



# FMCSA Operation Protect Your Move **Final Report**

Nationwide Enforcement Initiative

January 2025



U.S. Department of Transportation  
Federal Motor Carrier Safety Administration



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# Executive Summary

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The U.S. Department of Transportation (USDOT) Federal Motor Carrier Safety Administration (FMCSA) conducted “Operation Protect Your Move” from April 1, 2024 through April 19, 2024. Operation Protect Your Move (OPYM) is a nationwide initiative focused on investigating the household goods (HHG) carriers and brokers with the most egregious records of complaints in FMCSA’s National Consumer Complaint Database (NCCDB), as well as those with serious safety deficiencies, as identified by the HHG Top 100 Carriers list. FMCSA conducts OPYM before the busy moving season in efforts to safeguard the moving public from doing business with duplicitous carriers and brokers. In some cases, State agencies partner with FMCSA to support the operation, particularly in high-impact States.

FMCSA conducted investigations in 17 States to address the large number of “HHG hostage complaints” in NCCDB—reports of movers holding household possessions hostage to extort exorbitant additional charges from consumers. FMCSA investigators also addressed complaints against moving companies and brokers that are not in compliance with Federal safety and consumer protection regulations and statutes while transporting household goods. The Operation targeted both movers and the brokers that claim to connect consumers to local movers but instead take advantage of consumers by promoting scams. These carriers and brokers are referred to as “OPYM carriers” throughout this report.

As a result of the Operation, FMCSA conducted 62 total investigations and addressed 380 HHG complaints (252 non-hostage complaints, 128 hostage complaints).

Approximately 219 FMCSA employees were directly involved in the operation. These employees included Safety Investigators, Federal Program Specialists, Division Administrators, Enforcement Program Specialists, and Legal and Headquarters personnel. Texas participated in the Operation as a State Partner.





# Key Findings

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- Operation Protect Your Move (OPYM) identified 36 unsafe drivers and 12 noncompliant commercial motor vehicles (CMVs) being placed out-of-service (OOS).
- As a result of OPYM, 83.3 percent of the HHG complaints specific to the OPYM carriers were addressed.
- Approximately 46.8 percent of the total OPYM investigations featured cross-state (“borderless”) collaboration. Increased borderless collaboration allows FMCSA to address a larger number of HHG complaints about unsafe, deceptive, and noncompliant carriers and brokers.
- OPYM investigations identified a significant number of both commercial and safety violations (665 combined total).
- FMCSA utilized a variety of enforcement tools for OPYM, including notices of violations (NOVs), letters of probable violations (LOPVs), and notices of claims (NOCs).
- FMCSA updated the content of the training material to promote the use of LOPVs—11 LOPVs were completed as a result of OPYM 2024.



# Operation Goals

## REPORT SCOPE

While the Operation was conducted from April 1, 2024 through April 19, 2024, the data spans a wider timeframe (March 15, 2024 through May 15, 2024) to allow time to close Operation-related investigations and take appropriate follow-on action. The analysis team evaluated Operation Protect Your Move using a set of metrics that align with the Operation's goals: decreasing deceptive business practices, strengthening program sustainability, and optimizing resource and information sharing.



### GOAL 1 Decrease Deceptive Business Practices

Increase attention, focus, and enforcement actions on the worst-performing Household Goods (HHG) motor carriers and brokers to improve industry standards and compliance ahead of the 2024 moving season.

#### This goal aims to:

- Investigate HHG carriers from the top 100 list.
- Conduct inspections of HHG carriers on the top 100 list.
- Identify commercial and safety violations.



### GOAL 2 Strengthen Program Sustainability

Provide comprehensive training and resources to Commercial and Safety Investigators to develop a sustainable and efficient program while continuously learning and improving from ongoing operations. Facilitate the sharing of resources across Divisions and Regions to ensure a cohesive and effective approach to managing and improving operations.

#### This goal aims to:

- Provide training for investigators new to HHG investigations.
- Continue certification for existing HHG Specialists.
- Leverage the appropriate enforcement tools based on up-to-date training and best practices; when appropriate, focus on letters of probable violations (LOPVs).
- Leverage borderless enforcement activity to optimize resource- and information-sharing.



### GOAL 3 Improve the Moving Experience for American Families

Mitigate negative nationwide press by addressing common pain points and delivering a more reliable, efficient, and satisfactory moving experience.

#### This goal aims to:

- Review, address, and close a large number of HHG complaints in the NCCDB.
- Decrease the number of HHG complaints being filed from year to year.



