293-7872	Elkhart	IN
OGA	Bobby Woodall	770-543-9539	-	Mcdonough	GA
PTP	Paul Taylor	484-516-1337	-	Morgantown	PA
STX	Siamak Chabokrow	210-728-4822	210-750-8891	New Braunfels	TX
WGO	Darien Clark	888-324-3143	888-324-3132	Forest City	IA

OPERATIONS

Overview

Bennett DriveAway is a niche transport company, specializing in the transport of power units from one customer to another. In order to service this market, Bennett DriveAway contracts with highly qualified and experienced individuals around the country who physically get behind the wheel, drive, and deliver the power unit. This service requires knowledge, planning, and communication for successful completion: on time and damage free. To this end, this section will explain policy and procedure regarding the operations of Bennett DriveAway.

Contractor Control Number and Driver Qualifications

Each contractor receives a six-digit contractor control number. The control number will start with a 50, 55, 57 or 58 followed by an additional four numbers. Contractors are qualified in Bennett's system based on past experience noted on their application and references. Along with the numeric control number, there are letter codes used internally representing vehicle type(s) each contractor is qualified to drive. These codes are as follows:

S=Straight Truck, T=Tractor, TT=Tractor-Trailer, D=Deck Sets, B=School Bus, C=City Transit/Highway Coach

Please note, simply an endorsement on the contractor's license does not qualify him/her to drive a specific vehicle type within the Bennett System. The Bennett DriveAway Safety Department should be contacted if the contractor is unsure of his/her qualifications within the Bennett system.

The importance of the contractor control number is the fact that it is how all correspondence is identified and provides the identification necessary to issue and settle funds. This number must be written on all documents provided to Bennett DriveAway.

Bills of Lading / Inspection Sheets

A bill of lading is the contract of carriage for a commercial transporter. This document must be filled out completely and accurately, as it will be submitted to Bennett at the completion of every transport in order to receive settlement. The bill of lading should be in the contractor's possession at all times during a transport. In most cases, both the shipper and consignee locations will ask for a copy of this bill and it should be provided. There are two forms of bills of lading used and provided by Bennett DriveAway: a blank five-part carbon copy and a pre-printed bill of lading generated through the Bennett DriveAway computer system. These pre-printed bills of lading are provided by some field offices, but not all, making it necessary for contractors to always have blank bills of lading on hand.

Completing Necessary Information

When a contractor accepts dispatch, he/she will be provided a bill of lading number, sometimes referred to as a load number or freight bill number. The bill of lading is to be placed in the top right hand corner of the bill in the field labeled "bill of lading #" or "Carrier's Freight Bill Number".

Both the "pickup information" and "delivery information" fields must be filled out in their entirety. This ensures the contractor has all pertinent information prior to transporting a vehicle. This information will include: complete addresses, contact names and phone numbers of both the shipper and consignee, complete description of the vehicle being moved, body or unit number on the vehicle, and vehicle identification number (VIN).

Identifying the Correct Vehicle

A key part of the description of a vehicle is the VIN. Contractors should always check the number provided by Bennett DriveAway at the time of dispatch against the VIN plate on the vehicle he/she is about to transport. This ensures that the correct vehicle will be transported. If the contractor finds that the VIN provided by Bennett DriveAway does not match the VIN on the unit in question, he/she is not to begin transport of the vehicle, regardless of what is stated by the shipper. In this scenario, the contractor should notify the dispatching agent or Bennett DriveAway Operations prior to proceeding with the transport. Please note that it is the contractor's responsibility to ensure the transport of the correct vehicle. In the case of an incorrect vehicle being transported, it will be returned or corrected at the contractor's expense.

Shipper and Consignee Signatures

It is necessary for the contractor to understand that in order for the bill of lading to be a valid contract of carriage, he/she must obtain a signature from a representative at both the shipper and consignee locations. This gives each party the opportunity to inspect the unit and notate any damage found. It is imperative that the contractor inspects the vehicle thoroughly, noting any damage or abnormalities found with the vehicle on the bill of lading and/or inspection sheets, prior to the shipper signing the bill. This will be addressed further in the safety section of this handbook. Contractors should be aware failing to secure signatures could delay or even result in the forfeiture of his/her settlement.

Proper Documents

At a minimum, each transport will require the submission of a completed and signed bill of lading and up to date logs in order for the transport to be processed and settled. In most cases, Bennett DriveAway will process completed loads with the submission of paperwork via fax, email or www.bennettig.mobi. However, there are some customers who require all original paperwork to be submitted by the contractor. Likewise, some customers will have unique documents that must be submitted with the bill of lading. In these instances, the dispatcher will provide the information when the contractor accepts a transport. It is important to understand that a contractor's failure to submit proper documents required by the paying party will result in his/her settlement being delayed until all such documents are received. Bennett DriveAway does reserve the right to use financial penalty as a means to collect necessary paperwork if it becomes necessary.

Field Offices and Agents

Bennett DriveAway has field offices throughout the United States responsible for account operations and dispatch. A list of these field offices is provided in this handbook on page 4, and provides the contractor with office locations, phone and fax numbers. This list is updated frequently and contractors are responsible for updating and maintaining accurate information, resulting in higher efficiency. The most current list can be provided upon necessity to the contractor if he/she calls the corporate office or any field office.

Corporate Office Personnel

Bennett DriveAway Operations (Corporate Office)

The main function of the Bennett DriveAway Operations personnel is to arrange transport of vehicles, ensure quality customer service, and to assist in all tasks pertaining to keeping our contractors loaded and moving.

Bennett DriveAway Operations business hours are Monday through Friday 8:00 AM to 6:00 PM and Saturdays 8:00 AM to 12:00 Noon. All times are Eastern Standard Time.

Bennett DriveAway Operations can be reached at:
1-800-866-4600
770-957-1866 (local number)

Contractors can find all available loads via the web by logging on to www.driversig.com. No vehicles are dispatched through Bennett DriveAway Operations after 6:00 PM Monday through Friday or after 12:00 noon on Saturday. After hours emergency numbers are not to be called in an attempt to secure a dispatch in any circumstance. Please note that dispatching agents in field offices around the country may have different business hours due to time zones, etc.

Supporting Departments

The corporate office personnel in supporting departments are here to assist the contractor, answer questions, and provide guidance and understanding. These departments include, EFS, claims, settlements, qualifications and log departments.

On Time Deliveries

Contractors are required to go from the pickup location directly to the destination. The vehicle is not to be taken out of route, home, or to any other location that is not within the parameters of a direct route from the shipper to the consignee.

Reasonable Dispatch

Contractors will never be asked to exceed maximum driving time required by the Federal DOT. Each contractor is on reasonable dispatch, meaning contractors are to have the vehicle delivered within reasonable time.

Bennett sells 500 mile per day service to its customers. For instance, if a transport is less than 500 miles, it is one-day service. 501 to 1000 miles is two-day service, and so on. It is a reasonable expectation for contractors to meet a 500 mile per day standard. If for any reason a contractor cannot meet this requirement, he/she should notify Bennett DriveAway Operations immediately.

Out of Route

As stated previously, taking a vehicle out of route is not permitted as it jeopardizes service standards put forth by Bennett DriveAway and its customers. A contractor should always travel the shortest route to deliver a vehicle. Aside from ensuring customer service standards are upheld, traveling the shortest route possible will ensure the contractor saves as much as possible on fuel costs. Contractors are allowed ten percent variation in miles driven based on the latest version of PC miler. Any contractor exceeding the ten percent variation on any given transport can be charged for the additional miles.

Vehicle for Personal Use

Use of vehicles for personal use is strictly prohibited. If a contractor is found doing so, it will result in automatic contract termination.

Accepting Dispatch and Service Commitment

When a contractor commits to transport by accepting dispatch, Bennett DriveAway fully expects the contractor to honor the commitment and complete the transport. If a contractor has accepted dispatch on a load and there is a need to cancel due to illness or other valid reason, the contractor is required to call Bennett DriveAway Operations and the dispatching agent (if applicable) to notify them he/she will not be taking the vehicle. Call immediately; do not wait. A contractor refusing to take a load after commitment, without a valid reason, should understand that his/her actions could result in contract termination.

