



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

Minimum Qualifications for Entry as a Motor Carrier

CVSA supports the creation of minimum qualification standards for entry as a motor carrier.

Safety on the roadways is paramount, particularly within the motor carrier industry. In 2022, there were 5,476 fatal crashes involving large trucks or buses.¹ It is critical that motor carriers operating in commerce understand what is required, how to comply with the federal regulations and how to establish a strong safety culture within their operations. Currently, it is far too easy to obtain a USDOT number, and very little is required of an entity to obtain registration and begin operations as a commercial motor carrier. In comparison, commercial motor vehicle (CMV) inspectors and enforcement personnel must be trained and certified to conduct inspections, and CMV drivers must go through a rigorous Entry Level Driver Training and/or qualification process and be properly credentialed in order to drive a CMV. However, no such qualification standard exists for entities wishing to register as a motor carrier and obtain a USDOT number.

In 2019 there were a total of 567,467 active motor carriers operating in interstate commerce, and by 2023 that number rose to 745,829,² meaning the Federal Motor Carrier Safety Administration (FMCSA) observed an increase of 178,362 motor carriers in just four years. Each of those new motor carriers were permitted to begin operating CMVs in commerce without demonstrating any understanding of the Federal Motor Carrier Safety Regulations, the Hazardous Materials Regulations or their responsibility as a motor carrier.

This model for entry does not work. Motor carriers have an obligation to understand and follow all applicable safety regulations from the first day of operation, including safely maintaining their vehicles and ensuring their drivers are qualified, among many other safety functions. But past safety data demonstrates that new motor carriers are less safe than established motor carriers. For example, new motor carriers are found to have higher crash rates than more experienced carriers.³ Additionally, the number of acute and critical violations a motor carrier receives during enforcement actions decreases over time, furthering the observation that new motor carriers are less safe than established motor carriers.⁴ To ensure safe operations from day one, motor carriers should be required to demonstrate they have an understanding of the rules they are obligated to follow and are capable of meeting safety expectations. To address this, ***CVSA supports the creation of minimum qualification standards for entry as a motor carrier.***

¹ Commercial Motor Vehicle Crash Data Overview. FMCSA. December 2024.

<https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2024-12/Commercial%20Motor%20Vehicle%20Crash%20Data%20Overview%20508.pdf>, p. 7

² Table 1-5 Active Motor Carriers by Type, 2018-2023. 2024 Pocket Guide to Large Truck and Bus Statistics. Federal Motor Carrier Safety Administration. p. 9. <https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2025-09/FMCSA%20Pocket%20Guide%202024-v6%20508%20.pdf>

³ Table 2-2. "Background to New Entrant Safety Fitness Assurance Procedure." FMCSA. March 2000. p. 2-4. https://ai.fmcsa.dot.gov/CarrierResearchResults/PDFs/back_newentrant.pdf

⁴ Table 2-3. "Background to New Entrant Safety Fitness Assurance Procedure." FMCSA. March 2000. p.2-7. https://ai.fmcsa.dot.gov/CarrierResearchResults/PDFs/back_newentrant.pdf

In addition to ensuring new motor carriers are equipped to operate safely, establishing this process could reduce instances of fraud and abuse of the registration system within the CMV industry. For example, reincarnated carriers, who apply for a new USDOT number following an out-of-service order in order to continue unsafe operations without being affiliated with a poor safety history may choose to not apply for a new USDOT number when faced with having to demonstrate an understanding of the safety regulations. The demonstration of the qualifications may be too cumbersome and act as a barrier to a reincarnated carrier continuing its unsafe behavior. By requiring a motor carrier to demonstrate qualifications upon registration for a USDOT number, bad actors may be deterred from abusing the registration system.

In collaboration with our enforcement and industry members, CVSA compiled recommendations for the types of qualifications that motor carriers must demonstrate, in addition to recommendations for how the qualifications should be demonstrated. The complete recommendations are found in the “Minimum Qualifications for Entry as a Motor Carrier” addendum.

Creating a standard for entry for motor carriers reinforces an industry-wide safety culture. Implementing minimum training and qualification standards for motor carriers prior to receiving authority to operate will improve overall safety in the motor carrier community, reduce instances of fraud and help prepare new motor carriers to operate safely.