# MOTOR CARRIER INDUSTRY PERCEPTIONS OF IFTA AND IRP

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# **Table of Contents**

| Introduction | 1 1   |
|--------------|---|
| Inte<br>Inte | of IFTA and IRP   |
| Results      |   |
|              | l Registration Plan (IRP)   |
| Summary .    |   |
| Appendix     |   |
|              | LIST OF TABLES  |
| Table 1.     | Year States in the Mountain-Plains Region (Federal Region 8) Joined the International Registration Plan |
| Table 2.     | Example of IRP Registration for One Tractor/Trailer Combination   |
|              | LIST OF FIGURES   |
| Figure 1.    | Respondents by State  |
| Figure 2.    | Types of Trailers Used  |

#### INTRODUCTION

Transportation fulfills three major roles in a developed economy. It is primarily an enabler that allows an economy to develop by facilitating the specialization of production. Second, transportation is necessary for competition to exist among producers of commodities, goods, and services throughout a broad area. Third, transportation is a major component of the Gross National Product (GNP) in its own right.

As an enabler, transportation provides the opportunity for regional and national economies to specialize through trade. Trade and specialization are intertwined. Specialization is the exploitation of a region's comparative advantage in the production of commodities, goods, and services. The incentive to specialize is to increase profitability from a set of resources. This also results in increasing overall production that leads to a higher living standard for the participating economies. However, specialization would not take place if production could not be traded. Transportation is necessary for specialization of economies to take place. Thus, transportation is an important enabler allowing trade and specialization. This in turn has permitted economies to develop beyond the primitive state they were confined to before transportation and trade began to evolve. Before transportation, an economy had access to only the scarce resources found in the locality. The methods of production were limited to local knowledge and human resources were limited to the local population. The resulting economy was indeed limited until transportation evolved and unleashed the economic potential of the entire globe.

The existence of transportation is a necessary but not necessarily sufficient condition for competition to exist interregionally and globally. Producers of the same or similar goods and services, or substitutes from different regions or countries, could not compete against one another for the available business if they could not transport their goods and services to the location of demand. Competition is limited, or enhanced, by the availability of affordable transportation. When transportation costs exceed the comparative advantage that a region has in the production of a good or service, trade will not take place (barring artificial barriers or incentives) and competition will diminish. Thus, transportation is not

only an enabler for economic specialization but also allows competition to develop. Both economic phenomena have a positive impact on the development and growth of the global economy.

The third major role transportation plays in an advanced economy is the direct contribution it makes to the GNP. The purchase of trucks, trailers, locomotives, rail cars, planes, barges, ships, automobiles, tires, gasoline, and all of the other inputs required by the transportation industry are enormous. The cost of developing the various modal infrastructures is also a substantial part of a developed country's GNP.

Additionally, people employed in service and maintenance add significantly to the total transportation tab. Transportation's share of the United States GNP in 1993 was 16.1 percent, amounting to \$1.04 trillion. This is an absolute increase from 1983 of \$390 billion. This is a 60 percent increase in absolute value, but a decrease in the percent of the GNP from 18.7 percent to 16.1 percent in the same period. This is an indication that the United States transportation system is becoming more efficient compared with our overall economy. Deregulation of major sectors of the transportation industry in the early 1980s generated a sharp increase in competition in both the freight and passenger arenas. This held down both rates and fares and in part explains the fact that transportation's share of the GNP has been declining steadily over this period. Freight transportation accounted for a little more than a third of this bill — amounting to \$393 billion in 1993. It is clear from these statistics that transportation is a major sector of the United States economy.

The motor carrier industry is a major component of that sector and an integral part of the U.S. economy. The truck mode accounted for 78 percent of the total freight bill in 1992, \$293 billion.<sup>3</sup> It also

<sup>&</sup>lt;sup>1</sup> Transportation in America, 1994 12th edition, ENO Transportation Foundation, Inc., p. 7.

<sup>&</sup>lt;sup>2</sup> Ibid.

<sup>&</sup>lt;sup>3</sup> op. cit., p. 40.

accounted for 31 percent of the total intercity ton-miles, compared to 37 percent by rail, 19 percent by pipeline and 12 percent by river.<sup>4</sup> The trucking industry dwarfs all other modes in revenues and is only exceeded in ton-miles by rail. This shift toward trucking has occurred in the past seventy years. Rail and river transportation dominated the movement of freight in the United States before this time.

The growth of the trucking industry has been staggering since its development. It has the largest share of freight revenues of all the transportation modes. However, the most significant aspect of the industry is the important role it has played in the development of an advanced economy. Obviously all modes of transportation are important to an advanced economy. However, trucks were probably most critical, because of the unique differences they provided — especially when compared with other freight transportation in the 1920s and 30s, when it came on the industrial scene. The capability to deliver door-to-door, the lack of a restricting schedule, the elimination of trans-loading and transferring, the speed, and the personal attention given the load all made truck transport very distinguishable. These attributes must be important to the development of a modern industrialized and consumer economy — obvious from the growth and the relative size of the freight bill among modes.

The trucking industry has become such an important and integral part of our present economy that it could not function without it. Indeed, many businesses and industries could not survive without truck transportation — ranging from goods and commodities that are extremely time or temperature sensitive, to the movement of bulk agricultural commodities from the field to the farm. This unique form of transportation utility has resulted in tremendous growth in truck traffic and the attendant needs for a highway and road infrastructure.

One could argue over what came first, the development of a ubiquitous infrastructure or the motor carrier industry. Indeed, they probably developed symbiotically. One fact does seem certain: states

<sup>&</sup>lt;sup>4</sup> op. cit., p. 44.

took notice of the increased traffic and the impact that it had on the development and maintenance of the highway system and also its impact on safety.

The development of highway and road infrastructure has evolved into a dual responsibility of the federal and state governments. Today the state and local governments assume the responsibility for maintaining and policing the highways, while the federal government participates, along with state and local government, in the financing.<sup>5</sup> Furthermore, since states have the right to protect their citizens (police powers) and must pay for the construction and maintenance of their highways, they have established vehicle regulations covering safety, weight, length, width, and speed.<sup>6</sup> Additionally, the states have developed regulations and laws that impose vehicle registration fees and tax fuel used within their state for the same reasons.

The laws and regulations set up by the various states were not uniform and have caused problems for motor carriers that operate in multiple states. Many inefficiencies resulted from the lack of uniformity, and these resulted in increased clerical and management costs. Operational inefficiencies also resulted from these varying state regulations and laws. Companies had to register their trucks in all states they operated in, no matter how little time they spent there. These inefficiencies increased costs without increasing output. Trucking companies had to deal individually with each state they operated in regarding their mileage and the corresponding fuel they consumed (a similar situation exists for the registration of vehicles). This became an enormous clerical burden, not to mention cost, to the industry.

<sup>&</sup>lt;sup>5</sup>Coyle, John J., et. al., Transportation, Second Edition, West Publishing Company, 1986, p. 131.

<sup>&</sup>lt;sup>6</sup>op. cit., p.133

<sup>&</sup>lt;sup>7</sup>Unless they used trip permits.

#### DESCRIPTION OF IFTA AND IRP

The International Registration Plan and the International Fuel Tax Agreement are two unique programs that are being carried out to mitigate the inefficiencies resulting from the individual state requirements to collect fuel taxes and register vehicles. Although these programs are in different stages of development, they have been sufficiently started to learn how effective they are and how they could be improved. That is the essence of this study.

## International Registration Plan (IRP)

Registration fees are the oldest form of vehicle taxation. They have been in use for more than 80 years and are the second most important source of transportation revenue for states. Proper registration, including payment of the registration fee, is required before a vehicle can legally operate on the nation's road network. These registration fees are regulated independently by each state. Passenger cars and light trucks are only registered in one state, usually where domiciled. All other states the vehicle may travel through recognize this registration. Heavy vehicles, however, must be registered in every state they travel in.

Registration requirements for heavy vehicles are complex and burdensome. In an attempt to alleviate the problems for both vehicle owners and state regulators, organizations have struggled to develop a solution. The International Registration Plan (IRP) is one initiative developed by the American Association of Motor Vehicle Administrators (AAMVA) to solve some of the problems of interstate vehicle registration. IRP is a registration reciprocity agreement among states in the United States and provinces in Canada initiated in 1973. The objective of IRP was to create a simple registration system for the motor carrier industry while providing each jurisdiction a fair share of revenue.

The unique feature of IRP is that license fees are paid to all jurisdictions based on the proportion of fleet mileage in each jurisdiction. Additionally, each vehicle in the fleet is issued only one license

plate and cab card when registered under IRP and the carrier only deals with the registration agency in its base state. A carrier can also operate on an intrastate basis in any of the jurisdictions for which the vehicle is apportioned, provided any other regulatory requirements have been met.

