

#### **General Discussion**

- How many of you have had a true GPS audit?
  - If you raised your hand, we are going to be looking for your assistance during this discussion!
- For those that have, at the onset, you probably didn't consider things like...
  - your workpapers may look a bit different
  - where to keep the detail provided by the carrier
  - is it necessary to keep all the raw data that's provided?





Remember, the focus of an audit, and the level of testing should always be determined by the system of controls

- Many small carriers with manual records and even GPS records – lack a system, so more testing is necessary
- Carriers with a good electronic system should require less testing
- Proving the system doesn't necessarily mean the auditor won't find any errors or other issues – no system is perfect!





#### Let's talk about the impact of ping rates...

We want as much data as we can get to ensure accuracy, but:

- the higher the ping rate the larger the data file
- a higher ping rate will potentially generate a significant amount of unnecessary info.





#### Let's talk about the impact of ping rates...

#### 2 minute pings equate to

- 30 lines of lat/lon data per hour
- 240 lines per 8 hours
- 720 lines per 24 hours
- Many of those will not reflect a change in movement or status, so where's the value?





# Let's talk about pings (cont'd)

On the other hand, the ping rate may be more often if the system is programmed to collect data at other times such as:

- Change of status (was the engine turned off or in idle mode)
- Did the vehicle cross a jurisdictional border (geofencing)?

#### ge·o·fenc·ing

/ˈjēo fensiNG/ •)

noun

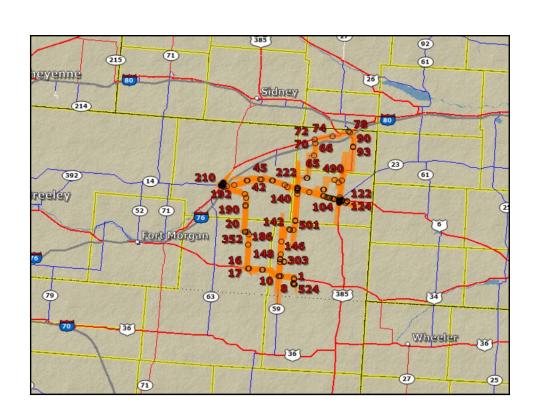
the use of GPS or RFID technology to create a virtual geographic boundary, enabling software to trigger a response when a mobile device enters or leaves a particular area.

"geofencing turns the lights off when you leave and on when you get home"

Can distance software handle a multitude of data points?

- If you copy/paste all the data for a "trip", you will have an excessive number of data points on the map
- Although much quicker than entering city data, it will still take some time
- Will it tell you any more than a shorter test would?





A few more things of note...

- The original DOT ELD mandate was December 18, 2017
- AOBRDs (automatic on-board recording devices) compliant with existing regulations that were put in use prior to 12/18/17 may be used until December 16, 2019, so...





#### A few more things of note (cont'd)

Your carrier may have had:

- A manual system prior to the mandate
- An AOBRD that was not compliant, so they had to change to an ELD
- An AOBRD that was compliant, but can't be used after 12/2019
- An ELD they tried and didn't like so they went to
- A new ELD....so





#### A few more things of note (cont'd)

YOUR AUDIT PERIOD
MAY REFLECT 2 (or more)
DIFFERENT SYSTEMS,
EACH OF WHICH MUST
BE TESTED





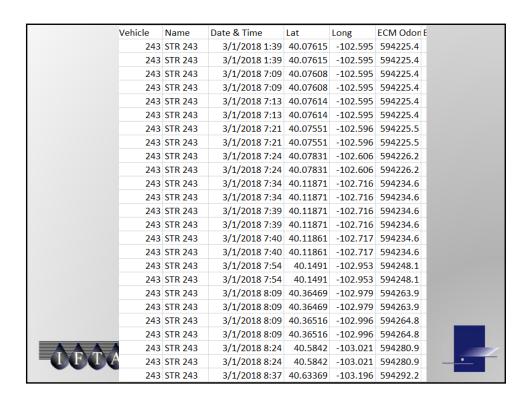
### General Discussion (cont'd)

Facts regarding a recently conducted electronic audit...

