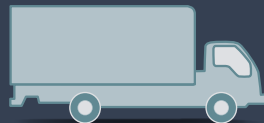
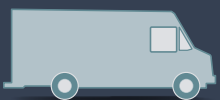


Tax & Licensing  
Title Management  
Base Plate Renewals  
Trip Permits  
DOT Authority

# Vehicle Compliance

How to Keep Your Commercial Motor Vehicles Qualified,  
In Compliance and On the Road



 **J. J. Keller**  
& Associates, Inc.<sup>®</sup>  
Since 1953

---

# The Complex World of Vehicle Compliance

---

Vehicle compliance covers everything from federal registration to U.S. DOT numbers, operating authority to vehicle registration, and federal taxes to fuel taxes. It's an area fraught with complications and multiple regulations. And when your commercial motor vehicles (CMVs) can't run due to non-compliance, your business comes to a stop.

J. J. Keller can help with a wide variety of services, including:

- Tax and licensing
- Temporary trip permitting
- DOT authority
- Base plate renewals
- Title management
- And more

## CONTENTS

<a href="#">5 Challenges of Vehicle Compliance .....</a>	<a href="#">3</a>
<a href="#">“How Do I Obtain Authority?” .....</a>	<a href="#">4</a>
<a href="#">Trucking Authority Services .....</a>	<a href="#">5</a>
<a href="#">Tax &amp; Licensing Service.....</a>	<a href="#">6</a>
<a href="#">5 Quick Tips for IFTA Compliance .....</a>	<a href="#">7</a>
<a href="#">Base Plate Renewal Service .....</a>	<a href="#">8</a>
<a href="#">“Why Do I Need a Base State?” .....</a>	<a href="#">9</a>
<a href="#">Title Management Service .....</a>	<a href="#">10</a>
<a href="#">“May I See Your Title and Registration?” .....</a>	<a href="#">11</a>
<a href="#">“Do I Need a Permit for That?” .....</a>	<a href="#">12</a>
<a href="#">Temporary Trip Permit Service .....</a>	<a href="#">13</a>
<a href="#">The Value of Outsourcing.....</a>	<a href="#">14</a>

CONTENTS





# 5 Challenges of Vehicle Compliance

## 1. Figuring Out Which Agencies You Need to Work With

Many agencies are involved when it comes to fleet legalization, including but not limited to:

- Federal Motor Carrier Safety Administration (FMCSA)
- State Departments of Transportation
- State Departments of Motor Vehicles
- Federal Internal Revenue Service (IRS)
- State Departments of Revenue

## 2. Determining Which Requirements Apply to Your Operation

The definition of a commercial motor vehicle (CMV) under one agency's rules is not always the same as the CMV definition under another agency's rules. This means that what might apply to one type of vehicle may not apply to the next. Applicability can also depend on where and how your vehicles operate.

When considering International Fuel Tax Agreement (IFTA) and International Registration Plan (IRP) applicability, these programs apply to vehicles/combinations that are over 26,000 lbs. gross weight or registered gross weight, or vehicles that have three or more axles regardless of their weight. But if the vehicle's wheels never leave the state, IFTA and IRP do not apply, even if the vehicle is hauling goods in interstate commerce.

## 3. Deciding What Options You Have for Compliance

Whether private or for-hire, passenger-carrying or hazmat hauling, no operation is like another. Perhaps you have a handful of vehicles that are involved in interstate commerce, but all others operate primarily intrastate. You may be able to satisfy your IFTA and IRP obligations with trip permits, rather than permanently plating under IRP or licensing under IFTA.

[Learn how to decide!](#)

## 4. Establishing a Recordkeeping Program that Works for Your Business

The purpose of the records is to prove your operations and reporting if you're audited by your base jurisdiction. Recordkeeping requirements vary widely depending on the type of record. For example, IFTA requires carriers to keep mileage and fuel data for 4 years, while IRP requires carriers to keep mileage data for 3 years. Under IRP, this timeframe can actually be over 6 years, depending on when the carrier renews IRP registration. Not having the proper records can be costly due to the risk of violations and penalties assessed in an audit.

## 5. Deciding on How to Maintain Your Credentials for Long-Term Compliance

Under FMCSA regulations, you're required to update your USDOT number at least once every two years according to the schedule identified in 49 CFR 390.19. IFTA requires quarterly fuel tax filing and annual renewals. IRP, UCR, and heavy vehicle use tax (HVUT) are all renewed or refiled on an annual basis, with HVUT filings required throughout the year if you add vehicles.

