



SSRS-UCR Status Update June 7, 2006

Background:

Federal legislation, enacted in August 2005, created the Uniform Carrier Registration (UCR) program and required UCR to replace the current Single State Registration (SSRS) program on or before January 1, 2007. 38 states administer the current SSRS program, collecting approximately \$100,000,000 in annual revenues from motor carriers. Authorization for the collection of this revenue by the 38 states expires at midnight on December 31, 2006.

The Federal Motor Carrier Safety Administration (FMCSA) is tasked with oversight and implementation of UCR. Based on the best information available today, it seems fairly certain that FMCSA will not complete development and implementation of UCR before January 1, 2007. This situation is aggravated by the fact that UCR rules and procedures would need to be finalized by September 1, 2006 in order to give states adequate time for implementation. The net result is that the 38 SSRS states are faced with the loss of up to \$100,000,000 in the next year.

To address this problem, AAMVA is participating in a coalition that is pursuing a one-year extension of the SSRS program. Other coalition partners are the National Council of State Transportation Specialists (NCSTS) represented by the National Association of Regulatory Utility Commissioners (NARUC), the Commercial Vehicle Safety Alliance (CVSA), and the National Association of State Legislators (NCSL). While the efforts of the coalition continue, there is not yet pending federal legislation that provides for the extension of SSRS.

Impacts on States:

To be prudent, SSRS states should put this situation on their planning horizons. At this time, it appears one of three scenarios are likely to occur over the next few months—best case, medium case, and worst case. These scenarios are listed below, along with a description of possible impacts or issues that States may encounter or wish to address. Regardless of which plays out, AAMVA recommends that each State:

- Review their current state law to determine how they would proceed if a specific scenario becomes a reality
- Enact appropriate legislation and/or rules to provide for implementation of UCR

Some States have developed or enacted UCR legislation. If you are interested in obtaining copies of this enabling legislation, please contact Tim Adams at 502-845-0398 or tadams@aamva.org.

Possible Scenarios:

1. **The SSRS sunset is extended to December 31, 2007.**
2. **There is no extension of SSRS. UCR rules and procedures are finalized, but not in time for the annual renewal notice cycle employed by the State**
3. **There is no extension of SSRS. UCR is not ready for implementation**

Possible Considerations on Each Scenario

Scenario # 1: SSRS is extended

Your State should be able to:

- Conduct business as usual.
- Begin renewal process at normal times or as soon as possible after the extension is approved by the Congress.
- Continue to collect SSRS fees and issue credentials

Scenario # 2: UCR rules and procedures are finalized, but not in time for the annual renewal notice cycle employed by the State

Your state may wish to:

- Determine if the State can collect UCR fees without enabling legislation.
- Pursue enabling legislation if needed.
- Prepare and submit State UCR Plans to US DOT.
- Develop and begin vigorous education programs to bring carriers up to date on UCR and the requirements.
- Develop procedures for enforcement to verify the UCR status of carriers (wireless in cars, calls to radio/dispatch points, etc.).
- Develop accounting procedures to ensure funds go into highway safety programs.
- Work with law enforcement officials to determine enforcement policies during the transition period.

Scenario # 3: SSRS is not extended, and the UCR is not ready for implementation.

Your State may wish to:

- Consider alternative funding sources for effected programs
- Seek a legal opinion to determine if the State can fall back on existing laws to continue collection of SSRS fees and needed insurance and authority information
- Provide updated information to motor carriers within your State