Daily Check Calls

Contractors are required to complete a daily check call through www.bennettig.mobi. Check calls submitted through the mobi website use the GPS feature on your phone or tablet. This daily check call should be completed by 10 AM Eastern Standard Time. However, in the event the contractor cannot check in prior to 10 AM, he/she should still complete the daily check call as soon as possible. Contractors not completing the daily check call are subject to a \$25 per day fine. If no check call is completed between midnight and 1 PM, the contractor will receive a text/email notification reminding them to do so. No check call is required when not dispatched on a load.

Release Numbers

Once a load is completed and the consignee signs the bill of lading, the contractor is to obtain a release number through the www.bennettig.mobi automated system. Release numbers are assigned by clicking the load you are dispatched on, then clicking issue release number. The release number is to be placed on the bill of lading in the field labeled "Release Number" or "Release #". This release number allows Bennett DriveAway personnel to see when a vehicle is delivered so they can notify customers. Release numbers also allow Bennett DriveAway personnel to look for paperwork for processing. It is important that contractors obtain a release number as soon as possible upon the delivery of a unit, and no later than 24 hours after completion of the transport is acceptable.

Unauthorized Passengers

Federal DOT does not allow passengers in driveaway/towaway vehicles unless the passenger is a contractor or employee of the transport company transporting the vehicle. Even then, the contractor must have written authorization, listing the passenger by name, from the transport company in order for a passenger to be legally present in a driveaway/towaway scenario.

In regards to Bennett DriveAway, if a contractor is not transporting a motor home, in general, authorization will not be granted. Some vehicles transported by Bennett DriveAway do not have accommodations for passengers.

General Policies

Failure to accept dispatch of a vehicle within 30 days may result in termination due to inactivity. If a contractor has a valid reason for which they cannot accept dispatch within a 30 day period, the contractor should contact 1-800-866-4600 ext. 7286 to be placed on extended time off (ETO) to avoid contract termination.

Contractors are not to engage in the use of drugs or alcohol at any time in which the use of such jeopardizes the contractor's ability to affectively complete safety sensitive functions. Furthermore, no use of such substances will be permitted while a contractor is on duty.

It is the contractor's responsibility to ensure that he/she is in compliance with all Department of Transportation regulations at all times while on duty.

Any accident or damage found is to be reported immediately to the Bennett DriveAway Claims Department. In the case of an accident, Bennett DriveAway Operations should be notified as well. This will be discussed further in the Safety section of this handbook.

When taking trips into Canada, contractors must ensure he/she has the proper personal documentation for border crossings. This will require a U.S. passport. However, it is important to understand that simply a passport will not guarantee entry into Canada. Past legal issues and other factors can affect decisions made by border patrol personnel.

Contractors are the face of Bennett DriveAway and therefore are to be clean and neat at all times, representing themselves and Bennett in a professional manner.

Bennett DriveAway has a strict no smoking, eating, or drinking policy in any customer vehicle. Contractors are not to smoke in or around vehicles, regardless of whether they are new or used.

In no circumstance is it permissible for any animal, pet or otherwise, to be present in a customer's vehicle.

All vehicles are, without exception, to have clean interiors when they are delivered. Contractors failing to clean interiors will be subject to a vehicle detail fee in the case a claim is filed by the customer.

No loads will be assigned unless the contractor can pick up the unit within 24 hours.

All vehicles must be delivered with at least 1/8th tank of fuel at delivery, unless instructed otherwise by dispatch.

SAFETY

Devices

All Bennett DriveAway contractors are required, per federal regulation, to have in their possession, at all times while on duty, three bidirectional emergency reflective triangles or three liquid burning flares to be placed on the roadside in the case of a breakdown.

Fire extinguishers, which are required in commercial vehicles, are not required to be carried by Bennett DriveAway contractors due to the exception provided in the regulation itself for all drive-away and tow-away situations.

Vehicle Breakdowns

If a breakdown occurs on the road, the contractor is to get the vehicle to a secure location and shut it down as quickly as possible. This is to help reduce the possibility of further damage to the vehicle. He/she is then to notify Bennett DriveAway Operations or the dispatching terminal immediately. When making this call, contractor should know his/her current location and be able to provide a call back number. If after hours and roadside assistance is necessary, please call the terminal if they handle afterhours breakdowns, otherwise, call the FleetNet America afterhours breakdown number for assistance at 866-258-8669.

A contractor is never to leave a vehicle unattended. If the vehicle is towed, contractor is to secure both contact information for the tow service and the physical address where the unit will be secured. He/she is then to provide that information to Bennett DriveAway Operations or the dispatching terminal. Contractors are to never leave a transport unless released by the dispatching agent or Bennett DriveAway operations.

Contractors are not to call any customer if he/she runs out of fuel. He/she should never depend on the fuel gauge, as they may be wrong. Stick the fuel tank in order to obtain an accurate measurement and be aware that in most cases the first four to five inches of fuel are not usable. If a contractor runs a unit out of fuel, he/she will be charged the total cost of services rendered as a result. If a contractor reports a breakdown, and it is determined to be out of fuel, he/she will be charged the total cost of services rendered.

New Vehicles

New vehicle breakdowns **MUST** be handled through the manufacturer's breakdown department or service. This is to ensure all repairs are covered under warranty. These numbers are provided by the dispatcher when a breakdown is called in. It is imperative that contractors call the manufacturer's hotline and follow their instructions. Under no circumstance is a contractor to take initiative to secure towing or repair services on his/her own without going through the manufacturer. If he/she does so, the contractor will be subject to being charged the entire cost of services rendered. The contractor is not to leave a transport unless released by the dispatching agent or Bennett DriveAway Operations.

Used Vehicles

For used vehicles, Bennett personnel will contact the customer for instructions.

Diesel Exhaust Fluid (DEF)

It is important for Bennett DriveAway contractors to understand and stay up to date on engineering developments on new model trucks being produced by manufacturers. One such development has been the introduction of the Selective Catalytic Reduction exhaust systems. These systems are used with diesel engines and are the key component in manufacturers' attempts to meet stringent emissions standards.

All S.C.R. exhaust systems require diesel exhaust fluid, also known as DEF and Urea, which is held in a separate tank on the vehicle. If this tank runs dry, the truck will not function properly and will gradually shut itself down. It is the contractor's responsibility to ensure proper and sufficient DEF levels are maintained in all vehicles manufactured with the S.C.R. exhaust system.

S.C.R. systems, in most cases, include warning lights and a gauge, which appear on the dash to alert the contractor of any issue. These lights may simply indicate a re-gen cycle (burn off) is occurring, however, they could also mean the DEF is low or that there is an internal issue with the system. Contractors should check the back of the visor for warning light identification. If a warning light appears, its meaning is unknown, and if DEF levels are sufficient, the contractor should stop in an open area away from any form of overhang and call the manufacturer's breakdown number to inquire about its meaning. If the light is red, the contractor is to shut the vehicle down as soon as possible.

Accidents

In case of an accident, irrelevant of how major or minor, the contractor must use the following procedure:

- Call the Police: Obtain the officer's name, badge number, and accident number
- Obtain the name, address, phone number, tag number, state in which the vehicle is licensed in, year/make/model of other vehicle, and the name of the other person's insurance company; this is for all vehicles involved
- Call the Bennett DriveAway Claims Department at: (855)-330-1558
- Call the dispatching terminal, agent or Bennett DriveAway Operations and notify them of the accident

Failure to report an accident or claim could result in contract termination.

Accident Awareness

- Aim high in steering: Contractor should drive with a minimum fifteen second lead-time.
- Pre-plan the trip: Contractor should plan his/her trip considering travel time, metropolitan areas, and rush hours.
- Rest: Contractor should ensure he/she gets enough rest in order to prevent fatigue and ensure quality decisions and reactions.
- Space management conscious: Contractor should always know what the space around the vehicle contains, while always leaving him/herself an out. Bennett contractors should maintain a minimum of four to eight second following distance in good conditions and increase his/her following distances as conditions deteriorate. Avoid traveling in traffic clusters.
- See and be seen: Contractors should scan mirrors every five to eight seconds and whenever possible use eye contact as a form of communication with other drivers while leaving truck stops or other high traffic areas. Avoid backing unnecessarily by planning the departure upon arrival.

