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Impacts of Eliminating or Transferring Motor Carrier and Other Functions

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Mr. Chairman and Members of the Subcommittee:

We appreciate the opportunity to discuss the impacts of eliminating the Interstate Commerce Commission (ICC) and transferring its functions to other federal agencies. As you know, beginning in 1980, the Congress substantially curtailed ICC's jurisdiction over rail and motor carrier rates and market entry and exit. Last year, we testified on proposals to further reduce ICC regulatory activities, and we identified certain trucking regulatory activities that could be eliminated.[1] The Congress subsequently enacted the Trucking Industry Regulatory Reform Act of 1994 (TIRRA), which eliminated these activities and resulted in ICC budget being reduced by about one-third. Recent proposals would eliminate the ICC altogether and transfer any remaining activities to other agencies.

On February 22, 1995, we testified before this Committee's Subcommittee on Railroads, regarding where any remaining rail and motor carrier regulatory activities could best be handled if the ICC is eliminated.[2] As part of that testimony, we presented options, and their potential budgetary savings, for transferring ICC remaining activities to the Department of Transportation (DOT) and other federal agencies. Today, we will focus on motor carrier activities. In summary:

-- There is general agreement in the transportation community that many of the ICC's current motor carrier and rail activities could be eliminated. For example, given the competitive nature of the trucking industry, there appears to be little need for continued regulation of rates. ICC's own analysis indicates that current staff levels could be reduced by about 182 staff years, saving about $16 million annually, with most of these savings coming from the motor carrier area. ICC's fiscal year 1995 budget is $39 million and 428 staff years.[3] The President's budget proposal calls for even greater reductions and would eliminate essentially all motor carrier and a substantial portion of

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[1]See Interstate Commerce Commission: Transferring ICC Rail Regulatory Responsibilities May Not Achieve Desired Effects (GAO/T-RACED-94-222, June 9, 1994) and Interstate Commerce Commission: Key Issues Need to Be Addressed in Determining Future of ICC Regulatory Functions (GAO/T-RACED-94-261, July 12, 1994).

[2]Interstate Commerce Commission: Budget and Other Impacts of Eliminating or Transferring Functions (GAO/T-RACED-95-111, Feb. 22, 1995).

[3]The $39 million does not include $2.9 million in severance payments from staff reductions made in fiscal year 1994 but does include $8.3 million collected in user fees.

rail regulatory functions, resulting in savings of 301 staff years and $28 million annually.

-- Several options are available for transferring remaining ICC functions. These include moving all remaining functions into DOT; transferring most functions to DOT but giving the Department of Justice (DOJ) authority to review railroad mergers and other antitrust activities and making the Federal Trade Commission (FTC) responsible for providing consumer protection for the transport of households goods; combining ICC with the Federal Maritime Commission (FMC); creating an independent regulatory body within DOT similar to the way the Federal Energy Regulatory Commission (FERC) was made a part of the Department of Energy; and simply repealing ICC's regulatory authority. The budget impacts of these options would range from about $16 million to about $39 million.

-- Although the budgetary impact of each option is a key factor in the final decision, we believe perhaps an even greater consideration is the manner in which the successor agencies would perform their new activities, if the Congress decides that some of ICC's current functions need to be retained. For example, if collective rate making by motor carrier rate bureaus were no longer administered under the Interstate Commerce Act, such rate making would lose its antitrust immunity. Similarly, household goods consumer protection would be handled much differently by FTC than if these activities were transferred to DOT and continued to be handled under the Interstate Commerce Act. FTC focuses on industrywide unfair and deceptive practices, not individual complaints, whereas under the Interstate Commerce Act, DOT would focus on individual complaint handling and resolution.

The Congress is currently deciding which, if any, of the ICC's current functions should be retained and where they might best be relocated. The trade-off between budgetary savings and the desirability of continuing to have these functions handled by an independent regulatory body will be an important consideration in the decision process.

