OPERATIONAL POLICY 5
INSPECTION / CVSA DECAL

PURPOSE

To provide guidance and procedures for driver-vehicle inspection using the recommended North American Standard Inspection Procedure, and to establish a *North American Standard Out-of-Service Criteria* for drivers and vehicles.

OBJECTIVES

1. Remove potentially unsafe drivers and imminently hazardous vehicles from the highways.

2. Direct attention to the provisions of the Federal Motor Carrier Safety Regulations (FMCSR), the Hazardous Materials Regulations / Transportation of Dangerous Goods Regulation, the Canadian National Safety Code, the Mexican Federal Safety Regulations, and compatible state and provincial rules by requiring repairs of vehicle defects and appropriate remedial action for vehicle and/or driver violations.

3. Document violations that might be used in subsequent enforcement actions.

4. Obtain information regarding carriers, drivers, vehicles, and cargo relative to safety and compliance, and overall program direction and evaluation.

NORTH AMERICAN STANDARD INSPECTION LEVELS

Level I

North American Standard Inspection – An inspection that includes examination of driver's license; medical examiner's certificate and Skill Performance Evaluation (SPE) Certificate (if applicable); alcohol and drugs; driver's record of duty status as required; hours of service; seat belt; vehicle inspection report(s) (if applicable); brake systems; cargo securement; coupling devices; driveline/driveshaft; exhaust systems; frames; fuel systems; lighting devices (headlamps, tail lamps, stop lamps, turn signals and lamps/flags on projecting loads); steering mechanisms; suspensions; tires; van and open-top trailer bodies; wheels, rims and hubs; windshield wipers; emergency exits and/or electrical cables and systems in engine and battery compartments (buses), and HM/DG requirements as applicable. HM/DG required inspection items will be inspected by certified HM/DG inspectors.

NOTE: If more than 20 percent of pushrod travel, on exposed pushrods, cannot be measured, then the inspection would not be considered a Level I inspection and shall be identified as a Level II inspection.

NOTE: A 5-axle vehicle combination with one axle not measured will still require two defective brakes to be placed out-of-service 20 percent.

Level II

Walk-Around Driver/Vehicle Inspection – An examination that includes each of the items specified under the North American Standard Level II Walk-Around Driver/Vehicle Inspection Procedure. As a minimum, Level II inspections must include examination of: driver's license; medical examiner's certificate and Skill Performance Evaluation (SPE) Certificate (if applicable); alcohol and drugs; driver's record of duty status as required; hours of service; seat belt; vehicle inspection report(s) (if applicable); brake systems; cargo securement; coupling devices; exhaust systems; frames; fuel systems; lighting devices (headlamps, tail lamps, stop lamps, turn signals and lamps/flags on projecting loads); steering mechanisms; suspensions; tires; van and open-top trailer bodies; wheels, rims and hubs; windshield wipers; emergency exits and/or electrical cables and systems in engine and battery compartments (buses), and HM/DG requirements as applicable. HM/DG required inspection items will be inspected by certified HM/DG inspectors. It is contemplated that the walk-around driver/vehicle inspection will include only those items, which can be inspected without physically getting under the vehicle.

Level III

Driver/Credential Inspection – An examination that includes those items specified under the North American Standard Level III Driver/Credential Inspection Procedure. As a minimum, Level III inspections must include, where required and/or applicable, examination of the driver's license; medical examiner's certificate and Skill Performance Evaluation (SPE) Certificate; driver's record of duty status; hours of service; seat belt; vehicle inspection report(s); and HM/DG requirements. Those items not indicated in the North American Standard Level III Driver/Credential Inspection Procedure shall not be included on a Level III inspection.

Level IV

Special Inspections – Inspections under this heading typically include a one-time examination of a particular item. These examinations are normally made in support of a study or to verify or refute a suspected trend.

Level V

Vehicle-Only Inspection – An inspection that includes each of the vehicle inspection items specified under the North American Standard Inspection (Level I), without a driver present, conducted at any location.

Level VI

North American Standard Inspection for Transuranic Waste and Highway Route Controlled Quantities (HRCQ) of Radioactive Material – An inspection for select radiological shipments, which include inspection procedures, enhancements to the North American Standard Level I inspection, radiological requirements, and the *North American Standard Out-of-Service Criteria for Transuranic Waste and Highway Route Controlled Quantities (HRCQ) of Radioactive Material*.