# How Do I Obtain DOT Authority?

## 1. Determine Authority

First decide what type(s) of for-hire authority you need based on what type(s) of services you offer.



### Property Carrier

Transports items that are owned by others for compensation.

### Passenger Carrier

Transports people for compensation.

### Property Broker

Receives payment for arranging the transportation of property belonging to others by bringing a buyer and a seller (shipper and carrier) together.

### Freight Forwarder

Transports property for compensation and in the course of business assembles, consolidates and distributes shipments, often using multiple carriers and modes.

### Household Goods Carrier

Transports household goods for the general public in exchange for payment.

## 2. Apply for Authority

Based on the services you offer you must apply for each authority separately.

### New Carrier

Apply for authority at the same time you apply online for your USDOT number. The application process will help you determine the type(s) of authority required.

### Existing Carrier

Apply for authority using the FMCSA form designated as the OP-1 series. The FMCSA's preferred method of application is submitting the form electronically.



## 3.

## Demonstrate Financial Responsibility

Your insurance company must provide the FMCSA with documentation proving adequate coverage ranging from \$750,000 to \$5,000,000.



### Actual Transporters

Carriers that engage in actual transportation can use bodily injury and property damage liability insurance to meet this requirement. Household goods carriers must obtain cargo insurance.

### Brokers and Forwarders

These types of carriers have additional surety bond requirements.

## 4. Designate Process Agents

You are required to source a "statutory agent" to act as a conduit between the legal system and your operation in the event of an accident or other incident.



### Named By State

You must assign a process agent for each state in which your company operates, or name a "blanket" agent.

## 5. Wait

It's typical for it to take many weeks for your authority to be issued by the FMCSA.



### Errors

Every error or missing piece of information will delay the process, therefore it's imperative to handle each step correctly or seek a third party to handle it for you. Keep in mind that you will not have active authority until the FMCSA approves all of the steps. Active authority is required to move even a single for-hire interstate load.

The **J. J. Keller® Trucking Authority Service** makes obtaining the right authority easy!

[See page 6 for details.](#)



**J. J. Keller**  
& Associates, Inc.  
Since 1953

# Trucking Authority Services

Let J. J. Keller handle your operating authority quickly and easily.



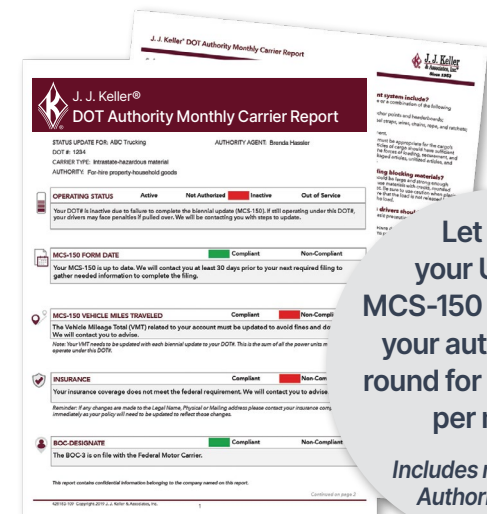
## AVOID PENALTIES & OUT-OF-SERVICE ORDERS With Accurate Operating Authority

To operate legally, you need the proper trucking authority registration and credentials. But managing these requirements can be confusing, because proper documentation depends on the type of carrier you are, the type of transportation you perform, and where you operate.

### We make it quick and simple with our DOT Authority Services:

- For-Hire Operating Authority
- Unified Carrier Registration (UCR)
- Designation of Process Agents
- PHMSA Hazardous Material Registration
- Federal Hazmat Permits
- State Hazmat Alliance
- Transport Applications
- USDOT Registration
- USDOT Number
- And more

[TruckingAuthority.com](http://TruckingAuthority.com) | 888.601.2017



Let us file your UCR and MCS-150 and monitor your authority year round for only \$49.50 per month.

Includes monthly DOT Authority Report!

# Vehicle Tax & Licensing Service



This service provides you with a team of regulatory specialists who will help keep your company compliant with the complex motor carrier tax and registration requirements, state IFTA and IRP requirements, and your fuel tax reporting obligations.

