
PRISM News

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Hot Topic – Registrant Only USDOT Numbers

As discussed on our recent National PRISM Conference Call, the usefulness of the “Registrant Only” USDOT Number that is unique to the PRISM program has been questioned. FMCSA is studying the possible elimination of the registrant only number.

The registrant only number was created by PRISM to establish an audit trail to properly assign safety events to a motor carrier. The registrant only number is not being used for the purpose for which it was created. Instead, this number has created havoc with the assignment of safety events and with the overall oversight of the motor carrier safety programs.

Originally, the concept was for these events to be “parked” on the registrant only numbers. In other words, the number is to be used as an audit trail. Removing the events from the registrant only record obviously is not happening.

SAFER is adversely affected by the events being on the registrant only records. The calculations for the motor carriers are not including the events that should be on the records of motor carriers.

The motor carrier that improperly uses a registrant only number escapes any oversight by FMCSA,



including compliance reviews and the new entrant program audit.

Transition issues

Systems will need to be modified to allow the registrant to not have a USDOT number when the registrant is not also a motor carrier. The best method to do this will need to be determined by the PRISM states.

PRISM states’ systems do a validation check and a safety check on the USDOT Number of the registrant to determine if the number is out-of-service. The system edits will need to be modified for the registrant who is not also a motor carrier. They will need to recognize the notation that is determined by the states to be used in place of the “registrant only” USDOT number. The validation and safety checks will need to by-pass the process when this notation is encountered.

Renewal applications will also need to have programming edits modified for determining whether to print a pre-populated MCS – 150, the check for the MCS – 150

update date and for the display to the IRP screen of the MCS – 150 update date.

States will need to modify instructions on the IRP forms, checklists and the manuals.

As mentioned, safety events must be researched and moved to the appropriate records.

After the state has corrected its computer system to allow for the registrant to not obtain a “registrant only” USDOT number and has moved the safety events from all the numbers currently on file, the numbers should be replaced on the IRP data base with the corrected notation for such a registrant. MCMIS should be annotated so that the registrant only record cannot be restored as a “registrant only” type.

All of these edits will require resources – both human and funding.

The PRISM team in conjunction with IRP, Inc will be surveying the states for feedback on this issue. In addition to the survey, please feel welcome to send your thoughts, comments, suggestions and recommendations on this issue. Please forward your comments to tom.lawler@dot.gov.

CSA 2010 initiative

This past February, FMCSA introduced a change to the use of the MCSIP Step field in support of its Comprehensive Safety Analysis (CSA) 2010 initiative to improve the effectiveness of the Agency's compliance and enforcement programs. This change involved the addition of 30 new MCSIP step values, which will indicate a carrier's status during the Operational Model Test phase of the CSA 2010 initiative. A select set of carriers domiciled in four States are participating in the Test, and could be assigned one of these new MCSIP Steps. The steps used to indicate an Out of Service status of a carrier (steps 54-63 inclusive) have NOT be affected, nor does the process States use to upload vehicle records to SAFER require a change.

The SAFER system is working on a change to its programs that would properly classify the new CSA 2010 step 30 (DEFICIENT BASICS: NONE) as untargeted and until that has occurred, carriers assigned step 30 in MCMIS will be assigned a null MCSIP step value in SAFER and step 30 will not appear on the PRISM Local Census File. When SAFER releases an update to its system to correct this, a notification will be issued.

The appendix section of the PRISM System Specification document will reflect the complete set of MCSIP Steps resulting from this CSA 2010 initiative.

New MCSIP Step Changes

MCSIP is adding new out-of-service steps. The first addition under design is for carriers whose

operating authority has been revoked.

The second change will be to split step 63 – New Entrant into two steps. Step 63 will be renamed to include only the carriers that have either refused the audit or have made no contact for the audit. The new step 64 will be for those that have failed the new entrant audit

As each of these MCSIP step changes are finalized and are about to go into production, an announcement will be sent out to all of the PRISM contacts.

PRISM Enhancements to Validating the USDOT Number

PRISM Registration Requirements to validate the USDOT Number and renewal maintenance have been enhanced. Previously this requirement only specified that the USDOT Number and TIN must match with what the State has in its local database of carrier Census information, or match with MCMIS.

