

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Investigation of **Field Services** )  
**LLC, of Haysville, Kansas**, Pursuant to the Kansas )  
Highway Patrol Issuance of a Notice of Violation(s) and ) Docket No. 25-GIMM-345-KHP  
Invoice for the Violations of the Kansas Motor Carrier )  
Safety Statutes, Rules and Regulations. )

**NOTICE OF FILING OF REQUEST FOR HEARING**

The attached Request for Hearing was received on March 4, 2025 from Field Services LLC(Carrier). The attached documents include:

1. Driver/Vehicle Examination Report KSHP03031801, dated December 17, 2024.
2. Notice of Violations/Invoice #H000608886, dated January 8, 2025.
3. Carrier Contest of Violations, dated February 3, 2025
4. KHP Denial, dated February 24, 2025.
5. Carrier Request for Hearing, dated March 4, 2025.

WHEREFORE, the attached Request for Hearing and corresponding documents are hereby filed for consideration by the Commission.

Respectfully submitted,

*/s/ Ahsan Latif*

Ahsan A. Latif, S. Ct. #24709  
Litigation Counsel  
Kansas Corporation Commission  
1500 S.W. Arrowhead Road  
Topeka, Kansas 66604-4027  
Phone: 785-271-3118  
Fax: 785-271-3167  
Email: a.latif@kcc.ks.gov

Attorney for Commission Staff

# DRIVER/VEHICLE EXAMINATION REPORT

Query Central 3.4

**Kansas Highway Patrol**  
**Email: Khp.TruckInspection@KS.GOV**  
**700 SW Jackson, Ste 704**  
**Topeka, KS 66603**  
**Phone: (785)296-7189 Fax: (785)296-2858**

**Report Number: KSH03031801**  
**Inspection Date: 12/17/2024**  
**Start: 10:16 AM CT End: 11:40 AM CT**  
**Inspection Level: I - Full**  
**HM Inspection Type: None**

FIELD SERVICES LLC  
 260 CAIN DR  
 HAYSVILLE, KS 67060  
**USDOT#: 02542140**  
**MC/MX#: 00968077**  
**State#:**

**Phone#:**  
**Fax#:**

**Driver: DAVIS, WILSON B**  
**License#:** [REDACTED] **State: KS**  
**Date of Birth:** [REDACTED]  
**CoDriver:**  
**License#:** [REDACTED] **State:**  
**Date of Birth:**

**Location: SHAWNEE COUNTY - 177**  
**Highway: I-70 KTA**  
**County:**

**MilePost: 183**  
**Origin: TOPEKA,KS**  
**Destination: WICHITA,KS**  
**Shipper: PAR NORTH AMERICA**  
**Bill of Lading: 2158163875**  
**Cargo: CHRYSLER 300**

### VEHICLE IDENTIFICATION

Unit	Type	Make	Year	State	Plate #	Equipment ID	VIN	GVWR	CVSA #	New CVSA #	OOS#
1	TR	RAM	2019	KS	[REDACTED]	[REDACTED]	[REDACTED]9711	16,500			170246
2	ST	TRLR	2015	KS	[REDACTED]	[REDACTED]	[REDACTED]2571	5,350			170246