## Your Vehicle Specialist will:

- Collect and enter your driver trip reports, fuel receipts, and toll information into a specialized database (We accept electronic data transfer or paper trip documents)
- Conduct a proprietary audit and correct errors to meet IFTA and IRP state compliance requirements
- Identify and correct discrepancies when appropriate
- Manage your monthly and quarterly mileage and fuel data for quarterly IFTA reporting
- Complete and submit tax returns and disperse payments
- Provide support for IFTA audits
- Store and purge documents according to regulatory timelines
- Obtain initial permits for mileage, authority, IFTA and IRP
- Complete IRP, IFTA, Mileage Tax (OR, NM, NY, CT and/or KY), Unified Carrier Registration (UCR) and Authority Permit applications for new vehicles added to your fleet and renewals
- Provide cost reports of total fuel, mileage, and authority permits

## Get Help with Your IFTA/IRP Setup

We'll handle the entire process of setting up your account with IFTA and/or IRP.

[Learn More](#)



**FREE Title & Registration Compliance Brief**  
Learn about titles vs. registration, vehicle purchases and more!

[Learn More!](#)

## How we make vehicle legalization easier:

- **Save time.** Our long-standing relationships with state agencies and our expansive tag agent network allow us to expedite the time-consuming vehicle title and registration process.
- **Save money.** We identify the most cost-effective way to title and register your fleet to lower our cost to you.
- **Gain visibility.** Your titles will be stored in a secure online database you can access for 24/7 reporting.
- **Minimize risk.** We apply the most current regulations in managing your licensing and titling.
- **Get audit support.** In the event of an audit, J. J. Keller's experts will prepare your records and manage the entire process.

## Small Fleet?



We offer special pricing starting at just one vehicle or driver!

[Get Started!](#)

# 5 QUICK TIPS for IFTA Compliance



Staying in compliance with IFTA involves some diligence, and the following tips should help you stay on top of the requirements in your day-to-day operations.

## 1. Know Your Qualified Vehicles

Qualified vehicles under IFTA are ones that meet any one of these criteria:

- A vehicle that has two axles and a gross weight or registered gross vehicle weight exceeding 26,000 pounds;
- A vehicle or power unit that has three or more axles regardless of its weight; or
- A combination when the weight of such a combination exceeds 26,000 pounds gross vehicle weight.

Keep in mind that your entire fleet may not have to be registered. For example, if you have 15 trucks that are over 26,000 pounds, but only two will regularly cross state lines, only those two vehicles would be registered under IFTA.

## 2. Track All Miles

Your drivers must know that all miles traveled in IFTA qualified vehicles must be recorded, regardless of the situation for which the vehicle is being used. For example, personal-use miles or when the vehicle is in the shop for repairs and the maintenance crew takes it out for road tests, all miles — work and non-work related — must be counted.

## 3. Maintain Proper Records

You must keep records in two categories: mileage records and fuel receipts.

### Mileage Records

Most carriers are now keeping their IFTA mileage data electronically through an electronic logging device (ELD) and here's what's required:

- Vehicle identification number
- Original Global Positioning System (GPS) reading or other location data for the vehicle
- Date and time and location of each GPS system reading
- Beginning and ending distance readings from the odometer, hubometer, or similar device
- Calculated distance between each GPS or other system reading
- Route of the vehicle's travel
- Total distance traveled by the vehicle
- Distance traveled in each jurisdiction.

### Fuel Receipts

Fuel receipts must include the following:

- Date of purchase
- Seller name/address
- Number of gallons
- Total amount of sale
- Purchaser's name/address
- Fuel type
- Vehicle number

Electronic receipts are acceptable under IFTA. Many carriers use fuel cards, and if your company uses them, rest assured that fuel card reports are an acceptable form of fuel receipts.

## 4. Hang on to Unused IFTA decals

When you register for IFTA, you get two decals for each vehicle. The decals must be placed on both sides of the cab. However, sometimes you may end up with extra decals that never make it onto your vehicles. Do not throw out those unused decals at the end of a registration year. Your jurisdiction has record of issuing them, and that same jurisdiction will also want to be sure they are accounted for in case of an audit.

## 5. Keep Records Long Enough

Under IFTA, you are required to keep the records for your quarterly tax return for four years from the return due date or filing date, whichever is later, plus any time period included as a result of any penalty assessments. These records include all of your mileage records, fuel receipts, and unused IFTA decals (if applicable).



### Struggling with IFTA & IRP Requirements?

Our **IFTA/IRP Records Review** spots your risk areas and provides recommendations.

Our **IFTA/IRP Workshop** provides in-depth training on all of the reporting requirements.

For details, call 888.473.4638

# Base Plate Renewal Service

IFTA and IRP audits are **mandated for 3%** of all registrants annually.

