PRISM News

Hot Topic - Registrant USDOT Number on Cab Cards

The only USDOT number that should be printed on State IRP cab cards is that which belongs to the designated *motor carrier responsible for safety* and only if that carrier is not expected to change during the registration year. Some states are currently printing the USDOT Number of the registrant on the cab card. *FMCSA is strongly requesting that those states stop this practice.*

Roadside enforcement officers are, in some instances, entering the registrant USDOT number on accident and inspection records. In many cases this mistake is being made because the registrant number is the only number on the cab card. However, even if the motor carrier responsible for safety number is also on the cab card, the registrant USDOT number is still being recorded on accident and inspection records in some instances. Please also see the related "Registrant Only" USDOT Number story in this newsletter for more information.

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New States on Board

We are pleased to announce that Wisconsin and the District of Columbia have indicated they will be submitting letters to FMCSA in the near future.

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NTSB Recommends Expedited PRISM Implementation in All States

The National Transportation Safety Board (NTSB) has formally recommended that FMCSA "establish a program to verify that motor carriers have ceased operations after the effective date of revocation of operating authority."

This NTSB recommendation stemmed from a crash that occurred at an Illinois toll -booth in which the motor carrier did not have Federal authority and should not have been operating in interstate commerce. This is an example of why we need to make sure that the States are verifying whether or not a carrier and/or vehicle are OOS before issuing credentials.

FMCSA responded to this recommendation by informing the NTSB that further deployment of PRISM would serve as a significant tool in ensuring carriers discontinue interstate operations after they have been ordered out-of-service.

The NTSB submitted a follow-up letter to FMCSA in Spring 2007 explaining that it likes the PRISM program's mission, but is concerned that PRISM is not fully implemented in all States.

The NTSB's 2007 follow-up letter recommended that FMCSA "expedite PRISM implementation in all States" and indicated that the NTSB would like to receive regular updates on State implementation status.

Since PRISM is getting positive awareness from outside groups, we need to provide them with accurate updates on PRISM State Implementation efforts. Please continue responding to the quarterly implementation status questionnaires and let us know if we can assist further in PRISM deployment for your State.

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Automatic State DMV Alert of FMCSA OOS Orders

The PRISM Team provided information on this topic in the January newsletter. We include this again since it is such an important project and many states have yet to implement.

The requirement is for the State DMV to have an automated report each business morning to tell them that a carrier with vehicles registered in their State was placed OOS (or rescinded) the previous day by the FMCSA. The new automated reports are intended to identify candidates for immediate

discussion with FMCSA on the appropriateness of plate sanctions and to foster more routine communication between the FMCSA and State DMVs.

The PRISM team had heard from several State DMVs that they discovered OOS carriers only after their registration system flagged them at renewal or when the carrier attempted to add a vehicle to their IRP account and that they would have suspended the carrier's plates sooner if they had been informed by FMCSA that the carrier was OOS. That is why an automated notification from the IRP records to the IRP manager must be established in each PRISM State. It will automatically notify the IRP manager within 24 hours of an FMCSA OOS order issuance.

Funding is available to States that still need to implement this process.
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Possible Elimination of the "Registrant Only" USDOT Numbers

As discussed on our recent National PRISM Conference Call a number of individuals have recently questioned the usefulness of the "Registrant Only" USDOT Number that is unique to the PRISM program and have suggested eliminating it altogether.

One issue is the ever expanding number of inspections and accident reports, currently over 32,000 that are incorrectly assigned to these "Registrant Only" numbers.
This is rapidly becoming an issue of growing concern. The thousands of accident and inspection records incorrectly linked to "Registrant Only" USDOT numbers do not show up as a problem in data quality reports because they appear to be linked to a valid USDOT number.

Also mentioned as a concern is the possibility that FMCSA may not have the legal authority to require an entity that is not a regulated motor carrier to register and obtain any kind of USDOT number.

Even more troubling, however, there have been assertions that motor carriers are purposely obtaining "Registrant Only" USDOT numbers because they know this type of USDOT number will not flag them for the FMCSA/State New Entrant audit program and will not be evaluated by the SafeStat compliance review priority system.