### BRAKE ADJUSTMENTS

Axle #	1	2	3
Right	N/A	N/A	N/A
Left	N/A	N/A	N/A
Chamber	HYDR	HYDR	HYDR

### VIOLATIONS

Vio Code	Section	Unit	OOS	Citation #	Verify	Crash	Violations Discovered
383.71H	383.71H	D	N		N	N	Failing to submit medical certification documentation as required: Driver is listed as Excepted Interstate. Driver is not operating in an excepted status.
392.2-SLLTL	392.2-SLLTL	D	N		N	N	State/Local Laws - Misc. traffic law violation: Ref KSA 8-1729. Driving on the interstate with amber and red light bar on top of truck flashing.
393.75A3-TAOL	393.75A3-TAOL	1	Y		U	N	<b>Tires - All others, leaking or inflation 50% or less than of the maximum inflation pressure on tire not equipped with ATIS: Axle #2 driver's side inner tire flat. Outside sidewall is blown out.</b>
393.75A3-TAOL	393.75A3-TAOL	1	Y		U	N	<b>Tires - All others, leaking or inflation 50% or less than of the maximum inflation pressure on tire not equipped with ATIS: Axle #2 driver's side outer tire measured 54 PSI. Rated at 120 PSI.</b>
393.71H10-CDDSDN S	393.71H10-CDDSDN DNS	2	Y		U	N	<b>Coupling - Driveaway, safety devices not attached/not able to be secured: Safety chains not attached to towed vehicle at time of stop.</b>
393.11A1-LSLMWR	393.11A1-LSLMWR	2	Y		U	N	<b>Lighting - Stop lamps - Both missing when required to be on.: Tow light bar fell off and the battery was lost. Tow light bar inside cab of truck at stop.</b>
393.11A1-LTSM	393.11A1-LTSM	2	Y		U	N	<b>Lighting - Turn signal - Any missing on the rearmost vehicle.: Driver's side turn signal missing. Tow light bar inop.</b>

Report Prepared By:  
D. E. WILLS

Badge #:  
0303

Copy Received By:  
WILSON DAVIS

Page 1 of 3



02542140 KS KSH03031801

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X \_\_\_\_\_

DRIVER/VEHICLE EXAMINATION REPORT

Query Central 3.4

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Email: Khp.TruckInspection@KS.GOV
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Topeka, KS 66603
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FIELD SERVICES LLC
260 CAIN DR
HAYSVILLE, KS 67060
USDOT#: 02542140
MC/MX#: 00968077
State#:

Phone#:
Fax#:

Driver: DAVIS, WILSON B
License#:
Date of Birth:
CoDriver:
License#:
Date of Birth:
State: KS
State:

Table with columns: Vio Code, Section, Unit, OOS, Citation #, Verify, Crash, Violations Discovered. Contains two rows of violation data.

HazMat: No HM Transported.

Placard: No Cargo Tank:

Special Checks:

\* Pursuant to the authority contained in Title 49, CFR; K.S.A. 66-1,129; K.C.C. Reg. 82-4-3, I hereby declare the above marked unit(s) as "OUT OF SERVICE".

\* NOTE TO MECHANIC: The undersigned certifies that all mechanical defects listed on this report HAVE BEEN CORRECTED at the time of signature.

Signature Of Repairer X: Facility: Date:

\*\*\\\*\* DRIVER: THIS FORM IS REQUIRED TO BE RETURNED TO THE CARRIER BY REGULATION. \*\*\\\*\* \*CARRIER CERTIFICATION: All defects on this sheet must be corrected or acknowledged PRIOR TO RE-DISPATCH and then certified by a responsible carrier official who must sign below.

Signature Of Motor Carrier X: Title: Date:

Report Prepared By: D. E. WILLS

Badge #: 0303

Copy Received By: WILSON DAVIS



X

X

DRIVER/VEHICLE EXAMINATION REPORT

Query Central 3.4

Kansas Highway Patrol
Email: Khp.TruckInspection@KS.GOV
700 SW Jackson, Ste 704
Topeka, KS 66603
Phone: (785)296-7189 Fax: (785)296-2858

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FIELD SERVICES LLC
260 CAIN DR
HAYSVILLE, KS 67060
USDOT#: 02542140
MC/MX#: 00968077
State#:

Phone#:
Fax#:

Driver: DAVIS, WILSON B
License#:
Date of Birth:
CoDriver:
License#:
Date of Birth:
State: KS
State:

