

From: [Monty Foust](#)
To: [zzMSHA-OSRVRegulatoryReform](#)
Subject: Wheel loader park brake tests
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I believe the requirement to test wheel loader park brakes is flawed , it requires the operator to set the park brake with the bucket in the air, with the normal load that it carries, on the steepest terrain it normally travels, this function is strictly prohibited by every manufacturer operators manual I have read they clearly say do not use the park brake with the bucket loaded and in the air. This means that operators across the country are being asked to test their equipment in a manner prohibited by all manufactures and would result in an S&S citation if they were to park the equipment with the bucket up loaded or empty. While I understand and agree with the need to check park brakes, operators should not be asked to test the brakes in a manner against the manufacturers recommendations and instructions for the safe operation of the vehicle.

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