We have found Intrastate numbers, inactive numbers as well as registrant only numbers being used as the carrier responsible for safety on vehicle registrations. To detect these numbers, we have added edits for the states to implement in their validation programming.

In addition to validating the USDOT Number and TIN, there are these three additional scenarios to check before a registration application can be completed. The first new check is for an Intrastate only carrier, the second check is for an Inactive carrier, and the third at the vehicle level is for a Registrant-only entity type.

Re-validation at renewal to check for these three situations should also be completed.

CVSA Adoption of OOS Criteria

CVSA is considering adopting the FMCSA out-of-service orders into the CVSA Criteria for out-of-service. There will be a vote this summer and the issue will be on the agenda at the next CVSA meeting in Winnipeg, Canada. If adopted, it will be effective April 2009. As part of this initiative, FMCSA is also modifying the query Central response. See below.

Proposed Query Central (QC) Changes

To furnish more accurate information to the roadside enforcement officer, FMCSA is modifying the Query Central response message. Currently in QC, the result of an OOS Carrier Query returns conflicting messages about the OOS Status of the Carrier. On the top of the screen, there is real-time information from MCMIS that says "Alert – This Carrier has been placed Out-of-Service." On the same screen at the bottom of the page, there is another message that says "This Carrier may be Out-of-Service. Please confirm." Since the alert at the top of the page is real time from MCMIS, the message at the bottom from Safer will be removed. Also, in response to requests from the field, the response screen will be populated with the reason the carrier is Out of Service and the applicable Federal Regulation section.

Proposed MCS – 150 Processing Changes

Some States are printing the zero-filled and zero-padded fields on the pre-printed MCS-150 forms that are sent out with the registration renewal package. This makes it difficult for the carriers to make changes by having to write over the zeros, or cross them out first to make a change.

PRISM Support at VOLPE solicited comments on a possible change in the MCS – 150 file that currently contains the zeros. We asked whether it was easier for VOLPE to modify the file or for the states to modify the print program.. The decision has been made to keep the file as is but to emphasize in the specifications that states should not print the zeros (zero-filled and zero-padded fields.)

Bar Coding - Registered Weight Sub-File and Annual Re-Certification

PRISM has added a new Registered Weight SubFile (RW) to the bar code specifications. This new SubFile will contain those Registered Weights as shown on the Cab Card for the vehicle described in the Registrant (IR) SubFile. This is an **“optional”** Sub File. The detailed description of the file is now included in the PRISM Bar Code Specifications document, version 3.4. There are now two different tables for the Bar Code Format, the first is without the new Registered Weight Sub-File, while the second is with the new RW Sub-File.

The PRISM team also reminds all states that are currently bar-coding their cab cards to send copies of the cab cards to the PRISM team each year for annual re-certification (details in the Bar code Specifications.)

Email to Remove OOS VIN from Target File

In efforts to capture chameleon carriers, PRISM not only maintains VIN records associated with “Active” Out-of-Service carriers, but also maintains VIN records associated with “Inactive” Out-of-Service carriers and expired registrations. Through this, OOS carriers that falsely change their status to “Inactive” in order to evade Federal regulations or try to move their registration to another state will still have their vehicles listed on the PRISM Target file.

During routine safety checks, the IRP office may find a carrier who is attempting to register a VIN that is associated with a different Out-of-Service carrier on the Target File. Further investigation is then needed before proceeding with the registration. At that time, the carrier needs to show proof that he/she has broken the lease with the OOS carrier and is not associated with them. If the paperwork is valid and the carrier is in good standing then the registration can proceed, but one more important step needs to take place.

We do not want the new carrier in good standing to have their VIN on the Target File because of its previous association with an OOS carrier. Therefore, an email needs to be sent to PRISM Technical Support in order to remove the

OOS VIN record from the Target File. The State IRP office needs to send this email to: PRISMTechnicalSupport@volpe.dot.gov with the following information: USDOT, VIN, and License Plate of the record to be removed from the Target File, along with the new carrier’s USDOT and the new registration start date. Once the email is received by PRISM Technical Support, the VIN will be removed from the Target File on the next day.

