

In general, the use of commas needs to be somewhat more consistent.

B.1., B.3. What's referred to here as the UCRS is now commonly called the URS, and the text of should probably be changed to that acronym. The flow chart should have URS in place of UCR. The chart is somewhat unclear anyhow, and we might consider dropping it, along with the reference to it in the text.

E.2. This language needs clarification.

E.3. This doesn't appear to belong here – perhaps put it in section R., enforcement? It also needs clarification, and may in fact deal with two separate subjects.

E.5. Change wording to third person.

E.6. What's this about? Clarification seems in order.

F.1. Change wording to reflect the existence and content of the Agreement.

F.2. Last comma in the question ought to be deleted for clarity. The Note under this answer seems to be unnecessary.

F.3. Change wording to third person, and clarify slightly as needed. This question doesn't seem to fit well in F. It might better go with the subjects of L. or N., which might perhaps be lumped into a new Reporting Under UCR heading.

F.4. This should be updated to reflect the current situation, and the current amount of \$5 million should probably be stated.

G.2. This description of the subcommittees might be expanded a little to reflect recent practice, but it may not be necessary.

H.2. The order of Hawaii and Florida should be reversed in the list of nonparticipants. The question might be restated as Which Jurisdictions Are Not Participating, with a note at the end that no Canadian or Mexican jurisdiction may participate, although carriers that are based in those countries are subject to UCR if they have U.S. operations covered by UCR.

H.3. There could be a note to the effect that a participating state may drop out of UCR, but that the Act bars additional states from participating in the program.

H.6., H.7. The wording should be updated to reflect the current status. No need for detail. The two questions might be combined into one.

H.8., H.9., H.10. These three questions might also be combined, or, with proper adjustment to H.3., dropped altogether. This topic, important early in the life of UCR, seems much less important now to anyone.

I.1. The second sentence should be reworded so that the parenthesis applies to leasing companies as well as the other two categories. The language of the sentence could generally be clearer. The last sentence needs some help as well.

I.2. This question and answer should be rephrased for clarity.

I.3., I.4. These questions need to be combined and the answer reworked to reflect current practice and experience.

I.5. The question and the answer need to be amended slightly for language.

J.1., J.2. This section might be retitled Accounting for UCR Revenues, with J.1. rephrased to deal with the overall process, and J.2. to deal with how a state gets its money. All of it needs to be updated to reflect the existence and scope of the Indiana system and maybe on-line registration generally.

K.1. This question and answer are both awkwardly phrased, and either in the question or answer “financial responsibility” must be identified as an entity’s insurance coverage. See under K.3/4. also.

K.3., K.4. These questions and answers ought to be worded consistently with K.1., that is, in terms either of financial responsibility or insurance coverage of certain entities. Just what filings (Form E, “insurance filing”) may or may not be required need to be described in such a way that they can be identified by a reader.

L/M. These sections may need to be reorganized so that a user can more easily find the guidance he needs. I think I’d recommend stating the more general rules on inclusion and on exclusion in these sections, and inserting a new section including the miscellany of special instances we have.

L. I don’t see questions having to do with the definition of interstate, with intermodal operations generally, and with interstate operations that don’t cross state lines. Those should all be added.

L.1/2. These two questions aren’t really distinguishable, so the answers need combined. The answer now under L.1. also needs to be updated and may need to be amplified.

L.4. The language of this answer needs to be pruned so it deals only with entities based outside the U.S.

L.5/6. The term “X” *means* – not is. The answer to L.6. needs to be clarified a little.

L.5/6/7. This is probably the place to deal with the UCR liability of entities that have authority in more than one category covered by UCR. It may need a separate question.

L.7. Language should be added noting that if an entity that is otherwise a leasing company repositions its own vehicles it becomes a private carrier for UCR purposes with respect to those vehicles.

L.9. The language needs some smoothing.

L.16. Instead of “Ryder” use “leasing company”. The answer is determined by a rule (something to do with 30 days) that needs to be explained.

L.17/18. These answers may be obsolete, since a carrier acting as a broker is now required to have broker’s authority. L.19. may now be the only relevant answer.

L.21 through L.30, and L.33/34/35. This language needs to be expanded and amended in places for clarity and consistency.

L.31/32. A single question and answer covering the liability for all trailing equipment needs to replace these.

M.1. This answer needs to be updated.

M.2. The language of this answer needs to be amended for clarity – and are we sure this answer is correct if the company is subject to UCR on account of its other operations?

M.3. The font of the question needs to be fixed, and the answer slightly clarified.

M.4. The question needs to be reworded in third person.

M.5. The question needs to be stated more simply.

M.6. The question needs to be restated.

M.7. This question needs to be updated, if in fact it's not obsolete. See M.1.

M.8. The question needs to be restated.

M.9. This one should be deleted.

M.10. This question and answer probably needs to appear earlier in this section, and should be made more general.

N.1. The question might be reworded to refer to fee calculation as well as to specific spots on the form.

N.2. The answer might be made simpler.

N.4. This answer covers two topics, which need separate questions.

N.5. This answer, which may need a little rewording, needs to be in a more prominent place (almost certainly in a different section), and its question needs to pertain to the definition of interstate and intrastate for purposes of the UCR.

O. Let's talk to Sandy about what Indiana would like to see in this section before we redo it.

P. The question should be simplified, probably along the lines of: Under what circumstances are refunded allowed under the UCR?

Q. If this section is really needed, an initial question and answer should explain why this is relevant for UCR.

R.1. The answer, and probably the question, needs to be more straightforward.

R.2. through R.11. These should all be reworded and put in section L. or M., as special instances of inclusion in or exclusion from UCR. There's no reason these should be here, in terms of what

violation they represent. If something is wanted here as instruction to law enforcement, it can be more general.