- The carrier had 25 30 IFTA/IRP vehicles
- They had approximately 60 vehicles that were locally base plated
- The IRP/IFTA vehicles were based out of 7 terminals
- Those 7 terminals were in 3 jurisdictions
- The detailed data reports reflected lat/lon and the ECM odometer readings







The process...

 As with any carrier, 1 of the 1<sup>st</sup> things to do is review the vehicle recaps or summaries

<b>⊿</b> A		C						
3rd Qtr., 2017	10.11							
Tractor	<b>Total Miles</b>	CO	IA	KS	MO	NE	SD	WY
1000	5,361.7	0.0	0.0	4,600.5	761.2	0.0	0.0	0.0
123	9,745.3	0.0	0.0	0.0	0.0	9,745.1	0.0	0.2
165	27,236.7	0.0	1,500.7	0.0	276.1	25,442.9	17.0	0.0
171	17,529.9	0.0	11,989.1	0.0	257.8	3,153.0	2,130.0	0.0
184	8,692.2	3,530.4	0.0	0.0	0.0	5,161.8	0.0	0.0
190	7,992.3	0.0	0.0	162.7	7,829.6	0.0	0.0	0.0
192	10,297.5	0.0	3,240.5	0.0	0.0	6,666.5	390.5	0.0
0 194	2,317.6	2,317.6	0.0	0.0	0.0	0.0	0.0	0.0
1 2000	5,698.8	0.0	110.2	1,187.2	4,384.9	16.5	0.0	0.0
2 212	18,195.2	0.0	4,613.8	111.5	12,514.1	955.8	0.0	0.0
3 220	19,895.9	0.0	3,606.4	4,672.0	10,804.5	813.0	0.0	0.0
228	17,352.8	0.0	3,552.5	0.0	269.5	13,115.7	415.1	0.0
5 229	22,810.0	0.0	5,922.7	60.1	15,814.0	1,013.2	0.0	0.0

#### The process (cont'd)...

- We've reviewed the summaries, selected a sample of vehicles and we're ready to test
- What about testing "days" instead of trips?





Tractor		243	
Units		Miles	
Date	Total Miles	со	NE
1/1/2018	0.0	0.0	0.0
1/2/2018	270.2	270.2	0.0
1/3/2018	213.6	213.6	0.0
1/4/2018	248.4	248.4	0.0
1/5/2018	186.5	186.5	0.0
1/6/2018	5.1	5.1	0.0
1/7/2018	0.0	0.0	0.0
1/8/2018	214.7	214.7	0.0
2/15/2018	283.2	280.0	3.2
3/6/2018	274.5	271.8	2.7
3/19/2018	223.3	223.3	0.0
3/20/2018	264.9	261.9	3.0
3/21/2018	229.6	229.6	0.0
3/22/2018	253.0	253.0	0.0
3/23/2018	196.3	196.3	0.0
3/26/2018	180.1	180.1	0.0
3/27/2018	264.9	264.5	0.4
3/28/2018	182.9	182.9	0.0
3/29/2018	329.7	329.7	0.0
3/30/2018	209.5	209.5	0.0
3/31/2018	0.5	0.5	0.0
Total	14,596.3	14,587.0	9.3

By testing days, the auditor

- could zoom in and determine those minimal miles were incorrect
- even though it was not a material error in comparison to the total, had it been an issue, it might have gone unnoticed if longer periods of time had been tested
- Overall, the GPS info was acceptable, although there were some minor adjustments.





### General Discussion (cont'd)

Now what about the workpapers...