Claims

A claim is a damage, loss, or shortage on any shipment made by carrier. In a driveaway scenario, the vehicle, which the contractor is driving, is the cargo. If the cargo gets damaged in any way, a claim will be filed. If/when a chargeable claim (chargeable to the driver) is submitted by the customer, the contractor is responsible for the claim deductible, which is \$800.00. This is deducted from the contractor's future settlements at 5% of linehaul pay until the deductible is paid off in full.

The burden of proof in any claim situation is on the carrier. As a result, when a claim is filed, Bennett DriveAway and the contractor must prove or disprove what is being alleged. Always read any notations made on paperwork by the shipper or consignee. If any notations mention damage (scratches, dents, etc), the Bennett DriveAway Claims Department must be notified immediately.

Please be advised, putting out-of-route miles on a vehicle or not delivering on time can be considered a claim. Contractors are given a 10% cushion over PC miler Route Practical Miles. Contractors putting miles exceeding that 10% cushion are subject to being charged.

The responsibility of claim payment falls on the contractor and Bennett DriveAway. Therefore, the more claims incurred, the greater the cost to both Bennett DriveAway and the contractor. Limiting this cost is in the interest of both Bennett DriveAway and the contractor. To do so requires a proactive effort by the contractor in claim prevention.

Regardless of when or where the damage occurs, or who is at fault, once the damage is discovered, the contractor must contact the Bennett DriveAway Claims Department at (855) 330-1558 to report the damage.

Claim Prevention

Claim prevention is an ongoing effort throughout a transport, but begins at the pickup location with the bill of lading and the pre-trip inspection. Contractors are responsible for thoroughly inspecting a vehicle and noting any damage on the bill of lading prior to the shipper signing off and leaving the property. This inspection and signature represents the condition of the vehicle prior to Bennett DriveAway assuming responsibility. The importance of the bill of lading is that it provides the base line to which the condition of the vehicle will be compared when the transport is complete. If damage is noted at the delivery location, which was not noted at the shipper, then the assumption is that the damage occurred during transport making it the responsibility of both Bennett DriveAway and the contractor. On the other hand, if damage is found upon delivery but was noted and signed off on at the shipper, then it is assumed the damage was pre-existing, resulting in Bennett DriveAway and the contractor not being held liable.

It is imperative the contractor understands that the vehicle he/she is transporting is, in most cases, large, and the vehicle will not maneuver or fit in spaces that a standard passenger vehicle will. The clearance height on all canopies, bridges, and overhangs must be considered and accounted for. If a contractor is not certain he/she will clear a height limitation, it is not to be left to chance.

Claim Awareness

The following is a list of Bennett DriveAway's consistent claim issues. Important facts, some of which are procedural, are listed below each issue. As stated, it is in both the contractor and Bennett DriveAway's interests to limit costs associated with claims. Contractors should take time to familiarize him/herself with the following information, as awareness is vital to the prevention of such issues.

- Glass Breakage and Chips
 - Winter is the worst time for glass chips and breakage
 - Increase following distance to reduce risk
 - Call the claims department prior to delivery on all glass damage
 - Most can be repaired rather than replaced, reducing costs
- Striking Fixed Objects
 - Adjust mirrors for optimal use, eliminating blind spots
 - Be conscious of space management. Slow down and take your time in and around fuel stations, toll booths, wash bays, and other tight areas
 - Avoid backing when possible
 - Plan a departure upon arrival
 - If backing up is required, get out and check all surroundings
 - If needed, have someone assist you
- Dings, Dents and Scratches
 - Thorough pre-trip inspections will prevent most of these type of claims
 - The more thorough a contractor is in his/her inspection, the less likely an issue will arise
 - Check and double check everything
 - Ensure notes are made on the bills of lading with any damage found
 - Take pictures of any noted damage at pickup
 - At time of delivery, ensure proper information is written on the packing list, delivery sheets, and bill of lading
 - Take pictures of any noted damage at delivery
 - Winter time increases the chance for dings, dents, and scratches due to highway debris placed for inclement weather
 - Slowing down and increasing following distance will reduce the chance that damage will occur
- Struck While Parked – Phantom Vehicle
 - Park away from other vehicles
 - Park in the car area with small vehicles, motor homes, and buses, rather than the truck area of truck stops and rest areas
 - After being away from the vehicle, inspect the vehicle thoroughly before leaving
 - If you find any damage, you should call the Bennett DriveAway Claims Department immediately
 - Call the police, and get a report on damage found
 - Take pictures
- Road Hazards/Hitting Animals
 - Stay alert
 - Be aware of the fact that animals are more active during certain times of the year, increasing risk
 - Always leave yourself an out
 - Drive with a minimum fifteen second lead time; know what is coming
 - Be conscious of space management
- Untidiness
 - A contractor has no excuse for not cleaning the vehicle prior to delivery
 - A contractor has no excuse for not being clean and having good personal hygiene
 - If a contractor smokes, he/she must ensure he/she does not smoke in or around a vehicle being transported. If the contractor smokes away from the vehicle, they must allow time to air out before reentering the vehicle.

CSA 2010

The Federal Motor Carrier Safety Administration's (FMCSA) initiative designed to improve the effectiveness of the agency's compliance and enforcement programs was launched as Comprehensive Safety Analysis 2010, but is now simply referred to as Compliance, Safety, Accountability (CSA). The aim of the program is to reduce large truck and bus accidents, lowering the rate of both injuries and fatalities caused by such accidents. To do this, CSA provides the FMCSA the tools to effectively identify both contractors and carriers that pose safety threats, along with the means to intervene in order to address such issues as soon as they are identified.

The Program

Under CSA, all companies and all contractors will be assigned a safety rating score. The contractor is responsible for his/her personal score, which will stay with that individual regardless of the carrier he/she drives for or contracts with. These scores are evaluated by the company that employs or contracts with the contractor, companies to which he/she applies for employment, and insurance companies.

Carriers and contractors will be evaluated in seven behavioral analysis and safety improvement categories, or BASIC(s), which are identified as those that lead to accidents. These categories are based on driver characteristics and behavior while on the road. If or when a company shows a deficiency in the BASIC(s), the FMCSA will intervene and address these driver behaviors with the company that employs or contracts with them.

The seven categories that make up BASIC(s) are as follows:

- Unsafe Driving – dangerous or careless operation of commercial vehicles
- Hours of Service – driving commercial vehicles when fatigued (hours of service violations)
- Driver Fitness – operation of a commercial vehicle when unfit to do so, due to lack of training, experience, or medical qualification
- Controlled Substance and Alcohol – operation of a commercial vehicle while impaired due to alcohol, illegal drugs, or the misuse of prescription or over-the-counter medications
- Vehicle Maintenance – operation of a commercial vehicle that is without proper maintenance
- Crash – histories or patterns of high crash involvement including frequency and severity
- Hazmat – Unsafe handling of HM on a CMV

Information attained from roadside inspections, traffic violations, warnings and/or citations, and accident scenes will be provided to the program. Violations will then fall into one of the BASIC(s) and will be assigned a point value. This point value is then used to determine a safety rating for the contractor and is then updated each month. The data that is used as the basis for this score will stay on the contractor's record for three years. This is important; as there is very little an individual can do to improve their score other than wait until enough data falls off his/her record resulting in a lower score. Please be aware Bennett DriveAway has a vested interest in tracking its contractors' CSA performance and will manage accordingly. An internal safety program is in place with its own internal thresholds that will be used to make risk management decisions when necessary. Any questions regarding CSA or the internal safety program should be addressed with Bennett DriveAway Compliance at 800-866-4600 ext. 7232.