To get a better feel for and an understanding of the pros and cons of this issue, the PRISM team is soliciting your thoughts, comments, suggestions and/or recommendations on this issue. Please forward your comments to tom.lawler@dot.gov.
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Social Security Number Privacy

The Tax Identification Number (TIN) is required to be collected on IRP applications in order to validate the USDOT Numbers. However, this number should **not** be printed on the cab card nor should it be printed on the renewal notice since it can be the social security number in some cases.

For the renewal notice, we recommend that the **field** for TIN (which needs to be on the renewal for changes of the USDOT Number and accompanying TIN) be filled with ****.
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National Conference Call Notes

The PRISM quarterly conference call was held on April 25, 2007. Topics discussed included:

- Program Status Update and Recent Activities

As mentioned in the last newsletter, new levels of implementation have been created. They are intended to provide more clarity and definition to State implementation status.

Notable activity with the states in the last quarter that was mentioned on the call included:

- KS & AK -approval on Implementation plans.
- KS - more funding for Roadside Enforcement.
- WI & DC - plan to submit letters of intent.
- OK and ID - close to approval of PRISM Implementation plans
- MT, WY, CA, NY - planning for implementation training
- WV - Implementation Review
- IN- Implementation Assistance session.

- Coordination with CVISN

The PRISM program is making an initiative to work closer with the CVISN program to take advantage of both programs in terms of grants and funding allowing States to leverage and complement developments in each program. This effort was discussed.

- Letter to FMCSA from NTSB

A safety recommendation made to the FMCSA by the National Transportation Safety Board (NTSB) stemming from a crash at an Illinois toll-booth by a carrier without authority was discussed. See related article in this newsletter.

- OOS Vehicle Tracking

PRISM has begun to track vehicles when a state suspends or denies registration after the OOS order is issued. This new effort was mentioned on the National conference call. Some records have been found to be registered even though they were OOS. There may be a glitch in some States' systems.

- PRISM System Specifications

The new PRISM System Specifications were discussed. The primary change is to the requirements for States uploading vehicles via the PRISM Vehicle File (PVF) format, specifically, the requirement that all OOS vehicles should be uploaded. These records remain on the target file to detect a carrier who obtains a different USDOT number for the same vehicle that is currently OOS.

Also the new requirement that specifies an automated notification to the IRP manager for Federal OOS orders was discussed.

- IRP Clerical Training Package

The availability of the PRISM Registration Staff Training Package on the CVISN website was discussed. To access the PRISM documents, use this link, http://cvisn.fmcsa.dot.gov/. Then click on the "Documents" button on the top, and then the "PRISM" link on the left. This will provide a list of the latest PRISM documentation.

The PRISM Registration Staff Training Package contains 2 different versions of the training manual, one for the Instructor, and one for the IRP clerks. Customization by each State should only take a couple of hours.

- Funding to Replace Polk System

It was mentioned that POLK has recently announced that they are no longer planning to be an IRP vendor. It was further mentioned that States that are looking for additional support in ensuring future IRP systems are PRISM compliant, should contact their local FMCSA Division office.

- MCS-150 Update Requirement

A call participant indicated that carriers ask why PRISM requires updating the MCS150 information every year, when the Federal regulations only require that it be done every 2 years.

Put simply, we want to prevent carriers from running the road with old MCS150 data. Tying MCS-150 update checks to the annual IRP registration process enables us to ensure that a motor carrier's MCS-150 data will not expire (exceeded 24 months) before the new license plates expire. If PRISM States allowed carriers to renew license plates with MCS-150 data that was as old as 23 months (technically in compliance with Federal regulations) the data could be nearly 3 years old before plate renewal time rolled around again.

A conference call participant indicated that automatic federal MCS-150 update notice letters are being sent to carriers even though the carriers have already updated their MCS150 information through a PRISM State DMV. The PRISM team will check with the MCMIS team to see if there is a way to filter out that group and not send out the letter or change the wording to provide more prominent notice that additional updates are not required if the data has already been updated through a PRISM State DMV.

- Carrier Instructions for using MCMIS in the IRP Office

Some States have indicated they have been required to spend a lot of time helping out the customers who want to update their USDOT Number online at a PC kiosk in the IRP office. The PRISM team indicated they will provide standardized instructions in the next version of the PRISM Procedure Manual.