- · The auditor did not duplicate the carrier's info
- They added the data sheet(s) as a separate tab
- Where they would normally have reflected location data, they referenced that tab





A good system should not require excessive testing; there is no need to test merely for the sake of testing when no issues are being discovered. BEG. END. TOTAL ODOM. ODOM. MILES TRIP DESCRIPTION IA ΝĒ SD SEE RAW DATA REPORT TAB 228 1/2 559,066 559,352 286 SEE RAW DATA REPORT TAB 228 559,352 559,622 137 133 270 1/3 228 SEE RAW DATA REPORT TAB 559,622 559,877 111 135 255 1/4 559,877 560,140 228 1/5 SEE RAW DATA REPORT TAB 132 124 264 560,140 55 228 SEE RAW DATA REPORT TAB 560,399 197 259 1/8 228 SEE RAW DATA REPORT TAB 560,399 560,694 71 216 295 1/9 228 SEE RAW DATA REPORT TAB 560,694 560,978 114 169 283 1/10 228 1/11 SEE RAW DATA REPORT TAB 560,978 561,245 161 99 267



#### Company Facts....

- Regional Household Goods Mover
- Global Positioning System (GPS)
- · Fuel purchased over the road
  - Locally
  - Fuel card
- 5 Apportioned vehicles 1 registered at 26K
- 4 Local and/or non-qualified vehicles





#### Moving on Down the Road

#### Company Facts (cont'd)....

- · All vehicles are equipped with GPS units
- · The units are hardwired and tamper proof
- Carrier does not print copies of the GPS records
- · Carrier does not generally save the info
- GPS provider only retains the data for 1 year
- · All vehicles have been reported
- The base jurisdiction distance was incorrectly reported as non-taxable in 1Q2017





#### Company Facts (cont'd)....

- · Fuel cards are assigned by driver
- Drivers must enter a driver ID number to fuel
- Due to issues with the fuel card company, owner has told all drivers to enter the same ID number.
- Fuel purchased locally on account does not identify the vehicle on the receipts
- Initial Audit Period: 3Q16 2Q18





# Moving on Down the Road

#### Available Records

- Detail reports from 07/01/16 12/31/16
- Summary reports from 2Q 4Q 2017
- State Miles report from 11/01/17 06/30/18
- Receipts from 1/2018 12/2018
- Fuel Card Reports from 4/2017 1/2018





Exa	ample De	etail R	eport
DATE_CREATED EVENT_DATE EVENT_1/1/2016 0:01 7/1/2016 0:01 MOV 7/1/2016 0:05 7/1/2016 0:07 MOV 7/1/2016 0:02 MOV 7/1/2016 0:02 MOV 7/1/2016 0:02 MOV 7/1/2016 0:01 7/1/2016 0:01 MOV 7/1/2016 0:12 7/1/2016 0:14 MOV 7/1/2016 0:14 MOV 7/1/2016 0:15 MOV 7/1/2016 0:18 MOV 7/1/2016 0:18 MOV 7/1/2016 0:22 MO	/E_PER 1290 US Hwy 431 N /E_PER US Hwy 431 N /E_PER 131 Co 84 86 W /E_PER S Eufaula Ave /E_PER 1 Richards Crossroad /E_PER 4791 S Eufaula Ave /E_PER 33 Co Rd 40	CITY Abbeville Abbeville Abbeville Abbeville Eufaula Eufaula Eufaula Eufaula Eufaula	STATE ZIP LAT ING ODOMETER AL 36310 31.55342 -85.2834 208014842 AL 36310 31.61571 85.2774 208021794 AL 36310 31.64766 -85.2805 208025364 AL 36310 31.67967 -85.2791 208028908 AL 36027 31.73673 -85.2513 208032840 AL 36027 31.73679 -85.2513 208039038 AL 36027 31.75349 -85.2136 208039398 AL 36027 31.76349 -85.1874 208043160 AL 36027 31.76349 -85.1874 208043160 AL 36027 31.76389 -85.1874 208043160
Date created Event Date Event Type Address City	d	State Zip Lat Lng Odomet	er
-JETA-			