The growth in jurisdictional participation in IRP shows its success in mitigating the problems associated with the registration of interstate motor carriers. Since its inception in 1973, when nine states joined, the IRP has grown to encompass all but five states in the U.S. Additionally, two Canadian provinces, Alberta and Saskatchewan, participate in IRP. The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) requires all states to participate in IRP by 1996 or risk losing federal highway funds. All of the states in the Mountain-Plains region currently participate in IRP. Table 1 delineates when each state in the Mountain-Plains region joined IRP.

Table 1. Year States in the Mountain-Plains Region (Federal Region 8) Joined the International Registration Plan.

| State            |
|------------------|
| Colorado, Utah   |
| South Dakota     |
| Montana, Wyoming |
| North Dakota     |
|                  |

A base state must be selected by the motor carrier for initial registration in IRP. The base state must be where the carrier has an established place of business, where mileage is accrued by the fleet, and where operational records for the fleet are maintained or can be made available for an audit. The base state provides registration materials, collects and processes registration materials and funds, and distributes registration information and funds to the other applicable jurisdictions.

The information required for vehicle registration is determined by each individual state. However, it is the base state's responsibility to collect the information from the applicant for each applicable jurisdiction. In other words, each state must be familiar with all information requirements for the other participating states. In actuality, there is very little difference in the information required by the different states. The minimum information required by the IRP application includes the number of power units in the fleet, trailers, semi-trailers, auxiliary axles, and miles traveled in each jurisdiction for the previous year. Additionally, all states require, at a minimum, that the carrier show proof of title and, by federal law, proof that the Federal Heavy Vehicle Use Tax has been paid for vehicles weighing more than 55,000 pounds.

After this information has been provided, registration fees can be computed. The registration fee for each vehicle is based upon the percent of annual mileage for the entire fleet in each jurisdiction. A sample IRP registration for one tractor/trailer is provided in Table 2. Many motor carriers rely on their base state to calculate their IRP fees and bill them for the appropriate amount. The base state then supplies the motor carrier with license plates and cab cards for each of the apportioned vehicles. On the cab card, the base state identifies the jurisdictions the vehicle is registered in, the weight registered in each jurisdiction, and any other information specifically required by the applicable jurisdictions.

Table 2. Example of IRP Registration for One Tractor/Trailer Combination.<sup>a</sup>

| Jurisdiction                 | Jurisdiction Mileage<br>(from<br>previous year) | Percent of Total<br>Mileage | <br>ll Year Fees<br>(by state)<br>80,000 lbs. | Ap | portioned<br>Fees |
|------------------------------|---|-----------------------------|---|----|-------------------|
| North Dakota<br>(Base State) | 18000   | 16.67%                      | \$<br>1,056                                   | \$ | 176               |
| South Dakota                 | 18000   | 16.67%                      | \$<br>1,460                                   | \$ | 243               |
| Montana                      | 18000   | 16.67%                      | \$<br>1,018                                   | \$ | 170               |
| Wyoming                      | 18000   | 16.67%                      | \$<br>120                                     | \$ | 20                |
| Colorado                     | 18000   | 16.67%                      | \$<br>2,232                                   | \$ | 372               |
| Utah                         | 18000   | 16.67%                      | \$<br>570                                     | \$ | 95                |
| Totals                       | 108000  | 100.00%                     |   | \$ | 1,076             |

<sup>&</sup>lt;sup>a</sup>Registration based on a 1990 diesel-powered truck tractor of 14,458 pounds empty weight and a semitrailer of 11,500 pounds empty weight, registered for 80,000 pounds gross combination weight, in private operation.

Source: Highway Taxes and Fees. U.S. Department of Transportation, Federal Highway Administration. FHWA-PL-91-017. Washington, DC: Federal Highway Administration. 1991. pp 81-85.

Under IRP, each state has agreed to audit at least 25 percent of the IRP registered motor carriers based in their jurisdiction each year. As part of the IRP agreement, states have agreed to maintain a sufficient staff of audit personnel, make the results of an audit known to all other member jurisdictions in which the registrant operates, and follow the Uniform Audit Procedure Guidelines. The audit is essential to ensure that accurate mileage figures are reported for the various jurisdictions. Carrier records and weigh station and safety inspection data, are often used to ensure the carrier is reporting accurate mileage in the appropriate jurisdiction.

## **International Fuel Tax Agreement (IFTA)**

Motor fuel taxes are the largest source of highway revenue in most states. These taxes are usually levied on the retail price of fuel. However, this creates problems for vehicles that can travel across several states without refueling. With the fuel tax collected at the pump, a vehicle that does not refuel in the state would not pay any fuel taxes in that state. To compensate for this, 47 states have set up a fuel-use tax. This tax is based on how much fuel is consumed in a state no matter where it was purchased. The jurisdictions that do not have a fuel-use tax are Alaska, Hawaii, Oregon, and the District of Columbia.

It is quite easy for intrastate commercial vehicles to comply with a state's fuel tax requirements. These vehicles, due to the nature of their operation, pay fuel taxes at the pump and consume all fuel purchased in that state. To comply with a state's fuel tax requirements for an interstate vehicle, however, is much more complex. These vehicles pay fuel taxes at the pump and then must record their mileage and fuel economy for the state to decide if additional payments are due the state (i.e., less fuel was purchased in a state than was consumed in that state) or if a refund is due the vehicle (i.e., the vehicle purchased more fuel in a state than was consumed in that state). The administrative and reporting requirements for an interstate motor carrier to comply with each state's fuel-use taxes are extremely burdensome.

The heavy burden of this system, for both motor carriers and state bureaucracies, has resulted in developing uniform administrative procedures and base-state arrangements. The International Fuel Tax Agreement (IFTA) and the Regional Fuel Tax Agreement (RFTA) are results of these efforts to reduce the burden of complying with and administering state fuel-use taxes. Initially, these agreements each had three states participating in them. Several changes were made to the IFTA in 1987 trying to get additional states to participate. These changes increased the membership of IFTA to 20 states (as of January 1993). The RFTA continues to consist of the original three states: Maine, Vermont, and New

Hampshire. The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) has essentially mandated all states to participate in IFTA by 1996.

A carrier that participates in IFTA receives a fleet account number and an IFTA license from its base state. A copy of the license must be carried in every vehicle in the carrier's fleet. Additionally, a decal must be affixed annually to every vehicle in the fleet. The carrier is responsible for reporting mileage for its entire fleet, unlike the IRP where reporting is per individual vehicle. Also, IFTA reports are filed quarterly, unlike the annual IRP filing requirement. The quarterly report must show the fuel consumed, fuel tax paid, and mileage for each jurisdiction for the fleet. The base state determines to which states the carrier owes money and which states owe the carrier a credit. The carrier simply pays the base state the net liability for all jurisdictions.

The base state is responsible for annually auditing at least 15 percent of the carriers based in that state. These states must also follow the Uniform IFTA Audit Guidelines. Any other jurisdiction may audit carriers outside their jurisdiction at their own expense. States usually enforce IFTA compliance by visually inspecting the IFTA license and decal. The decals are a different color each year.

Although IFTA has resulted in substantial reductions in the fuel-use tax compliance burden, many problems still exist in administering the program. Differences in state laws — regarding which fuels and vehicles are subject to tax, filing periods and reporting dates, and policies toward the crediting and refunding of an overpayment — contribute to this complexity. The National Governors' Association and the Federation of Tax Administrators continue to work toward more uniformity in the administration of fuel-use tax regulations. However, their success has been marginal. The complexity of the system leads to evasion and avoidance on the part of some motor carriers. This contributes not only to lost revenue for states, but also to a less equitable competitive position for those motor carriers who pay all their taxes.

# METHODOLOGY AND PROCEDURE

The objective of this study was to determine how IFTA and IRP are working for motor carriers: are they reducing paperwork or the regulatory burden on interstate truck commerce, can they be improved, what experiences have carriers had with the programs? The test of this objective is not a measurement of the actual time spent on paperwork or in meeting the regulatory requirements, but a determination of how the programs are **perceived** by the motor carrier industry. Whether time and effort savings are actual or not, truckers' perceptions of the programs will determine how enthusiastic and supportive they will be towards them.

In order to determine the perception of these programs, a questionnaire was mailed to owners of commercial vehicles in Federal Highway Administration Region 8. The region encompasses the states of Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming. The Canadian provinces of Alberta, Manitoba, and Saskatchewan were also included. The reader should be aware that this area of the country is often considered by motor carriers to be the best for dealing with state agencies. They seem to have fewer problems and encounter much less animosity than in other states in the nation.

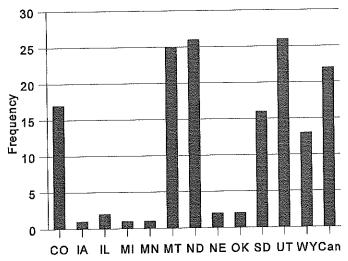
Only carriers with 20 or more vehicles whose main cargo was not passengers were chosen. This resulted in 596 questionnaires being mailed out. The questionnaire was a thirteen-page booklet with forty-six individual questions. The questionnaire was mailed in May of 1994. A week later it was followed by a postcard reminding participants to return the questionnaire or thanking them if they already had. Business reply mail was used to boost response. A total of 186 questionnaires were returned for a response rate of 31.2 percent. However, 26 of the surveys returned indicated that they did not use IRP or IFTA, which reduced the usable returns to 160 for a response rate of 26.8 percent.