Bennett DriveAway Risk Management Program				
Chargeable Claims		CSA		Bennett Safety Score
Cat 1 (20 Points)	Cat 2 (35 Points)	+	Violations (CSA Point Total)	
Tire / Wheel / Hub Untidy Driver Securement Shortage Damage by Tow Veh Fire Loading / Unloading Dents / Scratches Misc Cargo Damage Improper Fueling	Head on Collision Hit & Run Improper Lane Change Lost Control Merging Backing Struck Parked Vehicle Pulled From Stop Rear End Accident Ran Red Light / Stop Sign Struck Overhead Bridge Struck Overhead Wire Struck Overhead Side Swipe Struck Fixed Object Turning Wrong Direction			
Thresholds & Corrective Action				
			40 Points <u>Intervention</u>	100 Points <u>High Risk Review</u>
			Safety meeting or log class required within a given time frame depending on the issue to be addressed	Flagged for high risk and place out of service until his/her file is reviewed by the review board. The board will then decide appropriate measures & whether to continue the contract.
				Misc / Disclaimer Please note that these are a guideline. Although they are used and carry weight, circumstances deemed severe will be subject to immediate action by management
Points remain on a file for two years from the date of event				

Regardless of the contractor's current safety score, the following list will automatically subject the contractor to a High Risk Review.

- 1) Seatbelt violation
- 2) Super speeder (Speeding 11mph or more over the posted speed limit)
- 3) Cell phone use violation
- 4) Rear end another vehicle
- 5) Unauthorized passenger
- 6) Any alcohol related offense
- 7) Loss of control accidents
- 8) Rollover accidents
- 9) Overhead bridge strikes
- 10) Any issue where upper management deems it necessary (severe claims, excessive CSA violations, etc)

**Any contractor that receives an infraction/citation while under dispatch for Bennett DriveAway must submit the violation form to Bennett DriveAway immediately. If the contractor plans to dispute the ticket, he/she is to contact Mandy Garner at ext. 7534 ASAP to ensure the fine does not get paid by Bennett DriveAway and deducted from the contractor's future settlements.*

Safe Driving Incentive Plan

Bennett DriveAway is excited to institute a performance based safety incentive program that enhances our commitment to reward contractors who prioritize safety throughout their day to day operations. The program measures the contract driver/contract-owner operator (the "Contractor") on the following: total billed miles, number of days passed since an at fault DOT violation received, the number of days passed since an at-fault accident/damages as determined by BDA, and the number of days passed since the last safety meeting attended. The incentive payout factors in production, with the highest payout rate going to those with the highest billed mileage totals as they have greater exposure and obviously generate more revenue for the company and themselves. The incentive payout will be issued monthly to all Contractors who qualify.

Criteria

Qualification will be monthly and will require the following:

- Minimum of 1,000 billed miles during the month for which the bonus is awarded; and
- Zero (0) at-fault accidents/damages as determined by Bennett DriveAway incurred by the Contractor for a minimum of ninety-one (91) days prior to the last day of the month for which the bonus is issued; and
- Zero (0) at-fault DOT violations received by the Contractor for a minimum of ninety-one (91) days prior to the last day of the month for which the bonus is issued; and
- At least one (1) safety meeting attended within the past one hundred (100) days prior to the last day of the month for which the bonus is issued.
 - Qualifying meeting schedule along with an online meeting option is posted on www.driversig.com
 - Credit will be given for attending an in person meeting only if Contractor personally signs the attendance form provided at the meeting in an easy to read manner (name, truck/driver #, etc.). Contractor must be present for the entirety of the meeting.
 - Credit will be given for attending an online meeting only if Contractor views a minimum of 90% of the video and answers a minimum of 70% of the questions correctly.

Payout

Contractors must be active and in good standing with Bennett DriveAway on the date of payout in order to qualify for the payout. Active is defined as being available for dispatch. Contractors who are in non-compliance status within the Bennett operating system due to operations, safety qualifications, logs, etc. are not able to receive funds and therefore the safety bonus shall not be issued. Once compliance issues are resolved, the Contractor is placed back in active status, and the Contractor is in good standing, the safety bonus funds will be issued at that time. Contractors whose lease is terminated by either party will forfeit any funds due by this bonus program. Funds paid pursuant to this program may be used by Bennett DriveAway to return Contractor to good financial standing.

Qualifiers & Corresponding Available Payout

<u>Level</u>	<u>Days Claim/DOT Violation Free Required</u>	<u>Billed Miles Required For Month</u>	<u>Payout (per billed mile)</u>
Platinum	365	5000	\$.03
Gold	274	4000	\$.015
Silver	182	3000	\$.0125
Bronze	91	1000	\$.01

Annual Recognition

Contractors who meet the criteria below will be recognized as a Top Gun and receive additional incentives the following year. Each Contractor who completes over 60,000 miles without incurring an at fault safety issue and attends four (4) safety meetings during the calendar year will be recognized as a Top Gun and **entered for a chance to win a \$1,000 gift card!**

<u>Level</u>	<u>Claim/DOT OOS Violation Free</u>	<u>Billed Miles Required</u>
	Entire Calendar Year	60,000

This safety bonus plan is subject to change at any time at management's discretion.

Hitch/Tow Bar Safety

Introduction

This information is provided to ensure the proper and safe use of tow bar and hitch systems. The instructions and information below are intended to familiarize the contractor with important safety requirements and procedures. These are procedural requirements based on Federal DOT compliance and should be followed. Failure to do so may result in contract termination.

The contractor should have a good working knowledge of tow bar and hitch use in order to provide the greatest safety for the general public and our customers. If at any point in time a contractor has a question concerning proper tow bar or hitch use, he/she should not hesitate to call the Bennett DriveAway Safety Department or Bennett DriveAway Operations.

Tow Bars: Structural Adequacy and Mounting

Every tow bar shall be structurally adequate and properly installed and maintained. To ensure the tow bar is structurally adequate, it must meet the following requirements:

<u>Gross weight of towed vehicle (pounds)</u>	<u>Longitudinal strength</u>	<u>Strength as a Beam</u>
Less than 5,000	6,000	3,000

Vehicles over 4,000 lbs. will not be allowed for towed vehicles

Inspections

Constant inspection of tow bar and hitch systems is imperative. Each piece of equipment should be inspected before, during, and after each use. Contractors should check for metal fatigue, broken welds, bent parts, worn pins and bolts, stretched or stressed chains, egg shaped hitch balls, and any broken light wires. Also, the integrity of bolts and nuts on the hitch balls should be verified.

Prior to a towing trip, be sure all towing accessories and attachment points are secure. Always use certified pins and cotter pins at attachment points. Do not use bolts. Contractors should stop within the first 50 miles and inspect the assembly and again after each 150 miles of towing.

The tow bar and hitch are to be inspected daily for metal fatigue and weld cracks. If any are found, the contractor must not use the tow bar or hitch assembly. At any time a piece of equipment is found to be faulty, it must be replaced, not repaired. Furthermore, hitch balls must be changed at least once each year.

Proper Equipment

All tow bars are to be manufactured tow bars. No homemade tow bars will be allowed. Each tow bar must be plainly marked with the following certification of the manufacturer, or words of equivalent meaning, as per part 393.71 (9) of the F.M.C. Safety Regulations:

This tow bar complies with the requirements of the Federal Highway Administration for (maximum gross weight for which tow bar is manufactured) vehicles.

Allowable Maximum Gross Weight _____
 Manufactured _____
 (Month and Year)

By _____
 (Name of Manufacturer)

The tensile strength and the means of attachment to the vehicles must be at least equivalent to the corresponding longitudinal strength for the tow bar. All hitches must be approved by a Bennett DriveAway Agent or by the Bennett DriveAway Safety Department.

Safety chains or cables are used as the safety device for a vehicle. A minimum of two safety chains or cables meeting the required tensile strength and longitudinal strength for tow-bars must be used as per 393.71(10)(I). The length of the chain or cable used shall be no more than necessary to permit free turning of the vehicles as per 393.72(10)(ii).