As of January 1, 2005, all vehicles and carriers transporting highway route controlled quantities (HRCQ) of radioactive material are regulated by the U.S. Department of Transportation and required to pass the North American Standard Level VI Inspection.

Previously, U.S. Department of Energy (DOE) voluntarily complied with the North American Standard Level VI Inspection Program requirements.

Select radiological shipments include highway route controlled quantities (HRCQ) of radioactive material as defined by Title 49 CFR §173.403. And, because only a small fraction of transuranics are HRCQ, DOE has decided to include its transuranic waste shipments in the North American Standard Level VI Inspection Program.

Level VII

Jurisdictional Mandated Commercial Vehicle Inspection – An inspection that is a jurisdictional mandated inspection program that does not meet the requirements of any other level of inspection. An example will include inspection programs such as, but not limited to: school buses; limousines; taxis; shared ride; hotel courtesy shuttles, and other intrastate/intraprovincial operations. These inspections may be conducted by CVSA-certified inspectors, other designated government employees or jurisdiction approved contractors. Inspector training requirements shall be determined by each jurisdiction. No CVSA decal shall be issued for a Level VII inspection but a jurisdiction-specific decal may be applied.

COUNTING INSPECTIONS

Each inspection, regardless of the number of vehicles constituting the combination, shall be counted as one inspection for the purposes of inspection tallies and SafetyNet.

RAISED LIFT AXLE(S)

Raised lift axles are to be inspected to ensure all components are secure and for conditions that adversely affect the vehicles operation (i.e., air leaks, etc.). If a Critical Vehicle Inspection Item defect is discovered on the raised axle, the vehicle is not eligible to receive a CVSA decal and the defect should be documented in the notes section of the inspection report. The raised lift axle shall not be included in determining the total

number of brakes on a vehicle combination for the 20 percent service brake calculation. If the raised lift axle is required to be lowered to comply with regulatory requirements in order to continue operation, the operator has the option to adjust or offload cargo. Otherwise the axle is subject to inspection.

BRAKE MEASUREMENTS

It shall be the policy of CVSA to record on inspection forms all brake measurements, if obtained during North American Standard Level I and Level V Inspections. If a brake measurement was not obtained due to a hidden component, then "NM" shall be documented for that wheel-end brake as well as being noted on the inspection report that it was not measured due to a hidden component. Brakes not measured will be considered compliant and still included in the 20 percent calculation.

NOTE: The marking and measuring of pushrod travel is not required if a performance-based brake test (PBBT) has been completed.

QUALIFYING FOR CVSA DECALS

The North American Standard Level I and/or Level V are the only inspections that may result in issuance of a CVSA decal. To qualify for a CVSA decal, a vehicle must not have any Critical Vehicle Inspection Item violations contained in CVSA Operational Policy.

Inspections must be performed by and CVSA decals affixed by North American Standard Level I and/or Level V certified inspectors. The term "certified" as used in this section means the government employee performing inspections and/or affixing CVSA decals must have first successfully completed a training program approved by the Alliance. CVSA decals, when affixed, shall remain valid for a period not to exceed three consecutive months. Vehicles displaying a valid CVSA decal generally will not be subject to re-inspection.

However, nothing shall prevent re-inspection of a vehicle or combination of vehicles bearing valid CVSA decals, under the conditions specified in the section titled, "Vehicle Re-inspections".

CRITICAL VEHICLE INSPECTION ITEMS

- Brake Systems
- Cargo Securement
- Coupling Devices
- Driveline/Driveshaft
- Exhaust Systems
- Frames
- Fuel Systems

- Lighting Devices (Headlamps, Tail Lamps, Stop Lamps, Turn Signals and Lamps/Flags on Projecting Loads)
- Steering Mechanisms
- Suspensions
- Tires
- Van and Open-Top Trailer Bodies
- Wheels, Rims and Hubs
- Windshield Wipers
- Emergency Exits and/or Electrical Cables and Systems in Engine and Battery Compartments (Buses)

CVSA DECALS ON CARGO TANKS

When a U.S. DOT/Transport Canada specification cargo tank inspection is completed in conjunction with North American Standard Level I and/or Level V Inspection CVSA decals shall not be issued to U.S. DOT/Transport Canada specification cargo tank vehicles found to have violations of the following:

