PRISM
Performance and Registration Information Systems Management

Law Enforcement Training

Insert Law Enforcement Agency Name

Insert Training Date
What is PRISM?

TWO MAJOR PROCESSES

1. Commercial Vehicle Registration
   (IRP – International Registration Plan)
2. Motor Carrier Law Enforcement

- Cooperative Federal/State public safety program sponsored by FMCSA
- Links carrier safety fitness to State vehicle registration
Commercial Vehicle Registration

- The commercial vehicle registration process provides the framework for PRISM

- Establishes link between the Motor Carrier Responsible for Safety and associated vehicles registered commercially
  - Plate Number (or VIN) can always be traced back to the responsible carrier for safety
  - Brings safety down to the vehicle level
State Imposed Sanctions

- Deny vehicle registration when a Federal OOS order has been issued or USDOT Number is Inactive

- Ultimate Sanction: State registration suspension/revocation concurrent with the Federal order to cease interstate operations
Law Enforcement’s Role

- **FMCSA** issues Federal Out-of-Service orders to unsafe motor carriers.
- **IRP** denies and suspends State Registrations to Federal OOS carriers.
- **PRISM** provides vehicles targeted for inspection due to safety reasons.

**Law Enforcement’s role**
is to identify vehicles operating while under a Federal Out-of-Service Order or targeted for inspection and **take appropriate action!**
PRISM Law Enforcement Training Topics

- Identify Motor Carrier Responsible for Safety
- Identify Federal Out-of-Service Vehicles
- Out-of-Service Actions at Roadside
What is a Registrant?
- The entity that pays for the vehicle registration plate
- The Registrant may own or lease the vehicle and is responsible for obtaining the registration

What is a Motor Carrier Responsible for Safety?
- The Motor Carrier that is responsible for the safe operation of the vehicle
- The USDOT Number that should be displayed on the sides of the truck.
- May or may not be the Registrant
Identify the Motor Carrier Responsible for Safety

The best methods to identify MCRS:

- USDOT Number displayed on side of truck
  - Must be Active Interstate Carrier USDOT Number
- Shipping Papers
- Lease Agreement
- Interview Driver to Identify Employer/Carrier
- Cab Cards (If registered in a PRISM State)
Inspectors will encounter vehicles whose MCRS changes frequently due to the carrier contracting with brokers/shippers to move freight.

These lease agreements, some for as short as days or weeks should include MCRS information and the USDOT Number of the MCRS should be displayed on the vehicle.
The MCRS changes every time a new lease is issued and the cab card issued at the time of registration should indicate that the MCRS is expected to change.

Inspectors should be careful to identify the correct MCRS so that the crash or inspection is credited to the proper USDOT Number.
States Barcoding Cab Cards: (36 States + D.C.)
AL, AZ, CA, CT, D.C., DE, FL, GA, IA, ID, IN, KS, KY, LA, MA, ME, MN, MO, MS, MT, NC, NE, NH, NJ, NM, NY, OH, RI, SC, SD, TN, TX, UT, VA, VT, WA, WV

Data as of December 2013
The information on the Cab Card was the best available at the time of registration and could have changed.

The following slides will show cab card examples for these three scenarios:

- Registrant and MCRS are the same
- Registrant and MCRS are different – Not expected to change
- Registrant and MCRS are different – Expected to change
Registrant and MCRS are Same

When there is no lease and the Carrier Responsible for Safety is **NOT** expected to change, the following info is printed on the Cab Card:

- USDOT Number
- Carrier Name
- Mailing Address
When there is a lease, but the Carrier Responsible for Safety is **NOT** expected to change, the following info is printed on the Cab Card:

- USDOT Number
- Carrier Name
- Mailing Address

**Different Company**
When there is a lease and the Carrier Responsible for Safety IS expected to change during the registration year, the Cab Card includes a message:

**THE CARRIER RESPONSIBLE FOR SAFETY IS EXPECTED TO CHANGE DURING THE REGISTRATION PERIOD**
Questions for Review

1. What is Law Enforcement’s Role in the PRISM Program?

2. What is a Motor Carrier Responsible for Safety?

3. What is a Registrant?

4. What are the methods used to properly identify the Motor Carrier Responsible for Safety?
Question: What is the key requirement for Law Enforcement in PRISM States?