Tow Bar Fastening 393.71 (3)

The means used to transmit the stresses to the chassis or frames of the towed and towing vehicles may be either temporary structures, bumpers, or other integral parts of the vehicles provided, however, that the means used shall be so constructed, installed, and maintained so that when tested as an assembly, failure in such members shall not occur.

General Policies

- All tow bars must be fastened to the frame of the tow vehicle by means of bolts and safety pins.
- The tow bar should be attached in such a manner for sufficient movement of the front wheels of the towed vehicle so that it may follow in the path of the towing vehicle without cramping the tow bar.
- The tow bar shall be mounted as to cause the towed vehicle to follow directly in the path of the towing vehicle. Tow bars should be in such condition as to permit the towed vehicle to deviate no more than 3 inches to either side of the path of a towing vehicle moving in a straight line as measured from the center of the towing vehicle. If a contractor's tow bar allows more than 2 inches of side-to-side movement, it must be corrected or replaced.
- Tow bars are designed for the coupler to be parallel to the ground when it is attached to the towed and towing vehicles. If the tow bar coupler is at an angle, damage or accident could occur.
- Avoid sharp turns and rough terrain. Tight turns will cause serious damage to the tow bar and could lead to disconnection. If you get into a tight turn situation, inspect the tow bar carefully for any damage.
- Do not attempt to back up when towing. This could cause damage to the tow bar and to the chassis for the tow vehicle.

Hitch Fastening

Bennett DriveAway requires hitches to be frame mount or DOT bumper mount with press plate construction. No bumper hitches are allowed that are "c" clamp or chain mounted. Hitches should be mounted to the frame or DOT bumper, taking extra precautions help prevent frame scarring. Each bolt on the press plates should be torqued to minimum of 50 lbs. Be sure to securely fasten the hitch. Safety chains, cables, or straps should be placed around the hitch to the frame or cross member of the towing vehicle in such a manner that the hitch will be held in place if the hitch fails or becomes loose.

Safety Devices for Bar Failure or Disconnection 393.71(10)(i)

Any vehicle being towed shall be connected to the towing vehicles by a safety device to prevent the towed vehicle from breaking loose in the event the tow bar fails or becomes disconnected. When safety chains or cables are used as the safety device for that vehicle, at least two safety chains or cables meeting the tensile strength requirements must be used.

4000 lbs. vehicle – tensile strength must be 3000 lbs.

Chains or cables must be crossed and attached to the vehicles near the points of bumper attachments to the chassis of the vehicles, so that if the tow bar becomes disconnected it will not drop to the ground. The length of the chain used must be no more than necessary to permit free turning of the vehicle. The chains must be attached to the tow bar at the point of crossing, or as close to the point as is practical, and must be attached to a solid part of the chassis of the towed vehicle or to the bracket convenience links. Never use damaged chains or cables. Replace them if they become stretched or frayed.

Medical Disqualification

Contractors must contact Bennett DriveAway's Safety Department within forty-eight (48) hours and report any of the following, which may potentially be medically disqualifying:

- (i) The contractor sustaining an injury that may jeopardize the contractor's ability to safely perform the duties of commercial driving;
- (ii) The contractor undergoing any medical procedure that may jeopardize the contractor's ability to safely perform the duties of commercial driving; or
- (iii) The contractor receiving a prescription which may be disqualifying under Section 391.41(b)(12) (such as an amphetamine, narcotic, anti-seizure medication, methadone, or any other habit-forming drug) or which may jeopardize the contractor's ability to effectively complete safety sensitive functions.

If in doubt, please ask. If you are unsure if your situation would be medically disqualifying, please contact the Bennett Safety Department for guidance. The contractor will remain in non-compliance status within Bennett's operating system until Bennett DriveAway receives a valid doctor's release stating that it is safe for the contractor to return to commercial driving.

DRUG AND ALCOHOL POLICY

Information

Bennett has a significant responsibility to ensure the safety of our contractors and the motoring public. Toward that end, Bennett adheres to the guidelines provided by the DOT and FMCSA as it relates to the use of drugs and alcohol. Anyone performing tasks defined by the US Department of Transportation (DOT) as safety-sensitive, such as driving a truck, are subject to DOT workplace drug and alcohol testing.

Who is subject to testing?

Anyone designated in DOT regulations as working in a safety-sensitive position, is subject to DOT drug and alcohol testing including:

Commercial Motor Carriers – Commercial Driver's License (CDL) holder who operate Commercial Motor Vehicles, 26,001 lbs. gvwr or greater or operate a vehicle that carries 16 passengers or more including the contractor or required to display a DOT placard in the transportation of hazardous material.

Why are people in safety-sensitive position tested?

The short answer is for the safety of the traveling public and yourself. There are published guidelines on how to conduct the tests and what procedures to use when testing. DOT agencies write industry specific regulations, spelling out who is subject to testing, when and in what situations. Bennett adheres to the guidelines set forth by the DOT and FMCSA.

What conduct is prohibited by the regulations?

As a person in a safety-sensitive position:

- You must not use or possess alcohol or any illicit drug while assigned to perform safety-sensitive functions or actually performing safety-sensitive functions.
- You must not report for service or remain on duty if you:
 - Are under the influence or impaired by alcohol;
- Have a blood alcohol concentration .04 or greater; (with a blood alcohol concentration of .02 to .039, some regulations do not permit you to continue working until your next regularly scheduled duty period);
 - Have used any illicit drug
- You must not report for duty or remain on duty when using any controlled substance unless used pursuant to the instructions of an authorized medical practitioner
- You must not refuse to submit to any test for alcohol or controlled substances
- You must not refuse to submit to any test by adulterating or substituting your specimen

What drugs do DOT test for?

DOT drug tests are conducted only using urine specimens. The urine specimens are analyzed for the following drugs/metabolites:

- Marijuana metabolites/THC
- Cocaine metabolites
- Amphetamines (including methamphetamine, MDMA)
- Opiates (including codeine, heroin (6-AM), morphine)
- Phencyclidine (PCP)

Can I use prescribed medications & over the counter (OTC) drugs and perform safety-sensitive functions?

Prescription medicine and OTC drugs may be allowed but must meet the following minimum standards:

- The medicine is prescribed to you by a licensed physician, such as your personal doctor
- The treating/prescribing physician has made a good faith judgment that the use of the substance at the prescribed or authorized dosage level is consistent with the safe performance of your duties.

Best Practice: To assist your doctor in prescribing the best possible treatment, provide your physician with a detailed description of your job.

- The substance is used at the dosage prescribed or authorized
- If you are being treated by more than one doctor, you must show at least one of the treating doctors has been informed of all prescribed and authorized medications and has determined that the use of the medications is consistent with the safe performance of your duties.
- Taking the prescription medication and performing your DOT safety-sensitive function is not prohibited by agency drug & alcohol regulations

When will I be tested?

People in safety-sensitive positions are subject to drug or alcohol testing in the following situations:

- Pre-employment/lease on
- Reasonable Suspicion/Cause
- Random
- Return-to-duty
- Follow-up
- Post-accident

Pre-employment/lease on

As a new leased on contractor, you are required to submit to a drug test and alcohol test. Only after we receive a negative drug/alcohol test result may you begin performing safety-sensitive functions.

Reasonable Suspicion/Cause

You are required to submit to any test (whether drug, alcohol, or both) that Bennett requests based on reasonable suspicion. Reasonable suspicion means that one or more trained supervisors reasonably believes or suspects that you are under the influence of drugs or alcohol. They cannot require testing based on a hunch or guess alone, their suspicion must be based on observations concerning your appearance, behavior, speech and smell that are usually associated with drug or alcohol use.