- Questions & Answers

A call participant indicated that the number of inspections and crashes assigned to "Registrant Only" USDOT Numbers instead of carrier numbers is staggering and growing. There are over 32,000 accident or inspection records assigned to a USDOT number classified as "Registrant Only." The call participant asked if we could eliminate the concept of a Registrant Only USDOT Number. The PRISM Team wants to look into this. (See article Elimination of the Registrant Only USDOT Number)

A call participant inquired if there was detailed documentation that describes the various carrier OOS Order processes at the Federal level. The PRISM Team will research.

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States' Implementation Progress

The status of the states' PRISM implementation progress follows.

PRISM Implementation Status – June 2007
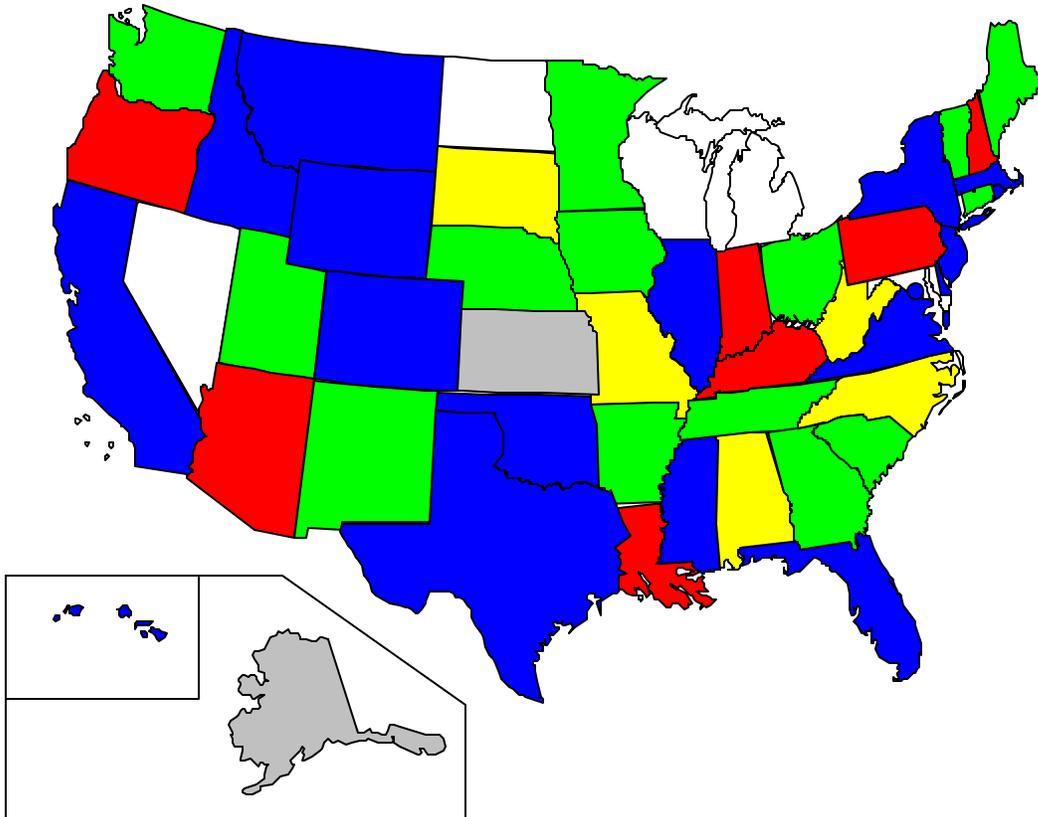
PRISM Implementation Levels

Grant Approval – Blue (18 States: CA, CO, DC, DE, FL, HI, ID, IL, MA, MS, MT, NJ, NY, OK, RI, TX, VA, WY)

Approved PRISM Implementation Plan – Gray (2 States: AK, KS)

Level 1 – Red (7 States: AZ, IN, KY, LA, NH, OR, PA)
- Collecting/Validating USDOT Number of Carrier Responsible for Safety

Level 2 – Yellow (5 States: AL, MO, NC, SD, WV)
- Enforcing MCS-150 Update
- Checking Carrier Safety Status
- Submitting Targeted Vehicles to SAFER

Level 3 – Green (14 States: AR, CT, GA, IA, ME, MN, NE, NM, OH, SC, TN, UT, VT, WA)
- Denying, Suspending, Revoking for Federal OOSO
- Bar Coding PRISM Specs
- Enforcement Stopping Targeted Vehicles

N/A – White (5 States: MD, MI, NV, ND, WI)