Answer: Identify carriers operating while under a Federal Out-of-Service Order.

...check EVERY vehicle, EVERY time for Federal Out-of-Service!
## FMCSA Out-of-Service Reasons

<table>
<thead>
<tr>
<th>FMCSA OOS Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>* Imminent Hazard</td>
</tr>
<tr>
<td>* Unsatisfactory/Unfit Motor Carrier</td>
</tr>
<tr>
<td>Failure to Pay Fines due to Safety Violation</td>
</tr>
<tr>
<td>New Entrant Revoked - Expedited Actions</td>
</tr>
<tr>
<td>New Entrant Revoked - Failure of Safety Audit</td>
</tr>
<tr>
<td>New Entrant Revoked - Refusal of Safety Audit/No Contact</td>
</tr>
</tbody>
</table>

* These Out-of-Service orders also apply to **INTRASTATE commerce**
Interstate and Intrastate OOS

ORDER TO CEASE ALL TRANSPORTATION IN INTERSTATE AND INTRASTATE COMMERCE AND REVOCATION OF REGISTRATION

EFFECTIVE Monday, June 27, 2011 at 12:01 am

USDOT # 1856412

This Order to Cease All Transportation in Interstate and Intrastate Commerce (Order) and Revocation of Registration is issued pursuant to 49 USC §§ 13905(f)(1)(B) and 31144, and 49 CFR § 385.13.

This Order is the result of a compliance review of AGAPE TRANSPORTATION LLC’s operations completed on May 12, 2011. The review disclosed serious violations of the Federal Motor Carrier Safety Regulations and/or the Hazardous Materials Regulations.

AGAPE TRANSPORTATION LLC, USDOT # 1856412, was issued a proposed “unsatisfactory” safety rating on May 12, 2011. AGAPE TRANSPORTATION LLC was notified to take certain actions within 45 days from the date of that proposed rating to improve its safety rating to “conditional” or “satisfactory”. AGAPE TRANSPORTATION LLC was further advised that it would be ordered to cease any and all operation of any commercial motor vehicle(s) in interstate and intrastate commerce and its registration would be revoked unless its safety rating was improved to “conditional” or “satisfactory”.

AGAPE TRANSPORTATION LLC has failed to take the necessary steps required to improve its safety rating to “conditional” or “satisfactory” within the required timeframe.

THEREFORE, IT IS ORDERED THAT AGAPE TRANSPORTATION LLC SHALL CEASE ALL OPERATION OF ANY COMMERCIAL MOTOR VEHICLE(S) IN INTERSTATE AND INTRASTATE COMMERCE ON THE EFFECTIVE DATE AND TIME OF THIS ORDER, AND THE REGISTRATION OF AGAPE TRANSPORTATION LLC SHALL BE REVOKED UNLESS AND UNTIL SUCH TIME AS THE FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION...
## FMCSA Tools to Identify OOS

<table>
<thead>
<tr>
<th>Tools Available</th>
<th>Access</th>
<th>Data Timeliness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Query Central</td>
<td>Online via FMCSA Portal</td>
<td>Real-Time</td>
</tr>
<tr>
<td>Nlets</td>
<td>State ACQ/AVQ Queries</td>
<td>Up to 24 hrs.</td>
</tr>
<tr>
<td>ISS</td>
<td>Download from InfoSys</td>
<td>Monthly</td>
</tr>
<tr>
<td>CVIEW</td>
<td>State CVISN System</td>
<td>Up to 24 hrs.</td>
</tr>
</tbody>
</table>

Note: The SAFER website does provide real-time OOS information for **Active** USDOT Numbers only. If the USDOT Number is inactive and OOS, the SAFER website will not display the OOS alert message, it will just display INACTIVE.
Query Central

- Query Central is available via the FMCSA Portal and gives real-time Out-of-Service Carrier status directly from MCMIS.