If you're an interstate motor carrier, you're required to indicate a base state of operations under the IFTA, IRP and UCR programs.

Let us get your company's new commercial motor vehicles (CMVs) plated quickly and easily, renew the base plates for each of your company's commercial motor vehicles (CMVs), and ensure they're up-to-date and accurate.

## Your Vehicle Specialist will...

- Manage your renewals in the most efficient manner available
- Process and track renewals to ensure registration
- Complete the necessary paperwork
- Monitor the progress with the appropriate states to verify the renewal is complete
- Check the credentials for accuracy
- Ensure you have the most up-to-date inventory information
- Give you access to a clean, accurate and organized asset list
- Provide consistent renewal management across your organization
- Offer ongoing support as your assets and needs change due to ownership, lien changes, business mergers, and acquisitions



## Need Help Complying with California CARB and other State Requirements?

J. J. Keller's **Clean Fleet State Compliance Reporting** service keeps your vehicles in compliance.

For details, call 888.473.4638

## Partnering with J. J. Keller will help you:

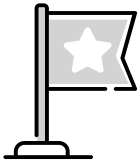
- Get your vehicles plated faster
- Eliminate the complexities of dealing with multiple state base plate regulations
- Ensure your vehicles are operating legally
- Centralize processes and have full visibility of your assets
- Save valuable time



In the event of a DOT audit or intervention we'll support you 100%. We'll prepare requested files and provide guidance during the entire process. We'll even negotiate on your behalf to lower any fines assessed.

# Why Do I Need a Base State?

Interstate motor carriers must indicate a base state of operations under several reporting programs. The base state approach simplifies compliance by eliminating the need to report operations, register vehicles, and pay fuel taxes to multiple states for every vehicle operated by the carrier.



## CARRIER REGISTRATION (UCR)

Nearly all carriers engaged in interstate commerce are subject to the [Unified Carrier Registration](#) (UCR) program. Each carrier must register, report fleet size, and pay fees annually to its base state. However, not all states participate in UCR. But even though a carrier's base state doesn't participate, they must still register under UCR.

Under this program, when the principal place of business is in a participating state, that state will serve as the carrier's base state. When the principal place of business is not located in a participating state, any participating state in which the carrier maintains an office or operating facility may serve as its base state.

When a carrier does not have a principal place of business, office, or operating facility in any participating state, the participating state that is nearest to the location of the carrier's principal place of business may be the base state, or the carrier may select any participating state within their FMCSA region.

## VEHICLE REGISTRATION (IRP)

Instead of registering commercial vehicles in every state in which they travel, carriers can [register their trucks](#) in the base state and have the registration recognized by all jurisdictions.

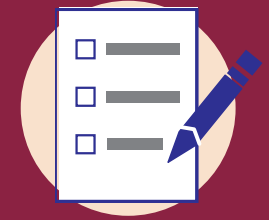
Under the International Registration Plan (IRP), "base jurisdiction" means the jurisdiction (state or province) where the carrier has an established place of business, where mileage is accrued by the fleet, and where operational records of the fleet are maintained or can be made available.

## FUEL TAX REPORTING (IFTA)

Rather than each state having its own [fuel tax regulations](#), the International Fuel Tax Agreement (IFTA) allows motor carriers to maintain one license, carry one set of fuel credentials, and [file quarterly tax returns](#) with a base state. The base jurisdiction then distributes the taxes to all other jurisdictions in which the carrier operated.

Under IFTA, base jurisdiction means the member jurisdiction where qualified motor vehicles are based for vehicle registration purposes.