Of the respondents that returned their questionnaire 90.6 percent registered vehicles in more than one state. The base state jurisdictions were divided between 12 states (see chart) with most coming from the six states in region 8. North Dakota and Utah led with 26 respondents each, followed by Montana

with 25, Colorado with 17, South Dakota with 16, and Wyoming with 13 respondents. The remaining jurisdictions had only one or two respondents each. Special mention needs to be made of the 22 respondents which listed Canada as their base jurisdiction. The majority of these were from Alberta, but a few were from Manitoba.

The average fleet size was 145 trucks, in a range from 3 to 1,800. Nearly 70 percent of hauls were interstate, but the percent per carrier ranged from 0 to 100. The average number of states that carriers registered trucks in was 26. This also varied widely, from 0 to 50 states. Since IRP and IFTA do

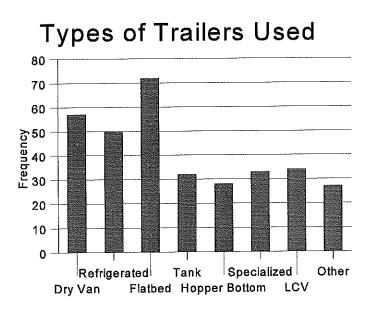




not apply in Alaska and Hawaii, those who responded with "50" either meant 48 states or included Canadian provinces.

Interestingly, the average number of states that fuel taxes were filed in was 24, which is lower than the 26 states that they were registered in, on average. It could be that carriers are registering trucks in states "just in case" they need to run there, but actually don't make it to a couple of them.

Companies were asked what types of trailers they used to give some indication as to the nature of their business. The breakdown of these trailer types is shown in the chart. Flatbed trailers were the most common. These trailers are used for heavy equipment or bulky loads. The type of haul they lend



themselves to is usually long and on an irregular route. Dry van was next most frequent. This type of trailer is used for many things, but is often used for shorthaul, regular routes. Refrigerated trailers are used for temperature-sensitive freight (freight may be kept cold or warm in a refrigerated van). They are often used for foodstuffs and toiletries. Hauls may be either short or long, but are usually on a regular route.

Computer use was indicated by nearly 75 percent of the responding companies. However, their application was limited to word processing. Not one respondent indicated using computers for spreadsheets, data bases, contact management, electronic data interchange, fuel tax reporting, or record keeping. This indicates that computer use is not a very integral part of their business operations. There is much room for improvement in automating the business of trucking.

#### RESULTS

The results of this study are based on the responses to the 46 questions provided by the 160 respondent trucking firms. The actual responses to each question can be found in the Appendix. All references to a specific question relate to answers provided in the Appendix.

# International Registration Plan (IRP)

Trucking firms are generally positive about the International Registration Plan (IRP). Regarding the paperwork involved in vehicle registration, 66 percent of the respondents said that the IRP had reduced the paperwork required to register their vehicles (Question 2). A small percentage, 7 percent, thought the program had resulted in increased paperwork. Seventeen percent thought it was about the same and 10 percent were not able to make a comparison.

Most firms, 64 percent, also thought that it had made the registration process faster (Question 3).

Only 11 firms, 8 percent of the respondents, thought that IRP slowed the registration process. Twenty percent of the respondents concluded that the time to register vehicles was about the same.

Forty-two percent of the respondents surveyed reported that they have filed for a refund/credit under the IRP. An overwhelming majority, 81 percent, were satisfied with the outcome of the process (Question 5). However, 36 percent of those satisfied with the outcome reported that the process took too long. Thus it appears that some states could improve the program by speeding up the refund process. Furthermore, 20 percent of the firms were dissatisfied with the outcome. Companies that did suggest that they had a problem perceived that they came mostly from their base state. Sixty-three percent of companies experiencing problems said that they resulted from their base state. Conversely, 37 percent had problems with states other than their base states.

Most of the respondents, 62 percent, also thought the IRP instructions were easy to understand.

Another 17 percent thought that the instructions were understandable but too complicated. Only 13 percent of the respondents thought the instructions were not clear.

Only 29 percent of the firms surveyed have been audited under the IRP. The firms audited generally reported a positive experience (Question 12). Thirty-six percent of those audited thought the audit was quick and 38 percent reported that the audit was easy. A small percentage said that the audit took a long time (7 percent). A vast majority of those audited, 96 percent, had reported the correct miles and vehicles. Only two respondents, 4 percent, had incorrectly reported mileage and/or vehicles.

Electronic registration of vehicles is not at all prevalent among the survey respondents. Less than 1 percent, one respondent, said that they had electronically registered their vehicles. Most firms, 76 percent, were not capable of electronic registration. Additionally, 13 percent signified that their state was not set up for it. It appears that the age of electronic registration is far from being realized.

The firms responding to the survey had a positive attitude about dealing with their state in the IRP (Question 17). Thirty-eight percent thought their state was very easy to deal with, 30 percent thought their state was easy to deal with and 26 percent said their state was okay to deal with. Only five percent of the respondents thought their states were difficult or very difficult to deal with.

This perception is reinforced by the experience that firms had when requesting help from their state. Sixty-three percent related that their questions were answered clearly and right away when dealing with their state. A very small percentage said that they could not get their questions answered or had other problems, such as being on hold for too long. Most of the firms, 58 percent, wished that the Canadian provinces were members of IRP also.

The most frequent response to Question 20 (If you could change three things that would improve IRP, what would they be?) was that all states and Canadian provinces should be included in the program. Given that the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) requires all states to

become members by September 30, 1996, this recommendation will soon be accomplished. Several other recommendations included:

- Offer better information when changes are made,
- Use smaller size renewal forms,
- Offer training sessions for trucking company personnel who are using the IRP for the first time,
- Develop a better explanation of the program and what it does,
- Provide a cost breakdown by state and vehicle,
- Distinguish the renewal form from the quarterly report by printing them on different colored paper,
- Provide uniformity among states,
- Develop an easier system for registering vehicles of different weights,
- Offer registration by computer.

All of the responses are included in the Appendix.

### **International Fuel Tax Agreement (IFTA)**

The respondents which represented the trucking firms participating in this study had positive feelings about the International Fuel Tax Agreement (IFTA) similar to those they had about the IRP. A majority of respondents, 68 percent, feel that IFTA has reduced the amount of paperwork required to comply with the different state fuel tax requirements (Question 24). Eighteen percent thought it was about the same and only 6 percent perceived that it made it worse.

Respondents had a similar opinion of how IFTA affected the speed of reporting. Sixty-one percent of the firms thought that reporting under IFTA is faster, 29 percent thought it is about the same, and only 3 percent perceived it as being slower.

More than half of the respondents, 56 percent, have filed for a refund or credit under IFTA (Question 26). Over two-thirds of those that had filed for a refund or credit were satisfied with the process, finding it quick and acceptable. Twenty-four percent thought the process took too long but the outcome was okay. Only eight percent were not satisfied with the time it took and/or the results. A majority of those few that did perceive problems indicated that the problem was with their base state, 15 out of 24.

There was some concern shown by the respondent firms about the uniformity of forms among the states participating in IFTA. Forty-two percent of the firms indicated that states ask for the same information in different formats and 14 percent perceived that the information requested varied from state to state. Twenty-seven percent thought that the information requested was the same using similar forms.

One-fourth of the firms responding to the survey had ever been audited under the IFTA (Question 31). The firms who were audited were generally pleased with the process. Thirty-two percent thought the audit was quick and half thought it was easy. Only 16 percent felt the process took too long.

As with IRP, only a very small percentage of the firms file electronically, 1 percent. Seventy-six percent reported that their company was not set up for it and 11 percent indicated that their state was not set up for electronic filing.

As with IRP, a very significant majority of the firms rated their state very positively in regard to their experience with them in dealing with IFTA matters. Twenty percent indicated that their state was very easy to deal with, 33 percent said it was easy to deal with and 44 percent felt that it was okay to deal with. Overall, this indicates a strong endorsement by the industry of how the program is run.

As with the IRP, the most frequent response to Question 39 (If you could change three things that would improve IFTA, what would they be?) was that all the states and Canadian provinces should be in the program. Given that the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) requires all states to become members IFTA by September 30, 1996, this recommendation will soon be accomplished. Several other recommendations included:

- Allow a longer time for returning reports to the state,
- Eliminate rate changes in the middle of the month and quarter,
- Provide larger blocks on the report form,
- Implement electronic filing,
- Provide uniformity among states,
- Make certain base state personnel are more informed of other states' issues, thereby eliminating the need of carriers to contact other states.

All of the responses to Question 39 are provided in the Appendix.

#### **SUMMARY**

The motor carriers in Region 8 appear to have a positive perception of both the IRP and IFTA.