BACKGROUND

ICC, established in 1887 by the Interstate Commerce Act, is the nation's oldest independent regulatory agency. The agency was charged with protecting the public from monopolistic and discriminatory practices by railroads. Over the years, ICC's jurisdiction was expanded to include motor carriers, water carriers, and the transportation by pipeline of materials other than water, gas, or oil. For nearly a half century, the Commission exercised extensive regulation over the nation's surface transportation industries by controlling rates and deciding which firms could transport which goods and over which routes. However, beginning in the mid-1970s and early 1980s, in response to changing market conditions and perceptions that excessive regulation had led to inefficiencies in the transportation sector, the Congress substantially reduced ICC's jurisdiction over rates and market entry and exit. Most recently, TIRRA further reduced ICC's jurisdiction over motor carrier rates and market entry. Because of these reductions in responsibilities, ICC staffing has declined from about 2,500 in the early 1960s to 428 today.

Although ICC's jurisdiction has been substantially curtailed over the years, the surface transportation modes have not been completely deregulated. The Motor Carrier Act of 1980 substantially reduced federal regulation of the trucking industry. Similarly, the Bus Regulatory Reform Act of 1982 increased pricing flexibility and eased market entry and route abandonments for intercity bus firms. However, ICC continues to license interstate motor common carriers, perform consumer protection functions involving household goods, oversee trucking undercharge cases, and regulate the intercity bus industry. In fiscal year 1995, ICC expects to devote about 52 percent of its resources to motor carrier activities. The Staggers Rail Act of 1980 gave railroads greater freedom to set their rates according to market conditions and limited ICC's authority to review such rates. But, ICC continues to hear complaints over the reasonableness of rail rates. In fiscal year 1995, ICC expects to devote about 48 percent of its resources to rail activities, including rates. Appendix I breaks out ICC's regulatory functions and the staff years allocated to each of these functions.

THERE ARE OPPORTUNITIES FOR REDUCTION OR ELIMINATION OF REGULATORY FUNCTIONS

Although TIRRA led ICC to reduce the number of staff from 622 to 428, further opportunities for reducing costs and regulatory functions are available. In October 1994, in response to a TIRRA requirement, ICC reported on the continued need for its regulatory activities.[4] According to the report, ICC currently performs 18 motor carrier and 27 rail regulatory activities. While ICC believes many of these activities should be continued, the report identified 12 motor carrier and 6 rail activities that could be eliminated.[5] ICC staff estimate that eliminating these functions

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[4]Study of Interstate Commerce Commission Regulatory Responsibilities, Pursuant to Section 210(a) of the Trucking Industry Regulatory Reform Act of 1994 (ICC, Oct. 25, 1994).

[5]The motor carrier activities included all motor carrier rate regulation (including collective rate making); most consumer protection functions, such as owner-operator leasing and household

would save 103 staff years. In addition, ICC staff assumed that three motor carrier activities--intercity bus regulation, freight forwarder licensing, and loss and damage claim handling--could be transferred to DOT without increasing DOT's staff. This transfer would save 36 staff years. Finally, ICC staff estimated that truck licensing activities could be accomplished with 42 fewer staff than the 54 now assigned. Motor carrier functions continued with the same level of staff include truck undercharge oversight and regulation of Mexican carriers. Total savings from all changes were estimated by ICC to be 182 staff years and about $16 million. Reduced motor carrier activities would account for nearly all the savings--179 staff years.

The President's budget proposes a reduction of 301 staff years for an annual cost savings of about $28 million.[6] Of the remaining 127 staff years, 102 would be transferred to DOT, 24 to DOJ, and 1 to FTC. The President's budget would essentially eliminate all regulation of the motor carrier industry and make substantially greater cuts in rail regulation than suggested in the ICC staff study.

Many carriers and shippers also believe opportunities exist to reduce or eliminate regulatory functions. For example, in comments submitted to DOT for its analysis of ICC's functions, one trade association, representing more than 30,000 motor carriers of every type and class, suggested that ICC's jurisdiction over motor carrier mergers and acquisitions deserved further study and possible elimination. It also believes the distinction between contract and common carriage for motor carriers should be eliminated.[7] The association believes the distinction between contract and common carriage has become less important over time with the elimination of individually filed tariffs.[8] Other

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goods complaints; and data collection and oversight of the industry. Handling motor carrier loss and damage claims was excluded. The rail activities included rates on recyclables, rate discrimination, commodities clause, railroad securities, recording liens, and rail valuation.

