DOTRA | CARRIER GUIDE

The new carrier compliance roadmap.

What FMCSA requires, where each item gets filed, and the order to do it in.

Version 1.0 | Current as of August 10, 2026
dotracompliance.com

What's inside.

Tap any line to jump straight to it.

Read this first.

This guide covers the federal requirements that apply to most new for-hire interstate carriers. It does not cover every state requirement, and hazmat, passenger, and intrastate-only operations carry obligations this guide does not address.

The motor carrier is responsible for its own compliance. That duty sits with you under 49 CFR, and it does not transfer to a vendor, a consultant, or a software product. This guide shows you what is required, points you to where each filing happens, and tells you what to keep. You decide, you file, you certify.

FMCSA rules move. This guide is current as of August 2026, and every requirement lists its official source. Check the source before you rely on anything here.

The shape of the job.

A new carrier needs three things in place: active registration and authority with FMCSA, a drug and alcohol testing program that is live before any driver operates, and complete records for every driver and vehicle. Everything in this roadmap falls under one of those three, and the order matters, because some steps gate others and a few carry automatic-fail consequences at your new entrant safety audit.

General information about federal requirements, not legal advice.

PHASE 1

Registration and authority.

Where you register.

New carriers register through MOTUS, FMCSA's registration system at **motus.dot.gov**. MOTUS replaced the old Unified Registration System (URS) on May 14, 2026. If a guide or a vendor points you to URS, it is out of date.

MOTUS is where you apply for your USDOT number and operating authority (your MC number), file MCS-150 biennial updates, and change company information. The filing fee is $300 per authority type.

One thing MOTUS requires that no one can do for you: identity verification through Login.gov, with a government-issued ID and a facial scan. The person registering the company completes this themselves. Any service that offers to handle your registration end to end is describing a process that no longer exists.

What to keep: your USDOT number, MC number, Login.gov credentials, and FMCSA Portal access. You will use all of them again.

Insurance.

For-hire property carriers need primary liability coverage of at least $750,000, and most brokers and shippers expect $1,000,000. Your insurance company files proof of coverage (BMC-91 or BMC-91X) directly with FMCSA, and your authority will not activate without it. You buy the policy, your insurer files it. Confirm with your agent that the filing went through.

What to keep: certificate of insurance and the MCS-90 endorsement, where you can produce them.

BOC-3 process agent.

A BOC-3 designates a process agent in each state, someone who can accept legal documents on your company's behalf. Required under 49 CFR Part 366 before your authority activates, and it must be filed electronically by a process agent company. Typical one-time cost: $20 to $100. FMCSA lists process agents at **fmcsa.dot.gov**.

UCR, IRP, IFTA, and Form 2290.

- **UCR.** Annual registration for interstate carriers. For 2026, the fee is $46 for a fleet of zero to two vehicles. Register directly at **ucr.gov**. Third-party sites sell the same registration at a markup. The window opens October 1, payment is due December 31, enforcement starts January 1.
- **IRP and IFTA.** Apportioned plates and fuel tax, both through your base state, not FMCSA. IFTA means quarterly returns, so calendar the deadlines the day you get your decals.
- **Form 2290.** Federal heavy vehicle use tax for any truck at 55,000 pounds or more taxable gross weight. File at **irs.gov**. You need the stamped Schedule 1 to register the vehicle with your state.

PHASE 2

The drug and alcohol program.

This phase comes before your first load, not after, and it is where new carriers fail audits. A new entrant automatically fails its safety audit for having no drug and alcohol testing program, no random testing program, or for using a driver who refused a test or tested positive without completing return-to-duty steps. Automatic means automatic. There is no partial credit.

Consortium enrollment.

If you drive a CDL vehicle, you are a covered driver even if you are the only employee, and you cannot administer your own random program. A one-driver operation must enroll in a consortium, a group random-testing pool run by a third-party administrator (C/TPA). Annual enrollment typically runs $100 to $300 per driver.

The 2026 minimum random rates are 50 percent of driver positions for drugs and 10 percent for alcohol, unchanged for six straight years. The consortium handles the selection math. The obligation to test is yours.

Clearinghouse registration.

The Drug and Alcohol Clearinghouse is FMCSA's database of program violations, and every employer of CDL drivers must be registered. Register free at **clearinghouse.fmcsa.dot.gov**. Then designate your C/TPA, run a full pre-employment query on every driver before they operate, and run a limited query on every driver at least once a year. Full queries require the driver's electronic consent inside their own Clearinghouse account, so each driver registers too. Limited queries run on a general written consent you collect and keep on file.

The rest of the program.

1. A written policy meeting 49 CFR 382.601, given to every driver, with a signed receipt in your records.
2. A negative pre-employment drug test result in hand before any driver performs a safety-sensitive function. Before, not after.
3. Supervisor training if you employ drivers: one hour on drug misuse, one hour on alcohol misuse, completion documented.
4. Records. Negatives kept one year. Positives, refusals, and return-to-duty records kept five years.

PHASE 3

Driver qualification files.

A DQ file under 49 CFR 391.51 is required for every driver, including an owner-operator driving their own truck. Missing or incomplete DQ files are the most commonly cited violation in FMCSA audits. If you build one thing carefully, build this.