This does not mean that there is not room for improvement, as is evidenced in the suggestions and some of the responses to the questions. However, overall they seem to have a high regard or at least a good attitude towards the programs and the way they are administered.

# **APPENDIX**

**Reciprocity Programs Survey** 

OVERALL RESULTS (N=160)8

July 1994

 $<sup>^8</sup>$  There were 26 additional surveys returned indicating no use of IRP nor IFTA for a total of 186 returned out of the 596 sent (31.2% return rate).

Q-1. DO YOU REGISTER VEHICLES IN MORE THAN ONE STATE?

| Item                   | Number Responding | Percent |  |
|------------------------|-------------------|---------|--|
| No (go to Question 14) | 15                | 9.4     |  |
| Yes                    | 144               | 90.6    |  |

## Q-2. HOW HAS THE IRP AFFECTED THE AMOUNT OF PAPERWORK YOU DO RELATING TO VEHICLE

#### REGISTRATION?

| Item                          | Number Responding | Percent | Cumulative Percent |
|-------------------------------|-------------------|---------|--------------------|
| Increased paperwork           | 10                | 6.9     | 6.9                |
| About the same amount         | 25                | 17.2    | 24.1               |
| Decreased paperwork           | 96                | 66.2    | 90.3               |
| Not able to make a comparison | 14                | 9.7     | 100.0              |

Q-3. HOW HAS THE IRP AFFECTED THE SPEED WITH WHICH YOU ARE ABLE TO REGISTER VEHICLES?

| Item                          | Number Responding | Percent | Cumulative Percent |
|-------------------------------|-------------------|---------|--------------------|
| Made it slower                | 11                | 7.5     | 7.5                |
| About the same                | 30                | 20.5    | 28.1               |
| Made it faster                | 94                | 64.4    | 92.5               |
| Not able to make a comparison | 11                | 7.5     | 100.0              |

Q-4. HAVE YOU EVER NEEDED TO FILE FOR A REFUND OR CREDIT UNDER IRP?

| Item                  | Number Responding | Percent |
|-----------------------|-------------------|---------|
| No (go to Question 7) | 84                | 57.5    |
| Yes                   | 62                | 42.5    |

Q-5. IF YOU ANSWERED YES TO Q-4, WHAT WAS YOUR EXPERIENCE?

| Item  | Number Responding | Percent | Cumulative Percent |
|---|-------------------|---------|--------------------|
| Satisfied with process, it was quick and    | 32                | 51.6    | 51.6               |
| acceptable                                  |                   |         |                    |
| Process took too long, but outcome was okay | 18                | 29.0    | 80.6               |
| Process was quick enough, but outcome was   | 6                 | 9.7     | 90.3               |
| unacceptable                                |                   |         |                    |
| Process took too long and outcome was       | 6                 | 9.7     | 100.0              |
| unacceptable                                |                   |         |                    |

Q-6. IF YOU ANSWERED YES TO Q-4 AND YOU ENCOUNTERED PROBLEMS, WHERE DID THEY COME FROM?

| Item                             | Number Responding | Percent | Cumulative Percent |
|----------------------------------|-------------------|---------|--------------------|
| No problems                      | 38                | 58,5    | 58.5               |
| My base state                    | 17                | 26.2    | 84.6               |
| A state other than my base state | 10                | 15.4    | 100.0              |

Q-7. WHEN YOU REGISTER VEHICLES IN NON-IRP STATES, ARE THE FORMS TO BE FILLED OUT SIMILAR?

| Number Responding | Percent        | Cumulative Percent           |
|-------------------|----------------|------------------------------|
| 14                | 9.7            | 9.7                          |
| 37                | 25.7           | 35.4                         |
|                   |                |                              |
| 28                | 19.4           | 54.9                         |
|                   |                |                              |
| 65                | 45.1           | 100                          |
|                   | 14<br>37<br>28 | 14 9.7<br>37 25.7<br>28 19.4 |

Q-8. DO YOU EXPERIENCE ANY PROBLEMS WITH STATES THAT ARE NOT MEMBERS OF IRP?

| Item  | Number Responding | Percent | Cumulative Percent |
|---|-------------------|---------|--------------------|
| Yes, a lot of problems                      | 5                 | 3.4     | 3.4                |
| Yes, a few problems                         | 42                | 28.8    | 32.2               |
| No problems                                 | 49                | 33.6    | 65.8               |
| I don't register vehicles in non-IRP states | 50                | 34.2    | 100                |

Q-9. DID YOU RECEIVE ANY TRAINING ON IRP PROCEDURES AND FORMS?

| Item  | Number Responding | Percent | Cumulative Percent |
|---|-------------------|---------|--------------------|
| No, figured it out myself                                     | 66                | 46.8    | 46.8               |
| No, I called my state for help, but didn't get                | 4                 | 2.8     | 49.6               |
| my question resolved Yes, I called my state for help and they | 45                | 31.9    | 81.6               |
| answered my question  |                   |         |                    |
| Yes, company sponsored in-house training                      | 5                 | 3.5     | 85.1               |
| Yes, I went to a seminar or other third-party                 | 21                | 14.9    | 100                |

Q-10. DOES THE STATE PROVIDE WRITTEN INSTRUCTIONS ON HOW TO FILL OUT THE IRP FORM?

| Item   | Number Responding | Percent | Cumulative Percent |
|--|-------------------|---------|--------------------|
| No, instructions are not provided            | 12                | 8.5     | 8.5                |
| Yes, but the instructions are not clear      | 18                | 12.7    | 21.1               |
| Yes, their instructions are understandable   | 24                | 16.9    | 38.0               |
| but too complicated                          |                   |         |                    |
| Yes, the instructions are easy to understand | 88                | 62.0    | 100.0              |

Q-11. HAVE YOU EVER BEEN AUDITED UNDER THE IRP?

| Q-II. HAVE TOO BY BACKET |                   |         |  |
|--------------------------|-------------------|---------|--|
| Item                     | Number Responding | Percent |  |
| No (go to Question 14)   | 103               | 71.0    |  |
| Yes                      | 42                | 29.0    |  |

Q-12. IF YOU ANSWERED YES TO Q-11, WHAT WAS YOUR EXPERIENCE?

| Item (n=42)                                       | Frequency | Percent |
|---|-----------|---------|
| Audit was quick                                   | 15        | 35.7    |
| Audit was easy                                    | 16        | 38.1    |
| Audit took forever                                | 3         | 7.1     |
| Audit pointed out problems                        | 12        | 28.6    |
| We were assessed additional fees because of audit | 8         | 19.0    |
| We could not provide required documents           | 0         | 0.0     |

# Q-13. If you answered yes to Q-11, did you report the correct miles and vehicles for the

### PROPER MILEAGE REPORTING PERIOD?

| Item | Number Responding | Percent |
|------|-------------------|---------|
| No   | 2                 | 4.5     |
| Yes  | 42                | 95.5    |

Q-14. HAVE YOU EVER REGISTERED VEHICLES ELECTRONICALLY (BY COMPUTER HOOKUP)?

| Item                                  | Number Responding | Percent | Cumulative Percent |
|---------------------------------------|-------------------|---------|--------------------|
| No, not set up for it at my company   | 119               | 75.8    | 75.8               |
| No, my state is not set up for it     | 21                | 13.4    | 89.2               |
| No, too complicated                   | 0                 | 0.0     | 89.2               |
| No, unsure of how to                  | 16                | 10.2    | 99.4               |
| Yes, but had problems with the hookup | 0                 | 0.0     | 99.4               |
| Yes, but had problems with the        | 0                 | 0.0     | 99.4               |
| administrative process                |                   |         |                    |
| Yes, no problems                      | 1                 | 0.6     | 100.0              |

Q-15. HOW WOULD YOU RATE YOUR STATE IN YOUR DEALINGS WITH IT FOR REGISTRATIONS (IRP)?

| Item                        | Number Responding | Percent | Cumulative Percent |
|-----------------------------|-------------------|---------|--------------------|
| Very difficult to deal with | 1                 | 0.6     | 0.6                |
| Difficult to deal with      | 7                 | 4.5     | 5.2                |
| Okay to deal with           | 41                | 26.5    | 31.6               |
| Easy to deal with           | 47                | 30.3    | 61.9               |
| Very easy to deal with      | 59                | 38.1    | 100.0              |

Q-16. WOULD YOU PREFER THE REGISTRATION YEAR TO START IN JANUARY, APRIL, JULY, OR OCTOBER?

| Item    | Number Responding | Percent | Cumulative Percent |
|---------|-------------------|---------|--------------------|
| January | 84                | 55.6    | 55.6               |
| April   | 30                | 19.9    | 75.5               |
| July    | 23                | 15.2    | 90.7               |
| October | 14                | 9.3     | 100.0              |

Q-17. WHAT IS YOUR EXPERIENCE WHEN REQUESTING HELP FROM YOUR STATE?

