

**BEFORE THE  
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION**

**PETITION OF  
MOTION PICTURE COMPLIANCE SOLUTIONS**

**FOR EXEMPTION FROM 49 CFR PART 382.701(a)(2) FOR EMPLOYERS  
OF DRIVERS PROVIDING TRANSPORTATION TO OR FROM A  
THEATRICAL, COMMERCIAL OR TELEVISION MOTION PICTURE  
PRODUCTION SITE.**

Pursuant to 49 C.F.R. § 381.300 *et seq.*, Motion Picture Compliance Solutions (“MPCS”) hereby petitions, on behalf of its members who are employers of drivers providing transportation to or from a theatrical, commercial or television motion picture production site, for a renewable five-year exemption from two requirements related to the drug and alcohol clearinghouse:

1. 49 C.F.R. §382.701(a)(2) --The requirement that employers must not employ a driver subject to the controlled substances and alcohol testing requirements without first conducting a pre-employment Full Query of the Clearinghouse. Specifically, MPCS requests its members be allowed to conduct a Limited Query in lieu of the required Full Query to satisfy the pre-employment query requirement; and
2. 49 C.F.R. §382.703 – The requirement that employers must obtain written consent before conducting a Limited Query of the Clearinghouse. Specifically, MPCS requests that it, as a Consortium/Third-party Administrator (C/TPA), be allowed to request, obtain and retain query forms on behalf of its motor carrier members.

The exemption is needed because, as explained in detail below, compliance with the aforementioned rules would significantly slow down our members’ ability to hire at the speed need to keep pace with the needs of the demands of the motion picture industry, subsequently increasing the number of production days and adding millions of dollars of increased production costs operating in the United States. Furthermore, the unique driver employment model of the theatrical, commercial or television motion picture production industry, and safety protocols it already has in place, create an environment that significantly reduces the likelihood that a full pre-employment query would yield any information not already known by MPCS and/or its member companies, rendering a Full Query a redundant and unnecessarily burdensome requirement. In short, the exemption is needed because the aforementioned regulations “prevent [motion picture driver employers] from implementing more efficient or effective operations that would maintain a level of safety equivalent to, or greater than, the level of safety achieved without the

exemption.”<sup>1</sup>

The exemption would apply to members of MPCS, who are employers of drivers of commercial motor vehicles (“CMVs”) providing transportation of property or passengers to or from a theatrical, commercial or television motion picture production site. The exemption would not have any adverse impacts on operational safety, as employers and their “production drivers” would remain subject to all controlled substances and alcohol use and testing regulations in 49 C.F.R. §§ 40 and 382 and will continue to exceed these requirements through participation in the MPCS consortium/third party administrator database.

[Note: MPCS understands there is significant interplay between several regulatory parts and FMCSA’s Drug and Alcohol Clearinghouse, including part 391 and other portions of part 382, and believes that exemption from 49 C.F.R. §382.701(a) is the appropriate regulation from which to ask for an exemption. MPCS can adjust the exemption request if FMCSA determines exemption from other rules are required/more appropriate.]

### **The Nature of the Theatrical, Commercial, or Television Motion picture Production Industry**

The nature of the theatrical, commercial, or television motion picture production transportation industry, (the entertainment industry), is significantly different from that of the general trucking industry; the primary business for standard trucking companies is the transportation of products from one pre-determined location to another. The entertainment industry transportation departments function as a support service, among many other production departments, toward the overall production of an entertainment product. The main purpose of drivers in the entertainment industry is to transport crew members and filming equipment to filming locations, driving an average of 1-2 hours each workday.

Providing this support service is, by nature, a short-term endeavor. MPCS members are frequently hiring drivers, with each driver being employed for very short periods on time. MPCS members quickly find driver applicants by accessing pools of available drivers maintained by local unions. These driver pools are static by nature, exhibiting little driver turnover and few new drivers. Last year only 6 percent of drivers hired by MPCS members were new to the motion picture industry. There are currently approximately 12,000 drivers in this pool

The fluid nature of the industry hiring practices results in a near constant need for safe experienced drivers and an efficient hiring process. This is because all drivers for the motion picture industry are considered “Day Players” and have no guarantee of continued employment. This is due to the volume of productions and daily changes in terms of the vehicle make-up and numbers. A production on stage requires a significantly smaller number of vehicles when on locations (meaning not on a sound stage). Productions

