WHITE PAPER 02 | NEW ENTRANTS

The First 18 Months

A new authority can be legal, insured, and still too young to have proved much.

18 months	12 months	16	1 floor
initial FMCSA new entrant monitoring period	general safety audit timing after operations begin	essential regulations identified in the automatic failure rule	legal authority is permission, not performance proof

EXECUTIVE SUMMARY

FMCSA monitors a new entrant for an initial eighteen-month period and generally conducts a safety audit within twelve months after operations begin.

The new entrant label is not a rejection rule. It is a history-depth warning: inspection counts, maintenance evidence, driver controls, and identity verification deserve more weight when time in operation is short.

A carrier can automatically fail its safety audit for serious control failures involving drugs, alcohol, driver qualification, insurance, hours records, out-of-service repairs, or periodic inspection.

01 New entrant means monitored, not pre-cleared

FMCSA allows a qualified applicant to begin interstate operations while the New Entrant Safety Assurance Program monitors performance. During the first eighteen months, the carrier must maintain records, inspect and maintain vehicles, operate safely, and pass the safety audit.

For a broker or shipper, the practical issue is evidence depth. A two-month-old carrier may have no meaningful roadside inspection denominator. That blank space cannot honestly be translated into either safe or unsafe.

Evidence: New Entrant Safety Assurance Program

02 The safety audit tests control systems

The automatic failure categories are a map of the controls that matter most. FMCSA lists failures involving drug and alcohol programs, driver licensing and medical qualification, required insurance, hours-of-service records, out-of-service repairs, and periodic vehicle inspection.

Those categories translate directly into setup questions. The aim is not to conduct your own federal safety audit. The aim is to ask for evidence proportional to the uncertainty.

Control area	FMCSA automatic failure theme	Desk evidence
Drug and alcohol	No required program or use of a prohibited driver	Clearinghouse and program confirmation through the carrier's compliance process
Driver qualification	Invalid, suspended, disqualified, or medically unqualified driver	Driver identity, license class, medical qualification path
Insurance	Operating without the required level	Current filing and direct agent confirmation
Hours records	Failure to require records of duty status	ELD process and a feasible dispatch plan
Out-of-service repair	Operating before required repair	Maintenance release and repair evidence
Periodic inspection	Operating a vehicle not periodically inspected	Current inspection record for the assigned equipment

Evidence: New Entrant Safety Assurance Program

03 Use an evidence ladder, not an age ban

An age-only ban is simple but crude. It can exclude disciplined small carriers and still admit older carriers with weak controls. A better policy increases required evidence as operating history decreases.

The highest-risk combination is young authority plus thin inspections plus identity changes plus urgency. Each condition increases uncertainty. Together they should stop automatic approval.

1. Confirm the authority start date and current Motus record.
2. Label the carrier as inside or outside the eighteen-month monitoring period.
3. Count inspections and read results with a denominator.
4. Verify the assigned driver and equipment, not only the company record.
5. Require direct insurance confirmation and an independently verified contact path.
6. Use tighter first-load controls: conservative cargo value, clear check calls, geofence or tracking, and no unexplained substitutions.
7. Review performance after the first load before increasing exposure.

Evidence: New Entrant Safety Assurance Program, Move into Motus, 2024 Pocket Guide to Large Truck and Bus Statistics

04 Watch for chameleon behavior

FMCSA warns that carriers may not obtain a new USDOT number to escape penalties or an out-of-service order. False or hidden information can trigger an out-of-service order or fines.

A young record therefore deserves a lineage check. Similar names, addresses, phone numbers, managers, equipment, or insurance agents tied to a failed or revoked entity do not prove wrongdoing, but they are reasons to slow down and resolve the relationship.

- New entity at an address tied to a recently failed carrier.
- Same contact or domain used across unrelated authorities.
- Equipment or driver presented under a different legal entity.

- Pressure to ignore a name, address, or payment mismatch.
- History that appears to reset immediately after an enforcement problem.

Evidence: New Entrant Safety Assurance Program

RECOMMENDED ACTIONS

1. Add a visible new entrant badge and authority-age field to the carrier file.
2. Scale evidence requirements by both age and inspection depth.
3. Use a controlled first-load policy before increasing cargo value or volume.

QUESTIONS WORTH ASKING NEXT

- What extra evidence does your team require inside the first eighteen months?
- Does your setup process look for related entities when a record appears newly created?

LIMITS AND CAUTIONS

- New entrant status does not mean unsafe, and age alone should not be presented as a federal disqualification.
- A safety audit may occur before the twelve-month point. FMCSA can intervene whenever safety data indicates problems.
- This paper describes risk operations, not a substitute for FMCSA rules or legal advice.

PRIMARY PUBLIC SOURCES

1. **New Entrant Safety Assurance Program**
Federal Motor Carrier Safety Administration | 2022-05-31

2. **2024 Pocket Guide to Large Truck and Bus Statistics**
Federal Motor Carrier Safety Administration | 2025-07

3. **Move into Motus**
Federal Motor Carrier Safety Administration | 2026-05-18

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