[6]This amount does not include severance costs of $6.7 million.

[7]Common carriers hold themselves out to provide service to the general public. Contract carriers, on the other hand, enter into contracts with particular shippers to either dedicate equipment for shippers' exclusive use or design transportation to meet shippers' distinct needs.

[8]TIRRA largely eliminated requirements for motor carriers to file individual tariffs with ICC. However, TIRRA required that collectively set tariffs by rate bureaus, as well as individual tariffs of household goods carriers, continue to be filed with the

industry trade associations, such as the American Bus Association and the Interstate Truckload Carriers Conference, also support these changes. Some shipper organizations, such as the National Industrial Transportation League, also believe antitrust immunity for motor carrier rate setting activities should be eliminated.

TRANSFERRING ICC'S FUNCTIONS TO OTHER AGENCIES COULD YIELD COST SAVINGS

Eliminating ICC and transferring its functions to other agencies offer opportunities for budget savings. We examined the following options for eliminating or transferring ICC's remaining functions to other agencies: (1) integrating ICC's rail and motor carrier functions into DOT, (2) integrating most functions into DOT but assigning rail merger and other antitrust functions to DOJ and consumer protection functions to FTC, (3) merging ICC with FMC, (4) creating an independent body within DOT, as FERC was created within the Department of Energy, and (5) eliminating ICC and repealing the Interstate Commerce Act.

Table 1 summarizes the estimated cost savings associated with each of these options. The savings range from $0 to about $39 million. The lowest savings estimate reflects the costs of keeping all of ICC's current functions intact with no reductions in staffing. The largest savings estimate assumes that all of ICC's functions would be eliminated. In general, mid-range savings estimates are based on eliminating potential overlaps in administrative staff and costs, implementing changes contained in ICC's October 1994 TIRRA report, or achieving reductions contained in the President's budget proposal. Although we examined five discrete possibilities for transferring and/or eliminating ICC's functions, combinations or variations on these options are possible and could generate savings between the maximum and minimum.

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commission.

Table 1: Estimated Savings From Transferring or Eliminating ICC's Functions

Dollars in millions

	ESTIMATED SAVINGS		ESTIMATED SAVINGS (IF ICC-RECOMMENDED REDUCTIONS ARE MADE)	
Options	Staff years	Dollars[a]	Staff years	Dollars[a]
1. Full integration into DOT	0 - 301	$0 - $28	182 - 301	$16 - $28
2. Integration into DOT, DOJ, and FTC	301	28	301	28
3. Merge ICC and FMC	0 - 40	0 - 5	at least 182	at least 16
4. FERC-like model	0	0	182	16
5. Eliminate ICC and repeal Interstate Commerce Act	428	39	428	39

[a]Savings do not reflect one-time separation costs, which ICC estimates could be as high as $16 million if all 428 of ICC staff are eliminated.

TRANSFER OF ICC'S FUNCTIONS COULD YIELD COST SAVINGS, BUT IMPORTANT ATTRIBUTES MAY BE LOST

While the budget impact is a key factor in the final transfer decision, we believe another--and perhaps even greater--consideration is the manner in which remaining activities, if any, will be handled by the successor agencies. Specifically, careful consideration must be given to the trade-offs between cost savings and attributes exhibited by an independent regulatory commission. These attributes include independence in decision-making and expertise in economic regulatory matters.

