

Commerce & Compliance Division

Operating Plan 2022-2027

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Introduction

Supporting and promoting the safe and reliable movement of freight on Oregon's roads and railways is a challenge that the people of our organization take pride in tackling each and every day. At a time when supply chain constraints, infrastructure investments and sustainability—among many other issues—are getting increasing attention, the role of the Department of Transportation and the Commerce and Compliance Division (CCD) is more important than ever. So, in turn, is our commitment to carry out our duties and serve all users and beneficiaries of the transportation system and the freight it carries.

This divisional operating plan is the product of an extensive effort to evaluate our current capabilities and enhance our division's processes, technology and skills—the CCD Modernization Initiative. The plan provides direction to our team, and key messages to our partners and stakeholders, on the efforts we are pursuing to regulate and enable the growing volume of freight in Oregon.

The CCD plan is intended to build on and support ODOT's agency-wide Strategic Action Plan, with emphasis on the changes that are most relevant to our divisional responsibilities. It creates a known, prioritized path for improvement and investment.

Our goal over the next five years is to be prepared for the changes that will come our way. We must also be good stewards of taxpayer dollars and continue to align our services with available funding. We are also mindful of the need to ensure our compliance requirements do not place any unnecessary burdens on our customers, and that we strive to identify and remove any bias or barriers that prevent businesses from being successful. We have made some important improvements, but there is still much to be accomplished. I would like to thank the members of our management team and staff for their work to date and in the coming years.

We welcome your comments and questions and will be reporting regularly on our progress.



CCD Leadership Team (L-R): Elisha Brackett - Business Operations Section Manager, Audrey Lawson - Motor Carrier Services Section Manager, Chris Malm - Rail Safety Section Manager, Amy Ramsdell - Division Administrator, Sven Johnson - Audit Section Manager, Carla Phelps - Safety and Enforcement Section Manager

A photograph of a green steel truss bridge. In the foreground, a silver car is blurred on the left, and two cyclists are riding on the right. The bridge's structure is prominent, with large green steel beams. In the background, a city skyline is visible under a clear blue sky. A blue banner with white text is overlaid on the right side of the image.

Organizational Profile

Department of Transportation

Mission

We provide a safe and reliable multimodal transportation system that connects people and helps Oregon's communities and economy thrive.

Values

These principles inform decision making and guide our behavior in working with each other, our partners and the communities we serve:

Integrity: We are accountable and transparent with public funds and hold ourselves to the highest ethical standards.

Safety: We share ownership and responsibility for ensuring safety in all that we do.

Equity: We embrace diversity and foster a culture of inclusion.

Excellence: We use our skills and expertise to continuously strive to be more efficient, effective and innovative.

Unity: We work together as One ODOT to provide better solutions and ensure alignment in our work.

