



Transportation Law Alert

SCOPELITIS, GARVIN, LIGHT, HANSON & FEARY

**FMCSA Announces Additional Delay of Unified Registration System
("URS")**

The FMCSA has announced additional delay to the implementation of URS, which was set to take effect on September 30, 2016. As most in the industry know, once URS is implemented, the U.S. DOT number will be the sole designator assigned to any entity subject to FMCSA jurisdiction (including, for example, for-hire motor carriers, private carriers, property brokers, freight forwarders, passenger carriers, for-hire exempt interstate carriers, etc.).

The new effective date is January 14, 2017. On that date, currently issued "docket numbers" such as the "MC" number designating for-hire motor carrier and property broker authority will no longer be assigned or used by the FMCSA and will be replaced by a DOT number. The announcement is also expected to delay associated changes to FMCSA regulations regarding transfers of operating authority. To the extent URS requires regulated entities to make filings for the first time (for instance, filing of BOC-3 forms from entities that were not previously subject to filing requirements), FMCSA is providing a 90 day compliance window to make such filings, which will conclude on April 14, 2017. For entities that are currently regulated, no action is required at this time. For instance, freight forwarders that do not currently hold a U.S. DOT number are not required to proactively seek one. They will be assigned by the agency.

If you have questions regarding URS, please contact Andy Light (alight@scopelitis.com) or Nathaniel Saylor (nsaylor@scopelitis.com).