- Supports inquiries by:
  - USDOT Number
  - Carrier Name
  - VIN Number
  - State/Plate
  - CVSA Decal Number
Query Central – Carrier Data

Real-Time OOS Status

ALERT: Carrier is currently under a Federal OOS

OOS Date: 08/29/2012
State: 
Reason: UNSATISFACTORY = UNFIT
Rescinded Date:

For further information, please contact the appropriate FMCSA Service Center.

Click here to review a reference to the applicable section of 49 CFR

Motor Carrier Identification & Safety Data

Please Note: You can now access L&I detail by clicking on the MC/MX number(s).

<table>
<thead>
<tr>
<th>Legal Name:</th>
<th>FIVE SONS EXPRESS INC</th>
<th>USDOT#:</th>
<th>2108606</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBA Name:</td>
<td></td>
<td>MC/MX#:</td>
<td>735243</td>
</tr>
<tr>
<td>Physical Address:</td>
<td>30103 SW 152ND AVE</td>
<td>Phone#:</td>
<td>(305)747-5660</td>
</tr>
<tr>
<td>Country of Domicile:</td>
<td>HOMESTEAD, FL 33033</td>
<td>Fax#:</td>
<td>(502)690-8007</td>
</tr>
<tr>
<td>Mailing Address:</td>
<td>30103 SW 152ND AVE</td>
<td>Status of USDOT #:</td>
<td>ACTIVE</td>
</tr>
<tr>
<td>Country of Domicile:</td>
<td>HOMESTEAD, FL 33033</td>
<td>Entity:</td>
<td>CARRIER</td>
</tr>
</tbody>
</table>

Inspection Value: 100 - INSPECT

Inspection Value is based on Safety data.
# Query Central – OOS CFR List

**List of Chapter 49 CFR OOS Section Numbers**

<table>
<thead>
<tr>
<th>OOS Description</th>
<th>Section Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Failure to Pay Fine - Private Carrier</td>
<td>386.63(a)(1)</td>
</tr>
<tr>
<td>Failure to Pay Fine - For-Hire Carrier</td>
<td>386.64(a)(1)</td>
</tr>
<tr>
<td>UNSAT/UNFIT - Placarded HM &amp; Passenger Carriers</td>
<td>385.13(a)(1)</td>
</tr>
<tr>
<td>UNSAT/UNFIT - Property Carriers</td>
<td>385.13(a)(2)</td>
</tr>
<tr>
<td>New Entrant - Failure of Safety Audit</td>
<td>385.325(c)</td>
</tr>
<tr>
<td>New Entrant - Refusal of Audit/No Contact</td>
<td>385.337(b)</td>
</tr>
<tr>
<td>New Entrant - Expedited Actions</td>
<td>385.308</td>
</tr>
<tr>
<td>Imminent Hazard – Motor Carrier</td>
<td>386.72(b)(4)</td>
</tr>
<tr>
<td>Imminent Hazard – Intermodal Equipment Provider</td>
<td>386.72(b)(4)</td>
</tr>
<tr>
<td>MX carrier (inadequate corrective action)</td>
<td>385.105(b)</td>
</tr>
<tr>
<td>MX carrier UNSAT/UNFIT</td>
<td>385.111(a)</td>
</tr>
<tr>
<td>MX carriers (suspended operating authority for UNSAT rating or failed Safety Audit)</td>
<td>385.111(c)(1)</td>
</tr>
<tr>
<td>MX carriers (revoked operating authority)</td>
<td>385.111(c)(2)</td>
</tr>
</tbody>
</table>
Query Central – Vehicle Data