# Findings



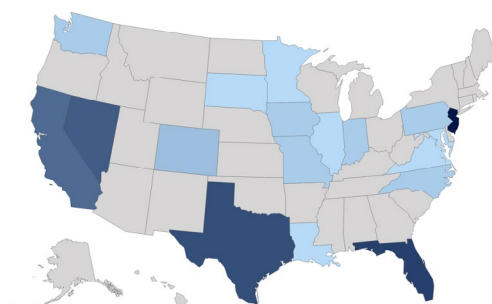
## GOAL 1 Decrease Deceptive Business Practices

Operation Protect Your Move (OPYM) targeted the worst-performing Household Goods (HHG) motor carriers and brokers to improve industry standards and compliance ahead of the 2024 moving season.

**Figure 1** shows that OPYM targeted 78 distinct HHG carriers and brokers across the Nation. The OPYM carriers and brokers were identified based on their NCCDB complaint records and status on the HHG Top 100 Carrier list. States with the highest concentration of targeted carriers were New Jersey, Florida, Texas, and Nevada.

**FIGURE 1**

### OPYM Carriers by State



NJ	15
FL	12
TX	11
NV	10
CA	9
CO	9
IA	2
IN	2
MD	2
NC	2
PA	2
WA	2
IL	1
LA	1
MD	1
MN	1
SD	1
<b>Total</b>	<b>78</b>

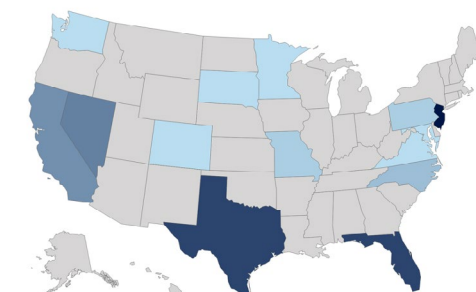
Note: Data collected from March 15 – May 15, 2024.

FMCSA conducted a large number of investigations and inspections on OPYM carriers.

**Figure 2** shows the distribution of investigations by State. Most investigations were conducted in New Jersey, Florida, Texas and Nevada, which aligns with where the highest number of targeted carriers are located (see Figure 1). OPYM resulted in 62 total completed investigations across the Nation on 58 OPYM carriers (4 carriers had more than 1 investigation). The OPYM team conducted investigations on 74.4 percent of the targeted OPYM carriers.

**FIGURE 2**

### OPYM Investigations by State



	# OPYM Investigations	Count of DOT NUMBER
NJ	14	13
TX	11	11
FL	11	9
NV	7	7
CA	6	6
NC	3	2
MO	2	2
PA	2	2
CO	1	1
MD	1	1
MN	1	1
SD	1	1
VA	1	1
WA	1	1
<b>Total</b>	<b>62</b>	<b>58</b>





# Findings



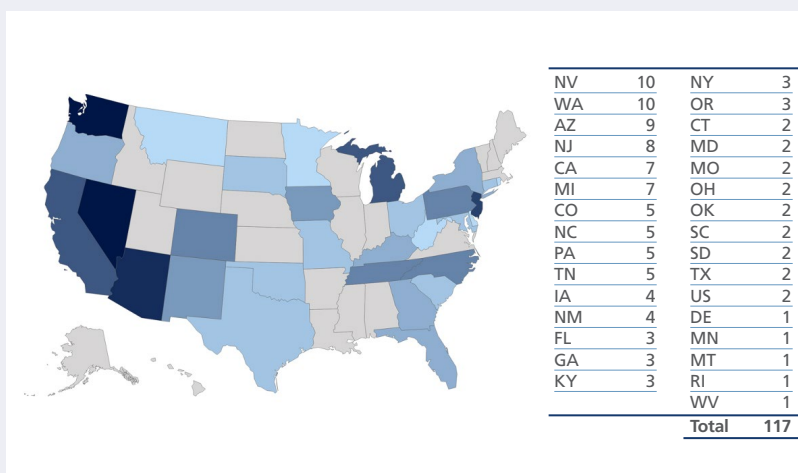
## GOAL 1

### Decrease Deceptive Business Practices

**Figure 3** shows the distribution of inspections by State, with the most inspections occurring in Washington, Nevada, Arizona, and New Jersey. A total of 117 inspections were completed on 42 of the 78 OPYM carriers (53.8%); the other 36 OPYM carriers did not receive inspections (46.2%).