National Conference Call Notes

The PRISM conference call was held on May 7, 2008. Topics discussed included:

- Program Status Update and Recent Activities

Oklahoma is now a Level 1, Arkansas was upgraded to Level 3, Montana had its implementation plan approved, and the PRISM team met with Maryland and Wisconsin and the team is meeting with Virginia later this month.

- PRISM Integration with License Plate Readers and USDOT Number Readers

The PRISM team is working with Law Enforcement agencies, Vendors, and System Integrators to identify the requirements for connecting the license plate and USDOT readers to the PRISM Target File. The main goal is to increase the chances of identifying a vehicle at the roadside that has a Federal out-of-service order.

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- New MCSIP Step Changes

MCSIP is adding Steps in the near future. See the related article in this newsletter for details.

- Proposed Query Central (QC) Changes to Conform to CVSA OOS Criteria

PRISM has requested that Query Central be modified to include the appropriate violation cite on the response when the carrier is out-of-service.

CVSA will vote on whether to incorporate OOS information into the CVSA Criteria this summer.

Also a PRISM Law Enforcement Conference Call is being planned for the near future for all PRISM LE Contacts to discuss issues and ask questions related to PRISM roadside enforcement.

- Proposed MCS-150 Processing Changes

The PRISM team is seeking input from the States. Should PRISM change the current format of the MCS-150 file to eliminate zero-filled and zero-padded fields to eliminate the printing of the zeros on the renewal package? See related article with an update in this newsletter.

- PRISM Website and Content Updates

New and updated documentation is available on the PRISM Website under the CVISN > Documents > PRISM link.

<http://cvisn.fmcsa.dot.gov>

- The PRISM Procedure Manual was updated

- The new Law Enforcement Training Package is completed
- The IRP Clerical Training Package was updated

PRISM is working on developing its own Website. It should be operational in early summer.

- PRISM Enhancements to Validating the USDOT Number

PRISM Registration Requirements 3 and 9 - Validate the USDOT Number and renewal maintenance have been enhanced. See related article in this newsletter.

- Bar Coding Issues - Registered Weight Sub-File and Annual Certification

In the Bar code Specifications, a new Registered Weight optional Sub-File (RW) will contain the Registered Weights as shown on the Cab Card.

Additionally, States were reminded that they need to send copies of their cab cards to the team for annual re-certification of the bar codes. See related articles in this newsletter.

- Registrant-Only USDOT Numbers

FMCSA is considering eliminating the registrant only entity type in MCMIS. See related article in this newsletter.