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<sup>1</sup> 49 C.F.R. §381.305(a)

alternate between stage and location frequently, as such, they hire and dismiss drivers daily. This volatile process requires expedient onboarding protocols as in most cases drivers get notified the evening prior to the start of a “job” which averages about 8-10 hours of advance notice only. Union rules require drivers not to work for a production unless they are “on the clock” preventing them from engaging in any type of onboarding protocols prior to “clocking in”. Subsequently, any additional layers such as the Clearinghouse consent a driver must complete to allow the employer to conduct a Full Query, every time many times over, would significantly slowdown the process without improving the level of safety the agency is eager to achieve.

MPCS serves as a C/TPA for major motion pictures studios, independent productions and commercial production-houses in the United States. In this capacity, MPCS manages the controlled substance and alcohol testing programs for its members and ensures their compliance with 49 C.F.R. §§ 40 and 382.

### **Nature of the Safety Protocols for Production Employers Subject to 49 C.F.R. §§ 40 and 382.**

The Motion Picture Industry, which is freelance in nature, employs a pool of approximately 12,000 production drivers who are considered “multiple-employer drivers.”<sup>2</sup> These drivers often find themselves working for more than one production-related motor carrier in a week and in some instances, two or more in the same day. Given these unique challenges, and in order to improve safety and quickly and efficiently meet the requirements of 49 C.F.R. §382.413,<sup>3</sup> in 2009 MPCS, in tandem with their members, established and implemented a DOT Violation Database (“Database”) comparable to the FMCSA’s Commercial Driver’s License Drug and Alcohol Clearinghouse (“Clearinghouse”). The Database consists of all documents pertaining to a driver’s DOT violation(s), including the initial positive/violation report(s) and/or supporting documentation(s), SAP documentation(s), return-to-duty test(s) and any follow-up tests. Throughout the past 10 years, drivers and employers have provided and disclosed information relating to driver violation(s), allowing for the Database to accumulate the data needed to perform at peak levels for the Motion Picture Industry. The Database complies with all relevant privacy rules including driver notification and consent. With respect to privacy practices, MPCS implements a security protocol consistent with ISO 27001/27002 and two-factor authentication for drivers using mobile devices. Drivers sign a Driver Data and Electronic Signature Consent with every iteration of an onboarding protocol to reinforce the privacy rules in connection to driver notifications and consents.

Similar to the pre-employment query requirement of the Clearinghouse rules, each time a production company onboards a driver, they access the driver’s record in the Database to determine if he or she is eligible to operate a CMV requiring a CDL based on

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<sup>2</sup> Defined in 49 C.F.R. §390.5 as “a driver, who in any period of 7 consecutive days, is employed or used as a driver by more than one motor carrier.” Under 49 C.F.R. §391.63, employers of multiple employer drivers are exempt from certain application and investigatory requirements related to hiring and annual review. They are not, however, exempt from requirements to review a driver’s drug and alcohol history pre-hire an annually.

<sup>3</sup> 49 C.F.R. §382.413 requires motor carriers to request alcohol and controlled substance information from previous employers within the last three years and, beginning January 6, 2020, to do so using the Drug and Alcohol Clearinghouse.

their drug and alcohol violation history. The Database instantly identifies drivers who are prohibited from performing safety-sensitive functions based on DOT drug and alcohol program violations and ensures that such drivers received the required SAP evaluation and treatment and follow-up testing before operating a CMV on public roads.

The result has been an outstanding safety record and lower than average violation rates. According to the Motion Picture Industry's reported MIS data from 2017, and in contrast to the FMCSA's reported national MIS data for the same year, production-related drivers who were subject to testing had a significantly lower rate of DOT violations than the national average. The FMCSA's MIS data for 2017 reports an overall positive drug testing rate of 1.25% compared to the Motion Picture Industry's positive drug testing rate of 0.79%. Positive alcohol testing rates are favorable to MPCCS as well with the FMCSA positive rate at 0.88%<sup>4</sup> compared to 0.63%, based on data collected by the MCPS Database. The Motion Picture Industry's 2018 MIS data is similarly favorable.