**FIGURE 3**

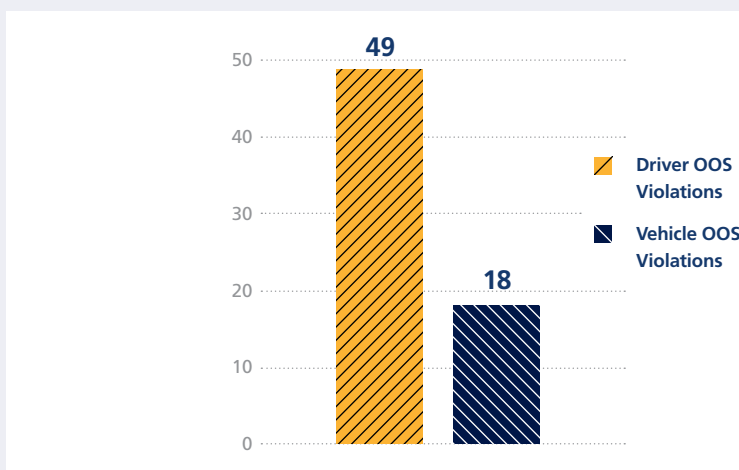
#### OPYM Inspections by State



Between March 15, 2024 and May 15, 2024, inspections completed as part of OPYM found 49 driver OOS violations on 36 different drivers and 18 commercial motor vehicle (CMV) OOS violations on 12 vehicles (**Figure 4**). Note, some drivers and CMVs had multiple OOS violations.

**FIGURE 4**

#### OPYM OOS Violations





# Findings



## GOAL 1

### Decrease Deceptive Business Practices

Investigations conducted on OPYM carriers identified a high volume of both commercial and safety violations, indicating significant problems in both areas (Figure 5). The 62 investigations completed as part of OPYM found 665 violations (403 commercial; 228 safety; 32 “other”; and 2 hazmat). Violations in the “other” category fall outside the analysis categories of Federal safety, commercial, and hazmat regulations and may reflect violations of State regulations. As a result of the violations found by OPYM, FMCSA took several actions, including issuing letters of probable violations, notices of claims, and notices of violations (Figure 6).

FIGURE 5

Violation Counts & Distributions

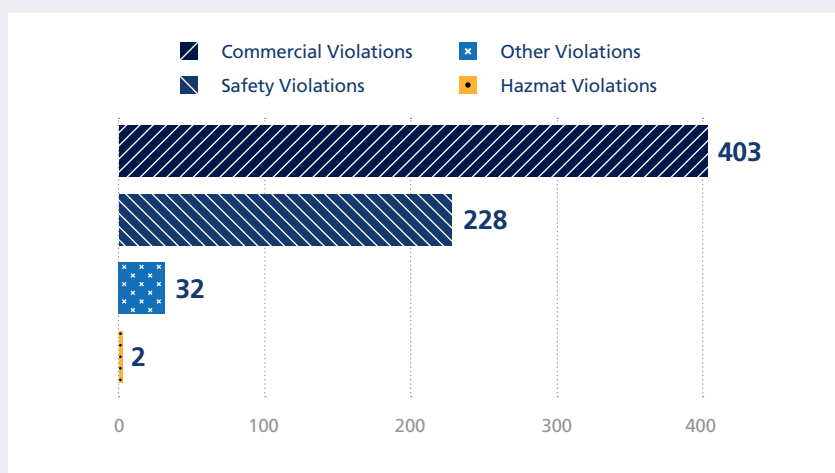
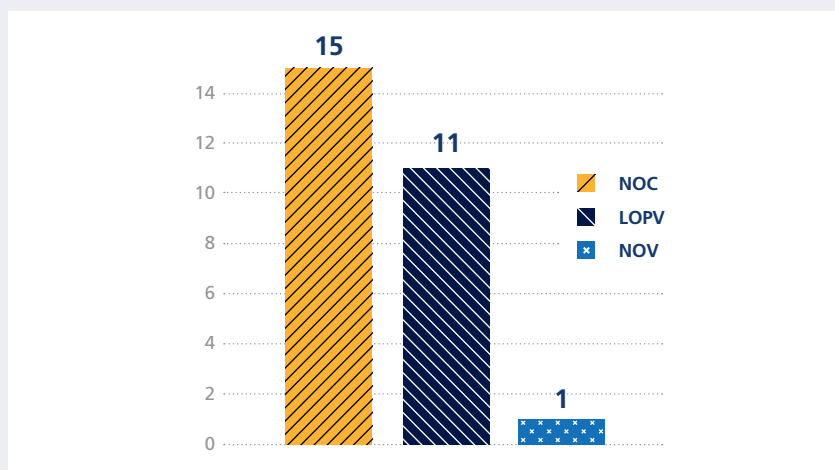


FIGURE 6

Enforcement Activity as a Result of OPYM



# Findings



## GOAL 2 Strengthen Program Sustainability

FMCSA strengthened program sustainability by developing and delivering updated training to field staff participating in the Operation while continuously learning and improving from ongoing operations.