Ех	ample	State Miles	Re	port	
4496				!	
AL Mar 01	, 2018 1:41:26 PM	Mar 05, 2018 8:42:50 AM	655,792	656,114	321.2
1	, 2018 8:42:50 AM	Mar 06, 2018 7;46;39 AM	656,114	656,163	49.4
Mar 06	, 2018 7:46:39 AM	Mar 06, 2018 10:05:20 AM	656,163	656,199	36.1
∳ Mar 06	, 2018 4:59:00 PM	Mar 08, 2018 6;00:40 AM	656,362	656,640	277.0
Mar 14	, 2018 4:53:27 AM	Mar 15, 2018 1:51:27 PM	659,142	659,365	223.4
Mar 15	, 2018 1:51:27 PM	Mar 15, 2018 3:28:11 PM	659,365	659,395	.29.3
Mar 16	, 2018 5:59:39 PM	Mar 19, 2018 1:53:32 PM	659,955	660,014	58.6
Mar 19	, 2018 3:42:51 PM	Mar 19, 2018 4:42:26 PM	660,121	660,188	67.0
Mar 20	, 2018 4:05:30 PM	Mar 20, 2018 5:05:45 PM	660,462	660,529	67.0
	2010		1	t.	
FL Nov 28, 2	2017 8:21:02 AM	Nov 28, 2017 4:04:40 PM	635,381	635,443	61.8
Dec 06, 2	2017 9:46:02 AM	Dec 08, 2017 12:04:02 PM	636,871	637,731	859.6
Dec 27, 2	017 8:46:02 AM	Dec 27, 2017 11:37:17 AM	641,987	642,060	•73,3
Jan 12, 2	018 9:19:12 AM	Jan 12, 2018 5:13:57 PM	646,524	646,673	149,5
Feb 07, 20	18 12:35:27 PM	Feb 07, 2018 2:39:30 PM	652,503	652,611	108.3
3	<b>-</b>		<b>.</b>	<b>-</b>	_

				Distance Traveled	
State	Vehicle Group	Vehicle	Drivers	in State (MILES)	
AL	No Group	4496	Unassigned	0	
AL	No Group	4495	Unassigned	2,762	
AL	No Group	4482 red	Unassigned	1,585	
AL	No Group	2	Unassigned	2,060	
AL	No Group	9 pack truck	Unassigned	2,628	
AL	No Group	2961	Unassigned	3,100	
AL	No Group	4483	Unassigned	1,000	
AL	No Group	4 3500	Unassigned	1,502	
GA	No Group	4495	Unassigned	1,330	
GA	No Group	4482 red	Unassigned	314	
GA	No Group	2	Unassigned	240	
GA	No Group	2961	Unassigned	147	
SC	No Group	4495	Unassigned	619	
SC	No Group	4496	Unassigned	0	
NC	No Group	4495	Unassigned	494	
NC	No Group	4496	Unassigned	0	
LA	No Group	4496	Unassigned	0	
LA	No Group	4495	Unassigned	191	
FL	No Group	9 pack truck	Unassigned	1,013	
FL	No Group	4 3500	Unassigned	211	

Although there were lots of parts & pieces...

- There were no summaries to validate the detail reports
- There were no detail reports to validate the summaries
- The fuel could only be tied to the 2 vehicles that conducted the majority of the OTR activity





The audit was reduced to 4 quarters with an overall rating of inadequate.