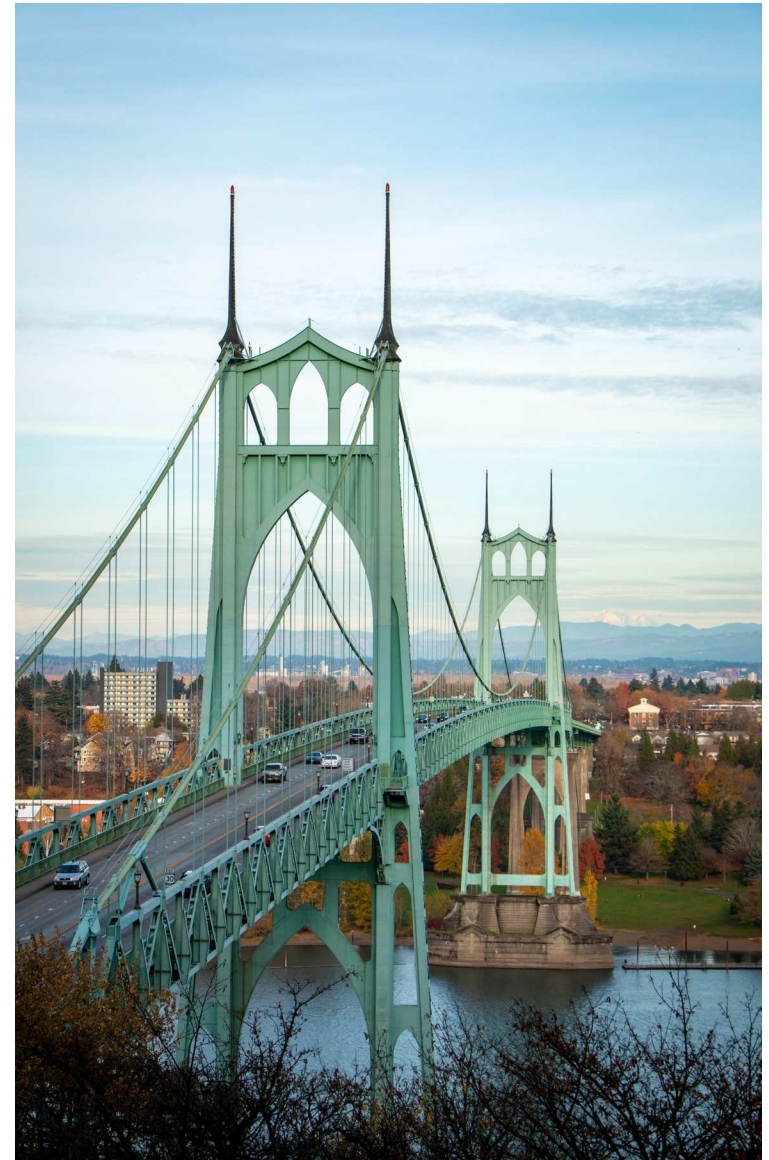


Commerce & Compliance Division

The Commerce and Compliance Division (CCD) regulates intra- and interstate truck and rail freight in the State of Oregon. Working with our freight carrier customers as well as partner state and federal agencies, we are responsible for safety, legal compliance and collection of funds to maintain our transportation system, under the following programs:

- Weight-Mile Tax
- Commercial Vehicle Safety
- Size and Weight
- Motor Carrier Operating Authority and Commercial Vehicle Registration—which includes the International Registration Program or IRP.
- International Fuel Tax Association (IFTA)—an element of the Oregon Fuels Tax Program
- Household Goods Regulation
- Rail Safety Programs including:
 - ◊ Federal Railroad Administration rail safety inspection program
 - ◊ State Safety Oversight (covers transit rail)
 - ◊ Employee Safety (state walkway and side/overhead clearances statutes and rules)
 - ◊ Crossing Safety and related STIP decisions

The importance of freight transportation is hard to exaggerate. All the goods we rely on, final product and/or raw materials, at some point move by truck or rail—from food to furniture and clothes to computers.



A large container ship is docked at a port, with several yellow gantry cranes positioned above it. The ship's deck is filled with stacks of colorful shipping containers in shades of blue, red, yellow, and green. The ship is sailing on a calm sea under a clear blue sky. A blue rectangular box is overlaid on the right side of the image, containing the text "Freight Transportation Trends" in white.

Freight Transportation Trends

CCD Selected Facts & Figures



9,759 truck carriers registered for the infra-and interstate operations (2021)

3.4M trucks per year pass through Weigh-in-Motion weigh stations/Ports of Entry (3 year average)



2,400 rail crossings monitored

2,308 miles of freight railway statewide



60,455 Annual over-dimension permits issued per year (2021)

69,653 Single-trip over-dimension permits issued per year (2021)



17,300 vehicle, **26** rail operations and **1,538** rail safety inspections per year (2021)



13,634 phone calls and **8,006** incoming mail documents handled per month by our service team (2021)



1,000 motor carrier audits performed annually (average), including Weight-Mile Tax, IFTA and IRP



\$442,644,983 contributed to the state transportation system per year (2018-2020 average)

1 of only 4 freight transportation agencies in the US that currently levy “weight mile” taxes, ensuring more equitable user fund contribution.

The Freight Carrier Lifecycle

While the programs cover specific areas of authority and responsibility, in practice our work revolves around our customers, through the Freight Carrier Lifecycle. Each phase of the Lifecycle includes key services, across multiple programs:

- 1. Manage the Relationship** – Includes business and vehicle registration, maintaining accurate records, providing permits for large loads, collecting fees and taxes, and responding promptly to questions and concerns.
- 2. Evaluate Operations** – Safety inspections, records reviews, weigh station checks (including “weigh-in-motion” systems), investigations, educational services and account audits help carriers comply with legal and safety requirements. We also oversee the safety of the state’s freight rail and rail transit systems, and work to ensure the safety of railroad employees.
- 3. Corrective Action** – When errors, infractions, or serious violations occur, we help carriers restore their good standing. In a small proportion of cases, legal action and/or revoking of permits will be required to ensure carriers fulfill their obligations or cease



How We Work

Modernizing our division, achieving our strategic priorities, and performing at our best requires holding ourselves to a high standard of behavior and teamwork. The following are some of the important principles we seek to uphold, as individuals and a Division of the Oregon Department of Transportation.