Inspection Notes

Random inspection. Factory GVWR located. Neg DACH. Driver was driving with overhead lightbat on(amber and red). Driver was very rude and hostile. More so after he broke his own lpad. Driver was argumentative that we were using the wrong tire pressure rating. Stated we should be using the vehicle manufacuerer rating(95) not the tire manufacturerer rating(120). Driver is the one who checked the pressure in his tire. Tried mltiple time and was never above 60 PSI with the last time being 54 PSI. Driver refused to sign the report stated he would not until my supervisor arrived. Driver initiallly stated he knew he had a flat tire, that he just lost it before we stopped him. Driver stated the tow light bar had fallen off previously and he picked it up but lost the battery. Driver stated he has been inspected numerous times by troopers before and no one ever said that chains had to be connected to a towed car. Zero previous inspections located for driver.Carrier is contesting Violations 393.75A3-TAOL, 393.71H10CDDSDNS, 393.11A1-LTSM.Carrier states they do not use the Tire manufacturers Maximum Tire pressure due to the Tire manufacturer not knowing what type of vehicle the tire is going on. That they use the vehicle manufactures recommendation. States their trucks are equipped with light bars from Tow Mate that are USDOT approved. That on day of inspection it was properly attached to top of towed vehicle unsure if the battery had died while in transit. States the driver was not using safety chains that the vehicle was correctly strapped down from both front tires to tow truck lift.At time of inspection drivers side axle 2 duel set, Inner tire was flat due to blown tire, Outter tire measured at 54 PSI Rated at 120 PSI from tire sidewall. Not using safety chains when required at time of inspection. Tow light bar was found inside cab of truck not on towed vehicle.Violations and Fines remail valid TWare 2/21/25

Special Studies No Special Study Data Recorded

Report Prepared By:
D. E. WILLS

Badge #:
0303

Copy Received By:
WILSON DAVIS



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X \_\_\_\_\_

# KANSAS CORPORATION COMMISSION



Kansas Corporation Commission  
 Transportation Division  
 1500 SW Arrowhead Road  
 Topeka, Kansas 66604-4027  
 (785) 271-3145  
 FEIN: 48-1124839

## INVOICE

FIELD SERVICES LLC  
 260 CAIN DR  
 HAYSVILLE, KS 67060

Invoice Date: January 8, 2025  
 Invoice Number: H000608886  
 Due Date: February 7, 2025

Unit #	Unit Make	Unit License	Power Unit Identification at Time of Inspection:		Company ID
			VIN	License Number	
1	RAM	[REDACTED]	[REDACTED]	9711	[REDACTED]
2	TRLR	[REDACTED]			

Unit	Violation	Violation Description	Penalty
1	393.75A3-TA	TIRES - ALL OTHERS, LEAKING OR INFLATION LESS THAN 50% OF THE MAXIMUM INFLATION PRESSURE	150.00
1	393.75A3-TA	TIRES - ALL OTHERS, LEAKING OR INFLATION LESS THAN 50% OF THE MAXIMUM INFLATION PRESSURE	0.00
2	393.11A1-LSI	LIGHTING - STOP LAMPS - BOTH MISSING WHEN REQUIRED TO BE ON	150.00
2	393.11A1-LT	LIGHTING - TURN SIGNAL - ANY MISSING ON THE REARMOST VEHICLE	0.00
2	393.11A1-LT	LIGHTING - TURN SIGNAL - ANY MISSING ON THE REARMOST VEHICLE	0.00
2	393.71H10-C	COUPLING - DRIVEAWAY, SAFETY DEVICES NOT ATTACHED/NOT ABLE TO BE SECURED	150.00
<b>Total Due:</b>			<b>\$450.00</b>

Please return this invoice with your payment, payable to the  
 Kansas Corporation Commission  
 1500 SW Arrowhead Road  
 Topeka, KS 66604-4027  
 Email: kcc.transportation@ks.gov  
 Fax: (785) 271-3124

Payment options: check, money order or credit card

Circle type of credit card: Visa, MasterCard, Discover or American Express

Card Holder Name \_\_\_\_\_

Credit card number: \_\_\_\_\_ Expires: Date \_\_\_\_/\_\_\_\_/\_\_\_\_

## Field Services, LLC

Prime Protection of Your Investment  
PO Box 954 Derby, KS 67037  
(p) 316-295-3771 | (f) 316-260-3853  
brian@fieldservicesllc.com



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KANSAS HIGHWAY PATROL  
MOTOR CARRIER SAFETY PROGRAM  
700 SW JACKSON # 704  
TOPEKA, KS 66603

02/03/2025

RE: KSHP03031801

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Good Day,

I am writing with regards to the above cited violations issued by KHP and request for our office to pay \$450.00 in fines, First and foremost our office has been in operations over 10 years and have logged over 2.5 million miles in that time, our drivers routinely go through driver safety courses every couple months as well as receive education on laws, regulations, etc.. from our in house legal counsel monthly.