| Item   | Number Responding | Percent | Cumulative Percent |
|--|-------------------|---------|--------------------|
| Haven't requested help                             | 15                | 9.7     | 9.7                |
| Too much time on hold or being                     | 4                 | 2.6     | 12.3               |
| transferred I knew more about it than the person I | 7                 | 4.5     | 16.8               |
| was talking to                                     |                   | 4.0     | 10.7               |
| I couldn't get the answer I needed                 | 3                 | 1.9     | 18.7               |
| Got my question answered after awhile              | 28                | 18.1    | 36.8               |
| Got my questioned answered clearly and             | 98                | 63.2    | 100                |

Q-18. DO YOU FILE RENEWAL APPLICATIONS ON A TIMELY BASIS (AT LEAST 30 DAYS BEFORE REGISTRATION

| EXPIRES)?       |                   |         |                    |
|-----------------|-------------------|---------|--------------------|
| Item            | Number Responding | Percent | Cumulative Percent |
| Rarely or never | 6                 | 3.9     | 3.9                |
| Usually         | 51                | 33.1    | 37.0               |
| Always          | 97                | 63.0    | 100.0              |

Q-19. WOULD IT HELP YOUR OPERATIONS IF ALL CANADIAN PROVINCES WERE MEMBERS OF IRP?

| Item              | Number Responding | Percent | Cumulative Percent |
|-------------------|-------------------|---------|--------------------|
| No                | 65                | 42.2    | 42.2               |
| Yes, somewhat     | 37                | 24.0    | 66.2               |
| Yes, a great deal | 52                | 33.8    | 100.0              |

Q-21. DO YOUR VEHICLES TRAVEL IN MORE THAN ONE STATE OR PROVINCE?

| Item                   | Number Responding | Percent |
|------------------------|-------------------|---------|
| No (go to Question 34) | 2                 | 1.3     |
| Yes                    | 156               | 98.7    |

Q-22. HOW MANY VEHICLES DO YOU USE IFTA FOR?

| tem                | Mean   | Range      |
|--------------------|--------|------------|
| lumber of vehicles | 190.40 | 0 - 10,250 |

Q-23. APPROXIMATELY, HOW MANY TOTAL FLEET MILES ARE DRIVEN BY THOSE VEHICLES?

| Item              | Mean         | Range           |
|-------------------|--------------|-----------------|
| Total fleet miles | 8,286,148.15 | 0 - 135,000,000 |

### Q-24. HOW HAS THE IFTA AFFECTED THE AMOUNT OF PAPERWORK YOU DO RELATING TO FUEL TAX

| REP | ORT | 'ING' |
|-----|-----|-------|
|     |     |       |

| Item                          | Number Responding | Percent | Cumulative Percent |
|-------------------------------|-------------------|---------|--------------------|
| Made it worse                 | 9                 | 5.8     | 5.8                |
| About the same                | 28                | 18.1    | 23.9               |
| Made it better                | 106               | 68.4    | 92.3               |
| Not able to make a comparison | 12                | 7.7     | 100.0              |

Q-25. HOW HAS THE IFTA AFFECTED THE SPEED WITH WHICH YOU ARE ABLE TO REPORT FUEL TAXES?

| Item                          | Number Responding | Percent | Cumulative Percent |
|-------------------------------|-------------------|---------|--------------------|
| Made it slower                | 4                 | 2.6     | 2.6                |
| About the same                | 45                | 28.8    | 31.4               |
| Made it faster                | 95                | 60.9    | 92.3               |
| Not able to make a comparison | 12                | 7.7     | 100.0              |

Q-26. HAVE YOU EVER NEEDED TO FILE FOR A REFUND OR CREDIT UNDER IFTA?

| Item                   | Number Responding | Percent |
|------------------------|-------------------|---------|
| No (go to Question 30) | 69                | 44.5    |
| Yes                    | 86                | 55.5    |

Q-27. IF YOU ANSWERED YES TO Q-26, WHAT WAS YOUR EXPERIENCE?

| Item  | Number Responding | Percent | Cumulative Percen |
|---|-------------------|---------|-------------------|
| Satisfied with process, it was quick and    | 57                | 67.9    | 67.9              |
| acceptable                                  |                   |         |                   |
| Process took too long, but outcome was okay | 20                | 23.8    | 91.7              |
| Process was quick enough, but outcome was   | 2                 | 2.4     | 94.0              |
| unacceptable                                |                   |         |                   |
| Process took too long and outcome was       | 5                 | 6.0     | 100.0             |
| unacceptable                                |                   |         |                   |

Q-28. IF YOU ANSWERED YES TO Q-26 AND YOU ENCOUNTERED PROBLEMS, WHERE DID THEY COME FROM?

| Item                             | Number Responding | Percent | Cumulative Percent |
|----------------------------------|-------------------|---------|--------------------|
| No problems                      | 65                | 73.0    | 73.0               |
| My base state                    | 15                | 16.9    | 89.9               |
| A state other than my base state | 9                 | 10.1    | 100.0              |

Q-29. WHEN YOU FILE FUEL TAXES IN VARIOUS STATES, ARE THE FORMS TO BE FILLED OUT SIMILAR?

| Item                                      | Number Responding | Percent | Cumulative Percent |
|---|-------------------|---------|--------------------|
| No, they ask for different information    | 14                | 14.4    | 14.4               |
| No, they ask for the same information,    | 41                | 42.3    | 56.7               |
| but the forms are different               |                   |         |                    |
| Yes, they ask for the same information on | 26                | 26.8    | 83.5               |
| similar forms                             |                   |         |                    |
| I don't pay fuel tax in non-IFTA states   | 16                | 16.5    | 100                |

Q-30. DO YOU EXPERIENCE ANY PROBLEMS WITH STATES THAT ARE NOT MEMBERS OF IFTA?

| ·····                                   | *************************************** |         |                    |
|---|---|---------|--------------------|
| Item                                    | Number Responding                       | Percent | Cumulative Percent |
| Yes, a lot of problems                  | 9                                       | 5.9     | 5.9                |
| Yes, a few problems                     | 71                                      | 46.7    | 52.6               |
| No problems                             | 53                                      | 34.9    | 87.5               |
| I don't pay fuel tax in non-IFTA states | 19                                      | 12.5    | 100                |

Q-31. HAVE YOU EVER BEEN AUDITED UNDER THE IFTA?

| Item                   | Number Responding | Percent |
|------------------------|-------------------|---------|
| No (go to Question 34) | 116               | 75.3    |
| Yes                    | 38                | 24.7    |

Q-32. IF YOU ANSWERED YES TO Q-31, WHAT WAS YOUR EXPERIENCE?

| Item (n=38)                                       | Frequency | Percent |
|---|-----------|---------|
| Audit was quick                                   | 12        | 31.6    |
| Audit was easy                                    | 19        | 50.0    |
| Audit took forever                                | 6         | 15.8    |
| Audit pointed out problems                        | 12        | 31.6    |
| We were assessed additional fees because of audit | 13        | 34.2    |
| We could not provide required documents           | 0         | 0.0     |

# Q-33. IF YOU ANSWERED YES TO Q-31, DID YOU REPORT THE CORRECT MILES AND VEHICLES FOR THE

### PROPER MILEAGE REPORTING PERIOD?

| Item | Number Responding | Percent |
|------|-------------------|---------|
| No   | 6                 | 13.0    |
| Yes  | 40                | 87.0    |

O-34. HAVE YOU EVER FILED FUEL TAXES ELECTRONICALLY (BY COMPUTER HOOKUP)?

| Item                                  | Number Responding | Percent | Cumulative Percent |
|---------------------------------------|-------------------|---------|--------------------|
| No, not set up for it at my company   | 118               | 75.6    | 75.6               |
| No, my state is not set up for it     | 17                | 10.9    | 86.5               |
| No, too complicated                   | 0                 | 0.0     | 86.5               |
| No, unsure of how to                  | 19                | 12.2    | 98.7               |
| Yes, but had problems with the hookup | 0                 | 0.0     | 98.7               |
| Yes, but had problems with the        | 0                 | 0.0     | 98.7               |
| administrative process                |                   |         |                    |
| Yes, no problems                      | 2                 | 1.3     | 100.0              |

Q-35. HOW WOULD YOU RATE YOUR STATE IN YOUR DEALINGS WITH IT FOR FUEL TAXES (IFTA)?

| Item                        | Number Responding | Percent | Cumulative Percent |
|-----------------------------|-------------------|---------|--------------------|
| Very difficult to deal with | 1                 | 0.7     | 0.7                |
| Difficult to deal with      | 2                 | 1.3     | 2.0                |
| Okay to deal with           | 68                | 44.4    | 46.4               |
| Easy to deal with           | 51                | 33.3    | 79.7               |
| Very easy to deal with      | 31                | 20.3    | 100.0              |

Q-36. WOULD YOU PREFER THE FUEL TAX YEAR TO START IN JANUARY, APRIL, JULY, OR OCTOBER?

| Item    | Number Responding | Percent | Cumulative Percent |
|---------|-------------------|---------|--------------------|
| January | 120               | 83.3    | 83.3               |
| April   | 12                | 8.3     | 91.7               |
| July    | 10                | 6.9     | 98.6               |
| October | 2                 | 1.4     | 100.0              |