Random

- You are subject to unannounced random drug & alcohol testing. Alcohol testing is administered just prior to, during or just after performing safety-sensitive functions
- Under DOT regulations, Bennett uses a truly random selection process with each contractor having an equal chance to be selected and tested
- Just prior to the testing, you will be notified of your selection and provided enough time to stop performing your safety-sensitive function and report to the testing location. Failure to show for a test or interfering with the testing process can be considered a refusal

Post-Accident

- If you are involved in an event (accident, crash, etc.), a Post-Accident drug and alcohol test will be required. FMCSA regulations state testing for drugs and alcohol must take place “as soon as practicable following an occurrence”
- Post-Accident Alcohol Testing must be administered “within eight hours of the occurrence”. However, if alcohol testing is not completed within two hours, Bennett will maintain written documentation regarding the reason(s) testing did not occur. If testing is not completed within eight hours, Bennett maintain the same record
- Post-Accident Drug Testing must be administered “within 32 hours of the occurrence”. If testing is not completed within 32 hours, Bennett will maintain on file a record stating the reasons the test was not promptly administered
- In any Post-Accident situation, the contractor “shall remain readily available” for testing. If one does not remain available, he/she may be “deemed by Bennett to have refused to submit”

How is the urine drug test administered?

- The drug test consists of three components
 - The collection (49 CFR Part 40, Subparts C, D, E)
 - Testing at the Laboratory (49 CFR Part 40, Subpart F)
 - Review by the Medical Review Officer (29 CFR Part 40, Subpart G)

A summary of each component is below. For a more detailed account go to www.dot.gov/odapc.

The Collection

During the collection process, a urine specimen collector will:

- Verify your identity using a current valid photo ID
- Create a secure collection site by:
 - Restricting access to the site to only those being tested
 - Securing all water sources and placing blue dye in any standing water
 - Removing or securing all cleaning product/fluids at the collection site
- Afford you privacy to provide a urine specimen
- Ask you to remove any unnecessary garments and empty your pockets
- Instruct you to wash and dry your hands
- Select or have you select a sealed collection kit and open it in your presence
- Request you to provide a specimen (a minimum of 45ml) of your urine into a collection container
- Check the temperature and color of the urine
- In your presence, put the urine into two separate bottles, (Bottles labeled A & B) seal them with tape and ask you to sign the seals after they have been placed on the bottles
- Ask you to provide your name, date of birth, and daytime and evening phone numbers on the Medical Review Officer Copy (Copy #2) of the Federal Drug Testing Custody and Control Form (CCF)
- Complete necessary documentation on the Test Facility (Copy 1) of the CCF to demonstrate the chain of custody (i.e. handling of the specimen)
- Give you your copy (Copy #5) of the CCF
- Package and ship both sealed bottles and completed CCF to a U.S. Health and Human Services lab

If you are unable to provide 45ml of urine on the first attempt, the time will be noted and you will be:

- Required to remain in the testing area – leaving the testing area may be considered a refusal to test
- Urged to drink up to 40 oz. of fluid
- Asked to provide a new specimen
- If you do not provide a sufficient specimen within 3 hours, you must obtain a medical evaluation within 5 days to determine if there is a medical reason why you were unable to provide a specimen. If there is no medical, physiological or pre-existing psychological reason or not providing a urine specimen, it will be considered a refusal to test

Testing at the laboratory

At the lab the staff will:

- Determine if flaws exist. If so, the specimen is rejected for testing
- Open only bottle A and conduct a screening test. Specimens that screen positive will be analyzed again using a different testing method
 - If the specimen tests negative in either test, the result will be reported as negative
 - Only if the specimen tests positive under both methods will the specimen be reported to the medical review officer as a positive test
- Report the findings of the analysis of the bottle A to the Medical Review Officer (MRO)
- Store the A and B bottles for any reported positive, adulterated or substituted result for at least 12 months

Review by the Medical Officer

Upon receipt of the test result from the laboratory, the Medical Review Officer (MRO) will:

- Review paperwork for accuracy
- Report negative result to Bennett
- If the result is positive, conduct an interview with you to determine if there is a legitimate medical reason for the result. If a legitimate medical reason is established, the MRO will report the result to Bennett as negative. If not, the MRO will report the result to Bennett as positive
- If the result is an adulterated or substituted test, conduct an interview with you to determine if there is a legitimate medical reason for the result. If there is, the MRO will report the result to Bennett as cancelled. If not, the MRO will report the result to Bennett as a refusal
- Report a non-negative test result to Bennett if:
 - You refused to discuss the results with the MRO;
 - You did not provide the MRO with acceptable medical documentation to explain the non-negative test result
- Inform you that you have 72 hours from the time of the verified result to request to have your B split bottle sent to another lab for analysis for the same substance or condition that was found in the A “primary” bottle

What are Medical Review Officers (MRO)?

Under DOT regulations, MROs are licensed physicians with knowledge and clinical experience in substance abuse disorders. All lab results are sent to a MRO for verification before a company is informed of the result.

How is an alcohol test administered?

The DOT performs alcohol testing in a manner to ensure the validity of the testing as well as providing the confidentiality of the results.

At the start of the test, a technician will:

- Establish a private testing area
- Require you to sign Step #2 of the Alcohol Testing Form
- Perform a screening test and show you the results. If the result is less than 0.02, no further testing will be needed and no DOT action will be taken. The technician will document the results and provide you and Bennett with a copy
- If the result is 0.02 or greater, you will be required to take a confirmation test. They will wait at least 15 minutes, but not more than 30 minutes. You will not be allowed to eat, drink, smoke, belch, put anything in your mouth or leave the testing area. The results will be shown to you. You and Bennett will both be provided with a copy

Should I ever refuse to take a test?

DOT regulations prohibit you from refusing a test. The following would be considered refusal to take a test:

- Failure to appear for a test
- Failure to provide the sample needed
- Failure to provide a sufficient specimen
- Failure to cooperate with any part of the process
- Failure to sign Step #2 of the form
- Providing a sample that is adulterated or substituted
- Admit to the collector that you adulterated or substituted the specimen
- Failure to remain at the testing site until complete
- Failure to permit the monitoring of you
- Failure to take a second test if requested
- Failure to undergo medical evaluation if directed
- Failure to follow instructions given to you
- Wear any device that could be used to interfere with the collection process

What happens if I test positive, refuse a test, or violate an agency specific drug & alcohol rule? Or what if I advise Bennett that I have a drug or alcohol problem?

When an employee or contractor has a positive test or refuses to be tested or has one of the other violation, or if the contractor admits to a drug or alcohol problem, the DOT requires the carrier to immediately remove that contractor from safety-sensitive functions.

A contractor who has a violation has two options:

1. He/she can find another job, outside of the transportation industry
2. He/she can be considered for returning to safety-sensitive functions in the transportation industry, but only after successfully completing DOT's return-to-duty process, and then providing a negative result on a return-to-duty and/or alcohol testing.

The return-to-duty process requires involvement of a qualified and trained Substance Abuse Professional, or a SAP.

- The SAP must conduct a face-to-face clinical evaluation of the contractor. DOT's rule then requires the SAP to recommend treatment and/or education for the contractor
- The SAP must send a report to the employer/carrier, specifying the SAP's recommendation for treatment and/or education
- The SAP must then monitor the contractor's progress in the recommended program of treatment and/or education
- When the SAP feels that the contractor has made sufficient progress, the SAP will schedule a Follow-Up evaluation for the employee or contractor
- Based on that evaluation, the SAP will report to Bennett that the contractor has successfully complied with the SAP's recommendation (or that the contractor has not complied)
- If the SAP reports that the contractor has successfully complied with the recommendation, Bennett will decide whether to arrange for a return-to-duty test for the contractor. (Bennett is not obligated to take the contractor back)
- If the SAP reports that the contractor has not successfully complied with the recommendation, Bennett cannot return the contractor to safety-sensitive functions
- A contractor who has not successfully complied with the SAP's recommendation may not return to safety-sensitive functions for any DOT contractor until the SAP's recommendations have been fully met, and the contractor is able to provide a negative return-to-duty test

Will the results follow me to another company?

Yes, your drug & alcohol testing history will follow you if that new position is regulated by DOT. Bennett is required to provide your drug & alcohol testing history to your new company.

But I have more questions...