Build Knowledge: We stay abreast of trends and challenges that impact freight transportation. Growing individual and organizational expertise are high priorities.



Keep Commitments: We set goals, take on tasks and establish deadlines with careful consideration—and then strive to fulfill our promises. We seek to build and maintain trust in all that we do.



Embrace Collaboration: Achieving our goals relies on teamwork across CCD, the agency and with our customers and partners. We value feedback and encourage shared responsibility for daily tasks and projects.



Respect Differences: We do our best work when we seek out, listen to and learn from a diverse group of people and perspectives. Decisions are made that best achieve the goals of the agency and support efficient freight mobility and highway safety.



Improve Continuously: Every day, we are looking for ways to boost the efficiency and value of our services and processes. Each member of our team plays a role in these changes.

Trends, Impacts & Challenges

Driving Forces for Change

Our operational planning effort has considered current and anticipated developments in the freight and transportation landscape. Some of these present immediate challenges, others are on the more distant horizon, but all have impacts on our work that must be considered in our priorities and actions. The following are some of the most significant external factors that bear attention and response.

Trend/Development	Program Impacts
Evolving Supply Chain: Increased specialization, industry consolidation, more direct-to-consumer shipments.	Affects all programs: <ul style="list-style-type: none"> • Increased workload for all CCD programs • Need to flex to changing needs and volume • Questions on regulation of medium-duty vehicles
Increasing size, complexity and number of very large freight trips in and across Oregon.	Affects Operating Authority & CV Safety programs: <ul style="list-style-type: none"> • Resources to provide permits and routing • Ability to facilitate larger, specialized loads • Increased collaboration to manage risks and costs
Advancing technologies to monitor and support the transportation system.	Affects CV Safety, Size & Weight & Audit programs: <ul style="list-style-type: none"> • Need for improved roadside monitoring systems • Staff shift from data gathering to proactive enforcement • Freight role in ODOT's Connected Vehicle Ecosystem initiative
Growing emphasis on improving rail safety and integration with other modes.	Affects Rail Safety program <ul style="list-style-type: none"> • Integrate rail crossing improvements with broader investment choices and execution • Ensure industry support and participation
Greater Federal and State alignment on data standards, sharing and response.	Affects all programs: <ul style="list-style-type: none"> • Need to review and realign data usage and format • Opportunity to rely more on external data sources • Uncertainty about timing and requirements for change.
Transportation funding a key topic in Oregon and nationwide.	Affects all programs: <ul style="list-style-type: none"> • Adapting to support chosen strategies • Opportunity to share input on Weight-Mile Tax program • Shift in stakeholder expectations
Connected, automated and electric vehicles	Affects all programs: <ul style="list-style-type: none"> • Ability to flex based on speed of adoption • Adapting programs to needs of new—and potentially unfamiliar—technology • Taking advantage of features that improve safety

Challenges and Constraints

While we aspire to make significant progress on the priorities and goals presented below, there are very real needs and obstacles that will require creative solutions—and in some cases, will limit the speed and scale of change we can accomplish.

Core Systems Infrastructure – CCD's operations rely on a legacy mainframe system that support our services and carry information on carriers, credentials, transactions and compliance activity. Similarly, our call center phone system is unstable. Both are prone to unexpected crashes, while changes and enhancements are slow and costly to implement. System downtime and data errors also significantly impact efficiency and customer service. Programmers who can work with the base COBOL software language of the mainframe are increasingly hard to find. We have a long-term roadmap to gradually replace elements of these systems. The first, a new Over- Dimension permitting and routing solution is already underway. That project—a key element of the ODOT Strategic Action Plan—will greatly streamline the permitting progress, allowing staff to shift their focus to more complex requests. This project, however, is a large undertaking and limits the Division's ability to take on other similar endeavors in parallel. Funding and people resources to address other technology gaps are limited and, at times, other agency-wide priorities may be of greater importance and take precedence. Therefore, our Division is focusing on creative ways to stabilize our operations and develop “low-tech” ways to enhance programs, while we do our best with the systems we have.