Q-37. DO YOU FILE FUEL TAXES ON A TIMELY BASIS (AT LEAST 30 DAYS BEFORE THEY ARE DUE)?

| Item            | Number Responding | Percent | Cumulative Percent |
|-----------------|-------------------|---------|--------------------|
| Rarely or never | 28                | 18.3    | 18.3               |
| Usually         | 27                | 17.6    | 35.9               |
| Always          | 98                | 64.1    | 100.0              |

Q-38. WOULD IT HELP YOUR OPERATIONS IF ALL CANADIAN PROVINCES WERE MEMBERS OF IFTA?

| Item              | Number Responding | Percent | Cumulative Percent |
|-------------------|-------------------|---------|--------------------|
| No                | 63                | 41.7    | 41.7               |
| Yes, somewhat     | 31                | 20.5    | 62.3               |
| Yes, a great deal | 57                | 37.7    | 100.0              |

Q-40. WHAT STATE IS YOUR BASE STATE\*?

| Item         | Number Responding | Percent |
|--------------|-------------------|---------|
| Colorado     | 17                | 12.9    |
| Iowa         | 1                 | 0.8     |
| Illinois     | 2                 | 1.5     |
| Michigan     | 1                 | 0.8     |
| Minnesota    | 1                 | 0.8     |
| Montana      | 25                | 18.9    |
| North Dakota | 26                | 19.7    |
| Nebraska     | 2                 | 1.5     |
| Oklahoma     | 2                 | 1.5     |
| South Dakota | 16                | 12.1    |
| Utah         | 26                | 19.7    |
| Wyoming      | 13                | 9.8     |

<sup>\*</sup> There were 22 surveys which indicated a Canadian province as their base state, the majority being Alberta and a few Manitoba.

Q-41. HOW MANY TRUCKS DO YOU REGISTER ANNUALLY?

| Item             | Mean   | Range     |
|------------------|--------|-----------|
| Number of trucks | 144.52 | 3 - 1,800 |

Q-42. WHAT PERCENT OF YOUR HAULS ARE INTERSTATE?

| Item                     | Mean    | Range           |
|--------------------------|---------|-----------------|
| Percent interstate hauls | 69.05 % | 0.0 % - 100.0 % |

Q-43. HOW MANY STATES DO YOU REGISTER TRUCKS IN?

| Item                           | Mean  | Range  |
|--------------------------------|-------|--------|
| Number of states registered in | 26.19 | 0 - 50 |

Q-44. HOW MANY STATES DO YOU FILE FUEL TAXES IN?

| Item                                | Mean  | Range  |
|-------------------------------------|-------|--------|
| Number of states file fuel taxes in | 24.05 | 0 - 50 |

Q-45. WHAT TYPE OF TRAILERS DO YOU USE?

| Item (n=160)                | Frequency | Percent |  |
|-----------------------------|-----------|---------|--|
| Dry van                     | 57        | 35.6    |  |
| Refrigerated                | 50        | 31.3    |  |
| Flatbed                     | 72        | 45.0    |  |
| Tank                        | 32        | 20.0    |  |
| Hopper bottom               | 28        | 17.5    |  |
| Specialized                 | 33        | 20.6    |  |
| Longer combination vehicles | 34        | 21.3    |  |
| Other                       | 27        | 16.9    |  |

Q-46. WHAT DO YOU USE COMPUTERS FOR IN YOUR OPERATION?

| Item (n=160)                | Frequency | Percent |  |
|-----------------------------|-----------|---------|--|
| Word processing             | 119       | 74.4    |  |
| Spreadsheets                | 0         | 0.0     |  |
| Database management         | 0         | 0.0     |  |
| Contact management          | 0         | 0.0     |  |
| Electronic data interchange | 0         | 0.0     |  |
| Fuel tax reporting          | 0         | 0.0     |  |
| Record keeping              | 0         | 0.0     |  |

## RECIPROCITY PROGRAMS SURVEY

## **Essay Responses**

Q-20. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IRP, WHAT WOULD THEY BE?

| Survey | Response   |
|--------|--|
| 001    | Better information when changes are made.  |
| 003    | Smaller size renewal forms - too large of sheets to work with now.                                       |
| 007    | We could use an option to have all private fees broken out per equipment # - because we charge           |
|        | private fees back to owner operators.  |
| 009    | 1. The IRP is one of the greatest things to happen to the trucking industry.                             |
|        | 2. Only change I would like to see is the allowance of computer generated miles for trips.               |
| 011    | Discontinue the practice of keeping track of miles/states for prorated pickups & light trucks - does not |
|        | affect apportioned percentages. We have a variety of weight class vehicles the smaller groups are a      |
|        | reflection of what the larger trucks are running for percentages.  |
| 013    | 1. Make all states IRP members mandatory.  |
|        | 2. Make all Canadian provinces members.  |
| 015    | Add all states & provinces to IRP.   |
|        |  |

Q-20. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IRP, WHAT WOULD THEY BE?

| Survey | Response   |
|--------|--|
| 018    | 1. Payment made by the quarter.  |
|        | 2. Credit for deleted vehicles even if they are not replaced.  |
|        | 3. Breakdown of fees spent with bill showing total by unit by state.                                     |
| 019    | Don't like the voice mail system at the capital. Wastes time trying to get through.                      |
| 021    | 1. All states & Canadian provinces should be members.  |
|        | 2. Full electronic exchange of information.  |
| 022    | Training for new personnel - would be nice if there was a training session for people who are doing      |
|        | this for the first time.   |
| 023    | 1. Provide rules & regulations more concise and easier to administrate.                                  |
|        | 2. Provide more uniformity on fees due from various states (as it stands now, it takes a Philadelphia    |
|        | lawyer to translate).  |
|        | 3. More detailed billing on exactly what we re being charge for.   |
| 031    | 1. A better explanation of what it does and more instructions of how to file.                            |
|        | 2. 1-800 #   |
| 032    | 1. Although my base state is not overly difficult to deal with, the employees are not always friendly. I |
|        | feel that they should try to make IRP registration as easy as possible.                                  |
|        | 2. Every year after registration, I receive a bill for total payment due - with no cost break-down per   |
|        | state or vehicle. I usually have to request this information at least twice before receiving it. This    |
|        | should be included with original billing.  |

# Q-20. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IRP, WHAT WOULD THEY BE?

| Survey | Response  |
|--------|---|
| 033    | 1. I would like to know at what weight increment fees change in the various states, plus the fee base       |
|        | costs in each increment.  |
|        | 2. Wish that all states would be uniform in that we could increase our weight with a trip permit only       |
|        | & not be required to increase the prorate cabcard prior to the movement such as Iowa is requiring           |
|        | now.  |
|        | 3. IRP renewals should be in order by carriers own unit # not by the title #. Would be easier to spot if    |
|        | all tractors & trailers are on the list. When fee prints per unit are requested by carrier the print should |
|        | have its columns totaling at the end of the fee columns of each unit so that the carrier could easily       |
|        | charge the fees back to its contractor.   |
| 035    | 1. Add on all Canadian provinces & US states.   |
|        | 2. Better information between IRP members.  |
| 038    | Only been in for one year cannot request changes at this time.  |
| 040    | 1. All states must give refunds!  |
|        | 2. All states and provinces should supply companies with maximum allowance weights.                         |
|        | 3. All states and provinces should supply contact numbers, fax numbers, all information requested to        |
|        | run in their state, permits, costs, etc.  |
| 044    | Every state & province on IRP.  |
| 045    | Due the same time as the decals - January 1.  |
| 050    | Make the weight restrictions more clear for small outfits, all the instructions are for major over the      |
|        | road companies.   |
| 054    | We have no problem as the system now works good in answering questions, all information transfer            |
|        | done with the state of Iowa.  |
|        |   |

Q-20. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IRP, WHAT WOULD THEY BE?

| Survey | Response  |
|--------|---|
| 055    | 1. The need to reapply every year - that's a nuisance!  |
|        | 2. Reapplication fee assessed to first quarter return.  |
|        | 3. If we must reapply each year, at least send the renewal forms separate from the quarterly return or  |
|        | have them a different color so they stand out.  |
| 057    | Have all states involved.   |
| 059    | Get all states to become members.   |
| 061    | Accept Company Checks   |
| 065    | 1. I would change the start of the registration year - to hectic at year end.                           |
|        | 2. Many states add a third structure tax or increase amount on fuel taxes with a surcharge.             |
|        | 3. All states and Canada should be members of the IRP would make operations a lot easier.               |
| 068    | 1. Make refund amounts prorated by months remaining in license year.                                    |
|        | 2. Issue cash refunds rather than credit against future registration.                                   |
| 070    | Easier refunds.   |
| 072    | Add more states.  |
| 074    | All 50 states were members. You would only have one report to complete.                                 |
| 075    | Better communication skills with state employees.   |
| 078    | Would like to see all states and Canadian provinces become members.                                     |
| 079    | States could offer a payment plan instead of all funds at one time.                                     |
| 083    | Make filing year October and then use mileage from January-December of the previous year.               |
| 084    | The state needs to know the regulations for Canadian license as far as needing authority to be licensed |
|        | - they don't ask for it now and it can cause problems in Canada.  |
| 085    | change to IFTA  |
| 090    | Make sure the state coming on line have the needed information and they furnish the base state with     |
|        | what they need in a timely matter. This seems to be the biggest problem. ND does a nice job. The        |
|        | other states are not as efficient as ND and not very knowledgeable.                                     |