### Training & Partnerships

FMCSA delivered two training sessions on Operation Protect Your Move for FMCSA field staff members on February 27, 2024 and March 6, 2024. In total, 219 Federal and State partners attended the sessions, including 32 Federal investigators and 14 State investigators. This training focused on investigative tools, how to cite violations and create LOPVs, enforcement considerations, NCCDB complaint procedures, and violation trends.

Several high-impact States—those with the most HHG complaints—were identified by OPYM, and efforts by Division Administrators to work with the State agencies on building partnerships and developing memorandums of understanding (MOAs) are ongoing. Currently, FMCSA has MOAs with 14 State enforcement partners, three of which were added since last year's Operation.

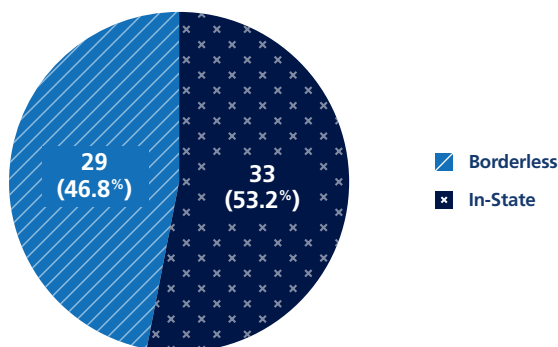
Training for this year's Operation placed emphasis on increasing the number of LOPVs by enhancing staff knowledge about when to use and how to develop an effective LOPV. After the Operation, FMCSA discussed additional ways to increase the utilization of LOPVs, including updating the training material again to include lessons learned, best practices, and examples of well-prepared LOPVs and creating an LOPV checklist. This year's Operation resulted in 11 LOPVs (Figure 6).

### Borderless Collaboration

OPYM facilitated the sharing of resources across Divisions and Regions to ensure a cohesive and effective approach to managing and improving operations. OPYM included a significant percentage of investigations conducted through borderless collaboration, that is, investigations that are conducted across State borders, where the carrier and investigator are based in different States. Borderless investigations made up 46.8 percent of the total OPYM investigations (Figure 7). Increased borderless collaboration allows FMCSA to address a larger number of unsafe, deceptive, and noncompliant HHG carriers and brokers to help protect the moves of the American people.

FIGURE 7

#### OPYM Investigations that were Conducted Leveraging Borderless Collaboration



Note: Data collected from March 15 – May 15, 2024.





# Findings



## GOAL 3 Improve the Moving Experience

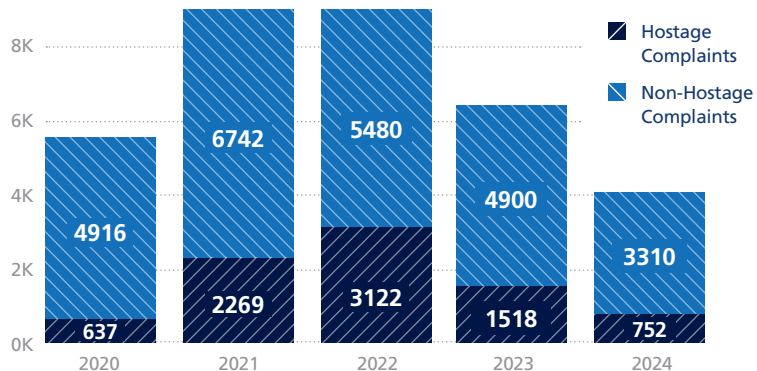
The overall number of complaints regarding HHG is decreasing over time.

**Figure 8** displays the five-year trend for all HHG related complaints in FMCSA's NCCDB, broken down by allegation type. The total number of complaints peaked in 2021 while the total number of hostage complaints peaked in 2022, possibly due to increased media attention on moving scams. A 2019 decision by an administrative law judge in Riojas held that FMCSA lacks the statutory authority to administratively assess civil penalties for violations of commercial regulations. This includes HHG regulations, which could have contributed to the increased inventory of unaddressed HHG complaints. However, the number of hostage and other HHG complaints has been decreasing over the past three years, perhaps due in part to the yearly Operation Protect Your Move efforts. The downward trend of hostage complaints may also be partially due to NCCDB system changes made by FMCSA that required complainants to answer a specific set of questions and provide documentation before submitting a hostage complaint. These changes were made to mitigate the number of complaints that were inaccurately filed as hostage complaints by the moving public.