- Retest requirements
- Cargo Tank Authorization
  - Does not include specification shortages
- Manhole Covers
- Internal Valves
- Discharge Valves
- Cargo Tank Integrity
- Supports and Anchoring
- Double Bulkhead Drains
- Ring Stiffeners
- Rear End Protection
- Emergency Flow Control
- Piping and Protection
- Overturn Protection
- Venting

VEHICLE INSPECTIONS

Each vehicle (i.e., motorcoach, school bus, other bus, truck, truck-tractor, semi-trailer, trailer, converter dollies, etc.) used singularly or in combination may qualify for a CVSA decal if it passes inspection, and a CVSA decal shall be applied. “Pass Inspection” means that during a North American Standard Level I or Level V Inspection no defects are found in the Critical Vehicle Inspection Items.

For the purpose of a CVSA decal issuance, if no violation is detected during a North American Standard Level I or Level V Inspection due to a hidden part, other than pushrod stroke measurements, of the listed Critical Vehicle Inspection Items, then a CVSA decal shall be applied. However, if more than 20 percent of pushrod travel, on exposed pushrods, cannot be measured, then a CVSA decal shall not be applied. An inspector can still apply a CVSA decal even though his/her jurisdiction does not allow for the inspection of gaseous fuel systems.

The CVSA decal criteria apply only to the condition of the vehicle, not the driver. It is possible for a driver to be out-of-service and still have vehicle(s) qualify for a CVSA decal.

Example #1:

A vehicle may have a clearance lamp out, (which is a violation) and still qualify for a CVSA decal. This is because clearance lamps are not specifically listed in the Critical Vehicle Inspection Items.

Example #2:

If a vehicle has one headlamp out, it does not qualify for a CVSA decal. This is because headlamps are specifically listed in the Critical Vehicle Inspection Items.

Example #3:

If a vehicle is missing one wheel fastener, it does not qualify for a CVSA decal. This is because wheel fasteners are listed in the Critical Vehicle Inspection Items.

Example #4:

A vehicle has two brakes with required self-adjusting brake adjusters that are out-of-adjustment. The brakes are adjusted at the time of inspection. Because only the brake adjustment problem was corrected, there is still a violation with the brake not adjusting automatically. As a result, the vehicle does not receive a CVSA decal.

Example #5:

A truck-tractor and semi-trailer is inspected. The tractor passes the inspection, but the semi-trailer has one flat tire. The tractor receives a CVSA decal, but the semi-trailer does not.

Example #6:

When you inspect a vehicle, you find that about 10 percent of the brakes are defective. This is a violation. The vehicle does not receive a CVSA decal because this is a violation of the Critical Vehicle Inspection Items.

Example #7:

When you inspect a truck-tractor and semi-trailer combination, you find that 10 percent of the brakes are defective. All defects are on the semi-trailer. The semi-trailer would not qualify for a CVSA decal; however, the truck-tractor would qualify for a CVSA decal.

LOCATION OF CVSA DECALS

The location for affixing a CVSA decal on a power unit shall be on the lower right corner of the exterior surface of the passenger's windshield.

The location for affixing a CVSA decal on trailing units (i.e., trailers, full trailers, semi-trailers, converter dollies, etc.) shall be on the lower right corner as near the front as possible.

The location for a CVSA decal on a cargo tank semi-trailer shall be at eye-level near the right front of the cargo tank and on the lower right corner of the exterior surface of the passenger's windshield of a straight truck.

The location for a CVSA decal on passenger vehicles shall be on the glass portion (window) of the passenger door as close to inspector's eye-level as possible.

Any expired CVSA decal shall be removed before a new CVSA decal is affixed.

CVSA DECAL APPLICATION

The quarter in which an inspection is performed is indicated by the color of the CVSA decal issued.

Inspection Period	Color Code
January, February, March	Green
April, May, June	Yellow
July, August, September	Orange
October, November, December	White

The year of issuance shall be indicated by using the last number of the calendar year (i.e., 2014 shall be indicated by the number "4") and shall be printed at the top portion of the sticker, with the CVSA trademark printed directly below.

CVSA decals affixed on the first month of a new calendar quarter must have both upper corners removed. Those issued during the second month of the same quarter must have the upper right corner removed. No corners are removed from those CVSA decals issued during the last month of a calendar quarter.