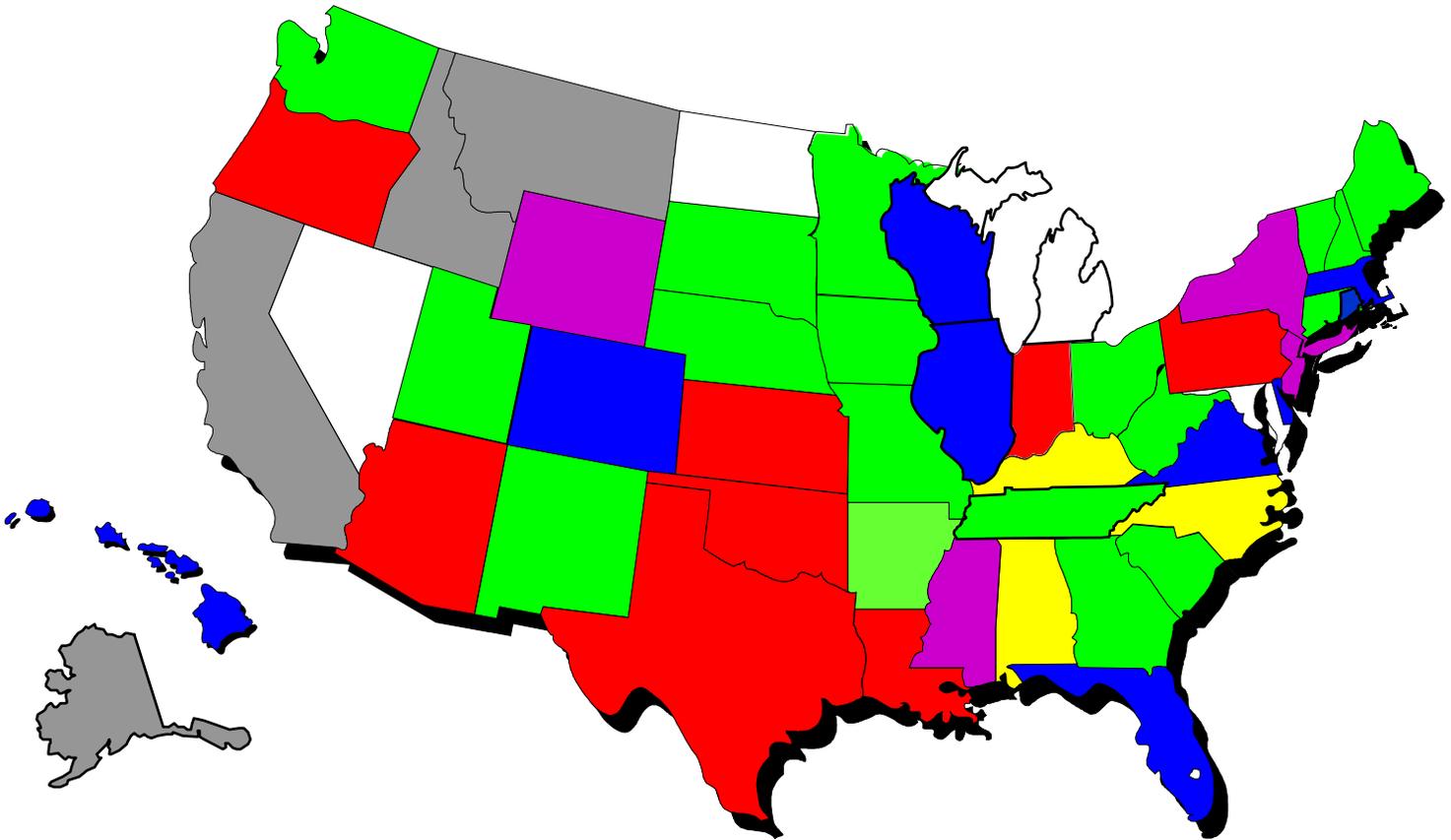
- PRISM Status Reporting

Tom Lawler reminded the States to complete the Quarterly Status reports. This is a key requirement in reporting PRISM achievements to Congress, and providing more funding to PRISM.

States' Implementation Progress

Since our last newsletter, significant progress and growth of the PRISM program has taken place. The following states' implementation levels have been upgraded which can be seen on the map on the next page:

**Arkansas
California
Idaho
Kansas
Kentucky
Mississippi
Missouri
Montana
Nebraska
New Hampshire
New Jersey
New York
Oklahoma
Texas
West Virginia
Wisconsin
Wyoming**



PRISM Implementation Levels

Grant Approval – BLUE (9 States + DC: CO, DE, FL, HI, IL, MA, RI, VA, WI and DC)

**States Developing Implementation
Plan for Approval – PURPLE** (4 States: MS, NJ, NY, WY)

**States Implementing
an Approved Plan – GREY** (4 States: AK, CA, ID, MT)

PRISM Level 1 – RED (8 States: AZ, IN, KS, LA, OK, OR, PA, TX)
**Collecting/Validating USDOT Number
of Carrier Responsible for Safety**

PRISM Level 2 – YELLOW (3 States: AL, KY, NC)
**Enforcing MCS-150 Update
Checking Carrier Safety Status
Submitting Targeted Vehicles to SAFER**

PRISM Level 3 – GREEN (18 States: AR, CT, GA, IA, ME, MN, MO, NE, NH, NM, OH, SC, SD, TN, UT, VT, WA, WV)
**Denying, Suspending, Revoking for Federal OOSO
Bar Coding PRISM Specs
Enforcement Stopping Targeted Vehicles**

N/A – WHITE (4 States: MD, MI, NV, ND)

Total PRISM States: 29