Q-20. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IRP, WHAT WOULD THEY BE?

| Survey | Response   |
|--------|--|
| 095    | 1. Statements were processed faster.   |
|        | 2. Plates were released prior to their receiving payment - for good accounts.                              |
| 097    | That small vehicles, like cars being approved to be licensed under IRP.                                    |
| 104    | I do not want to register IRP at all until all Canadian provinces are members. It is far too expensive as  |
|        | it currently stands.   |
| 106    | Have more states issue credit when a vehicle is transferred or deleted.                                    |
| 107    | I would get all states and provinces on the agreement.   |
| 109    | 1. Compel all states to use some set of rules, i.e. offer credits for sold equipment.                      |
|        | 2. Disallow states from taxing trailers - keep the taxes uniform.  |
| 111    | I feel the system is fine the way it is.   |
| 112    | 1. Would be great if all IRP members could have the same expiration dates for license plates.              |
|        | 2. Would be nice if all states issues new plates for each year for apportioned vehicles. You use a plat    |
|        | for a year on a vehicle that travels across the country they really get bent up quickly. Also difficult to |
|        | affix yearly decals in Dec & Jan.  |
|        | 3. In cases where you have fleets in different states, would be great if IRP forms were identical. One     |
|        | state wants this, the other state wants that, etc.   |
| 117    | All states were IRP.   |
| 124    | All states were members.   |
| 125    | They do a very good job.   |
| 128    | Wouldn't change a thing.   |
| 130    | Give credit on IRP cancellations.  |
| 134    | I wish everything was more uniform among the states and provinces.   |
| 135    | All states should be included.   |
| 136    | 1. Make quarterly payments.  |
|        | 2. Plates cost entirely too much.  |

Q-20. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IRP, WHAT WOULD THEY BE?

| Survey | Response  |
|--------|---|
| 138    | 1. Expand it to include all states and provinces.   |
|        | 2. Offer invoicing for services with accounts who establish credit.   |
|        | 3. Accept company cheques rather than the certified cheque only.  |
| 153    | 1. Have a simple rate form so we would know exactly what the fees will be.                                  |
|        | 2. Have a refund policy for canceled licenses so the total refund would come from the base state.           |
|        | 3. Have an easier system for licensing various weights.   |
| 154    | Every state & province belonged to IRP  |
| 156    | 1. Make applications the same in all base states. Each state (we base plate in 6 states) has a different    |
|        | form.   |
|        | 2. Provide a cost breakdown for each unit registered. Must request info in CO other states do not           |
|        | provide info at all.  |
| 157    | 1. All states/provinces IRP.  |
|        | 2. Register by computer hook-up would be great.   |
|        | 3. Detail billing.  |
| 158    | 1. Credit or refund procedures need to be more efficient & timely and actual cash credits not just          |
|        | paper credit only when a tractor truck is deleted. Direct transfers vs. 13 state credits are unfair to all  |
|        | tractors deleted. Credit on deletes needs to be revamped & not held by state.                               |
|        | 2. We should be provided breakdown of charges by state for each tractor & trailer to prove exact            |
|        | amount paid to other IRP states through our account. Our state has the computer program for IRP but         |
|        | all we are provided is the one total amount paid each state - leaving us to again calculate the entire bill |
|        | over for ourselves per unit. You would think a \$50,000 or \$60,000 program computer could include          |
|        | this. (I am told this is the cost of the state program) It is hard to believe it does not.                  |
| 161    | Figure out a simpler way to transfer fees from a deleted unit to an added unit.                             |

## Q-20. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IRP, WHAT WOULD THEY BE?

| Survey | Response   |
|--------|--|
| 162    | A way to track trailer miles when they are pulled by various subcontractor tractors (as all of our |
|        | trailers are).   |
| 164    | All 48 states go IRP.  |

Q-39. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IFTA, WHAT WOULD THEY BE?

| Survey | Response   |
|--------|--|
| 002    | 1. Have all states be member of IFTA.  |
|        | 2. Allow a longer due date - more than 1 month after quarter closes to get report done - maybe 45    |
|        | days after quarter ends.   |
| 009    | 1. Make Oregon get rid of their ton-mile and incorporate a fuel tax or get out of the IFTA.          |
|        | 2. Allow the use of computer generated miles for reporting purposes.                                 |
| 013    | Make it mandatory for all states & provinces to belong to IFTA.                                      |
| 015    | Add all states.  |
| 018    | 1. No rate changes in the middle of a month or quarter.  |
|        | 2. More states included.   |
|        | 3. One additional week to prepare return.  |
| 019    | 1. Make blocks bigger on the report form.  |
|        | 2. Find an easier way to receive a refund than copying hundreds of invoices.                         |
| 021    | 1. Everyone a member.  |
|        | 2. EDI filing  |
|        | 3. Quarterly reporting only - no more monthly's.   |
| 023    | 1. Provide rules & regulations more concise and easier to administrate.                              |
|        | 2. Provide more uniformity on fees due from various states.  |
|        | 3. More detailed billing on exactly what we are being charge for.                                    |
| 031    | All Canadian provinces members & USA all members.  |
| 033    | 1. The states should never, never change rates in the middle of a month. Must always be the first of |
|        | month.   |
|        | 2. Base reporting state - should accept a computer print & not require or demand to have their own   |
|        | hand written report.   |
| 035    | Better recognition of Alberta by other IFTA members.   |

Q-39. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IFTA, WHAT WOULD THEY BE?

| Response  |
|---|
| If you under pay, you are allowed interest, but if you overpay, there is no interest credit. Result is that |
| you can have a "balance due" on a "credit" balance.   |
| Add more provinces and states.  |
| Every state & province on IFTA.   |
| 1. Every state and province were on IFTA.   |
| 2. All reports due end of the next month after quarter.   |
| 3. All mileage (OR, AZ, KY, NY) reporting set up as IFTA.   |
| I wish all states were required to join, especially CA, OH, PA.   |
| Need to handle non-highway use refunds.   |
| Get all states involved.  |
| 1. Different forms - some parts are repetitive or difficult to understand.                                  |
| 2. All states involved.   |
| Get more states to join.  |
| 1. Set up a program whereby all states have to join IFTA.   |
| 2. Have all states uniform, IFTA apportion, and gain other needed revenue from fuel tax.                    |
| 3. Make it possible that whatever you need for your home state will be acceptable for all other states.     |
| All states should become members.   |
| 1. Make AZ and IN eliminate surcharge and use a format like all the other states use. (When                 |
| computing the fuel taxes, taxable gallons (gallons consumed) are determined by subtracting gallons          |
| purchased from taxable gallons. NET taxable gallons are then multiplied by the tax rate to arrive at        |
| amount owed or amount of credit. All states use this formula except AZ and IN. AZ and IN charge a           |
| surcharge rate on the taxable gallons (gallons consumed) and also charge their state tax rate on the ne     |
| taxable gallons. Therefore, the computations, formulas, and forms are different for these two states.)      |
| Program seems to work well.   |
| Add all states and Canada.  |
|   |
|   |

Q-39. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IFTA, WHAT WOULD THEY BE?

| Survey | Response   |  |  |
|--------|--|--|--|
| 078    | Would like to see all states and provinces become members.   |  |  |
| 079    | More states.   |  |  |
| 080    | 1. The states plan on going IFTA would let you know a little sooner.                                       |  |  |
|        | 2. I do not think states should be able to charge two different rates for purchased and used fuel.         |  |  |
| 084    | 1. Total lines for all columns.  |  |  |
|        | 2. Separate form for each type of fuel. Diesel, propane, gas.  |  |  |
| 085    | Not to change mileage along with being IFTA.   |  |  |
| 086    | Get BC to join   |  |  |
| 087    | Get the other states to join.  |  |  |
| 088    | All states on IFTA   |  |  |
| 089    | Sending itemized fuel ticket lists is a huge burdensome task!  |  |  |
| 090    | Same as IRP.   |  |  |
| 099    | 1. More uniformity among states eliminate surcharges, mileage taxes, etc.                                  |  |  |
|        | 2. UT requires that we type the info on their form. A PC generated report is not acceptable.               |  |  |
|        | 3. UT doesn't add newest states in alphabetical order on their report.                                     |  |  |
| 101    | Uniform procedures concerning purchase of reefer fuel or off-highway fuel.                                 |  |  |
| 103    | Get more members ASAP.   |  |  |
| 104    | 1. That all provinces and states have to be joined up by Jan 1, 95 and not have to wait until 96.          |  |  |
|        | 2. That it be mandatory for all Canadian provinces to join IFTA. My understanding is that, the             |  |  |
|        | provinces don't have to join.  |  |  |
| 109    | 1. Not allow states to alter methods of collecting, i.e. Oregon for mile tax - AZ for mile - in surcharge. |  |  |
|        | 2. Allow credits for fuel not used to propel vehicles - idle hour.   |  |  |