CVSA decals, affixed, will remain valid for the month of issuance plus two months. For example, a CVSA decal issued on July 28 will expire September 30.

In general, vehicles displaying a valid CVSA decal are not subject to re-inspection. However, if a Critical Vehicle Inspection Item violation is detected on a vehicle with a current CVSA decal, nothing prohibits inspection of the vehicle.

Should inspection of a vehicle displaying a valid CVSA decal disclose vehicle maintenance inconsistent with the minimum inspection criteria, the CVSA decal must be removed. However, if the Critical Vehicle Inspection Item(s) found are repaired at the scene, the CVSA decal would not have to be removed. In those instances where a complete re-inspection is performed and no Critical Vehicle Inspection Item(s) are detected, or if the item(s) are corrected at the scene, a new CVSA decal should be applied.

CVSA LEVEL VI DECAL

All CVSA-certified Level VI inspectors will honor the display of a valid CVSA Level VI decal. Enroute Level VI inspections should be conducted only if an obvious defect is observed or suspected by a CVSA-certified Level VI inspector. This does not prohibit jurisdictions that have laws, mandates, or orders requiring enroute inspections prior to transportation through the jurisdiction, from conducting such inspections.

A CVSA Level VI decal will only be issued to a vehicle and/or vehicle combination that is “defect-free” of the North American Standard Level VI Inspection for Transuranic Waste and Highway Route Controlled Quantities (HRCQ) of Radioactive Material at the point of origin.

If at the point of origin a vehicle and/or vehicle combination passes a North American Standard Level VI Inspection “defect-free”, the CVSA Level VI decal should be placed on the passenger side edge of the windshield near the top so that the bottom edge of the decal is not more than 6” from the top of the windshield. It must be out of the sweep of the wiper and not be affixed where it would interfere with the driver's view. Refer to the Federal Motor Carrier Safety Regulations (FMCSRs), Title 49 CFR §393.60(e)(1) & (2) for windshield decal placement restrictions. In addition, a regular or standard CVSA decal will also be applied in accordance with this Operational Policy if one is missing or not valid. Unlike the regular or standard CVSA decal, the CVSA Level VI decal will be for the entire vehicle and/or vehicle combination.

The CVSA Level VI decal will be hole-punched with the correct year, month, and day the North American Standard Level VI Inspection was completed and will be valid for a single trip.

Any vehicle and/or vehicle combination in violation of the *North American Standard Out-of-Service Criteria for Transuranic Waste and Highway Route Controlled Quantities (HRCQ) of Radioactive Material* will be declared out-of-service and the CVSA Level VI decal will be removed. Once in compliance and re-inspected following the defect-free North American Standard Level VI Inspection, a new CVSA Level VI decal will be applied. The CVSA Level VI decal is not valid after the shipment for which it was issued is completed. If there is an equipment change while enroute, the vehicle and/or vehicle combination will be re-inspected and a new CVSA Level VI decal applied. Any expired, regular or standard CVSA decal and any CVSA Level VI decal will be removed before a new CVSA Level VI decal is affixed. In addition, it is the driver's responsibility to remove the Level VI decal at the conclusion of the trip.

If after a vehicle transporting 'Transuranic Waste' or 'Highway Route Controlled Quantities (HRCQ)' of radioactive material successfully passes a point-of-origin North American Standard Level VI Inspection and during the course of transportation, the CVSA Level VI decal becomes missing from the windshield, the point-of-origin inspection report shall serve as verification of compliance for the missing decal. The driver of the vehicle will be required to provide the point-of-origin inspection report to any inspecting official who requests it while enroute to point of final destination. If the driver cannot provide the point-of-origin inspection report when requested, another North American Standard Level VI Inspection must be completed, and a new CVSA Level VI decal affixed upon the completion of a defect-free inspection.

If after a vehicle transporting 'Transuranic Waste' or 'Highway Route Controlled Quantities (HRCQ)' of radioactive material successfully passes a point-of-origin North American Standard Level VI Inspection and the CVSA Level VI decal cannot be applied due to inclement weather conditions, the decal will be placed onto the back of the inspection report. The driver of the vehicle will be required to provide the inspection report and CVSA Level VI decal to any inspection official who requests it while enroute to point of final destination. If the driver cannot provide both the inspection report and CVSA Level VI decal when requested, another North American Standard Level VI Inspection must be completed, and a new CVSA Level VI decal affixed upon the completion of a defect-free inspection.