Click on PRISM link to view vehicle data

Vehicle Information

<table>
<thead>
<tr>
<th>VIN</th>
<th>Plate #</th>
<th>State</th>
<th>Make</th>
<th>Model Year</th>
<th>Registration Start Date</th>
<th>Registration Expiration Date</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1FUY3ECB9MH505281</td>
<td>SF9256</td>
<td>IA</td>
<td>FRHT</td>
<td>1991</td>
<td>01/01/2012</td>
<td>12/31/2012</td>
<td>STATE SUSPENSION DUE TO FEDERAL OOS</td>
</tr>
<tr>
<td>1WUYDCJE2HN120747</td>
<td>SG1136</td>
<td>IA</td>
<td>WHIT</td>
<td>1987</td>
<td>01/01/2012</td>
<td>12/31/2012</td>
<td>STATE SUSPENSION DUE TO FEDERAL OOS</td>
</tr>
<tr>
<td>2XXWD29X0JM502882</td>
<td>SF2520</td>
<td>IA</td>
<td>KW</td>
<td>1988</td>
<td>01/01/2012</td>
<td>12/31/2012</td>
<td>STATE SUSPENSION DUE TO FEDERAL OOS</td>
</tr>
</tbody>
</table>
Note: If the vehicle registration has been suspended by the State, and the 950 IRP Status Code is applied to the record, the Status column will display the following alert message: STATE SUSPENSION DUE TO FEDERAL OOS
# Query Central – Vehicle Registration Status

## Example of Active Vehicle Registration

<table>
<thead>
<tr>
<th>USDOT#</th>
<th>VIN</th>
<th>Plate#</th>
<th>State</th>
<th>Make</th>
<th>Model Year</th>
<th>Registration Start Date</th>
<th>Registration Expiration Date</th>
<th>Target Indicator</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1027111</td>
<td>4V4NC9TG13N333136</td>
<td>MB3155</td>
<td>NC</td>
<td>VOLV</td>
<td>2003</td>
<td>08/13/2012</td>
<td>07/31/2013</td>
<td>Targeted</td>
<td>ACTIVE</td>
</tr>
</tbody>
</table>

## Example of an Inactive Vehicle Registration

<table>
<thead>
<tr>
<th>USDOT#</th>
<th>VIN</th>
<th>Plate#</th>
<th>State</th>
<th>Make</th>
<th>Model Year</th>
<th>Registration Start Date</th>
<th>Registration Expiration Date</th>
<th>Target Indicator</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1931417</td>
<td>1FVAAHCG91LH70746</td>
<td>MA6684</td>
<td>NC</td>
<td>FRHT</td>
<td>2001</td>
<td>10/26/2010</td>
<td>09/30/2011</td>
<td>Federal OOS</td>
<td>INACTIVE</td>
</tr>
</tbody>
</table>

Note: If the vehicle registration has expired, the Status column will display the message: **INACTIVE**
Query Central – Try to obtain an address when QC shows address as undeliverable
Is Operating Authority Required?

- Interstate for-hire carriers of regulated property & passengers require operating authority (An ACTIVE MC number)

- Operating Authority **Not** Required for:
  - Intrastate Transportation
  - Private Property Transportation
  - Transportation of Exempt Commodities
Generally, raw, unprocessed commodities are exempt from operating authority.

- See Admin Rule 119 “Composite Commodity List”
- Exemptions in Part 372 of the FMCSR’s
- Transportation in “Commercial Zones”
  (See Part 372 Subpart B and also Appendix F)
- U.S. Mail, Air Freight, Newspapers, Woodchips, and Garbage (NOT including scrap/recyclables) also exempt
Verify there is an MC/MX#. The following carrier has NO AUTHORITY.
Checking Query Central for Authority Issues

- Clicking on an MC # to check authority

Click the Link

Motor Carrier Identification & Safety Data

Please Note: You can now access L&I detail by clicking on the MC/MX number(s).

<table>
<thead>
<tr>
<th>Legal Name:</th>
<th>WAW TRUCKING INC</th>
<th>USDOT#:</th>
<th>551137</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBA Name:</td>
<td></td>
<td>MC/MX#:</td>
<td>319209</td>
</tr>
<tr>
<td>Physical Address:</td>
<td>18 SOUTHLAND DRIVE</td>
<td>Phone#:</td>
<td>(585)292-1325</td>
</tr>
<tr>
<td>Country of Domicile:</td>
<td>ROCHESTER, NY 14623</td>
<td>Fax#:</td>
<td></td>
</tr>
<tr>
<td>Mailing Address:</td>
<td>18 SOUTHLAND DRIVE</td>
<td>Status of USDOT #:</td>
<td>INACTIVE</td>
</tr>
<tr>
<td></td>
<td>ROCHESTER, NY 14623</td>
<td>Entity:</td>
<td>CARRIER</td>
</tr>
</tbody>
</table>

Inspection Value: 59 - OPTIONAL

Inspection Value is based on lack of safety performance data.