Q-39. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IFTA, WHAT WOULD THEY BE?

| Survey | Response  |  |  |  |
|--------|---|--|--|--|
| 110    | 1. Allow us to file the mileage tax as part of the IFTA return (AZ and ID both have mileage tax as      |  |  |  |
|        | well as fuel tax so we still have to file mileage with the state and fuel tax with IFTA.)               |  |  |  |
|        | 2. Allow us to include tax paid reefer fuel in the tax paid totals on the IFTA return. AZ says take the |  |  |  |
|        | credit- Other states say you can't take the credit. There is no consistency.                            |  |  |  |
|        | 3. Have all base states use the same IFTA forms - Currently each base state design their own form -     |  |  |  |
|        | again - there is no consistency. Each state still wants to do things their own way.                     |  |  |  |
| 117    | 1. Place on forms for credit.   |  |  |  |
|        | 2. All states were IFTA.  |  |  |  |
| 123    | All states join IFTA and eliminate all the fuel stickers.   |  |  |  |
| 125    | If all states would join the program.   |  |  |  |
| 126    | That all states be members of IFTA.   |  |  |  |
| 130    | South Dakota and Oregon have mileage tax to file. It would be easier if they included this under        |  |  |  |
|        | IFTA. So as to make it more streamlined.  |  |  |  |
| 134    | 1. All states should be required to belong.   |  |  |  |
|        | 2. I would like to see all of Canada included.  |  |  |  |
| 137    | Include all 48 contiguous states.   |  |  |  |
| 138    | 1. Include all states and provinces.  |  |  |  |
|        | 2. Semi-annual fuel tax filing.   |  |  |  |
| 146    | Incorporate requirements dealing with state hazmat filing.  |  |  |  |
| 148    | Have all states be members.   |  |  |  |
| 153    | Do away with all weight distance taxes and tax fuel only under IFTA.                                    |  |  |  |
| 154    | 1. Adding more states & provinces.  |  |  |  |
|        | 2. The Alberta IFTA tax return needs more lines on tax returns - only room for 20 states/provinces      |  |  |  |
| 157    | To include all states & provinces.  |  |  |  |
| 158    | It would help if my base state would have better answers. Most of the time I have to call the state     |  |  |  |
|        | themselves.   |  |  |  |

## Q-39. IF YOU COULD CHANGE THREE THINGS THAT WOULD IMPROVE IFTA, WHAT WOULD THEY BE?

| Survey | urvey Response   |  |  |
|--------|--|--|--|
| 159    | When requesting a refund we should not need to turn in a list of all fuel stops.             |  |  |
| 161    | Uniformity between states as to acceptability of off-highway fuel use (PTO, idle time, etc.) |  |  |
| 162    | A way to track trailer miles when they are all pulled by various subcontractor tractors.     |  |  |

#### COMMENTS ON THE BACK OF THE SURVEY.

| Survey | Response  |  |  |  |
|--------|---|--|--|--|
| 009    | We were told by our base state of South Dakota that we could not use computer miles on our trip           |  |  |  |
|        | reports, which we use to get our prorate & fuel tax reports. Although they use P.C. miles when they       |  |  |  |
|        | conduct audits, no states should be allowed entrance into either the IRP or IFTA with exceptions.         |  |  |  |
| 023    | #15, 17, & 35: The employees seem to be a little uncertain (just as we are as users) about how to         |  |  |  |
|        | administrate the rules & regulations.   |  |  |  |
|        | When the IRP was initiated, it was a chocolate mess. It has gotten slightly better each year.             |  |  |  |
|        | The IFTA started as a chocolate mess & remains the same.  |  |  |  |
| 026    | Make it possible to purchase off road low sulfur fuel without having to pay fuel taxes & then applying    |  |  |  |
|        | for refund for off road usage.  |  |  |  |
| 041    | I'm satisfied as they are.  |  |  |  |
| 045    | IRP & IFTA are great.   |  |  |  |
|        | It is like on stop shopping; i.e. one form, one cheque.   |  |  |  |
|        | For auditing I would think it is best as the states that would not travel far for the audit they now get  |  |  |  |
|        | their share of audits done for them.  |  |  |  |
| 047    | All of North America should operate on one base plate. All interstate - international or interprovincial  |  |  |  |
|        | registration should be the same cost no matter where. Also each jurisdiction could set intra              |  |  |  |
|        | registration for what ever they want, but only for local trucks. Also fuel tax should be the same for all |  |  |  |
|        | North America - no advantage to fuel in any one state or province- this sure would save a lot of work.    |  |  |  |
|        | It used to be this way once - your tag was good nearly everywhere and fuel tax was nonexistent.           |  |  |  |
|        | Missouri, Iowa, Nebraska, Kansas, Arkansas started to play games and it spread like wildfire.             |  |  |  |
|        | Missouri sold nearly tax free fuel going out of state and the others just wanted their share. 1952 or     |  |  |  |
|        | 1953.   |  |  |  |
| 054    | Both are good programs and helpful to small fleet owners.   |  |  |  |
| 068    | IRP and IFTA are very good except for refunds in IRP and AR and IN surcharge under IFTA.                  |  |  |  |

#### COMMENTS ON THE BACK OF THE SURVEY.

| Survey | Response  |
|--------|---|
| 079    | If someday, the states could agree on a similar fee for IRP and even the tax for IFTA, would perhaps    |
|        | make things better. If IRP was a reasonable fee that the industry could afford there would be more      |
|        | participation. Not these truckers who don't pay anything and run illegal.                               |
| 083    | I think the IRP and IFTA programs save a great deal of time and paperwork. One problem we have          |
|        | recently incurred, is IFTA states (AZ) wanting to put us on a reporting basis other than quarterly, we  |
|        | are required to file IFTA quarterly, I feel reporting period for all IFTA states should be the same, on |
|        | our account.  |
| 085    | I wish all states would go IFTA.  |
| 086    | Getting BC to go IRP and IFTA would help a whole bunch.   |
| 094    | I like both the IRP and IFTA now, if you could get Oregon and Idaho to quit their mileage fees I        |
|        | would be delighted.   |
| 104    | As a Canadian carrier that currently travels a majority of its miles in Canadian provinces, the local   |
|        | overall cost of registering IRP in AB, SK, and US jurisdictions and then registering in all the other   |
|        | Canadian provinces, without benefit of using the US states under Manitoba reciprocity system.           |
| 112    | We like IFTA and IRP very much. It saves us a great deal of time in both the licensing aspect as well   |
|        | as the fuel tax reporting. Sometimes we do not get the IFTA report until just a few days before it is   |
|        | due. We would like to see these reports at least 30 days before the due date.                           |
| 123    | One base plate - one IFTA sticker, eliminate ton tax in some states. One report (fuel) for all states.  |
|        | Eliminate card cabs for some states - IRP registration card only.                                       |
| 124    | We have been very happy with both. The only thing I would change is the reporting date. It is           |
|        | difficult for me to get all the reports in, calculated and the report done on time because most of our  |
|        | drivers never come into corporate office. Everything is by mail.  |
| 126    | It would be good if we could get rid of the Oregon plate - so we would have only our base state plate   |
|        | to deal with.   |
| 126    |   |

#### COMMENTS ON THE BACK OF THE SURVEY.

| Survey | Response  |  |
|--------|---|--|
| 130    | IFTA - This program has been a great time saver for me. I just wish the rest of the states and          |  |
|        | provinces would get into IFTA. IT makes fuel tax time a lot less stressful for me. My only concern is   |  |
|        | that it doesn't cover the mileage taxes in Oregon and especially SD.                                    |  |
| 138    | I feel that IRP and IFTA should be mandatory North America wide. It gives an easily managed logical     |  |
|        | approach to licensing and taxing.   |  |
| 144    | The only way IFTA and IRP work is if all states and provinces are included.                             |  |
| 146    | States seem to be requiring additional filing for items such as hazardous materials, weight-mile taxes, |  |
|        | and intrastate authority. Many of these added requirements are only for revenue generation and need     |  |
|        | to be stopped, or incorporated into an IFTA type program.   |  |
| 157    | To provide one decal for all - to minimize paperwork for licensing and taxes.                           |  |
| 161    | Uniformity between states lends itself to a reduction in administrative overhead cost; both in          |  |
|        | compliance and auditing.  |  |

**Technical Report Documentation Page** 

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| The International Registration Plan and the International Fuel Tax Agreement are two unique programs that are being carried out to mitigate the inefficiencies resulting from the individual state requirements to collect fuel taxes and register vehicles. Although these programs are in different stages of development, they have been sufficiently started to learn how effective they are and how they could be improved. That is the essence of this study. |   |                            |     |
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