DOTRA | FLEET GUIDE

The non-CDL compliance checklist.

Every DOT obligation for vehicles rated 10,001 to 26,000 lbs, and the ones you get to skip.

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What's inside.

READ THIS FIRST

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This guide is for the companies that run work trucks, not big rigs: box trucks, heavy cargo vans, service trucks, and pickups pulling loaded trailers. If your vehicles are rated 10,001 to 26,000 lbs, federal motor carrier rules apply to you even though your drivers don't need a CDL, and most owners learn that at a roadside inspection, an insurance renewal, or after a crash.

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.

It covers the federal requirements for interstate non-CDL operations. It does not cover every state requirement, and hazmat, passenger, and intrastate-only operations carry obligations it does not address. FMCSA rules move; this guide is current as of September 2026. Check the source before you rely on anything here.

Does DOT apply to you?

The line is 10,000 lbs, and it counts the combination. A vehicle rated over 10,000 lbs GVWR that crosses state lines for business needs a USDOT number and carries the obligations in this guide. A pickup rated 10,000 lbs pulling a 4,000 lb equipment trailer is a 14,000 lb combination, which is how a lot of landscapers and contractors end up regulated without knowing it. Many states apply the same rules to in-state-only fleets too.

One more distinction runs through this guide: **for-hire** (you haul other people's freight for money) versus **private** (you carry your own goods and equipment). Private carriers skip operating authority, the BOC-3, and the federal insurance filing. Everything else applies to both.

STEP 1

Start your journey.

Get registered.

- **Create a Login.gov account and verify your identity.** FMCSA's registration system requires the person registering the company to verify identity with a government-issued ID and a facial scan. Nobody can do this part for you. Free, about 20 minutes at login.gov.
- **Register in Motus for your USDOT number** at motus.dot.gov. Have ready: your EIN (or SSN), business name and address, vehicle and driver counts, and what you carry. The USDOT number itself is free. If you haul for hire across state lines, you also apply for operating authority (motor carrier of property, $300 per authority type).
- **Get insured** through an agent who handles commercial vehicles. Tell them what you run: the vehicle, its weight rating, whether you cross state lines, and whether you haul for hire. For-hire interstate: ask for the BMC-91 filing with FMCSA; your authority can't activate without it. Private fleet: no federal filing, but your state and your contracts still set minimums.
- **BOC-3 process agent** — only if you applied for authority. A process agent company files it electronically for $20 to $100, usually the same day. FMCSA lists agents at fmcsa.dot.gov.
- **Verify your number** the way an officer sees it: run it through the free USDOT checker at dotracompliance.com/usdot-checker and confirm your company name, address, and operation type look right. Mistakes are fixable in Motus while everything is fresh.

> **What to keep:** your USDOT number and Login.gov credentials. You will use both again, including for the MCS-150 update every two years.

STEP 2

File your drivers.

Every driver of a vehicle rated over 10,000 lbs needs a qualification file under 49 CFR 391.51 — the same file a CDL driver gets, minus the CDL and the drug testing program. The “file” is literally a folder with the driver's name on it: paper, computer, or a driver record in your Dotra account. One per driver, including you if you drive. Missing DQ files are the most commonly cited violation in FMCSA audits.

- **Employment application** meeting 391.21 — a DOT driver application, not a generic job form. Yes, an owner fills one out on themselves.
- **Motor vehicle record (MVR)** from every state the driver was licensed in over the past three years, ordered from each state DMV at hire. Then a fresh MVR every year with a short signed review note.
- **Road test certificate.** Someone competent rides along while the driver runs through normal driving in your actual vehicle, then signs the certificate form.
- **DOT medical card.** Drivers of 10,001+ lb vehicles in interstate commerce need a DOT physical — the same exam CDL drivers take, from an examiner on FMCSA's National Registry (nationalregistry.fmcsa.dot.gov). The paper certificate lives in the file, because there's no state record behind it, and its expiration date goes on your calendar.
- **Safety performance history** from every DOT-regulated employer in the past three years under 391.23, with good-faith attempts documented if a past employer never answers.
- **The English standard.** Under 391.11 a driver must read and speak English well enough for signs, the public, and officers. Since June 2025 inspectors treat a failure as out-of-service, so settle it during hiring and note that you did.

What you get to skip: no CDL, no drug and alcohol testing program, no consortium, and no Clearinghouse — those attach to CDL drivers. One catch: a driver who ever operates a CDL-required vehicle, even once, must already be enrolled and tested.

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

STEP 3

File your trucks.

Every vehicle over 10,000 lbs gets a file and an inspection schedule, even a box truck or a heavy van. 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.

- **A maintenance file and written schedule per vehicle** under 396.3: make, model, year, VIN, and tire size on page one, a schedule as simple as “oil and full chassis check every 10,000 miles,” and every repair receipt from here on. Keep records one year, and six months after the vehicle leaves your fleet.
- **An annual DOT inspection** under 396.17 by a qualified inspector — most truck shops do them as a standard service. Trailer included, if you pull one. Keep the report 14 months.
- **Driver vehicle inspection reports** under 396.11 for each day a defect is found, with the repair certified before the truck rolls again. Paper pads from a truck stop or electronic — e-signed DVIRs are explicitly allowed. Keep three months.
- **Roadside inspection reports** under 396.9: fix every violation within 15 days, keep proof with the report for 12 months, and return a signed copy only if the issuing state asks.
- **Hours-of-service records.** The rules still apply without a CDL, but most local crews qualify for the short-haul exception under 395.1(e): within 150 air-miles of base and back within 14 hours means no ELD, as long as accurate time records exist. Write and sign a one-page determination, track time daily (a timesheet counts, kept six months), and keep a paper log book on hand for any driver who breaks the pattern more than 8 days in any 30.

