

Does My Commercial Motor Vehicle Need a USDOT Number?

Understanding when your company needs to register with the Department of Transportation (DOT) for a USDOT number is very important. For industries that have commercial motor vehicles (CMVs), it can be confusing to know when you need to register with the DOT. Not only do employers need to be concerned about when they need to register for a USDOT number, but they need to know if the states they operate in have specific laws that require them to register their intrastate carriers for USDOT numbers as well.

What Is a USDOT Number?

A USDOT number is a unique number that the DOT provides to an employer to identify its fleet vehicles and monitor its safety management controls. This number is how the DOT reports information obtained from roadside inspections, audits and crash investigations.

Interstate vs. Intrastate

When employers are trying to determine whether they need a USDOT number, one of the areas they need to look at is whether their operations (e.g., trade, traffic or transportation) are performed in intrastate or interstate commerce.

Intrastate commerce is when an employer's operations are exclusively performed within the state the company is domiciled (where the company has been registered or incorporated).

Interstate commerce is when an employer's operations go outside the state it is domiciled in. For more specific information on interstate commerce, the Federal Motor Carrier Safety Administration (FMCSA) provides a detailed explanation here.

Does an Employer Need a DOT Number?

A USDOT number is required for an employer using vehicles involved in interstate commerce and falling into one of the categories below:

- Have a gross vehicle weight rating (GVWR), gross combination weight rating, gross vehicle weight or gross combination weight of 10,001 pounds or more;
- Are designed or used to transport more than eight passengers (including the driver) for compensation; or
- Are designed or used to transport more than 15 passengers (including the driver) and is not used for compensation.

In addition to the above requirements, employers are required to obtain a USDOT number when using vehicles to transport certain types and quantities of hazardous materials that require a safety permit in intrastate commerce and are involved in interstate commerce under FMCSA <u>regulations</u>. This means that an employer that is required to have a safety permit for transporting certain hazardous materials within their state, but also operate outside their state, must have a USDOT number.

If a motor carrier has any of those vehicle descriptions and is involved in interstate commerce, then a USDOT number is required as the vehicle is considered a commercial motor vehicle.

Employers can visit the FMCSA website for information pertaining to registration for a USDOT number. The FMCSA is part of the DOT. The FMCSA website provides an interactive <u>tool</u> that employers can use to determine whether they are required to have a USDOT number.

Vehicles Weighing over 10,001 Pounds

Vehicles weighing over 10,001 pounds are the vehicles that confuse employers when it comes to DOT regulations. Vehicles or vehicle/trailer combinations that weigh more than 10,000 pounds but stay under 26,001 pounds are considered CMVs for

FMCSA purposes. These CMVs are required to have a USDOT number if they are vehicles involved in interstate commerce and fall into one of the categories below:

- Have a GVWR, gross combination weight rating, gross vehicle weight or gross combination weight of 10,001 pounds or more:
- Are designed or used to transport more than eight passengers (including the driver) for compensation;
- Are designed or used to transport more than 15 passengers (including the driver) and are not used for compensation; or
- Are vehicles used to transport certain types and quantities of hazardous materials that require a safety permit in intrastate commerce and are involved in interstate commerce under FMCSA <u>regulations</u>.

Remember, just because an employer does not operate semi-trucks does not mean they do not fall under the FMCSA regulations.

CMVs that do not need a USDOT number under federal rules are those that are between 10,001 and 26,000 pounds, operate intrastate and do not carry any hazardous materials that require a safety permit. (Make sure to check state requirements.)

How to Determine the GVWR

The GVWR is the safety weight rating of a vehicle or a trailer. An employer must look at the vehicle, or the vehicle and trailer, to figure out what the total GVWR is for the setup they are running.

First, an employer should look at the GVWR of the vehicle, which is commonly located in the truck door jamb or inside of the door. This information is also located in the owner's manual. This will give the employer the maximum weight of the vehicle. If it is over 10,001 pounds and falls within a category above, it needs a USDOT number.

Second, for combination vehicles, an employer must determine the weight of the trailer they will be using. The trailer weight rating is found on a visibly displayed sticker on the trailer or in the owner's manual (if one is provided). If neither of these are available to provide a weight, then the employer must weigh the trailer to figure out the weight.

Third, the employer will need to determine the gross combined vehicle weight rating (GCVWR) to figure out the total weight of the vehicle and trailer. This is found by adding the vehicle weight with the trailer weight.

The combination weight rating is particularly important because most employers do not understand when they should be following FMCSA regulations while using a half-ton or three-quarter-ton pickup truck. Employers that are using half-ton or three-quarter-ton pickups and attaching them to trailers are often putting the combined weight over the 10,001-pound mark. This makes the vehicle (with the trailer) subject to DOT regulations, and it will need a USDOT number.

If employers are not aware of the trailers' weight or are unaware of the FMCSA requirements and are pulled over, they can be fined under the DOT for failure to be properly labeled as a commercial motor vehicle. This will have an impact on their safety fitness score.

States That Require a DOT Number

All states need to follow the FMCSA regulations, but some states also require intrastate CMVs to obtain a USDOT number. The FMCSA provides a list of those that require a USDOT number for intrastate CMV registrants. Employers must make sure to also check their state agency for those requirements

What Happens Next?

Once the employer determines whether they need a USDOT number by checking the FMCSA website and with their state agency, the employer will have to register with the FMCSA or state agency (depending on the requirements) to obtain the unique identifying number. This must be done prior to any CMV operations.

Registration instructions can be found on the FMCSA website. If an employer uses the interactive tool to determine whether they need a USDOT number, it will direct them to the unified registration system portal to fill out the application to apply for the USDOT number. Follow the prompts on the screen to submit the application.

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