

# 4 Compliance Questions Small Fleets Commonly Ask

## 1 Do I need to keep driver qualification (DQ) files for *all* of my drivers?

Many small fleets mistakenly believe that the DQ file only applies to drivers operating commercial motor vehicles (CMVs) that require a commercial driver's license (CDL). But the fact is, **drivers operating the following vehicles in interstate commerce need to have a completed DQ file:**

- Vehicles with a gross vehicle weight (GVW) or gross vehicle weight rating (GVWR), or gross combination weight (GCW) or gross combination weight rating (GCWR) of 10,001 pounds or more; or
- Vehicles designed or used to transport more than 8 people (including the driver) for compensation, or more than 15 people (including the driver) not for compensation; or
- Vehicles transporting hazardous materials that require the vehicle to be placarded.

If the driver is engaged solely in intrastate commerce (within one state), you would need to look at state-specific regulations to determine what applies.



### Driver Qualification File Management

J. J. Keller will help you keep qualified drivers on the road by maintaining your driver qualification documents. We'll examine these files daily and monitor expiring items, such as licenses and MVRs.

## 2 How can a small fleet like mine manage a DOT drug & alcohol testing program?

For a small fleet that's short on time and manpower, it's not easy to manage a testing program for all CMV drivers — in addition to handling the related recordkeeping — as required under Part 382 of the Federal Motor Carrier Safety Regulations (FMCSRs).

To solve this problem, **you can use a third-party administrator (TPA) to manage all, or part, of your drug & alcohol testing program, including enrollment in a testing consortium and maintaining required records.** A TPA will often manage the random testing programs of multiple employers, including those of owner-operators who are not permitted to manage random testing themselves. This saves you time while ensuring regulatory compliance.

(continued)



### DOT Drug & Alcohol Testing

Let J. J. Keller manage your drug and alcohol files in accordance with Parts 40 and 382. We'll maintain your driver testing pool — including consortium services — conduct quarterly random selections of your drivers for testing, offer ongoing proactive support, and provide 24/7 post-accident help.

## 4 Compliance Questions Small Fleets Commonly Ask *(cont.)*

### 3 Now that we have ELogs, how do I deal with all of these unassigned driving events?

Unassigned driving events occur any time a vehicle equipped with an automatic onboard recording device (AOBRD) or electronic logging device (ELD) is moved without a driver being logged into the device. If your drivers find out you're not catching them when they drive without being logged in, the number of unassigned driving events that are actually false logs could increase significantly.

To solve this problem efficiently, **take these three steps each day:**

- **Look into the unassigned driving events and assign them to the correct driver or explain why they're unassigned.**
- **Counsel the drivers who are generating unassigned driving time.**
- **Make sure your drivers are doing their part – logging in and out appropriately, accepting their unassigned driving time, etc.**

If you take these steps, you'll be able to manage this common issue. If you don't, unassigned driving events could end up managing your small fleet.

### 4 Which of my vehicles do I need to file quarterly fuel tax reports for?

Fuel tax reports are required under the International Fuel Tax Agreement (IFTA) for qualified motor vehicles operating in more than one jurisdiction. A "qualified motor vehicle" is a **motor vehicle used, designed, or maintained for transportation of persons or property, and that:**

- **Has two axles and a gross vehicle weight or registered gross vehicle weight exceeding 26,000 pounds or 11,797 kilograms; or**
- **Has three or more axles regardless of weight (counting axles on the power unit only); or**
- **Is used in combination, when the weight of such combination exceeds 26,000 pounds or 11,797 kilograms gross vehicle weight or registered gross vehicle weight.**

Qualified motor vehicles do not include recreational vehicles. Vehicles operating strictly intrastate are also not required to register under IFTA in most cases, but some jurisdictions might require them to be reported.



#### Driver Log Auditing (Driver DataSense® Service)

Get expert compliance guidance based on the data gathered from your ELDs, paper logs and even time sheets. J. J. Keller will collect and aggregate this data, and a Compliance Specialist will interpret it to help you take action to reduce your regulatory risk.



#### Vehicle Tax & Licensing

Be confident your company is compliant with the motor carrier tax and registration requirements, state IFTA and IRP requirements, and fuel tax reporting obligations, plus reduce your audit risk. J. J. Keller will keep your vehicles legal and improve the accuracy and integrity of your fuel and mileage tax data.

**J. J. Keller makes it easier to keep your small fleet on the road and operating legally.**

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