# Title Management Service

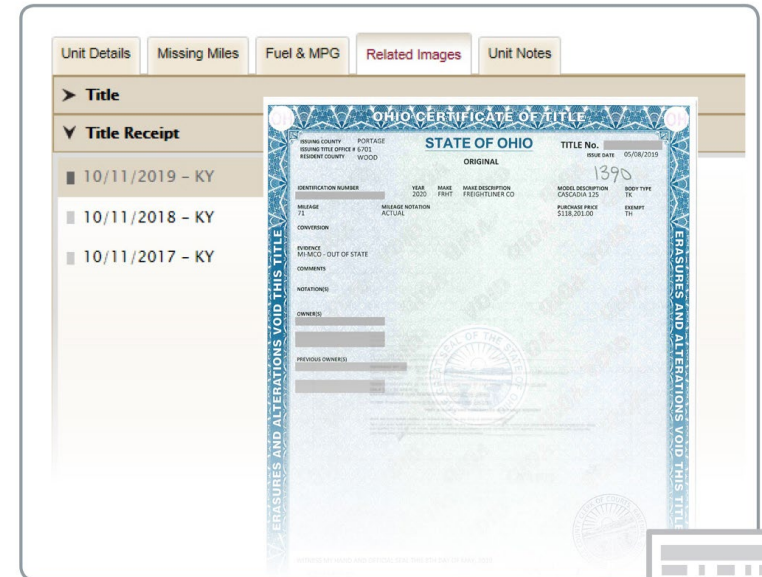


Whether you're going through a merger or acquisition, purchasing new trucks and equipment or selling old ones, we make titling and registering your vehicles easy. This includes preparing and submitting applications to the appropriate states for your title and registration changes and lien adds (if applicable) and working with a network of tag agents to process work through state offices quickly and accurately. We can also ensure timely receipt of titles by working directly with lien holders and leasing companies. Once we complete re-titling, you'll have immediate access to up-to-date titles, which are needed to sell equipment without delays.

Using our secure DataSense® platform, you can log in 24/7 to see all of the work we're doing on your behalf; have access to a clean, accurate, and organized list of your equipment that you can view and sort; and get instant access to your vehicles' titles to produce a copy any time one is needed.

## J. J. Keller will help you manage vehicle titles for:

- New truck purchases
- Base plate renewals
- Vehicle titling
- Vehicle transfers
- Mergers and acquisitions
- Re-finances or changes in lien holder
- Duplicate titles



**Get instant access to your vehicles' titles via our online portal so you can quickly produce a copy any time it's needed.**



## Going Through a Merger or Acquisition?

We can handle the paperwork of transferring vehicle titles to the new legal operating name.

[Learn More](#)

# “May I See Your Title & Registration?”

## How to make sense of vehicle compliance requirements.

Whether law enforcement is making a routine inspection, or you're trying to legally manage your company's fleet of vehicles, proper titling and registration is a must.



### Title vs. Registration—similar but different

A **vehicle title** is a legal form that includes specific information about the vehicle, most importantly, who owns the vehicle. Other items included will be the vehicle identification number (VIN), technical information, such as gross weight, and whether the vehicle has a lien. If a lien exists, the lien holder's information is included so that any debt on the vehicle is paid when the vehicle is sold.

**Vehicle registration** is required by each state. Depending on the operations of your company, you are considered either an intrastate or interstate carrier, and your registration will vary accordingly. Whether you are an intrastate carrier receiving a base plate for one state, or an interstate carrier receiving an apportioned plate, you are required to pay registration fees to your base jurisdiction.

### Vehicle Purchases—what you need to know

When purchasing new or used vehicles from a dealer, often the dealer will have titling paperwork ready for you at the time of purchase. The signed agreement and title application serve as proof of ownership until you receive the official title from the state motor vehicle office.

When buying a used vehicle from a private seller, you should ask to see the title before agreeing to the purchase. The title should reflect whether there is an outstanding lien on the vehicle or whether the vehicle has been in an accident and declared a total loss.

### Mergers and Acquisitions—proper paperwork required

As companies merge with or acquire other companies, many legal or regulatory issues need to be addressed, including re-titling and re-registering vehicles. When this happens, you'll want to work closely with the company you're acquiring or joining to make sure you have the proper paperwork to transfer ownership and register properly with the state motor vehicle office.

### Sales Tax—state requirements vary

Depending on your company's operations, you may or may not need to pay sales tax when purchasing a vehicle. Many states have a sales tax exemption for interstate carriers or for carriers who are for-hire.

If you find yourself needing to move a vehicle from one state to another, you might be subject to a sales tax when you re-title and re-register the vehicle in the new state. Some states may accept that sales tax was paid to another state through a reciprocity agreement, but you may want to consult with a tax professional because the requirements vary from state to state.

# Do I Need a Permit for That?

Understanding the vehicle permitting requirements.

Understanding when permits are required is key to keeping your vehicles on the road and in compliance. The most common permits are for trip, fuel and oversize/overweight vehicles. But when operating in some states, a vehicle may require a mileage permit in addition to fuel and trip permits.