Alert: This carrier is not currently active. An inspection is recommended.

Visit the SAFER Website for additional information.
## Checking Query Central for Authority Issues

### Verify Authority On the Next Screen

*Alert:* This carrier may not have valid operating authority.

### Authority Problem Identified

<table>
<thead>
<tr>
<th>Common Authority</th>
<th>Contract Authority</th>
<th>Broker Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Status: NONE</td>
<td>Status: INACTIVE</td>
<td>Status: NONE</td>
</tr>
<tr>
<td>Application Pending: NO</td>
<td>Application Pending: NO</td>
<td>Application Pending: NO</td>
</tr>
<tr>
<td>Revocation Pending: NO</td>
<td>Revocation Pending: NO</td>
<td>Revocation Pending: NO</td>
</tr>
</tbody>
</table>

### Operating Authority Types

<table>
<thead>
<tr>
<th>Property</th>
<th>Passenger</th>
<th>Household Goods</th>
</tr>
</thead>
<tbody>
<tr>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
</tbody>
</table>

### Insurance Amounts

<table>
<thead>
<tr>
<th>Liability Required</th>
<th>Cargo Required</th>
<th>Bond Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>$750,000</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

**NOTE:** The word YES does not mean the carrier has the authority, it means that Property Authority IS REQUIRED.

Select L&I Link to Verify
OPERATING AUTHORITY - Operating a motor vehicle without the required operating authority or beyond the scope of the motor carriers’ operating authority.

- Authority Required - 392.9a(a)(1)
- Beyond Scope - 392.9a(a)(2)

- Declare vehicle out-of-service until proper operating authority is obtained.
Data can be imported from QC into ASPEN
In the ASPEN Configuration screen, under the “External” tab, check the QC import boxes
# Query Central – Download Data into ASPEN

**Motor Carrier Identification & Safety Data**

Please Note: You can now access L&I detail by clicking on the MC/MX number(s).

<table>
<thead>
<tr>
<th>Legal Name</th>
<th>FAIRCHILD TRANSPORTATION SERVICES INC</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBA Name</td>
<td></td>
</tr>
<tr>
<td>Physical Address</td>
<td>10330 LOFTIN DR</td>
</tr>
<tr>
<td>Address</td>
<td>OLIVE BRANCH, MS 38654</td>
</tr>
<tr>
<td>Country of Domicile</td>
<td>UNITED STATES</td>
</tr>
</tbody>
</table>


**Inspection Value:** 70 - OPT

Inspection Value is based on lack of safety performance.

ALERT: This carrier is a new entrant. An inspection visit the [SAFER Website](#) for additional information. Click [here](#) for UCR information regarding this.

![Download Data for ASPEN button](image)
1) Enter a USDOT Number that is under a Federal Out-of-Service Order and review the Carrier Summary Screen. Use the “Click here” link to access the CFR 49 section numbers. Identify which section number would be used in this case.

2) Click on the “PRISM” link from the Carrier Summary Screen to access the vehicle information associated with that carrier (Carrier PRISM Summary Screen).

3) Enter a VIN that is “Targeted” by PRISM and review info provided in the PRISM Vehicle Summary Page. From this page, navigate back to the Carrier Summary Screen.

4) Enter vehicles with different registration status and review the “Status” column. (Suspended, Active, Inactive)

5) Enter any USDOT Number into the Carrier Search field. Once the data is returned, practice downloading the data from Query Central to ASPEN (see PRISM LE Manual pages 18-23 for step-by-step screenshots).
Nlets hosts the PRISM Target File
- Includes carriers and vehicles under a Federal Out-of-Service order or targeted for inspection by FMCSA for safety reasons

PRISM Specific Queries:
- ACQ (Carrier Queries) - USDOT Number
- AVQ (Vehicle Queries) - VIN or State/Plate
MSG FROM NLETS 3745
ACR.AVLIC0000. TO:DEST PA07710B5
*MRI0056917.
TXT

CARRIER IS UNDER FEDERAL OOS.
IMMINENT HAZARD.

