

When Do I Need to Comply With DOT and CDL Requirements?

Interstate Commerce

The DOT regulates interstate commerce through the Federal Motor Carrier Safety Regulations (FMCSR).¹ A driver is subject to the FMCSRs if they operate a Commercial Motor Vehicle (CMV) in interstate commerce. A CMV is defined as:

- Having a gross vehicle weight rating (GVWR) or gross combination (vehicle and trailer) weight rating (GCWR) of 10,001 lbs or more
- Designed to transport nine or more passengers (including the driver) for compensation
- Designed to transport 16 or more passengers (including driver) or
- Used in transporting hazardous materials under 49 U.S.C. 5103 and transported in quantities requiring placarding

If a passenger vehicle is $\geq 10,001$ it is considered a CMV, regardless of the seating capacity. Check the regulations as to what constitutes compensation.

¹ Interstate commerce (IC) involves conducting business across state lines. Even if your vehicle does not cross state lines it could be involved in IC. If, for example, vehicle/plane/train "A" crosses state lines and transfers cargo/passengers to vehicle "B", which stays within the state, both A and B are involved in IC. Some exceptions apply.

Intrastate Commerce (Within a State)

Many states have adopted some or all FMCSR regulations into their state regulations. Know your state requirements.

CDL Required

All states are required to follow general CDL licensing requirements but may have some variations.

- **Class A:** A combination of vehicles with a GCWR of 26,001 or more pounds, provided the vehicle being towed is in excess of 10,000 pounds GVWR;
- **Class B:** A single vehicle with a GVWR of 26,001 or more pounds;
- **Class C (Unless Class A or B applies):**
 - A vehicle designed to transport 16 or more passengers, including the driver.
 - Any vehicle that is transporting hazardous materials and is required to be placarded in accordance with state and federal regulations.

CDL Endorsements

- T:** Truck with double or triple trailers (knowledge test)
- N:** Truck with a tank (knowledge test)
- H:** Truck carrying hazardous materials (knowledge test)
- X:** Combination of a tank vehicles and hazardous materials (knowledge test)
- P:** Passenger carrying vehicle (knowledge and skills test)
- S:** School bus (knowledge and skills test)

Regulated Under FMCSR? (All GVWR in lbs.)

 8,500 GVWR	No
 1,501 GVWR + 8,500 GVWR = 10,001 GCWR	Yes
 $\geq 10,001$ GVWR	Yes
	No
9-15 capacity, including driver (No compensation)	Yes
9-15 capacity, including driver (For compensation)	Yes
	Yes
16 or more passengers, including driver	Yes
	Yes
Any size vehicle requiring a Hazmat placard	Yes

CDL Required and Class Needed

 10,001 GVWR (trailer) 18,500 GVWR (truck) GCWR $\geq 26,001$; and trailer $\geq 10,001$	Yes, Class A
 9,500 GVWR (trailer) 18,500 GVWR (truck) Truck not $\geq 26,001$; and trailer not $\geq 10,001$	No, None
 $\geq 26,001$ GVWR	Yes, Class B
 Any size vehicle requiring Hazmat placarding	Yes, Class A, B, or C
 16 or more passengers, including driver	Yes, Class A, B, or C