Our agent experienced an inner flat tire while towing a repossessed vehicle, the agent activated his overhead beacons to alert other motorists on the highway and proceeded to move over to the shoulder, the trooper was traveling in the same direction a distance back when this took place and when the agent pulled the tow truck over the trooper then used that to initiate a traffic stop and level I inspection.

While there are several other factors of things the trooper told our agent that were factually incorrect , I am addressing the violation 393.75A3-TA, the trooper is adamant that our tow trucks are required to be filled to the manufacturer PSI listed on the tire itself.

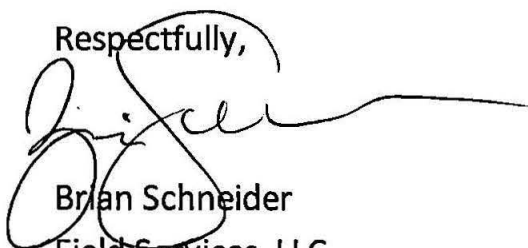
However our tow trucks are modified by the manufacturer of the tow truck beds installed and each have filed the required notifications and modifications through the approved process with the United States Department of Transportation and there is a specific placement card installed on the inside of driver's door spelling this all out in great detail and specially lists the PSI in our tires to be 90 PSI , the fact that our agent experienced a flat tire does not mean that was caused by low tire pressure , drivers check each truck before they begin their shifts.

So we disagree with this violation , I understand the Trooper telling our agent it is required to go by what the tire manufacturer states on the tire, however as you know the manufacturer has zero idea what vehicle those tires are going to go on and because our trucks are modified by the added application of a wheel lift bed that then changes the entire vehicle specifications, I am happy to provide a clear picture of the place cards installed in each of our tow trucks inside the driver's door to correctly prove our position.

Violation 393.11A1-LT – our trucks are equipped with light bars from Tow Mate that are USDOT approved, on this we are unsure if the light bar had died or not while our agent was in tow, the light bar was properly attached to the top of the vehicle being towed.

Violation 393.71H10-C – Our agent was not using the safety chains at the time; the vehicle was correctly strapped down from both front tires to the tow truck lift.

Respectfully,



Brian Schneider  
Field Services, LLC  
316-706-3789



**FIELD SERVICES, LLC**

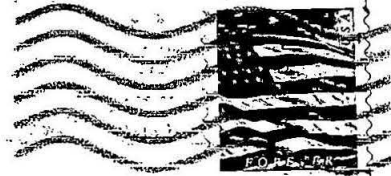
RECOVERY & INVESTIGATIONS

P.O. BOX 954

DERBY, KS 67037

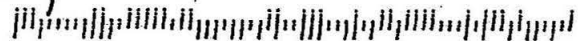
WICHITA KS 67201

5 FEB 2025 9:42 AM



Kansas Highway Patrol  
Motor Carrier Safety Program  
700 SW Jackson # 704  
Topeka, KS 66603

66603-978779







122 S.W. 7th Street  
Topeka, KS 66603

Erik Smith, Superintendent

phone: 785-296-6800  
fax: 785-296-5956  
www.KansasHighwayPatrol.gov

Laura Kelly, Governor

February 24, 2025

FIELD SERVICES LLC  
260 CAIN DR  
HAYSVILLE, KS 67060

Re: **Invoice # H000608886**  
**Report # KSHP03031801**

To Whom it May Concern,

This letter is to inform you that your request for a review regarding an inspection that took place December 17<sup>th</sup>, 2025, has been **DENIED**. Please see guidance below:

The out-of-service criteria is different from federal, state, and territorial regulations. Regulations are the minimum requirements (developed by federal, state, provincial or territorial regulatory authorities) for the operation of commercial motor vehicles in interstate/interprovincial commerce. CVSA's North American Standard Out-of-Service Criteria ensure uniformity, consistency and reciprocity among the states, provinces, territories, and countries in determining whether drivers or vehicles present an imminent hazard and should be placed out of service. Together, the federal regulations and CVSA's out-of-service criteria provide the standards drivers, motor carriers and law enforcement personnel use to ensure the commercial motor vehicles and drivers on North America's roadways are safe and in compliance.

