

Comment from FreightValidate

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Docket No.: FMCSA-2025-1381

Subject:** Renewal of Information Collection – Commercial Motor Vehicle Marking Requirements (49 CFR 390.21)

To Whom It May Concern:

FreightValidate and Truckstop.com submit this comment in support of FMCSA's renewal of the approved information collection associated with 49 CFR 390.21, Commercial Motor Vehicle marking requirements.

The requirement to display a carrier's legal name or single trade name and USDOT number remains one of the most practical, low-cost tools available to support safety enforcement, operational accountability, and fraud reduction.

Clear, legible markings provide an immediate link between the physical vehicle at the roadside or dock and the regulated entity responsible for compliance and operational control.

In today's environment, freight fraud and carrier impersonation increasingly exploit gaps between digital systems and real-world operations. Proper markings help reduce those gaps by enabling shippers, brokers, receivers, and enforcement personnel to quickly validate that the vehicle and carrier identity match what is represented in dispatch communications and load tenders.

FreightValidate also encourages FMCSA to consider guidance that reflects evolving freight operations, including the increasing use of smaller commercial freight vehicles such as Sprinter vans and trucks under 10,001 lbs.

We support a scalable identification standard for these vehicles, such as consistent display of the carrier name and USDOT number with appropriately sized, legible markings.

Finally, we encourage FMCSA to consider guidance promoting unit-level identification best practices near the USDOT marking, such as a carrier-assigned tractor/unit number or the last six digits of the VIN, to reduce equipment misrepresentation and plate swapping while improving alignment with VIN-based insurance and cab card documentation.

Respectfully submitted,

Dale Prax
Founder, FreightValidate