J. J. Keller®  
**PERMIT SERVICE**

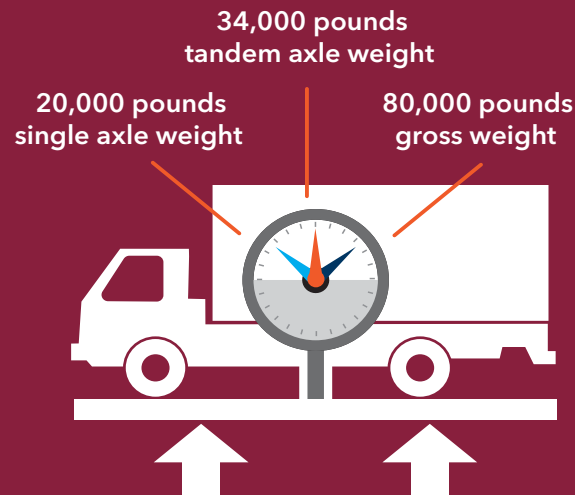
## OVERSIZE PERMITS

Your vehicle exceeds the legal size limits:



## OVERWEIGHT PERMITS

Your vehicle exceeds the legal weight limits:



## TRIP & FUEL PERMITS

You're operating the following vehicles or combinations across state lines and they do not have IFTA or IRP credentials:



Vehicles with gross weights, combined gross weights or registered weights over 26,000 pounds;



A power unit or truck that has 3 or more axles regardless of weight.

# J. J. Keller® PERMIT SERVICE

Trip Permits • Fuel Permits • Oversize/Overweight Permits • Specialty Permits

## Easier to Order, Faster to Get!

With the J. J. Keller® Permit Service you get...

- **Online ordering wizard** walks you step-by-step through your order
- **Expert staff** of over 40 agents you can rely on to ensure you're operating legally
- **Route auditing** to verify that your routes are legal and problem-free
- **Stored vehicle information and permit history** making reordering fast and simple
- **State-direct agreements** that speed up the paperwork process for faster turnaround times
- **Volume pricing** to make it even more affordable to request multiple permits
- **One-stop convenience** for all your fuel tax, licensing and trucking authority needs

Get your permits quickly & easily 24/7 by calling our permit specialists or ordering online.

[KellerPermits.com](https://www.kellerpermits.com) | 800-231-5266



**Fast  
Online  
Ordering**

[KellerPermits.com](https://www.kellerpermits.com)

J. J. Keller®  
**PERMIT**  
SERVICE

# The Value of Outsourcing

J. J. Keller lets you outsource your fleet's complex, labor-intensive vehicle compliance to the industry experts.

The value of outsourcing compliance includes a variety of benefits:

- **Going above FMCSA minimums** to show that safety is a value and a priority at your company.
- **Gaining expertise** that's difficult to find given the complexity across states and agencies.
- **Augmenting compliance efforts** if there's a shortage of workers or turnover in your business.
- **Saving time** that's required by staff to undertake due diligence in consistently meeting every regulatory and company policy requirement.
- **Reducing risk of negligent hiring or negligent supervision.** If a crash leads to litigation, a plaintiff attorney will have your company's compliance scrutinized, including vehicles not compliant to operate.
- **Reducing the risk of noncompliant vehicles on the road** by getting notifications for any compliance deficiencies and advanced notice of expiring registrations.
- **Understanding nuances** of the requirements, from IFTA and IRP to licensing, permits, authority and more.
- **Providing audit support**, including gathering the required paperwork and being there during the audit process for auditor questions.



## J. J. Keller® **TRUCKING AUTHORITY SERVICE**

We make it quick and simple with our  
**DOT Authority Services:**

- For-Hire Operating Authority
- Unified Carrier Registration (UCR)
- Designation of Process Agents (BOC-3)
- PHMSA Hazardous Material Registration
- Federal Hazmat Permits
- State Hazmat Alliance Transport Applications
- USDOT Registration
- USDOT Numberright decisions.



## J. J. Keller's Purpose

To create safer workplaces and highways, so your employees thrive and return home each day to the families who love them.

## Why J. J. Keller?

For nearly 70 years we've been helping fleets like yours run safer, more efficiently, and with reduced regulatory risk. Our safety and compliance specialists have over 300 years of combined regulatory experience. When you partner with us, you'll join over 500,000 customers, including 90% of the Fortune 1000® companies and 99% of the top 100 private motor carriers.

Discover how J. J. Keller goes the extra mile to make sure your vehicles are in compliance.

[TruckingAuthority.com](http://TruckingAuthority.com) | 888.601.2017



**J. J. Keller**  
& Associates, Inc.®

*Since 1953*