Repealing the Interstate Commerce Act

In terms of cost, eliminating ICC entirely by repealing the agency's authority to regulate under the Interstate Commerce Act would have the most budget savings of any option--about $39 million.[9] Nevertheless, this option would entail hidden costs and leave certain regulatory concerns unresolved. In particular, cases

[9]This amount does not include severance costs of $16 million.

now brought to ICC would, in the future, be examined by other federal and state agencies. This could potentially increase these agencies' workload and costs. For example, the elimination of the motor carrier collective rate making provisions of the Interstate Commerce Act would place these cases under the antitrust laws. Such an action would shift the responsibility of reviewing collectively set rates by motor carrier rate bureaus to DOJ, and the attendant costs of these activities to the judicial system.[10] The same would be true for motor carrier control and transfer transactions. While ICC currently handles most of these transactions under its exemption authority, repeal of this authority would shift the review of these cases to DOJ, and shift any subsequent costs to the judicial system. Finally, the elimination of the Interstate Commerce Act and repeal of provisions preempting state economic regulation of the intrastate transportation of property could subject motor common carriers to widely differing state laws and regulations.

Transferring ICC's Functions to DOT and Other Agencies

Transferring ICC's functions to DOT or dividing them among DOT, DOJ, and FTC as proposed in the President's budget could provide a more orderly transition to a reduced regulatory environment than the outright repeal of the statute. However, trade association representatives with whom we spoke believed that transferring ICC's regulatory functions to DOT and DOJ would affect the impartiality of decision-making, the ability to balance the interests of all concerned parties, and the accessibility of the process to the public and industry. Small shippers and carriers claim that they would be particularly disadvantaged if they had to litigate disputes in court. Concerns have also been raised about the potential loss of economic regulatory expertise. The President's budget proposal would eliminate about 300 staff years, but at the time of our review, final decisions as to which staff and functions would be retained or eliminated had not been made. However, a reduction from 428 to 127 staff years would likely result in the loss of economic regulatory expertise. While over the long-term such expertise could be developed or acquired, in the short-term the speed and/or quality of decision-making could be impaired.

In assuming ICC's functions, DOT could encounter problems since historically its focus is more on ensuring safety and financing infrastructure than on handling economic regulatory matters. First, although the Federal Highway Administration's (FHWA) Office of Motor Carriers (OMC) registers interstate motor carriers, sets insurance limits for these carriers, and conducts

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[10]Collective agreements on commodity classifications and/or mileage guides could also lose their antitrust immunity and be subject to DOJ and judicial review.

periodic motor carrier safety inspections, it does not require preregistration of motor carriers prior to doing business or maintain an automated insurance monitoring system, as ICC currently does. Second, while Mexican motor carriers are required to register with FHWA and demonstrate financial responsibility, ICC is responsible for licensing these carriers, setting pre-defined commercial zones in which they can operate, and enforcing current restrictions on the operation of Mexican carriers in the United States. As of September 1994, ICC had issued licenses to about 4,700 Mexican motor carriers to operate within the commercial zones along the U.S.-Mexico border. According to DOT, FHWA would have to modify its procedures and increase its staff to perform these functions. In addition, DOT would need to receive litigation authority before it could obtain injunctions against unauthorized Mexican operations without first going through DOJ. Finally, OMC (or another office within DOT) would have to handle remaining truck undercharge cases. This new work would be in addition to its existing workload.

DOT also recently announced its intention to reorganize the Department and consolidate functions. We believe it is too early to tell how this reorganization would affect DOT's ability to assume ICC's functions. However, the consolidation of functions offers opportunities for more explicitly considering the needs and interests of surface transportation modes and for giving greater flexibility to state and local governments in meeting their priority transportation needs.

Finally, transferring ICC household goods consumer protection activities to FTC would change the nature of how these activities are handled. FTC officials told us that it does not have the authority to handle individual complaints. Rather, it looks at patterns of nationwide consumer problems in determining where to deploy its resources. FTC receives over 30,000 individual complaints per year. While it does not intervene in behalf of one person, according to FTC, it will act to stop unfair practices. ICC, on the other hand, routinely handles individual cases and commission enforcement staff handle complaints, respond to inquiries, conduct investigations, and bring administrative or judicial enforcement actions. Between fiscal years 1992 and 1994, ICC handled about 8,300 household goods complaints and helped obtain $44,500 in civil penalties and about $1 million in refunds.[11] In fiscal year 1995, ICC expects to devote about 25 staff years to household goods activities. The President's fiscal year 1996 budget would transfer only 1 staff year to FTC to handle these matters.