**Figure 9** depicts the percentage of hostage vs. other complaints across all HHG complaints in NCCDB over approximately five years. Again, these data suggest that over all, HHG complains of all types have been decreasing since 2022.

**FIGURE 8**

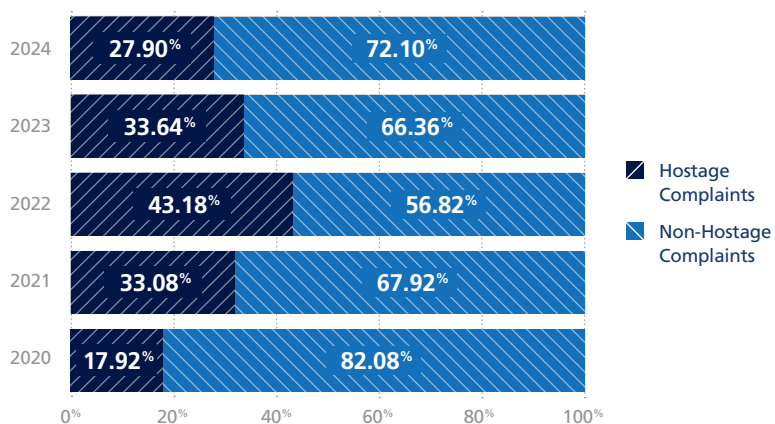
### All HHG Complaints (Not Limited to OPYM Carriers)



Note: The 2024 value reflects data collected from January 1 2020 – May 15, 2024.

**FIGURE 9**

### HHG Complaints in FMCSA's NCCDB



Note: The 2024 value reflects data collected from January 2020 – May 2024.



# Findings

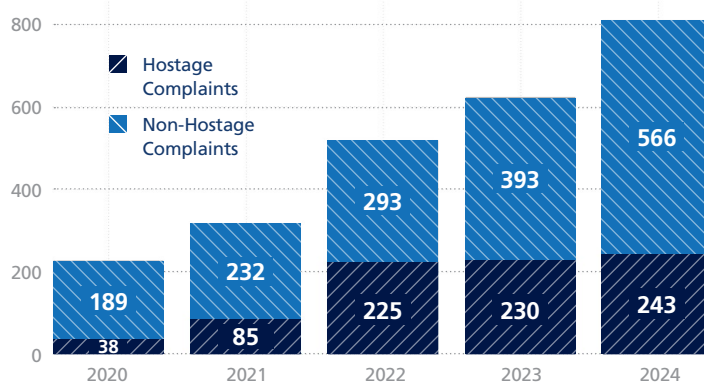


## GOAL 3 Improve the Moving Experience

**Figure 10** depicts the same data as **Figure 8**, but for only the 78 carriers identified for OPYM 2024. HHG complaint volume has decreased since 2022, but the number of complaints on carriers targeted for OPYM has increased, indicating that OPYM targeted the highest risk carriers with a rising number of HHG complaints.

**FIGURE 10**

All HHG Complaints (Limited to only OPYM Carriers)

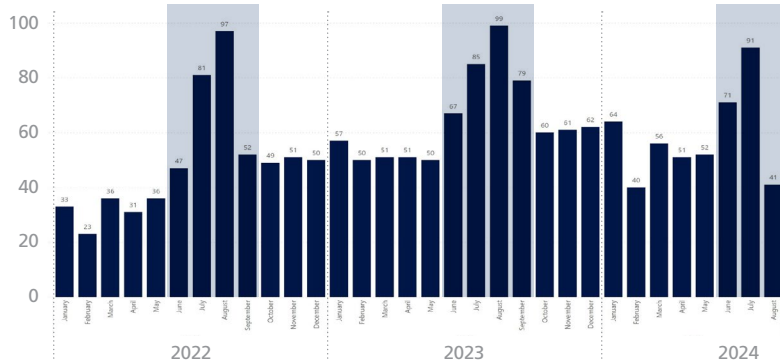


Note: The 2024 value reflects data collected from January 1 2020 – May 15, 2024.

The number of complaints specific to OPYM carriers spiked during the peak summer moving season (June–September) each year, as shown in **Figure 11**.