You can contact the Safety Department at Bennett or you can contact the ODAPC for DOT drug and alcohol regulations. The number is 202-366-DRUG (3784) or visit the website at www.dot.gov/odapc

FINANCIALS

EFS

EFS (Electronic Funds Source) is a money wire transfer system used by Bennett DriveAway in order to assist contractors in obtaining their advance money and/or final settlement. The card will allow the contractor to:

- Purchase fuel
- Access your funds at Star and Cirrus ATM's
- Make retail purchases wherever Maestro and Star debit cards are accepted
- Write EFS checks
- Make a direct deposit or transfer to home bank

Any questions or problems concerning EFS should be addressed with the Bennett DriveAway EFS Coordinator at 800-866-4600 ext. 7331

Advances and Settlement

Contractors may receive an advance up to 70% of the total pay for the transport. This is 70% of total line haul and fuel surcharge amounts combined. Funds advanced to a contractor are to be used only for purchasing fuel or other necessities in order to complete the transport. The funds will be made available on the contractor's EFS card electronically, at a maximum of \$550.00 per day. Advances are not issued to the contractor until the assigned unit is picked up.

It is not mandatory for a contractor to receive advanced funds. Please advise the dispatching terminal or the dispatcher in Bennett DriveAway Operations at the time of dispatch if an advance is not desired.

To ensure prompt payment, contractors should follow these procedures:

- Signed bills of lading, logs, and all other required documentation, must be faxed at one time to 800-201-9612, emailed to imaging@bennettig.com or submitted using www.bennettig.mobi
- All paperwork must be filled out neatly and completely. Ensure each piece of paper has the contractor control number along with the bill of lading number documented
- Settlement will be issued on imaged copies unless originals are required in which case they must be mailed
- When signed bills of lading and logs are received by the corporate office, pay will normally be available within eight business hours. Settlement of loads for customers such as Penske requiring a PO, which must be acquired after delivery. will not be available for pay for a minimum of 24 hours. Please be aware that this process can take up to 72 hours
- It is the responsibility of the contractor to ensure all proper documentation is turned in promptly and at the same time
- Any reimbursable receipt must be turned in at time of the billing process. Payment for such items will not be made at a later date

Bennett DriveAway does not pay for or reimburse the contractor for fuel. We do, however, reimburse contractors for all permits, oil, and antifreeze purchased. In order to ensure reimbursement for these items, contractors must fax these receipts and amount on all corresponding receipts. Receipts received after billing will not be reimbursed. Please note it is the contractor's responsibility to ensure with Bennett DriveAway Settlements that all documents were received. Settlements are made on a per trip basis and will be issued through the EFS system.

Bennett DriveAway Settlement hours are Monday through Friday 8:00 AM – 5:00 PM. Contractors should ensure he/she has his/her contractor control number and load number readily available prior to making the call. This is vital information needed to service your inquiry and those of others in an efficient and timely manner. Also, please note that all settlement statements may be viewed online at www.driversig.com or www.bennettig.mobi.

Escrow Deductions

Each contractor is required to build an escrow fund. The amount for each contractor is \$800.00

Escrow is deducted from each load at the rate of \$5.00 for each \$200.00 line haul amount earned by the contractor, with a \$5.00 minimum per transport, until total escrow amount is satisfied.

Please note the following:

- Drug test and lab fees will be deducted at one time
- Claim deductions will be made at 5% of line haul per load
- Over payment will be deducted at 100% of each load until paid
- Contractor's escrow bond cannot be used for any reason whatsoever, unless the contractor is deactivated and a debt is owed to Bennett DriveAway
- Upon contract termination, the escrow amount is held 45 days

Any questions you might have on your settlement or escrow account should be directed to Bennett DriveAway Settlements at 800-866-4600 ext. 7447.

LOGS

Introduction

Keeping a daily log is an important responsibility for contractors. In order to keep fatigued contractors off the road, federal law requires time spent working and driving to be documented and tracked.

Hours of Service Regulations

A contractor's hours of service are regulated by both federal and state agencies. On the federal level, hours of service of contractors are part of the Federal Motor Carrier Safety Regulations (FMCSR). They are issued and enforced by the Federal Motor Carrier Safety Administration (FMCSA) of the Department of Transportation (DOT). Specifically, Part 395 of the FMCSR covers the hours of service of interstate contractors and outlines the requirements and exceptions that apply. Many states also have hours of service requirements for intrastate operations. These requirements may match the federal requirements in whole or in part. Contractors and their companies are responsible to keep current on the hours of service regulations that apply.

Who is Regulated

The federal regulations concerning hours of service and the record of duty status apply to carriers and contractors of property-carrying commercial motor vehicles involved in interstate (or foreign) commerce that:

- Have a gross vehicle weight or gross combination weight rating, or have a gross vehicle weight or gross combination weight, of more than 10,000 lbs.
- Transport hazardous materials, which require a placard

Responsibility for compliance with the regulations lies with both the contractor and carrier. Violations are punishable by the fines and contractors are likely to be placed out of service.

Federal Requirements

The federal requirements contain four maximum limits established to reduce highway accidents by keeping the fatigued contractor off the road:

- 11 Hours Driving Rule
- 14 Consecutive Hours On Duty Rule
- 60/70 Hours of Service Rule
- 30 Minute Break

A contractor's knowledge and understanding of these four rules and how they apply, along with the proper application of the rules, will keep him/her legal and safe.

11 Hours Driving Rule

All time spent at the driving controls of a commercial motor vehicle in operation is considered driving time. After 11 hours of driving time, you must have 10 consecutive hours off duty before you can drive again. The regulations do include a provision that provides the contractor with the ability to extend his/her driving due to adverse driving conditions.

Adverse Driving Conditions

If you encounter adverse driving conditions: such as snow, sleet, fog, or unusual road or traffic conditions on a run that could normally be completed in 11 hours, contractors are allowed an additional two hours of driving to complete the run. However, the contractor must not have known or been able to foresee the situation at the time he/she began the run. Also, if at the 14th consecutive hour after coming on duty, the contractor cannot use this exception. This exception is not an excuse to get in 13 hours of driving.

14 Consecutive Hours on Duty

Contractors cannot drive after 14 consecutive hours after coming on duty and cannot drive again until 10 consecutive hours of rest are logged. Lunch breaks or other off duty time do not extend the 14-hour period. The 14 hours are consecutive from the time you come on duty.

On duty time is defined as all time from the time a contractor begins work, or is required to be ready for work, until he/she is relieved from work and all responsibility for doing work. On duty time includes time spent:

- Waiting to be dispatched
- Inspecting, servicing, or conditioning a commercial motor vehicle
- Driving (at the controls of your vehicle)
- In or on the vehicle (except time spent in the sleeper berth)
- Loading or unloading vehicle
- Repairing, obtaining assistance, or attending to a disabled vehicle
- Performing any other work for a motor carrier
- Complying with drug or alcohol testing requirements
- Performing compensated work for any other employer
- Time traveling to pick up a load (unless 10 consecutive hours off duty at pick up city)

30-Minute Rest Break Rule

Contractors may not drive beyond (8) hours from the last off duty period of at least (30) minutes. This means that at any given point in a contractor's workday, if he/she wants to continue driving a CMV, the contractor must look back at the past 8 consecutive hours and see if the last off duty period of at least 30 minutes ended within that time. If it did not, then a 30 minute break is required before more CMV driving can be done.

60 / 70 Hours of Service Rule

Contractors working for a company that does not operate motor vehicles every day of the week must not drive after accumulating 60 hours on duty during any 7 consecutive days. If a contractor's company operates vehicles every day of the week, he/she must not drive after accumulating 70 hours on duty time in any 8 consecutive days. The contractors may, however, continue to perform non-driving duties after reaching these limits and not be in violation.

A monthly summary sheet is one of the most convenient ways to keep track of available on duty time. Many duty status records are in book form and contain monthly summary sheets. If, for example, a contractor works on the 70 hour/8 day schedule, add the hours worked during the last 7 days (day 1 plus the preceding 6 days). If it totals 70 hours or more, the contractor has no driving hours available for the next day. Remember he/she can perform non-driving activities after reaching the 70 hour limit and not be in violation.