Roadside Technology Gaps – Another technology challenge involves the network of vehicle monitoring devices deployed across the state. These include license plate readers, weigh-in-motion systems and transponders that enable trucks to legally bypass weigh stations through our Green Light preclearance program. The program keeps freight moving and enables enforcement officers to focus on identifying and investigating non-compliant vehicles. Oregon was an early adopter of these tools; however, they are now aging and not as effective or reliable as newer units. Also, the software that controls and captures data from the devices is at the “end-of-life” stage. The limitations of these older technologies mean we have to bring more drivers into weigh stations to verify their status (permits, weight,

Challenges and Constraints

payments), and at the same time, we may be missing violations that newer technology could detect. Again, our strategic plan includes investments in upgraded roadside technology, but it will take several years to put in place and relies on Federal grant funding.

Operating Budget Shortfall – Reading the headlines, funding for transportation appears strong, thanks to Oregon’s investment (HB 2017) and the new Federal infrastructure bill. However, the money that supports ODOT’s ongoing operations—including maintenance, program support, personnel, technology, etc.—is not growing in line with our expanding responsibilities. As a result, ODOT (including CCD) faces a looming shortage of funds to run the agency and “keep the lights on.” Our Division must share in the effort to find efficiencies and adapt our work to fit within these constraints. We must do more with less and manage stakeholder expectations when changes impact services. CCD’s Strategic Priorities and goals include multiple efforts to avoid and/or minimize any negative impacts that might arise from this budget challenge.

Capacity for Change – The issues noted above put extra pressure on our people to get work done under less-than-ideal conditions, and simultaneously improve and modernize our operations. Like many organizations these days, we cope with high turnover, retirements of veteran staff, and difficulty finding people who are prepared for a future of evolving roles and a greater emphasis on value-adding services.

Fortunately, our management and staff are learning to question the status quo and rethink work that in some cases has not changed in many years. We will continue to rely on—and encourage—big picture thinking and innovative ideas from our people, while still doing the critical daily work that supports safe and efficient commercial transportation.



An aerial photograph of a coastal highway. The road is a two-lane asphalt road with yellow center and white edge lines, curving from the upper left towards the lower right. It runs along the edge of a steep, forested hillside covered in dense evergreen trees. Below the road is a rocky shoreline with a dark, pebbly beach. The ocean is visible on the right side of the frame, with waves breaking onto the shore. The sky is filled with dramatic, dark clouds, suggesting a sunset or sunrise. A bright blue rectangular box is overlaid on the right side of the image, containing the text "Strategic Priorities" in white, bold, sans-serif font.

Strategic Priorities

Strategic Priorities Overview

We have committed to six key priorities to address the trends, challenges and constraints outlined above. A feature is their interdependency: Success in one area will in many cases support progress in one or more of the others. Details including Goals, Actions and measures are found on the following pages.



Return on Investment

Reduce overhead costs associated with the programs to increase the funds that are contributed to the state transportation system.



Integration/Alignment with Federal & Partner Programs

Foster partnerships with our peers and Federal Agency partners to ensure sustained funding, enhance data and achieve shared goals.



Simplify Products and Services

Apply technology, process enhancement and review of statute, rule and policy to streamline transactions for freight carriers and increase the value we provide.



Customer Self Service

Enable customers of all types and backgrounds to easily access information and complete transactions on-line. Focus direct contact with CCD staff on specialized needs/request versus routine transactions.



Education and Communication

Improve effectiveness and accessibility of information and training to help customers operate safely and fulfill their legal and financial obligations. Provide the right information to the right person at the right time.



Diverse and Capable Workforce

Engage and develop motivated, talented people whose skills and knowledge meet the evolving needs of our customers and stakeholders.

A Closer Look: Priorities, Goals & Actions

Work is underway on these efforts, with a progress review and update in early 2024.