> **What to keep:** the unit folders, the signed short-haul determination, and the time records that back it up.

STEP 4

Manage your compliance.

- **UCR, every year,** filed directly at ucr.gov — third-party sites sell the same registration at a markup. For 2026 the fee is $46 for up to two vehicles; the window opens October 1 and payment is due December 31. Heads up: FMCSA has proposed higher fees for 2027 (about $55 for the smallest fleets), so check ucr.gov for the final number.

- **MCS-150 biennial update** in Motus, free, every two years. Your deadline comes from your USDOT number: the last digit sets the month, the second-to-last digit sets odd or even years. Skip it and your number can be deactivated quietly.
- **Accident register** under 390.15: one dated sheet titled “Accident Register,” opened on day one even while it stays empty. Keep three years.
- **Written policies with signed driver acknowledgments:** hours of service, no handheld phone or texting, seat belts, and what a driver does after an accident.
- **USDOT marking** under 390.21: your legal business name and USDOT number on both sides of the vehicle, readable from 50 feet. A local sign or vinyl shop does it from a photo of your door.
- **Be ready for the new entrant audit.** It comes within your first 12 months with limited lead time, days to a few weeks, and checks exactly what this guide builds: driver files, hours records, vehicle files, and insurance. If the boxes above are checked, it's a formality.

What you get to skip: no IFTA and no IRP under 26,000 lbs, and Form 2290 never reaches a 10,001 to 26,000 lb vehicle. One catch: a truck with three or more axles, or a truck-and-trailer combination over 26,000 lbs, brings IFTA and IRP back — both run through your base state.

THE STATE LAYER

What your state adds.

Everything above is the federal layer, and for non-CDL fleets the state layer matters even more: many states apply DOT-style rules to in-state-only operations, and some run intrastate registration programs on top of your USDOT number. One phone call sorts out what applies to you.

1. Call your base state DMV's motor carrier division and ask three questions: Do I need a state DOT or intrastate number? Are there state filings or permits for my operation? Anything extra for my weight class?
2. Planning to run through **New York, Kentucky, New Mexico, or Oregon**? Each charges its own weight-distance tax (NY HUT, KYU, New Mexico weight distance, Oregon weight-mile), separate from fuel tax, and each needs its own permit before you cross the line.
3. Write down what your state told you, who you talked to, and any renewal dates. State permits expire just like federal ones.

> **What to keep:** any state permits and numbers, with their renewal dates on your calendar.

THE SHORT VERSION

What you get to skip, and the catch on each.

- **No CDL** — until a vehicle or combination tops 26,000 lbs, or you haul hazmat or 16+ passengers.
- **No drug and alcohol program, no Clearinghouse** — they attach to CDL drivers. A driver who ever covers a CDL vehicle must already be enrolled and tested.
- **No ELD, usually** — the short-haul exception covers most local crews, but only if the written determination and daily time records exist.
- **No IFTA, no IRP** — under 26,000 lbs. Watch three-plus axles and combinations that top 26,000 lbs together.
- **No Form 2290** — it starts at 55,000 lbs.
- **No operating authority, BOC-3, or federal insurance filing** — if you only carry your own goods. Haul for hire interstate and all three apply.

CHECKLIST

The checklist in one list.

Before your first run.

- USDOT number active in Motus (authority, insurance filing, and BOC-3 too, if you haul for hire)
- UCR registered at ucr.gov
- DOT medical card in each driver's file, examiner verified
- Qualification file started for every driver
- Short-haul determination written and signed, time tracking running
- Vehicle file and maintenance schedule built for every unit
- USDOT number marked on both sides of every vehicle

Within 30 days.

- Full DQ file assembled: application, MVRs, road test, safety history
- Written policies signed and acknowledged by every driver
- Accident register opened
- State permits checked with your base state, weight-distance permits for NY, KY, NM, or OR if you run there

Ongoing.

- Annual MVR and documented review for every driver
- Annual DOT inspection for every vehicle
- Medical certificate renewals as they come due
- UCR renewal every December
- MCS-150 biennial update in Motus
- State permit renewals as they come due

RETENTION

How long to keep each record.

Record	Keep for
Driver qualification file	Employment plus 3 years
MVR and annual review	3 years
Time records (short-haul)	6 months
DVIRs	3 months
Annual vehicle inspection report	14 months
Maintenance records	1 year, plus 6 months after the vehicle leaves
Roadside inspection reports	12 months
Accident register	3 years

WHERE DOTRA FITS

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 checklist 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 job. Built around what your fleet actually owes, not a checklist written for long-haul carriers — and already there the day you add a 26,001 lb truck and cross into CDL territory.

A company should not have to learn these rules from a fine. The requirements are public, the deadlines are knowable, and getting it right should not depend on who you happened to ask.

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This guide is general information about federal requirements, not legal advice. Requirements vary by operation, and state obligations beyond the pointers above are not covered here. Verify current rules at fmcsa.dot.gov before relying on any requirement listed above.
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