

Existing NTA Requirement	Docket No. 23-07009 Proposed Regulations & Agenda for 8/1/2023	Questions/Comments regarding impact on small businesses
Submit list of all anticipated drivers coming in for the event	Not mentioned	Clarification needed: Is this still required?
Submit a fleet list (excel spreadsheet) that includes unit #'s, license plates, last 5 of vin, driver's name.	Not mentioned	Clarification needed: Is this still required?
Submit short term lease agreements/Hired Coach compliance agreements for every vehicle (no more than 30 days).	Not mentioned	Clarification needed: Is this still required?
Submit CFR 391.65 form with copy of driver's license prior to application submission	Not mentioned	Clarification needed: Is this still required? Assumption is this is still considered part of the application process.
Not directly identified in current NTA requirements	NAC 706.13779.1 Item 2 a. i. - Proof of applicant's employment with the certificated carrier through a contract or lease agreement or other record or provides proof that the applicant will become employed if a special event driver permit is issued by the Authority.	Clarification needed: T1 is working on the assumption that this is met with the 1st page of the driver application (providing a start date under our CPCN), the Employer Verification of Employment form, and the CFR361.65 form.
Not directly identified in current NTA requirements	NAC 706.13779.1 Item 2 a. ii - iv. - Conducts or contracts with an established third-party provider to complete a criminal history investigation of the proposed driver. 1) A Review of a commercially available database containing criminal records from each state, and 2) A search of a database containing the information available in the sex offender registry maintained by each state.	Clarification needed: Does this replace the need for electronic fingerprints? What level of background check is required? This may place an additional financial burden on operators and event owners.
Not in current process with NTA. NTA waived this requirement for T1 in 2019	NAC 706.13779.1 Item 2 a.vi. - Obtains a complete record of the applicant's driving history from the state which issued the applicant's driver's license.	Clarification needed: This was waived by the NTA in 2019 as no longer required as long as the CFR 391.65 form was completed fully. Re-establishing this requirement puts an undue burden on our vendors and on T1.
Submission of NTA Driver Permit Application w/ driver passport photo	No specifics mentioned	Clarification needed: Is the current driver permit application going to change? (Cover page, NTA Driver Permit Application with passport photo, Employers Verification of Employment, Public Safety Fingerprint Background Check Waiver (3 pages), NTA Fingerprint Request Form, CFR 391.65 Form, and copy of CDL)
Not directly identified in current NTA requirements	NAC 706.13779.1 Item 3. The special event driver permit must be in the driver's possession during the entirety of the provision of passenger transportation.	Clarification needed: Does this require that permits are in hand prior to events/operation? If so, this is a significant change to current processes. NTA generally permits drivers post event currently.
Permits become invalid due to driver working under a different CPCN within the three year active permit.	NAC 706.13779.1 Item 5 - The special event driver permit is invalid on the date that the driver is no longer employed by the certificated carrier identified in the original application.	Clarification needed: In 2023, NTA allowed T1 to provide more than 1 Employer Verification of Employment form in a driver's application so that the driver could work under more than one CPCN for the full three years of the permit. This change appears to eliminate the above process and creates additional costs and processes for a driver whose company is contracted to provide services for different logistics companies and certified carriers. Is the Special Event Permit only valid for a specific event or all special events? If only a specific event, is the permit invalid if driver is employed by another carrier on a different special event?
At the time of application submission, the applicant pays a fee of \$50.00 to the Authority.	NAC 706.13779.1 Item 6. At the time of the original application for a special event driver permit, the applicant shall pay a fee of \$100.00 to the Authority.	This is a 100% increase in costs.

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Process to update permit with a new company's CPCN	NAC 706.13779.1 Item 7, subsections a., b., and c. - A special events driver permit may be updated within the original 3-year period when a driver becomes employed by a different certificated carrier. a. the new certificated carrier must provide proof of the applicant's employment with the certified carrier through a contract or lease agreement or other record or provide proof that the applicant will become employed if a special event driver permit is issued by the Authority. b. The updated special event driver permit will only be valid for the duration of the initial 3-year period. c. The driver must pay a fee of \$25.00 to the Authority to obtain an updated special event drivers permit	Clarification needed: This change only provides for a driver to be connected or 'employed' by one singular CPCN, causing a need to process the change multiple times a year as their true employer provides services to other CPCN holders in the State of Nevada. In the current process, the NTA has allowed us to add a separate Employers Verification of Employment form so that a driver for multiple CPCN holders providing transportation services in the State of Nevada.
90 Day pushout logs for every vehicle	Not mentioned directly	Clarification needed: Vehicle documentation not contemplated in the Workshop document. Do those regs continue? Note, this document is currently covered under safety standards set by FMCSA and if operator is in good standing then documents are not needed.
Annual Vehicle Inspection Report (AVIR) for every vehicle	Not mentioned directly	Clarification needed: Vehicle documentation not contemplated in the Workshop document. Do those regs continue? Note, this document is currently covered under safety standards set by FMCSA and if operator is in good standing then documents are not needed.
Valid Registrations	Not mentioned	Clarification needed: Vehicle documentation not contemplated in the Workshop document. Do those regs continue? Note, this document is currently covered under safety standards set by FMCSA and if operator is in good standing then documents are not needed.
Not specified in the current process	NAC 706.381, Item 4 - A vehicle removed from service pursuant to subsections 2 and 3 must remain out of service until the defect is repaired and a notice of repair is filed by the carrier with the Authority on a form provided by a representative of the Authority.	T1/TMS provides mechanics on-site for our events and has used them to complete new AVIRs and repairs when needed. Unless the NTA makes these forms readily available, we request to be able to use standard AVIR forms and mechanic's slips of service for required repairs.
Not specified in the current process	NAC 706.381 Item 5. An authorized carrier shall maintain current records for each driver and of the inspection, maintenance, and repairs of each vehicle. Each driver's record must contain all citations, all the information required to be maintained pursuant to 49 CFR 391.51 and 49 CFR part 382, and other matters relevant to the driver's performance and his or her record of training. These records must be maintained and made available for inspection by the Authority pursuant to NAC 706.203.	Clarification needed: T1 is an authorized carrier bringing in contracted vehicles and drivers motorcoach companies to provide a service for our clients. We do not maintain any of these vehicles or directly employ the drivers, so would not have historical documentation beyond the current requirements for both. The current requirement for vehicles includes Registration, AVIR, 90-Day Push, COI, and Short-Term Lease Agreement. The operator has all this documentation. This would create a tremendous burden to acquire said documentation. How would this level of historical data be made available to the NTA? Is this a mitigating factor for processing of the driver permit application, or an enforcement question post event/issue?
Insurance Certificate with a schedule of autos	Not mentioned	Clarification needed: Is this still required?
Fuel Tax Permits	Not mentioned	Clarification needed: Is this still required?
Ensure proper signage on vehicles as follows: "Leased to and operated by: T1 Transportation, Inc., CPCN 2016, Unit #"	Not mentioned	Clarification needed: Is this still required?