If a contractor works on a 60 hour/7 day schedule, the procedure is the same. He/she would simply total the hours for the last 6 days (day 1 plus the preceding 5 days) and subtract from 60 to find out how many hours were available for the next day. If the total was 60 or more, the contractor would have no driving hours available for the next day.

34-Hour Restart

The regulations include an optional restart provision. This allows the contractor to restart his/her 60 or 70-hour clock after having at least 34 consecutive hours off duty.

Duty Status Record

In order to check compliance with the above-stated rules, the contractor must keep track of his/her hours of service. The carrier has the option to select the format, which best suits, its operation. Written format options include:

- Contractor's daily log, standard or modified
- Contractor's multi-day log, standard or modified
- Vertical graph grid, combined with a company record
- Horizontal graph grid, combined with a company record

Alternatively, a contractor may record his/her duty status by using an on-board recording device that meets the requirements of Sec. 395.15.

Log Contents

The duty status record, or daily log, is to be filled out in duplicate for each 24-hour period. All entries must be legible and in the contractor's own handwriting. No matter which form the carrier chooses to use, the following information must be included:

- A vertical or horizontal graph grid with a remarks section
- 24-hour period starting time, selected by the carrier for your terminal
- The date
- Total miles driven today
- Truck or tractor and trailer numbers
- Name of the carrier
- Carrier's main office address
- Place for the contractor's signature/certification
- Name of co-driver
- Total hours (at the end of the grid)
- Shipping document number or name of shipper and commodity

It is permissible to pre-print certain information such as the carrier's name and main office address on the forms.

Days Off

If the contractor is off duty for a weekend, a holiday period of several days, or even a two-week vacation, he/she may use one log entry to enter the dates and show the off-duty time on the graph grid. There cannot be two months on one log.

Filling Out the Log

The contractor must keep his/her logbook current to the time shown for the last change of duty status. This means the logbook must be up-to-date at all times. If possible, use a ruler to draw the graph lines. This will give a neat appearance to the daily log. Draw the lines in the middle of the space provided for each of the categories and no one can doubt the meaning. There are four categories to be recorded: off duty, sleeper berth, driving, on duty (not driving). The total of the hours shown in all four categories must add up to 24 hours. If it does not, a mistake has been made.

The remarks section records the location of changes in duty status. Changes in duty status of 15 minutes or more can be shown directly on the graph with the locations shown in the remarks section. Short stops of less than 15 minutes can be shown by simply drawing a line from the appropriate time marker into the remarks section and noting the location and length of time stopped. It is a good idea to indicate the reason for short stops.

If a change of duty status occurs at a location other than a city, town, or village, the location can be recorded in one of the following ways:

- The highway number and nearest milepost
- The highway number the name of the service plaza
- The highway number and the nearest two intersecting roadways

Each of these should be followed by the name of the nearest city, town, or village and the state abbreviation.

A current logbook keeps the contractor aware of his/her hours of service at all times. It is most important in allowing him/her to calculate availability for driving time for the next duty period.

Duty Status Record Retention

The regulations require you either submit or forward by mail the original contractor's record of duty status to your employer within 13 days following completion of the form (Bennett requires logs to be submitted every 7 days). The carrier then retains the record for 6 months from the date of receipt. The second copy or duplicate must be retained by you for a period of 8 days and be in your possession while on duty.

Conclusion

Contractor fatigue is a serious problem. It is one of the leading causes of heavy truck crashes. Thousands of deaths each year result from accidents involving commercial motor vehicles and, therefore, it is easily seen why there are regulations to keep tired contractors off the road. The hours of service regulations are based on the sensible idea if a contractor drives too long, he/she gets tired and dangerous. Following the rules and keeping good records can help avoid costly citations and fines, or even being placed out of service. Most importantly, following the rules may prevent an accident and possibly even save a life.

General Logging Procedures

The following procedures are intended to act as a guide in the proper preparation of daily logs and assist the contractor with the hours of service regulations put forth by the FMCSA.

Each Log must show:

- Proper month, day, and year
- Contractor number
- The bill of lading number, load number or freight bill number
- Origin and destination points
- Total hours for each line should be totaled at the end of the day
- Do not abbreviate cities
- Sign your full name
- All entries on logs are to be made by the contractor
- All times should be based on home terminal time zone
- Entries on logs must be current to the last change of duty status
- Contractors must have a log for each day, on duty or off duty
- Do not put two months on the same log
- Vehicles properly parked (engine off and vehicle secured) may be logged off duty for meals
- Breakdowns can be logged off duty when the vehicle is secured and the contractor is relieved from responsibility of the vehicle
- Time spent loading (picking up), unloading (delivery), at an accident, etc. must be shown on line 4 (on duty not driving)
- Time spent on line 1 (Off Duty) is time when relieved of all duty and/or the time spent for meals
- All Port of Entry (P.O.E.) stops must be shown on the log sheet under the remark section
- Change of duty status must be in remark sections
- D.O.T. check must be shown on line 4 (on duty not driving) by noting the complete time stopped
- More than one day off duty can be shown on a single log – show date range on the log
- All logs must be turned in every 7 days
- Bennett logbooks are to be used and are furnished for this purpose
- Pick-up and delivery times are to be noted, and a minimum of fifteen minutes is required for each
- Pick-up and delivery dates must be noted on bills of lading and must match the contractor's logs
- Total mileage each day to be completed on each log
- Company policy allows contractors an average speed up to but not greater than 65 mph (miles/hours = speed)
- Contractors will be placed in non-compliance preventing dispatch to collect missing logs
- Keep logs and delivery receipts together
- Do not submit multiple logs for the same date
- Keep your logs legible, neat and legal at all times

All contractors leased on with Bennett DriveAway are held to the following standards pertaining to HOS (hours of service) violations during roadside inspections:

Intervention Point	Requirement
Any HOS violation	Required log training
Any two or more HOS violations	Automatic High Risk Review

Internal Log Violations

The purpose of this compliance and accountability program is to educate all contractors of Commercial Motor Vehicles (CMV) who are leased on to a Bennett International Group transportation company and to maintain accountability with each contractor that violates the Hours of Service (HOS) regulations, as set forth in the Federal Motor Carrier Safety Administration (FMCSA) Regulations Part 395.

Violations/Offenses : HOS offense - Means any violation of the 14 hour, 11 hour, 70 hour, 30 minute rest break, or record of duty status falsifications.

General form and manner violations - Means any violation pertaining to general form and manner. Some examples are missing log date, truck number, contractor id, signature, miles driven, and grid total errors.

As of April 1, 2016	Paper Logs	ELD Logs
1st HOS Offense	○ Counselor will contact the contractor to counsel him/her about the HOS violation. ○ Counselor will educate the contractor on the importance of maintaining compliance with the FMCSA HOS Regulations and Bennett's HOS policies. ○ Counseling notes will be entered into the auditing program for future reference.	
2nd HOS Offense (Committed within 6 months of previous violation)	○ Counselor will contact the contractor to counsel him/her about the HOS violations for a 2nd time. ○ Counseling notes will be entered into the auditing program for future reference. ○ Contractor must sign a violation letter acknowledging the violation.	
3rd HOS Offense (Committed within 6 months of previous violation)	○ Counselor will contact the contractor to counsel him/her about the HOS violations for a 3rd time. ○ Counseling notes will be entered into the auditing program for future reference. ○ Contractor will be required to come to a certified HOS location (McDonough, GA, Forest City, IA) within 15 days of notification for a complete log or ELOG course, and a safety compliance review.	
4th HOS Offense (Committed within 6 months of previous violation)	○ Contractor will be notified that he/she will go before the High Risk Review (HRR) counsel for consideration of mandatory ELOG mobile application.	
General Form / Manner Violations	○ If any contractor accumulates 10 or more points for general form and manner violations within any six-month period, the contractor must install and use an ELOG mobile application. ○ After ELOG mobile activation, if the contractor accumulates another 10 points he/she will be required to come to a certified HOS location (McDonough, GA or Forest City, IA) within 15 days of notification for a complete HOS/ELOG course and a safety compliance review.	