#### **§393.75A3 Tires.**

If a tire has a noticeable leak or has 50% or less of the maximum inflation pressure marked on the tire sidewall; then an OOS condition exists. Tires on commercial motor vehicles must meet safety standards, including load restrictions, inflation pressure, and other safety standards, and be free from specified defects. Tire anomalies and flat tires decrease directional control, increase the risk of life, and decrease fuel economy.

- Axle 2, Driver side – Inner tire pressure was unmeasurable due to tire blowout.
- Axle 2, Driver side - Outside tire was measured at 54 PSI
  - The maximum inflation pressure marked on the tire sidewall is listed at 120 PSI

According to CVSA Operational Policy 15 item 12.b.(1) inspectors are to refer to the tire sidewall regarding the maximum inflation pressure of a tire.

**§ 393.71(h)(10) Safety devices in case of tow-bar failure or disconnection.**

The towed vehicle shall be connected to the towing vehicle by a safety device to prevent the towed vehicle from breaking loose in the event the towbar 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 are required.

The safety chains were not connected to the towed unit at the time of inspection. Per 393.71(h)(5) requires the towed vehicle be secured to the wheel lift. In addition, 393.71(h)(10) requires safety devices to be attached between the towing and towed vehicle.

**§ 393.11 Lamps and reflective devices**

At the time of inspection, it was noted that the tow light bar was located inside the cab of the truck. Mr. David indicated that the light bar had previously fell and lost the battery. On the rear of the rearmost towed vehicle, there must be at least two tail lamps, two stop lamps, two turn signals, two clearance lamps, and two reflectors, one of each type at each side per § 393.17 – driveaway-towaway operation. Failure to have the required lighting present listed on Table 1 of § 393.11 or Figure 21 Diagram § 393.17, resulted in an out of service violation.

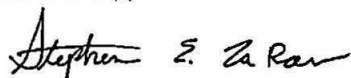
The violation(s) will remain on your carrier profile and Invoice # **H000608886** remains valid. Please see the invoice for information regarding the fines due. Failure to pay will result in the carrier being in default. Default status prohibits changes to KCC authority, including but not limited to adding vehicles, name changes or renewal of authority until the fine has been paid or the matter is resolved.

If you are not satisfied with the outcome of your Internal Review by the Kansas Highway Patrol, you have the right to an administrative hearing with the Kansas Corporation Commission regarding the civil penalty assessed by our state. The hearing request and all further documentation must be received **WITHIN 15 DAYS** from the date of this correspondence.

If you would like to appeal the violation received roadside, please avail yourself to the DataQ process at <http://dataqs.fmcsa.dot.gov>.

Thank you for your time and attention to this matter.

Sincerely,



Captain Stephen La Row  
Troop I

SEL: tw

Enc: References, Invoice

References:

1. Tires –
  - a. <https://www.ecfr.gov/current/title-49/section-393.75>
2. Coupling Devices –
  - a. [eCFR: 49 CFR 393.71 -- Coupling devices and towing methods, driveaway-towaway operations.](#)
3. Lamps and reflectors - combinations in driveaway-towaway operation -
  - a. <https://www.ecfr.gov/current/title-49/section-393.17>
4. Lamps and reflective devices
  - a. <https://www.ecfr.gov/current/title-49/section-393.11>
5. CVSA Operational Policy -
  - a. <https://www.cvsa.org/wp-content/uploads/Operational-Policy-15.pdf>

**From:** BRIAN SCHNEIDER <brian@fieldservicesllc.com>  
**Sent:** Tuesday, March 4, 2025, 11:01 AM  
**To:** KCC Motor\_Carrier <kcc.transportation@ks.gov>  
**Subject:** Administrative Hearing Request - Invoice # H000608886