**FIGURE 11**

HHG Complaints Specific to OPYM Carriers by Month





# Findings



## GOAL 3 Improve the Moving Experience

Through OPYM 2024, FMCSA closed a large number of HHG complaints to help mitigate negative nationwide press and improve the moving experience.

As a result of OPYM, 83.3 percent of the HHG complaints specific to the targeted OPYM carriers were addressed, meaning FMCSA reviewed and acted on the complaints (specific actions vary). Of the HHG complaints specific to OPYM carriers, 4.8 percent are still open, and 11.8 percent of the complaints have not yet been reviewed by FMCSA for possible action (Figure 12).

FIGURE 12

### OPYM Complaint Status

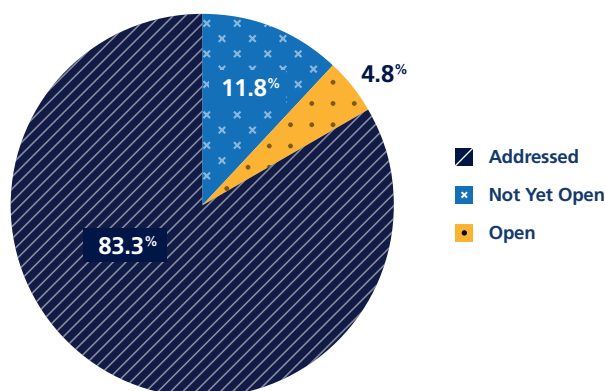
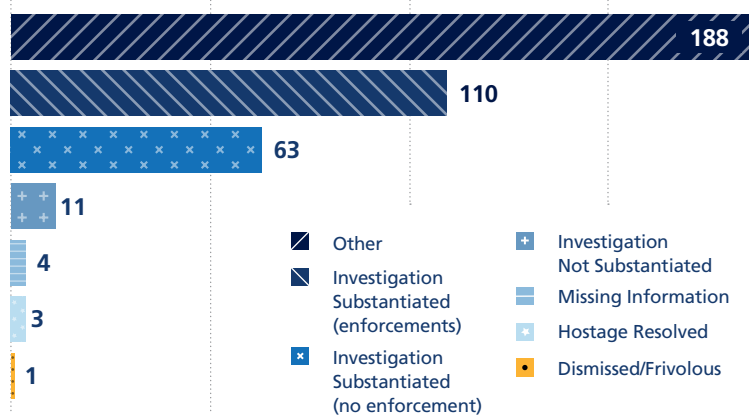


FIGURE 13

### Addressed OPYM Complaints (Detail)



Note: The values reflect data collected from March 15 – May 15, 2024.

Of the 83.3 percent of complaints that were addressed, 110 complaints were substantiated by investigations and enforcement action was taken; 188 were addressed due to “other” (complaints were addressed and used to assess the carrier’s overall compliance); and 63 were substantiated by investigation and addressed with no enforcement action taken (Figure 13).



# Next Steps

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Operation Protect Your Move is a yearly effort that is continuously improved based on lessons learned. Further activity is planned to support the monitoring and enforcement of the HHG industry.

- FMCSA will conduct a targeted broker investigation event, Operation Protect Your Load, centered around unlawful and predatory broker activities.
- Cases resulting from Operation Protect Your Move that involve potential criminal misconduct may be referred to the U.S. Department of Justice for further investigation.
- FMCSA is working to address all recommendations made by the Government Accountability Office (GAO) in an audit conducted in 2023.
- FMCSA is developing a new NCCDB website leveraging top of the line Customer Relationship Management (CRM) software. The new site will apply more stringent requirements around submitting complaints to ensure the Agency is deploying resources on substantial complaints.
- FMCSA is working to centralize the NCCDB website to the Registration Division to allow for more concentrated oversight.
- FMCSA is working on a plan to update the Protect Your Move website to be more user friendly, including updated messaging around operating authority.
- As a result of the Bipartisan Infrastructure Law (BIL), FMCSA continues to increase its future OPYM enforcement and investigation capacity by hiring additional full-time employees to join the Agency.
- FMCSA established the Household Goods State Enforcement Partnership Program to maximize the impact of collective efforts. Through this program, participating State agencies have access to FMCSA enforcement databases, free training on Federal regulations and laws, and will participate with FMCSA on joint investigations to support increased enforcement actions.
- Divisions continue to be encouraged to engage with various State Attorneys General offices and consumer protection agencies to develop new partnerships across the country.
- FMCSA refreshed its internal technical advisory group to help guide future efforts.