RETURN ON INVESTMENT

Reduce overhead costs associated with the programs to increase the funds that are contributed to the state transportation system

Rationale:

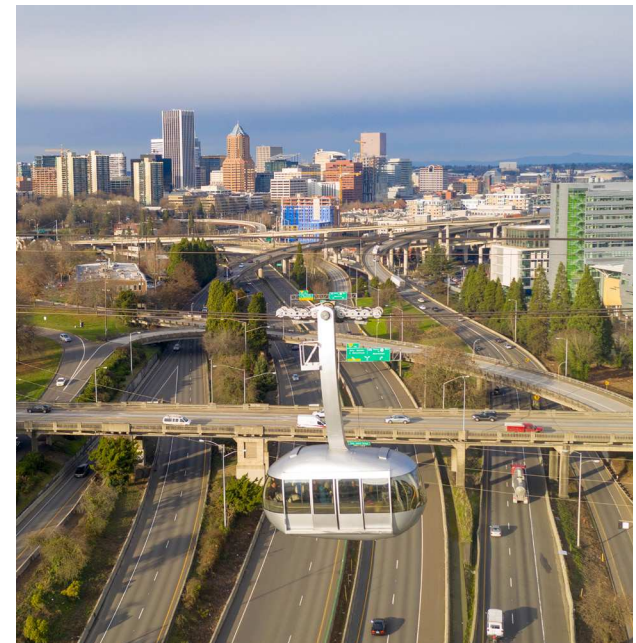
A major part of our role is to ensure funding to maintain Oregon's highways and transportation infrastructure. Improving our operating efficiency leaves more money for that critical purpose. Being ROI-focused will help shift our mind-set and ensure we find the most cost effective ways to strengthen our programs.

Goals:

- Invest in targeted technology modernization to reduce operating costs and improve service levels.
- Reduce the proportion of delinquent debt sent to collections.
- Ensure service costs do not exceed our revenue.
- Manage operations to spend Federal funds fully and appropriately.

Actions:

- Reduce total operating costs in the current biennium while maintaining or improving service levels.
- Regularly review fees and identify actions to ensure full recovery of costs.
- Ensure timely obligation of Highway Safety Improvement Program (HSIP) funds in coordination with the State Transportation Improvement Program (STIP).
- Target and implement improvements to reduce processing time and boost efficiency.
- Focus efforts on unpaid accounts that have higher rates of pre-collections payment.
- Upgrade roadside Weigh-in-Motion systems, using available Federal funding, to improve enforcement and safety compliance.



A Closer Look: Priorities, Goals & Actions



INTEGRATION/ALIGNMENT WITH FEDERAL AND PARTNER PROGRAMS

Foster partnerships with our peers and Federal Agency partners to ensure sustained funding, enhance data and achieve shared goals.

Rationale:

The vast majority of commercial vehicles using Oregon highways are interstate carriers. We rely on work with the Federal government, states, sister agencies (e.g., DMV, Oregon State Police, Department of Environmental Quality and others), as well as Canada and Mexico—to track operators' safety and compliance. There is a concerted effort across North America to make these connections even more effective, efficient and responsive.



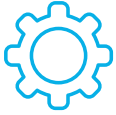
Goals:

- Select and pursue additional sources of revenue (e.g. Grants) to maintain and/or improve service levels or fund priority technology enhancements.
- Access Federal funds to cover a greater portion of our size and weight program costs.
- Utilize/integrate federal data/systems or other data/system repositories to improve carrier account management and reduce data management costs.
- Strengthen collaboration with other agencies to support freight transportation and improve safety.

Actions:

- Apply for FMCSA High Priority Grants to fund a commercial off-the-shelf system for Over-Dimension permitting and routing.
- Identify and support opportunities for other ODOT Divisions to apply for Federal ITD grants.
- Research and identify which size and weight program costs can be supported through Federal vs state funding.
- Contribute funds and expertise to advance goals of the Operation Life Saver program.

A Closer Look: Priorities, Goals & Actions



SIMPLIFY PRODUCTS & SERVICES

Apply technology, process enhancement and review of statute, rule and policy to streamline transactions for freight carriers and increase the value we provide

Rationale:

It's no secret that well-intentioned efforts at regulation can create unnecessary "red tape" as multiple rules and different jurisdictions lead to complexity and confusion. These can also make our services more challenging to use. We must continually assess how these impact our programs to balance the benefits (safety, return on investment) with the critical goal of promoting commercial enterprise.

