

The new carrier checklist: your first 90 days

For new interstate for-hire carriers and owner-operators. Work down the list. Each legal requirement (steps 1–8 and 13) links to the official rule or agency page. Steps 9–12 are practical business tips, not legal requirements. Not every step applies to every carrier: check the "if" notes, since it depends on your vehicle, your license and where you run.

Last checked: October 14, 2026. This is general information, not legal advice. Your state, cargo and operation can add requirements. When in doubt, call the FMCSA contact center at 1-800-832-5660.

Before your authority goes active

- Step 1 USDOT number and operating authority (MC).** Since May 2026, FMCSA registration runs through **Motus**, its new system. Use only motus.dot.gov; fake "Motus" sites have been reported. After your application is published in the FMCSA Register, there's a **10-day protest period** ([49 CFR 365.115](#)). Your authority isn't active until your insurance and BOC-3 are on file too.
- Step 2 BOC-3 (process agents).** You must name process agents for all 48 contiguous states and DC, unless your authority covers fewer states ([49 CFR 366.4](#)). Most new carriers pay a process-agent company to file the BOC-3 for them. Compare a few before you pay.
- Step 3 Insurance, filed with FMCSA.** Proof of financial responsibility (usually a certificate of insurance filed by your insurer) must be filed with and accepted by FMCSA before your authority is granted ([49 CFR 387.301](#); required amounts in [387.303](#)). Get quotes early, and ask each agent whether they file it for you and how quickly.
- Step 4 Drug and alcohol program, if your drivers need a CDL.** These rules apply to people who operate a commercial motor vehicle that requires a CDL ([49 CFR 382.103](#)). That includes you if you're an owner-operator who drives. If so: join a testing consortium, register in the [FMCSA Drug & Alcohol Clearinghouse](#), and complete pre-employment testing before driving. Driving a non-CDL vehicle (for example some box trucks or hotshot setups)? Check whether this part applies to you.
- Step 5 UCR (Unified Carrier Registration).** An annual registration. Pay it only by typing ucr.gov into your browser yourself. FMCSA has said it doesn't ask for UCR payments through unsolicited emails or calls.
- Step 6 IRP plates and IFTA fuel tax license, if they apply.** IFTA covers "qualified motor vehicles" that run in more than one member jurisdiction. That means a vehicle with two axles over 26,000 lbs, three or more axles at any weight, or a combination over 26,000 lbs ([definition, as published by New York State](#)). IRP apportioned plates have their own weight and axle test, so check with your state's IRP office. Both

come from your **home state** (usually the DMV or revenue department), not FMCSA. Background: [IFTA, Inc.](#)

7. **Step 7 Heavy Vehicle Use Tax (Form 2290)**, if your truck is 55,000 lbs or more. irs.gov/form2290. Your stamped Schedule 1 is usually needed for plates.
8. **Step 8 ELD, unless an exception applies.** Most drivers who must keep logs need an ELD. There are exceptions, including drivers who keep logs on no more than 8 days in any 30-day period, driveaway-towaway operations and trucks with pre-2000 engines ([49 CFR 395.8](#)). Short-haul drivers who qualify under 395.1(e) don't keep logs at all. If you need one, choose a device from [FMCSA's registered ELD list](#) and keep the **ELD information packet** in the cab ([49 CFR 395.22\(h\)](#)). The packet is:
 - an instruction sheet on transferring your logs to an officer;
 - an instruction sheet on malfunction reporting and recordkeeping;
 - blank paper log grids for at least **8 days**.

Weeks 1–4: hauling and getting paid

9. **Step 9 · tip Know your cost per mile, then decide how you'll get paid, before your first load.** Use the [cost-per-mile calculator](#) so you know which rates lose money. Brokers often pay in 30+ days. Your options are standard terms, broker quick pay or factoring, and each has a real cost. [Compare them here.](#)
10. **Step 10 · tip Set up broker packets.** Have these ready to send: W-9, certificate of insurance, authority letter and your payment details. New authorities are often rejected by brokers with minimum "authority age" rules, so ask before you chase a load.
11. **Step 11 · tip Bookkeeping from day one.** Use a separate business bank account, keep every fuel receipt (you'll need them for IFTA), and track cost per mile weekly.
12. **Step 12 · tip Lock down your accounts.** Your FMCSA login, PIN and email are what fraudsters want. Turn on 2FA for email, and never share your PIN. [Scam alerts](#)

Months 1–18: the New Entrant Safety Audit

For your first **18 months**, FMCSA treats you as a "new entrant" and watches your roadside inspections closely. It will run a **safety audit** once you've been operating long enough to have records, generally at least 3 months in ([49 CFR 385.307](#)).

13. **Step 13 Get audit-ready from the start.** Keep these in order:
 - a driver qualification file for every driver, including yourself;
 - drug and alcohol testing records, including your random-testing program;
 - hours-of-service/ELD records and supporting documents;
 - inspection, repair and maintenance records, plus annual inspections;
 - proof of insurance;
 - an accident register.

The official rules: [49 CFR Part 385, Subpart D \(New Entrant Safety Assurance Program\)](#).

14. **Ongoing** **Check your public record.** Look up your own USDOT number on [SAFER](#) to confirm your authority, insurance and BOC-3 show correctly.

The 16 violations that fail the audit automatically

Under [49 CFR 385.321](#), any one of these fails your audit, and a failed audit starts the process of revoking your new entrant registration. In plain English:

Area	Automatic fail if you...	Rule
Drug & alcohol	have no drug and alcohol testing program	382.115
	have no random testing program	382.305
	use a driver known to have an alcohol content of 0.04 or more	382.201
	use a driver who refused a required test	382.211
	use a driver known to have tested positive	382.215
Drivers	knowingly use a driver without a valid CDL	383.3(a) / 383.23(a)
	let a driver operate with a disqualified CDL or permit	383.37(b)
	let a disqualified driver drive a CMV	383.51(a)
	knowingly use a disqualified driver	391.15(a)
	knowingly use a physically unqualified driver (e.g. no valid medical card)	391.11(b)(4)
Insurance	operate without the required minimum insurance	387.7(a)
	operate a passenger vehicle without the required minimum insurance	387.31(a)
Hours of service	don't require drivers to keep records of duty status (fails at 51%+ of records checked)	395.8(a)
Vehicles	run a vehicle declared out of service before it's repaired	396.9(c)(2)
	run a vehicle before fixing out-of-service defects a driver reported on a DVIR	396.11(a)(3)
	use vehicles that weren't periodically (annually) inspected (fails at 51%+ of records checked)	396.17(a)

Summarised from 49 CFR 385.321(b), checked against the eCFR on October 14, 2026. The official table is the authority; read it for the exact wording.