- For the IRP registration year:
  - an inadequate records assessment was applied
- For the IFTA segment:
  - The 2017 vehicle summaries enabled the capture of the actual fleet vehicles for 3 quarters (best information available)





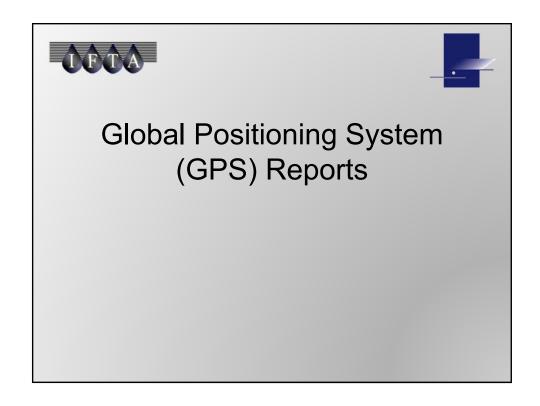
#### The IFTA Segment (cont'd)

- An estimate of activity was applied for the operating vehicle that had no distance
- The absence of a summary for 1Q 2017 led to the acceptance of that quarter as reported
- For the 2 vehicles that conducted the OTR travel, the fuel purchases were analyzed, and credit was allowed for those purchases that could be reasonably tied to the travel
- All other credit was denied
- The reported MPGs were reduced by 20%













#### About the Company

- Private carrier
- Rental and Leasing Servies
- IFTA fleet consists of 60 vehicles with a registered weight of 80,000 pounds
- Two IRP fleets: Fleet 001 consists of 51 vehicles and Fleet 002 consists of 9 vehicles
- Reported MPG's between 6.0 & 6.79



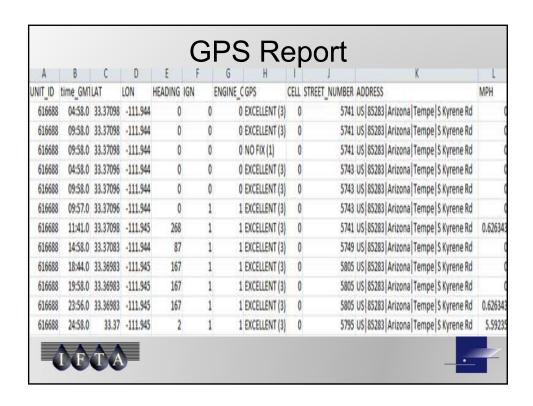


#### **Distance Records**

- The Company used GPS to report distance across each jurisdiction.
- Pings every two minutes.
- The Company provided GPS reports and summaries.
- Drivers maintained odometer readings.
- The company reconciled the odometer readings with the GPS reports monthly







#### Focus on Distance

- Any questions about the records?
- How would you detect if the GPS recorded distance is accurate?







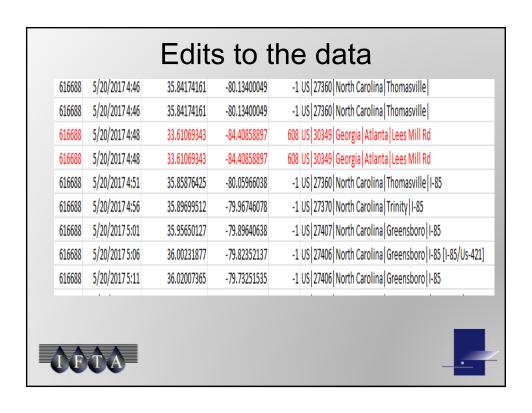
# Distance Analysis

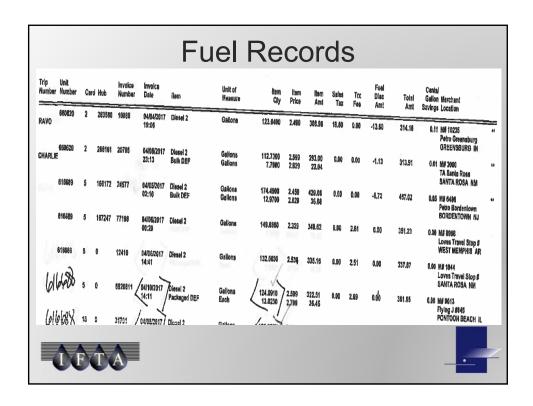
- The summary reports were used to file the Quarterly IFTA reports.
- Would you give the distance records an adequate or inadequate rating?
- What other information might you need/ask for?