Goals:

- Reduce unnecessary complexity to improve the freight carrier experience.
- Reduce regulatory requirements that have little benefit to safety and/or other outcomes.
- Establish and apply consistent criteria for corrective action against non-compliant carriers.

Actions:

- Review minimum information needed for carriers to estimate, verify and pay taxes. Implement changes to streamline carrier registration.
- Improve access to Rail Crossing project information so staff and stakeholders can easily get updates on project status.



A Closer Look: Priorities, Goals & Actions



CUSTOMER SELF SERVICE

Enable customers of all types and backgrounds to easily access information and complete transactions on-line. Focus direct contact with CCD staff on specialized needs/requests versus routine transactions.

Rationale:

Our systems and service culture have long favored direct contact with customers—an approach that is still valuable when carriers need personal attention, but not when people expect to get things done on their own, on-line, or when they want. Despite limitations to our technology, we are working to boost self-service access and ease of use, which also improves our efficiency and encourages simplification.



Goals:

- Increase the usage levels of existing self-service transactions.
- Invest in technology/on-line access and process change to increase availability of self-service transactions.
- Reduce the number of avoidable phone contacts with CCD to improve efficiency and boost service levels.

Actions:

- Purchase and implement an online Over-Dimension permitting and routing system.
- Assess factors impacting self-service transactions and identify actions to boost usage levels.
- Develop the business case to seek approval for implementation of an off-the-shelf Commercial Vehicle Registration system.

A Closer Look: Priorities, Goals & Actions



EDUCATION AND COMMUNICATION

Improve effectiveness and accessibility of information and training to help customers operate safely and fulfill their legal and financial obligations. Provide the right information to the right person at the right time.

Rationale:

The benefits of educating our customers and stakeholders extend across all our priorities. Well-informed carriers are better able to understand and follow rules, use our self-service options and take full advantage of programs to improve safety and mobility. Communication and education enhancement will be a leading-edge element of our strategy.

Goals:

- Improve carrier compliance through education.
- Increase awareness, effectiveness and use of customer-focused educational tools and resources.
- Develop a comprehensive communication strategy and dedicate the right skill and resources to ensure actions are executed continuously and consistently.

Actions:

- Implement enhanced methods for early identification and tracking of at-risk or non-compliant carriers.
- Identify levels and causes of non-compliance in small businesses and historically under-represented communities. Identify actions to improve outcomes.
- Assess and develop a plan to simplify, update and improve on-line information and educational opportunities for carriers.
- Review and identify ways to boost participation in the Rail Advisory Committee and other key advisory groups.



A Closer Look: Priorities, Goals & Actions



DIVERSE AND CAPABLE WORKFORCE

Engage and develop motivated, talented people whose skills and knowledge meet the evolving needs of our customers and stakeholders.

Rationale:

Freight transportation is an industry on the verge of significant change. CCD needs people who can support our traditional customer base and services while adapting to new technologies, growing demand, and an increasingly diverse population. These changes will make our work more interesting and engaging—which in turn we expect will help our existing staff grow in their roles while we attract a new generation of public servants.



Goals:

- Identify skills required/anticipated as our industry and services change and assess gaps and opportunities for people development.
- Actively involve our staff and managers in achieving our strategic priorities and goals.
- Build a workforce that reflects the communities we serve.

Actions:

- Update position descriptions to ensure they accurately reflect the breadth of skills required.
- Implement consistent standards for recruitment to ensure equity and eliminate implicit bias.
- Complete individual development plans that include potential division/agency career paths
- Improve staff onboarding and education to improve knowledge of CCD operations, goals and contribution to the ODOT mission.
- Successfully implement actions to build a more diverse workforce as reflected in the ODOT Strategic Action Plan.



Conclusion/ Acknowledgments

Acknowledgements and Your Comments

This plan has been developed with the input and contributions of many staff, partners, customers and stakeholders of the Commerce and Compliance Division. We appreciate the perspectives that have helped us define a clear direction and priorities for our organization—and look forward to their continued help in work ahead.

We welcome and encourage your comments, suggestions and questions. Please address your feedback to:

A handwritten signature in blue ink that reads "Amy J. Ramsdell". The signature is written in a cursive, flowing style.

Amy Ramsdell
Division Administrator

Contact us: SupportSvs@odot.oregon.gov