VEHICLE RE-INSPECTIONS

A Critical Vehicle Inspection Item violation(s) (OOS or otherwise) noted during a CVSA Level I inspection that is successfully repaired on-site and re-inspected by the same inspector at the same inspection location will qualify for a CVSA decal as long as all previously noted Critical Vehicle Inspection Item violation(s) have been properly repaired. In such instances, only a re-inspection of the repaired violation(s) shall be done

with decal(s) being applied to the vehicle(s) and properly noted upon the original inspection.

Any vehicle that is repaired off-site or inspected by a different inspector shall be required to have a complete inspection conducted in order to obtain a CVSA decal.

Nothing within this policy shall require an inspector to re-inspect a vehicle, with that decision being left to the individual inspector and his/her agency.

For the purposes of uniformity in the application of this section and maximum maintenance of the reciprocity standard, re-inspection of a vehicle bearing a current and valid CVSA decal is contemplated under the following circumstances:

1. A North American Standard Critical Vehicle Inspection Items or out-of-service violation is detected;
2. When a North American Standard Level IV (Special Inspection) exercise is involved;
3. When a statistically based random inspection technique is being employed to validate an individual jurisdiction or regional out-of-service percentage; or,
4. When re-inspections are conducted to maintain CVSA North American Standard Inspection quality assurance.

REQUIRED REPAIRS FOR OUT-OF-SERVICE NOTICES

The following shall be the policy regarding required repairs for out-of-service notices:

No motor carrier shall require nor shall any person operate, or any inspector release any commercial motor vehicle declared "out-of-service" until all repairs required by the "out-of-service notice" have been satisfactorily completed to where a violation no longer exists.

When a vehicle is declared out-of-service for a condition resulting from an accumulation of violations, all violations that contributed to the specific out-of-service condition must be repaired (e.g., a vehicle, or vehicles in combination declared out-of-service for 20 percent defective brake violations must have all the 20 percent defective brake violations repaired prior to being released; or, a vehicle declared out-of-service for two tires at less than 1/32 inch (0.8 mm) tread depth must have both tire violations repaired prior to the vehicle being released, etc.). Once all of the contributing out-of-service violations have been repaired on any vehicle in a combination, that specific vehicle in the combination is no longer considered to be out-of-service.

An out-of-service condition cannot be corrected by creating a new violation (e.g., if a vehicle is declared out-of-service for three missing wheel fasteners on one wheel, wheel fasteners from other wheels cannot be removed to correct this out-of-service condition, etc.).

When a vehicle is declared out-of-service, it may not be moved under its own power to a place of repair. The following are three exceptions:

1. Vehicles transporting hazardous materials/dangerous goods that require placarding may be escorted to a repair facility or safe parking place.
2. When the imminently hazardous condition is automatically removed by the disconnection of the power unit from a towed unit, the power unit may be moved. When such an out-of-service power unit is operated, the examination report must carry the notation, "Power unit not to be operated in combination with another vehicle until repaired". In these instances a CVSA decal will not be issued.

   There are two mechanical defect conditions, which meet this criterion:
   a. Defective coupling mechanism on the power unit.
   b. Defective emergency or service brake hoses, or tubing between tractor and trailer.

3. Vehicles transporting passengers that have been declared out-of-service for emergency exits that are missing, inoperative, or obstructed may be moved by driver to a location where the out-of-service condition can be repaired. At no time will the vehicle be moved in this condition with passengers aboard.

OUT-OF-SERVICE NOTIFICATION

When a driver or vehicle is declared out-of-service, the carrier must be notified by telephone in the following cases:

1. Vehicles transporting hazardous materials that require placarding or prohibit leaving the vehicle unattended.
2. Vehicles transporting perishable commodities.
3. Cargo tanks transporting commodities that require temperature control.
4. Vehicles transporting livestock or other living creatures.
5. Vehicles transporting mail for the U.S. Postal Service. When vehicles or drivers of Highway Mail Carriers are declared out-of-service, telephone notice of the out-of-service action shall be given to both the USPS and the HMC the USPS manuals require a driver who is delayed in route to contact postal personnel at the location of his/her scheduled stop. The driver can supply this information to the inspector.
6. Vehicles transporting people.