616688	5/19/2017 22:28	33.61090533	-84.40905702	617	US 30349 Georgia Atlanta Lees Mill
616688	5/19/2017 22:31	33.61069343	-84.40858897	609	US 30349 Georgia Atlanta Lees Mill
616688	5/19/2017 22:36	33.61069343	-84.40858897	609	US   30349   Georgia   Atlanta   Lees Mill
616688	5/19/2017 22:36	33.61069343	-84.40858897	609	US   30349   Georgia   Atlanta   Lees Mill
616688	5/19/2017 22:36	33.61069343	-84.40858897	609	US   30349   Georgia   Atlanta   Lees Mill
616688	5/19/2017 22:41	33.61069343	-84.40858897	609	US   30349   Georgia   Atlanta   Lees Mill
616688	5/19/2017 22:46	33.61069343	-84.40858897	609	US   30349   Georgia   Atlanta   Lees Mill
616688	5/19/2017 22:51	33.61069343	-84.40858897	609	US   30349   Georgia   Atlanta   Lees Mill
616688	5/19/2017 22:56	33.61069343	-84.40858897	609	US   30349   Georgia   Atlanta   Lees Mill
C1CC00	E /10 /2017 22:01	22 61060242	04 40050007	600	US 20240 Coordial Atlantal Lose Mill





# Overall Analysis of Audited Records

- Would you rate the records adequate or inadequate as a whole? Why?
- What additional information would change your mind?
- Want to know what happened?





#### **Audit Conclusion**

- · Overall, records were deemed adequate.
- Over reported Virginia miles during the 2<sup>nd</sup> quarter 2017 due to clerical errors.
- Underreported Texas, New Mexico, and Louisiana miles during the 2<sup>nd</sup> Quarter 2017 due to clerical errors.
- Fuel records were complete.





# Any observations or questions?









# The Case of the Electronic Logging Device (ELD)

#### **Company Specs:**

- Common carrier
- IFTA/IRP fleet consists of one vehicle
- Company hauled vehicles
- Operations took the company to Arizona, Utah, California and New Mexico
- Reported MPG's between 7.56 & 11.53
- IFTA and IRP accounts are active and have been renewed for 2019



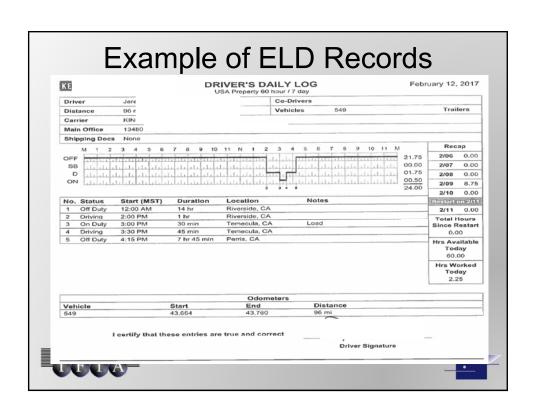


#### **Distance Records**

- The Company stated that they use an Electronic Logging Device (ELD) to record trips
- The Company prepares monthly summaries of the fleet's operations that include distance traveled during a quarter, in total, by vehicle, and by jurisdiction