DOT/9999999.
NAM/ABC CARTAGE INC.
ADR/25 MAIN STREET.
CITY/PITTSBURGH.ST/PA.ZIP/15204.
CAR TARG-HIST IND/T.MCSIP STEP/54.MCSIP DATE/01252014
Nlets – Vehicle Data

Nlets Vehicle (AVQ) Response Sample - OOS

CARRIER IS UNDER FEDERAL OOS
UNSAT/UNFIT

DOT/8888888.
NAM/JJJ TRANSPORT INC.
ADR/55 CAUSEWAY STREET.
CITY/BOSTON.ST/MA.ZIP/02114.
CAR TARG-HIST IND/T.MCSIP STEP/7.MCSIP DATE/01282014.

VMA/FORD.VYR/2007.VIN/1FDXW57P85ED627000.
LIC/99BF9M.LIS/MA.REG EFF DATE/05012014.REG EXP DATE/05302015.
VEH TARG-HIST IND/T.
PAGE/01 OF/01.
CARRIER IS TARGETED FOR INSPECTION.

DOT/8888888.
NAM/JJJ TRANSPORT INC.
ADR/55 CAUSEWAY STREET.
CITY/BOSTON.ST/MA.ZIP/02114.
CAR TARG-HIST IND/T.MCSIP STEP/7.MCSIP DATE/01282012.

VMA/FORD.VYR/2007.VIN/1FDXW57P85ED627000.
LIC/99BF9M.LIS/MA.REG EFF DATE/05012011.REG EXP DATE/05302012.
VEH TARG-HIST IND/T.
PAGE/01 OF/01.
1) Enter a USDOT Number that is under a Federal Out-of-Service Order and perform a PRISM-NLETTS Carrier Query (ACQ)

2) Enter a USDOT Number that is NOT under a Federal OOS, but is targeted for inspection by PRISM, and perform a PRISM-NLETTS Carrier Query (ACQ)

3) Enter a License Plate/State of a vehicle associated with a motor carrier that is currently under a Federal OOS and perform a PRISM-NLETTS Vehicle Query (AVQ).

4) Enter a License Plate/State of a vehicle associated with a motor carrier that is targeted for inspection by PRISM and perform a PRISM-NLETTS Vehicle Query (AVQ).
ISS – Inspection Selection System

- ISS updated monthly. Confirm the OOS Status with a more recent data source or call FMCSA Office.
ISS – Inspection Selection System

- ISS updated monthly. Confirm the OOS Status with a more recent data source or call FMCSA Office.
5. What is the best tool to identify FMCSA Out-of-Service Carriers in real time?

6. If you have Nlets access, but no Internet connection, can you still check the Targeted status of a vehicle?

7. Why are vehicles targeted for inspection by FMCSA?
What actions should be taken at the roadside after identifying a Federal OOS Vehicle?
OOS Actions at Roadside

- If an OOS Vehicle is identified take appropriate action by conducting a MCSAP Inspection and place the vehicle Out-of-Service.

- Follow State law and your department’s regulations in regards to placing the vehicle Out-of-Service.

- FMCSA has provided guidance to the members of CVSA regarding the enforcement of OOS Orders.
  - The Guidelines can be downloaded from the PRISM website.
What if the OOS order cannot be verified?

- Document the stop by obtaining photocopies of the following info:
  - Drivers log book and CDL License
  - Shipping Papers / Lease Agreement
  - Origin and destination of trip
  - Interview Driver to Identify Employer/Carrier
  - IRP Registration cab card

- Forward information to local FMCSA office
  - After-the-fact action can be taken by FMCSA, penalties and sanctions can be applied.
Questions for Review

8. What is the appropriate action to take if you determine that a vehicle is being operated in Interstate Commerce while under a Federal Out-of-Service Order?

9. What is the appropriate action to take if you cannot verify if the Out-of-Service Order is still currently in effect?

10. Why check the safety status of every vehicle you inspect every time?
Be vigilant and take every opportunity to identify Out-of-Service vehicles and take appropriate enforcement action.

The safety of all users of the highways is affected when FMCSA Out-of-Service carriers and vehicles continue to operate in Interstate commerce.