In telephone contacts, the carrier should be advised that responsibility for protection of the vehicle, its cargo, accessories, and contents rests solely with the carrier. In driver out-of-service actions, the carrier should be informed that the action does not prohibit the driver from remaining on duty with the vehicle; rather, the action prohibits the driver from driving a vehicle until he/she has met the requirements of the specified section. The

identity of the carrier representative contacted should be recorded by the inspector.

No consent may be given for any type of vehicle to be towed to a place of repair except by means of a towing vehicle equipped with and using a crane or hoist. A vehicle combination consisting of an emergency towing vehicle and an "out-of-service" vehicle shall not be operated unless such combination meets the performance requirements of the subchapter referred to in Title 49 CFR §396.9(c)(2).

SAFETY CONSIDERATIONS

1. Avoid conducting a North American Standard Inspection by the side of a road. Crawling under the vehicle is dangerous enough without the threat of passing traffic.

2. Be aware that many trucks carry Hazardous Materials/Dangerous Goods. Never touch liquids or breathe fumes unless you are certain of the source. If you suspect a problem, contact local experts immediately.

3. Make sure the inspection site is level and able to support the weight of the vehicle.

4. Do not go underneath a vehicle while the engine is running.

5. Use chock blocks to prevent the vehicle from moving. Place one in front of and one behind of the drive axle tires or between the axles.

6. Have the driver place the transmission in neutral and release all brakes.

7. Use extreme caution when inspecting between tandem axles, when checking tires, inside wheels, and suspension components (particularly air spring suspension systems), or between front fender well and front tire when checking steering components.

8. Always inform the driver when you are going under the vehicle.

9. Always enter and exit the vehicle undercarriage in view of the driver. However, if you choose to conduct this inspection by the side of a road, it is best to exit the vehicle undercarriage on the curbside.

10. When under the vehicle, try to remain in a position parallel with the frame rail. Never position your body directly in front of or behind a tire.

11. Never position your body directly behind the spring brake chamber. When the spring brake is compressed (parking/emergency brakes released), the potential for

explosion of the chamber exists. This potential is increased when there is any corrosion of the chamber. Never attempt to remove any clamps or bolts from these chambers.

PLANNING ROADSIDE INSPECTIONS

1. Selection of Check Sites

   As a general rule, a check site should have enough volume of commercial vehicle traffic to support the work activity.

   Select check sites that will provide safe working conditions for inspectors, drivers, and other authorized personnel.

   Each location selected should have sufficient space available or reasonably adjacent for the safe parking of vehicles declared out-of-service.

2. Assistance to Drivers

   Ascertain the following information for future reference:

   - Location and name of the check site;
   - Location of and distance to nearest public telephone;
   - Location of and distance to nearest cities or towns providing taxi service, meals and lodging;
   - Location of vehicle repair facilities and wrecker service for heavy commercial vehicles. (In no case is an inspector to recommend a repair facility.); and,
   - Location and hours of relevant courthouse.

3. Equipment

Calipers	Eye Protection
Chalk	Head Protection
Coveralls	Scraper
Creeper	6" - 12" Ruler
Flashlight	Tread Depth Gauge
Tire Pressure Gauge	Wheel Chock Blocks

4. Applicable Forms

   - A Driver-Vehicle Examination Report is to be used to report the results of driver, vehicle, and cargo examinations. It is to be prepared even though no defects are discovered and a copy given to the driver regardless of whether or not the driver consents to sign the form.

- A vehicle out-of-service sticker is to be affixed to a vehicle that has been declared out-of-service.
- CVSA decals are to be affixed to a vehicle that passes inspection.

COLLECTING EVIDENCE

1. Statements from Drivers

   The inspector should obtain signed statements from drivers or other carrier personnel at the examination side when such statements are of evidentiary value. Such statements can develop facts that are difficult or impractical to obtain at a later date.

2. Copies of Documents

   The inspector should make copies of documents of evidentiary value. In many cases, the best, and sometimes only, opportunity to obtain documentary evidence is at the time of the vehicle examination.

3. Photographic Evidence

   The inspector should take photographs whenever they can establish evidence material to the facts of the violation. Photographs can be used to substantiate such violations as defective and/or missing parts. Photographs can also be used to copy documents of evidentiary value.