

DOT Regulatory Reminder

Must I have USDOT# on my pickup?

There are several factors to consider:

1. USDOT # requirements
2. Definition of CMV
3. Marking a CMV
4. When a CDL is required

Bottom Line: Just because your USDOT# and Company Name are painted on the sides of your pickup truck doesn't mean the driver must have a commercial drivers license (CDL). If your pickup truck isn't hauling a hazardous material that requires a placard and is less than 26,001 pounds, the driver of the pickup does not need a CDL.

Day #1: Company 1/2-ton pickup truck is going to haul a placardable amount of pesticide across state line. The following must occur:

1. The vehicle becomes a commercial motor vehicle (CMV) in interstate commerce and must have a USDOT#, company name and placards on the truck
2. The driver must have a CDL with Hazmat endorsement
3. The driver must have a medical certificate while operating the truck
4. The truck must go through pre-trip and documented post-trip inspections
5. The driver must keep a log or observe the 100-air-mile radius rule
6. The truck must have an annual DOT inspection

Day #2: Same company 1/2-ton pickup is going to haul Roundup to a farmer 20 miles down the road in the same state (Roundup is not a DOT regulated commodity). The following must occur:

1. USDOT # and company name are not required on the truck for this day, but can remain on the truck even if it's not considered a CMV for day #2
2. Driver doesn't need a CDL
3. Driver doesn't need a medical certificate
4. No pre-trip or post-trip inspections required
5. Driver doesn't need to keep a log
6. The truck still must have an annual DOT inspection (because of Day # 1 above)

USDOT# Requirements

A USDOT # must be displayed on each side of a self-propelled commercial motor vehicle that has a gross vehicle weight rating (GVWR), gross vehicle weight (GVW), or gross combination weight (GCW) of 10,001 lbs. or more, whichever is greater.

If a vehicle such as the 1/2-ton pickup above sometimes falls into a category of a CMV needing USDOT # and sometimes doesn't, it's fine to mark it with USDOT # and Company Name and its there when you need it. Enforcement officials cannot ticket your driver for not having a CDL if the vehicle is not in a CMV mode of transport. If your driver does get a ticket for no CDL just because the pickup has USDOT # on it, fight it.

Definition of a CMV

Commercial Motor Vehicle is any self-propelled or towed vehicle used on a highway in interstate commerce to transport passengers or property when the vehicle:

1. Has a gross vehicle weight rating or gross combination weight rating, or gross vehicle weight or gross combination weight, of 10,001 pounds or more, whichever is greater
2. Is designed or used to transport more than 8 passengers (including the driver) for compensation
3. Is designed or used to transport more than 15 passengers, including the driver, and not used to transport passengers for compensation
4. Is used in transporting material found by the Secretary of Transportation to be hazardous in a quantity requiring placarding

Marking a CMV

Every self-propelled CMV must be marked as specified below.

- The legal name or a single trade name of the motor carrier
- The motor carrier identification number preceded by the letters "USDOT"
- The name of any person who is leased to the motor carrier and the preceding words "operated by"

Size, shape, location, and color of marking must:

- Appear on both sides of the self-propelled vehicle;
- Be in letters that contrast sharply in color with the background on which the letters are placed;
- Be readily legible, during daylight hours, from a distance of 50 feet while the commercial vehicle is stationary; and
- Be kept and maintained in a manner that retains legibility

The marking may be painted on the motor vehicle or may consist of a removable vinyl or magnetic device as long as it's legible and maintained.

CDL Requirements

Anyone operating a commercial motor vehicle as defined above is required to have a commercial driver's license. This same definition is used in determining a driver's

participation in a DOT random alcohol and drug-testing program. The applicable definition refers to vehicles used in commerce, whether interstate or intrastate, and meets one of the following:

- Has a gross combination weight rating of 26,001 or more pounds inclusive of a towed unit with a gross vehicle weight rating of more than 10,000 pounds;
- Has a gross vehicle weight rating of 26,001 or more pounds;
- Is designed to transport 16 or more passengers, including the driver; or
- Is of any size and is used in the transportation of hazardous materials.

CDL Classes

The federal regulations describe three vehicle groups for purposes of the commercial driver's license. The groupings are as follows:

- **Class or Group A** for Combination Vehicle - Any combination of vehicles with a gross combination weight rating of 26,001 pounds or more provided the GVWR of the vehicle(s) being towed is in excess of 10,000 pounds.
- **Class or Group B** for Heavy Straight Vehicle - Any single vehicle with a GVWR of 26,001 pounds or more, or any such vehicle towing a vehicle not in excess of 10,000 pounds GVWR.
- **Class or Group C** for Small Vehicle - Any single vehicle, or combination of vehicles, that meets neither the definition of Group A nor that of Group B as contained in this section, but that either is designed to transport 16 or more passengers including the driver, or is used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act and which require the motor vehicle to be placarded under the Hazardous Materials Regulations (49 CFR part 172, subpart F).

CDL Endorsements

Drivers are required to obtain endorsements for their commercial driver's license to operate certain types of commercial motor vehicles. Endorsements are required to operate vehicles that are:

- Double/triple trailers
- Passenger vehicles
- Tank vehicles
- Required to be placarded for hazardous materials

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