



Blog by Tommy Ruke, The King Pin – Leading Expert in Truck Insurance

URS UPDATE (REVISED)

Most of you have received the information about the long anticipated URS being pushed back (we have been talking about it since 1995 as part of the ICC Termination Act). When presenting, I often have said, “Always blame the government.” Looks like the FMCSA has adopted the “Always blame IT” as it is the reason the dates have been pushed back again.

“The October 21, 2015 Final Rule made slight revision to the 2013 rule and delayed the effective dates of the rule. Today’s final rule corrects the effective dates (note from me, what does final mean when it is not final) revised in 2015 to allow FMCSA additional time to complete the information technical (IT) system work.” Have you ever had a system delayed in your business because of IT – Most have – But where would you be if it took five years to accomplish the task? Just a thought!

If you were able to review my Blog, “URS – Second Phase Less Than 90 Days”, a couple weeks ago, hopefully you will remember it contained the question, “Will they meet the published time line?” We have the answer – No!

In the blog concerns were expressed about how the filings will be made, what the filings will be and other thoughts and all ended with “time will tell”. The push back in the date did not address these concerns, so again time will tell.

From FMCSA’s announcement:

Effective Dates

There are multiple effective dates for [this rule](#):

- Beginning December 12, 2015, new applicants are required to use the new online application when requesting registration and a USDOT number.
- On January 14, 2017 all new and existing entities must process new applications and updates to existing records using the new online system. FMCSA will not accept paper forms or faxes.

- On April 14, 2017, the requirement for all private and exempt carriers to have insurance and BOC-3 filings in place will take effect. New applicants will begin providing this information January 14, 2017.

FMCSA set November 1, 2013 as the compliance date for the biennial update requirements because motor carriers are already required to update their registration information biennially under [49 CFR 390.19](#) and the information is very valuable to the Agency in carrying out its safety mission.

FMCSA plans to extend the next URS compliance date, September 30, 2016, when all Agency-regulated entities—motor carriers, intermodal equipment providers (IEPs), brokers, freight forwarders, and cargo tank repair and manufacturing facilities—are required to start using a new web-based online registration “smart form” to apply for new registrations, update records, and/or record transfers of operating authority registration. The Agency will need more time to launch the new URS website. Moreover, changing the real-time data exchange systems between FMCSA and its industry and State agency partners will require additional time for collaborative planning and testing to ensure a successful implementation of the URS.

URS Final Rule Major Provision	New Effective Date
Registration Application Process using the MCSA-1 online application for New Applicants	12/12/2015
Use of MCSA-1 online application for all new and existing entities for all reasons to file	1/14/17
USDOT Number as sole identifier (discontinuing issuance of docket numbers)	1/14/17
New Fees Schedule	1/14/17
Evidence of Financial Responsibility (Insurance Filings and Surety Bonds/Trusts) for New Private HM and Exempt For Hire Carriers	1/14/17
Process Agent Designation (BOC-3) for New Private and Exempt For Hire Carriers	1/14/17
Evidence of Financial Responsibility (Insurance Filings and Surety Bonds/Trusts) for Existing Private HM and Exempt For Hire Carriers	1/14/17*
Process Agent Designation (BOC-3) for Existing Private and Exempt For Hire Carriers	1/14/17*

*Compliance deadline for existing entities not until 4/14/2017

We will have speakers addressing government regulations and these changes at our September 29-30, 2016 Annual Conference – Plan to join the 300+ of your fellow insurance professionals that are registered to attend – Act now while there is still space.