	1 Off Duty 2 Driving 3 On Duty 4 Driving 5 Off Duty	12:00 AM 2:00 PM 3:00 PM 3:30 PM 4:15 PM	14 hr 1 hr 30 min 45 min 7 hr 45 min	Riverside, CA Riverside, CA Temecula, CA Temecula, CA Perris, CA	Load
	3 On Duty 4 Driving	3:00 PM 3:30 PM	30 min 45 min	Temecula, CA Temecula, CA	Load
E	4 Driving	3:30 PM	45 min	Temecula, CA	Load
E					
	5 Off Duty	4:15 PM	7 hr 45 min	Perris, CA	
F	Vehicle		Start	Odometers	Distance
	549		43,664	43,760	96 mi
10.	Status	Start (MST)	Duration	Location	Notes
1	Off Duty	12:00 AM	7 hr	Perris, CA	
		7.00 444	4 hr 45 min	Perris, CA	
2	Driving	7:00 AM	4 117 45 111111	r citio, crt	
	On Duty	11:45 AM	30 min	Las Vegas, NV	Unload/Load
3				Las Vegas, NV Las Vegas, NV	Unload/Load
3 4 5	On Duty Off Duty Driving	11:45 AM 12:15 PM 12:45 PM	30 min 30 min 5 hr	Las Vegas, NV Las Vegas, NV Las Vegas, NV	
3 4 5 6	On Duty Off Duty Driving On Duty	11:45 AM 12:15 PM 12:45 PM 5:45 PM	30 min 30 min 5 hr 45 min	Las Vegas, NV Las Vegas, NV Las Vegas, NV Temecula, CA	Unload/Load Unload
3 4 5 6	On Duty Off Duty Driving On Duty Driving	11:45 AM 12:15 PM 12:45 PM 5:45 PM 6:30 PM	30 min 30 min 5 hr 45 min 45 min	Las Vegas, NV Las Vegas, NV Las Vegas, NV Temecula, CA Temecula, CA	
2 3 4 5 6 7 8	On Duty Off Duty Driving On Duty	11:45 AM 12:15 PM 12:45 PM 5:45 PM 6:30 PM 7:15 PM	30 min 30 min 5 hr 45 min 45 min 4 hr 45 min	Las Vegas, NV Las Vegas, NV Las Vegas, NV Temecula, CA Temecula, CA Perris, CA	
3 4 5 6 7	On Duty Off Duty Driving On Duty Driving	11:45 AM 12:15 PM 12:45 PM 5:45 PM 6:30 PM 7:15 PM	30 min 30 min 5 hr 45 min 45 min 4 hr 45 min	Las Vegas, NV Las Vegas, NV Las Vegas, NV Temecula, CA Temecula, CA	
3 4 5 6 7 8	On Duty Off Duty Driving On Duty Driving	11:45 AM 12:15 PM 12:45 PM 5:45 PM 6:30 PM 7:15 PM	30 min 30 min 5 hr 45 min 45 min 4 hr 45 min	Las Vegas, NV Las Vegas, NV Las Vegas, NV Temecula, CA Temecula, CA Perris, CA	Unload