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[11]ICC also received about 46,000 inquiries about household goods matters in fiscal year 1994.

Maintaining an Independent Regulatory Agency

Preserving an independent regulatory agency either by merging ICC and FMC or by following the FERC model in integrating the ICC's functions into DOT might produce the least cost savings. Both ICC and FMC are independent regulatory agencies with five commissioners appointed by the President with the advice and consent of the Senate, and both agencies regulate industry rates and practices. However, there do not appear to be immediate synergies between the two agencies. ICC regulates domestic surface transportation, while FMC primarily regulates international water transportation. According to FMC officials, the differences between these activities are significant and there is little overlap. In addition, FMC characterized its functions as largely related to law enforcement, whereas ICC's functions have more to do with rate and other economic regulation. To the extent that the two commissions could be integrated, some savings in administrative overhead could be achieved. However, even these savings might be offset by the need for new physical space to house a combined agency and computer systems and other equipment to handle each agency's workload. Finally, proposals for eliminating FMC have made this agency's future uncertain and a merger with ICC problematic.

Merging ICC into DOT under the FERC model would preserve the independence of the regulatory and adjudicatory processes, but the cost savings from transferring ICC's functions under a FERC-like model would depend almost entirely on which functions were retained. When FERC was made a part of the Department of Energy, there were few budgetary savings because all activities were continued and the agency maintained its administrative staff. To the extent that ICC's regulatory functions were reduced along the lines suggested by ICC or the administration, the cost savings associated with this option would increase.

CARRIERS AND SHIPPERS DIVIDED OVER THE OPTIONS

The transportation community is divided over how best to handle the elimination of ICC. While there is general agreement that certain rail and motor carrier regulatory functions could be eliminated, there is less agreement on where remaining functions should be placed. The division splits largely on the basis of the size of the firms. Generally, smaller shippers and carriers tend to favor an independent body within DOT--the FERC-like option--because they believe that the other options could compromise the independence of the decision-making process. The larger carriers tend to favor the complete elimination of surface transportation regulation. In the carriers' view, further reductions in the regulatory burden would enhance their competitiveness and enable them to respond more quickly to changes in the marketplace.

There is also some controversy over continuing antitrust immunity for collective rate making and other collective agreement activities. In general, some motor carrier organizations support the retention of antitrust immunity, believing that such immunity increases the efficiency and effectiveness of rate setting, especially for smaller and medium sized carriers. For example, in comments made to DOT, one association representing over 200 motor carriers of property, said that without antitrust immunity for discussing and setting joint-line rates, shippers could be subject to higher rates. Another association, representing over 200 less-than-truckload (LTL) carriers, said antitrust immunity for joint-line rate making facilitates the development and coordination of a nationwide trucking network. Others, however, believe antitrust immunity is no longer necessary. For example, one organization representing over 400 shippers that use LTL carriers, believes collective rate setting and rate bureaus have, in general, led to unreasonable rate increases. This organization does not believe rate bureaus are needed, and if necessary, special antitrust immunity could be conferred for two carriers to set joint-line rates.

CONCLUSIONS

Virtually all of the options we reviewed for transferring ICC's remaining functions offer opportunities for budget savings--ranging from about $16 million to about $28 million. The difference depends primarily on which functions and staff are transferred. Of potentially greater significance, however, is the issue of how ICC's remaining regulatory functions will be handled in the future. If the Congress decides that there continues to be a need for a high degree of independence and the application of substantial expertise in carrying out the remaining regulatory and adjudicatory processes, the options of a merger with FMC or incorporating the functions into DOT under a FERC-like model might be preferable. If, on the other hand, the Congress decides that there is no longer a need for an independent regulatory agency, then potentially greater savings might be available by integrating the remaining ICC functions into DOT or dividing them among DOT, DOJ, and FTC.

In weighing the options, the Congress may wish to make a distinction between rail and motor carrier regulatory activities. A higher degree of independence may be required for handling such matters as rail rate disputes and line abandonments compared with motor carrier activities such as overseeing Mexican carriers. It may be appropriate to establish a FERC-like entity to handle rail matters and to integrate the remaining motor carrier functions primarily into DOT. This could achieve cost savings while at the same time preserving independent decision making where necessary.