*EXTERNAL:* This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

We disagree with the internal review of the Kansas Highway Patrol regarding the civil penalty issued for tire pressure , Our 2019 Ram 4500 was modified through a manufacturer by having a tow bed installed upon it , with that came modification of the required tire pressure for each tire based on what the vehicle was designed to do , inside each one of our tow trucks, is a plaque installed by the manufacturer specifically detailing the PSI our front and rear tires should be at , yes this differs from the tire manufacture, HOWEVER the tire manufacturer does not know what their tires are being used for, our tow truck tires are set to the tow truck manufacture regulations which again the plaque specifically states it conforms to "ALL APPLICABLE FEDERAL MOTOR SAFETY STANDARDS" , so this tell us that the manufacture of the tow truck bed that modified the original chassis of this 2019 Ram 4500 did so within Federal regulations meaning when the plaque tells us 95 PSI for the tires , that what it is , not what is on the outside of the tire itself.

Having our tires at the suggested 120 PSI would cause issues while towing a vehicle, this has been documented all over the place , yet the KHP refuses to acknowledge the fact that when a vehicle is modified to do a specific job , it changes certain things about the vehicle and how it operates, this is why the manufacturer of the tow truck bed that was installed MUST place the modification plaque somewhere within said vehicle stating the modification was done by guidelines and regulations.

In this case our tow truck experienced a inner dual tire blow out, which most likely caused a issue with the outer tire, but the KHP had our driver check the tire pressure which measured to be 54 PSI, even with the outer tire being low, it would still have been within the 50% of the 95 PSI our tires are suppose to be at by the vehicles manufacturer.

This would be our dispute regarding Violation 393.75A3-TA - Proof of modification plaque is attached to this email.

Thank you kindly,

Brian

--



BRIAN SCHNEIDER  
FIELD SERVICES, LLC  
P.O. BOX 954  
DERBY, KS 67037  
(P) 316-636-7167  
(P) 316-295-3771  
(P) 316-768-6643  
(C) 316-706-3789  
(F) 316-260-6272  
(F) 316-260-3853



MFD BY: Meyer Truck Center, Inc.  
Olathe, KS

DATE OF MFR: MO. 08 YR. 2020

GVWR: 7,485 KG ( 16,500 LB)

GAWR-FRONT:

3,176 KG ( 7,000 LB)

WITH 225/70R19.5G TIRES,

19.5X6.0 RIMS, @ 660 KPA

( 95 PSI) COLD SINGLE

GAWR-INTERMEDIATE(1):

KG ( LB)

WITH TIRES,

RIMS, @ KPA

( PSI) COLD

GAWR-INTERMEDIATE(2):

KG ( LB)

WITH TIRES,

RIMS, @ KPA

( PSI) COLD

GAWR-REAR:

5,444 KG ( 12,000 LB)

WITH 225/70R19.5G TIRES,

19.5X6.0 RIMS, @ 660 KPA

( 95 PSI) COLD DUAL

THIS VEHICLE HAS BEEN COMPLETED IN ACCORDANCE  
WITH THE PRIOR MANUFACTURERS' IVD, WHERE  
APPLICABLE. THIS VEHICLE CONFORMS TO ALL  
APPLICABLE FEDERAL MOTOR VEHICLE SAFETY  
STANDARDS, [AND BUMPER AND THEFT PREVENTION  
STANDARDS, IF APPLICABLE] IN EFFECT IN:

MO. 09 YR. 2019

VEHICLE IDENTIFICATION NUMBER:

9711

VEHICLE TYPE:

TRUCK

**CERTIFICATE OF SERVICE**

25-GIMM-345-KHP

I, the undersigned, certify that a true copy of the attached Filing has been served to the following by means of electronic service on March 7, 2025.

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
ahsan.latif@ks.gov

James McIntyre, AGENT  
Field Services LLC  
260 Cain Dr  
Haysville, KS 67060  
jimmcintyre@fieldservicesllc.com

/S/ Kiley McManaman  
Kiley McManaman

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