		GAP Miles	S	hic	hli	aht	ed		
				ıııç	<b>]                                    </b>	giit	O G		
				FUEL WORKSHE LE # 02	ET				
CCOUNT		7250							
UDIT PER		07/01/16-06/30/17							
UDITOR:		101/04/10 00/00/11							
AMPLE PE	BIOD:	1st Quarter 2017							
P YEAR:		2018							
URPOSE:		To verify the accuracy of reported IFTA miles and fuel.							
OURCE:		Driver's Daily Logs, ELD Summaries							
ETHODO	LOGY:	Use the worksheet below and mileage software to verify the taxpa	ver's n	eported mileage	and fuel inform	nation.		-	
RK # 549	DATE	ORIGIN - DESTINATION / HIGHWAYS TRAVELED	ST	BEGINNING ODOMETER	ODOMETER	PER ODOMETER	REPORTED PER TAXPAYER	MILES	AUDITED
	02/09/17	CA-Perris-CA-Riverside-CA-Mira Monte-CA-Mira Loma-CA-Buena	_						
	Mante.	Park- CA-Riverside/ F215, CA-91, CA-60, U5-101, CA-33, CA-57							
	1	Park - CA-104615 Kiey P213, C4-31, C4-30, C3-301, C4-33, C4-37	CA	43,410	43,578	168	168	168	
	02/10/17	GAP Miles/ Personal use	CA	43,410	43,376	100	100	100	
	2/11/17	GAP Willesy Personal use	CA	43,578	43,664	86		86	
		CA-Riverside-CA-Temecula-CA-Perris/ CA-91, I-215	CA	43,576	43,760	96	96	96	
		GAP Miles/Personal Use	CA	43,760	44,010	250	96	250	
		CA-Perris-NV-Las Vegas/ I-215, I-15	CA	44,010	44,020	230		170	
		NV-Las Vegas- CA-Temecula/1-15, 1-215	NV	44,010				35	
		CA-Terrecula- CA-Perris/ I-215	CA		44,312	302	302	97	
-		GAP Miles/Personal use	CA	44,312	44,489	177	302	177	
		CA-Perris-CA-San Bernardino-CA-Lost Hills- CA-Walnut Creek- CA-	CA	44,312	44,403				
	02/13/1/	Tracy/ CA-60, I5, I-580, I-680	-	44,489	45,071	582	582	582	
	03/16/03	CA-Tracy- CA-Tehachapi-CA-Riverside/ CA-206, US-395, CA-99, I-5	CA	44,469	45,071	302	304	582	
			LA	45,071	45,646	575	575	575	20.000
	02/17/17	CA-Riverside-CA-Long Beach-CA-Mira Loma-CA-Riverside/ I-710, I- 105, I-605, CA-60, CA-91	CA	45,071	45,646	3/3	5/5	575	20.000
CI	1 D""	105 LEOS CA-60 CA-61	LA	45,646	45,786	140	140	140	
Or.	02/19/17	CA-Riverside- NV-Las Vegas/I-215,I-15	CA	45,786	45,786	140	140	210	18.00
		NV-Las Vegas-NV-Jean/ F15	NV	45,786		-		210 96	28.00
_		NV-Las Vegas- NV-Jean/ F15 NV-Jean-CA-Perris/ I-15, I-215	CA		46,320	534	534	228	
		GAP Miles/ Personal use	LA		46,320	534	534	228	
	02/19/17	Smart, trained Letantique nac	CA	46,320	46,489	169		169	
		CA-Perris- CA-Tehachapi- CA-Fresno- CA-Riverside/	CA	46,489	46,782	293	293	293	61.00
	Selevit,	CA-Riverside- CA-Irvine-CA-Riverside-CA-Costa Mesa- CA-Riverside-	un	40,489	40,782	293	293	293	61.00
	02/28/17	CA-Perris/ I-405, CA-55, CA-91, CA-241, I-215	CA	46,782	47,066	284	284	284	55.00
tarch		CA-Perris-CA-Bakersfield-CA-Victorville-CA-Perris/I-5, CA-58, I-395,	CA	40,702	47,000	204	204	204	33,00
	03/31/17	15. 1-215	~	47,066	47,489	423	423	423	50.00
		(Tac) There		47,000	47,489	423	423	423	50.00

#### **Fuel Records**

- The Company provided Audit with quarterly fuel invoices
- Fuel invoices indicated truck number, number of gallons purchased, and the jurisdiction in which the driver purchased fuel
- Cursory review Fuel invoice totals did not match reported Tax Paid Gallons totals





# Findings - Distance

- underreported Arizona distance in the 1<sup>st</sup> Quarter 2017 – misreported to Alaska
- underreported California distance during the audit period – missing distance: personal conveyance
- over-reported distance for Nevada and Utah for the 1<sup>st</sup> Quarter 2017 due to clerical errors





# Findings - Fuel

- Adjusted MPG for 1st Quarter 2017
- Over and underreported tax-paid gallons for the 1<sup>st</sup> Quarter 2017





#### The Wrap

The carrier received an *adequate mileage* rating and an *adequate fuel* rating, and here is why:

- Records were provided
- Records deemed adequate
- Internal Controls deemed reliable
- Audited MPG's resulted in a range of 7.59 to 11.53





# Q & A

- Any other questions you may have?
- Would you have made a different decision