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Mr. Chairman, this concludes my testimony. I would be happy to respond to whatever questions you or Members of the Subcommittee may have.

ICC'S ALLOCATION OF STAFF YEARS FOR REGULATORY FUNCTIONS, FISCAL YEARS 1994 THROUGH 1996

RAIL REGULATION	FY 94[a]	FY 95[b]	FY 96[b]
Rail Rate Regulation			
Rate cases and rate rulemaking activities	52.8	40.5	40.5
Rail rate contracts	1.4	1.4	1.4
Rates on recyclables	1.4	0.9	0.9
Reasonable practices	2.5	2.4	2.4
Rate discrimination	0.2	0.2	0.2
Commodities clause	0.1	0.1	0.1
Exemptions	8.5	6.4	6.4
Railroad Consolidations			
Mergers	32.6	31.1	32.4
Line transfers, leases, and trackage rights	11.8	8.1	8.4
Line sales to noncarriers	14.7	13.2	13.2
Labor protection	5.1	4.8	4.8
Rail Service Availability			
Rail car supply and interchange	9.7	8.0	8.0
Railroad service orders	2.7	2.7	2.7
Competitive access	0.7	0.7	0.7
Line Construction	21.9	14.3	13.3
Line Abandonments			
Abandonment applications	60.2	44.0	44.4
Financial assistance program	8.1	6.9	6.9
Feeder line development program	1.6	1.5	1.5
Rails-to-trails program	3.6	2.7	2.7
Labor protection	0.4	0.4	0.4
Other Rail			
State certification	0.7	1.2	1.2
Antitrust immunity for rail activities	0.8	0.8	0.8
Interlocking officers and directors	0.1	0.0	0.0
Railroad securities	0.7	0.7	0.7
Recording liens	3.1	2.8	2.8
Valuation	0.0	0.0	0.0
Data collection and oversight	10.2	7.9	7.9
Rail passenger transportation	3.5	3.4	3.4
Total Rail	259.1	207.1	208.1

ICC'S ALLOCATION OF STAFF YEARS FOR REGULATORY FUNCTIONS, FISCAL YEARS 1995 AND 1996

MOTOR CARRIER REGULATION	**FY 94**[a]	**FY 95**[b]	**FY 96**[b]
Motor Carrier Licensing Activities			
Truck licensing	67.5	54.4	54.4
Truck contract carriage	18.8	3.3	3.3
Motor carrier control and transfer transactions	2.3	2.2	2.2
Freight forwarders	1.2	0.8	0.8
Brokers	24.0	19.4	19.4
Motor Carrier Rate Regulation			
Exemption authority	3.0	3.2	3.2
Individual carrier rate regulation	88.7	7.5	7.5
Collective ratemaking	5.3	3.4	3.4
Consumer Protection			
Owner-operator leasing	30.2	28.9	28.9
Lumping	1.3	1.3	1.3
Loss and damage claims	25.8	18.3	18.3
Duplicate payments and overcharges	3.4	3.0	3.0
Household goods and auto driveaway carriers	27.8	25.2	25.2
Trucking Undercharge Oversight	29.3	17.6	16.6
Intercity Bus Regulation	17.6	16.6	16.6
Mexican Carriers	8.7	11.5	11.5
Other			
Pooling by trucking companies	0.1	0.1	0.1
Data collection and oversight-trucking	7.1	3.7	3.7
Total Motor Carrier	362.1	220.4	219.4
Total Rail and Motor Carrier	**621.2**	**427.5**	**427.5**
PIPELINE REGULATION	0.5	0.3	0.3
WATER CARRIER REGULATION	0.3	0.2	0.2
TOTAL	**622.0**	**428.0**	**428.0**

[a]Staff years for fiscal year 1994 represent authorized positions. ICC filled only 608 of these positions.
[b]Staff years for fiscal years 1995 and 1996 are based on budget projections.

Source: Interstate Commerce Commission

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