1. The employment application under 391.21, ten years of history for CDL drivers.
2. A motor vehicle record (MVR) from every licensing authority the driver held a license under during the past three years, pulled at hire.
3. A road test certificate, or a copy of a valid CDL accepted in its place.
4. Proof of medical certification. This changed in June 2025. For CDL drivers, certification now posts electronically to the MVR, and you verify it by pulling the CDLIS MVR rather than keeping a paper card. During the transition (FMCSA's waiver currently runs through October 11, 2026), a paper certificate serves as proof for up to 60 days after the exam, and a few states are still on paper entirely, so keep a copy of any paper certificate until the MVR shows the certification. For non-CDL drivers who need a DOT physical, the paper certificate still goes in the file, with the examiner verified against **FMCSA's National Registry**.
5. Safety performance history from every DOT-regulated employer in the past three years under 391.23, including drug and alcohol history under 40.25, with good-faith attempts documented.
6. The Clearinghouse pre-employment query result.
7. The negative pre-employment drug test.
8. An annual MVR and a documented annual review of the driving record, signed by a company official. The old driver-completed annual certification of violations (391.27) was eliminated in May 2022; a checklist that still asks for it is out of date.
9. Entry-level driver training (ELDT) verification for any CDL first issued after February 7, 2022.

One qualification standard worth calling out: under 391.11, a driver must be able to read and speak English well enough to converse with the public, understand traffic signs, and respond to official inquiries. Since June 2025, inspectors treat a failure of this standard as an out-of-service violation, so it belongs in your hiring review, not just your file.

What to keep: the full file, for the length of employment plus three years.

PHASE 4

Vehicle files and maintenance.

- **A systematic maintenance program** under 396.3. Written, on a schedule by miles or time, with a file per unit listing make, VIN, year, and tire size, plus inspection and repair records. Kept one year, and six months after the vehicle leaves your fleet.
- **An annual periodic inspection** under 396.17 by a qualified inspector, report kept 14 months.
- **Driver vehicle inspection reports** under 396.11 for each day a defect is found, with certification of repairs, kept three months. DVIRs can be created and signed electronically, which FMCSA made explicit in a 2026 rule.
- **Roadside inspection reports** under 396.9. When a driver gets inspected, the report comes back to you, violations get corrected within 15 days, and you keep the report for 12 months. As of July 22, 2026, you return the signed report to the issuing state only if that state requests it, so check the rules of the states you run in.

Start these the day the truck starts working. Auditors ask for maintenance history, and a file that begins the week before the audit tells its own story.

PHASE 5

Hours of service and ELDs.

Most property carriers need an ELD from FMCSA's registered device list at **eld.fmcsa.dot.gov/List**. Check the list before you buy. Revoked devices come off it, and carriers running them are out of compliance the day that happens.

- Driver accounts set up correctly, with personal conveyance and yard move settings decided and documented.
- Eight days of blank paper logs in every cab, plus the ELD instruction sheet and the malfunction procedure under 395.34.
- Supporting documents (fuel receipts, dispatch records, bills of lading) retained six months alongside records of duty status.

If you run short-haul under the 395.1(e) exemption, document the determination and keep time records instead. The exemption is real, but claiming it without records is the same as not qualifying.

PHASE 6

The paperwork nobody mentions.

- **Accident register** under 390.15, kept three years, opened on day one even if it stays empty. An empty register that exists beats no register.

- **Written policies**: drug and alcohol (required), hours of service, the handheld phone and texting prohibition, seat belt use, and what a driver does after an accident, including the post-accident testing decision tree. Every policy gets a signed driver acknowledgment.
- **USDOT marking** under 390.21: legal name or a single trade name and the USDOT number on both sides of the power unit, legible from 50 feet.

The new entrant safety audit.

It happens within the first 12 months of operation, and FMCSA monitors new carriers for 18 months. Auditors typically give 5 to 20 business days of notice. That is not enough time to build a compliance program, which is why every phase in this guide happens first.

The audit checks the areas this roadmap covers: drug and alcohol program, driver qualification, hours of service, vehicle maintenance, and insurance. Pass it, and you move toward permanent authority.

How long to keep each record.

Record	Keep for
Driver qualification file	Employment plus 3 years
MVR and annual review	3 years
Negative drug test results	1 year
Positive tests, refusals, return-to-duty	5 years
Random selection and collection process records	2 years
MIS annual summaries and program admin records	5 years
Records of duty status and supporting docs	6 months
DVIRs	3 months
Annual vehicle inspection report	14 months
Maintenance records	1 year, plus 6 months after the vehicle leaves the fleet
Roadside inspection reports	12 months
Accident register	3 years
Clearinghouse query records	3 years

The roadmap in one list.

Before your first load.

- Authority active in **MOTUS**, insurance filed by your insurer, BOC-3 on file
- UCR registered at **ucr.gov**
- IRP and IFTA through your base state, Form 2290 filed if at 55,000 pounds or more
- Consortium enrolled, random pool live
- **Clearinghouse** registered, C/TPA designated, pre-employment query run
- Negative pre-employment drug test in hand
- Medical certificate current, MVR pulled
- ELD installed from the **registered list**, blank logs in the cab
- USDOT number on the truck

Within 30 days.

- Full DQ file assembled for every driver
- Previous employer inquiries sent and follow-ups documented
- Written policies signed and acknowledged
- Supervisor training complete, if you employ drivers
- Vehicle files and maintenance schedule built
- Accident register opened

Ongoing.

- Annual MVR and documented annual review of the driving record
- Annual limited Clearinghouse query
- Annual vehicle inspection
- Quarterly IFTA returns
- UCR renewal every December
- MCS-150 biennial update in **MOTUS**
- Medical certificate renewals as they come due

Where Dotra fits.

Dotra does not file anything for you, and it is not your compliance department. The duty stays where the regulation puts it.

What Dotra does is keep this entire roadmap in one place: it tells you what your operation requires, links you to where each filing happens, holds every record with the retention clock running, and flags what is coming due before it costs you a load. When the auditor calls, everything in this guide is already organized and already yours.

A carrier should not have to guess at this. The requirements are public, the deadlines are knowable, and getting it right should not depend on who you happened to ask. We are building Dotra so a new carrier can see the whole picture on day one.

dotracompliance.com

Version 1.0, August 10, 2026.