Furthermore, the Database's immediate identification protocol of drug and alcohol violations in combination with MAPP, a mobile employment application with a 95% national adoption rate by production drivers, allows drivers to complete employment applications and allow production-related employers to identify and process drivers' drug and alcohol violations instantly before performing safety-sensitive functions. This system, and related processes, includes the validations of DOT-required SAP and return-to-duty protocols and allows for immediate identification of approximately 98% of violations that have been documented in the Motion Picture Industry. If the Agency grants this exemption request, MAPP will be modified to incorporate the driver's digital consent for the Limited Query into the employment application process.

To sustain the velocity of the Database and simultaneously remain compliant with 49 C.F.R. §§ 40.25 and 382.413, MPCCS incorporated a document into the drivers' application process, the Previous Alcohol and Drug Test Statement ("PADTS") ("Exhibit A"). The PADTS provides drivers the opportunity to ad hoc disclose any DOT violations to their prospective employers. Once electronically consented and signed, and if a violation was disclosed, the Database escalates this record to "High Priority" status for immediate processing. The Database contains production drivers' drug and alcohol violations and records thus being able to advise prospective employers whether the return-to-duty requirements of 49 C.F.R. § 40 Subpart O have been complied with or whether to initiate the administration of the return-to-duty protocol. In fact, members of MPCCS have been using the database to go beyond mere compliance to obtain up to 10 years of violation from potential hires, far surpassing the three-year investigation required under 49 C.F.R. §391.23(e) and the five years of data provided by the Clearinghouse.

Due to the high frequency of new employers seeking drivers in the Motion Picture Industry and MPCCS being the C/TPA for most employers, the Database offers prospective employers the ability to exercise the exception in 49 C.F.R. § 382.301(b). We have classified the exception as a "Carryover." We have implemented the Carryover as part of our Database which is available to employers at any given time via our web-based

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<sup>4</sup> U.S. Department of Transportation, DOT Agency MIS Data, Retrieved November 25, 2019 from [https://www.transportation.gov/odapc/DOT\\_Agency\\_MIS\\_Data](https://www.transportation.gov/odapc/DOT_Agency_MIS_Data)

platform. The Database validates DOT-requirements and provides prospective employers a quick “yes” or “no” response to confirm a driver’s eligibility. The validation process checks that a driver has been participating in a DOT controlled substance testing program for the previous 30 days and checks for any DOT drug tests within the previous 6 months or participation in a controlled substance testing program for the past 12 months. Prospective employers can access the Database via a secure web-portal for instant results; if eligible, they can download a release form (“Exhibit B”) for the driver and the prospective employer to execute. Currently, 88% of the Database qualifies to utilize this exception.

### **The Requested Exemption Will Create More Efficient and Effective Operations while Providing a Greater Level of Safety**

In lieu of requiring a Full Query in compliance with 49 C.F.R. Part 382.701.(a)(2), which would create a bottleneck in the Database’s velocity, we respectfully request the Agency to allow MPCS members (i.e., prospective production-related employers) and MPCS as the C/TPA to exercise a Limited Query first. This minor modification will not jeopardize operational safety because it is unlikely a Full Query of the Clearinghouse will yield any data not already available in the Database. Of course, if the Limited Query shows that information exists in the Clearinghouse about the individual driver, the employer and/or their C/TPA will then conduct a Full Query, with the driver providing consent in the Clearinghouse as required. At the same time, the Database’s instant protocol will already have identified potential DOT violation(s) prior to these queries.

If this exemption is granted, we invite FMCSA or its State enforcement partners to access our database as both a monitoring and training tool. Following a request, this access will be provided to the Agency (or State partner) through our web portal, by coming on-site to conduct a review.

Over the last 12 months, MPCS helped onboard the industry’s 12,000 drivers, 6,756 were qualified in a safety-sensitive capacity 37,826 times. Without the exemption, MPCS would be required to obtain consent for a full query through the Clearinghouse almost 38,000 times, greatly reducing the efficiency of the process. Under the proposed exemption however, FMCSA will be enabling MPCS to effectively monitor its drivers by obtaining a limited query more than three times per year per driver, on average.

### **MPCS Drug & Alcohol Violation Investigation Protocol Under the Proposed Exemption**

Under the proposed exemption, production-related employers, after identifying a driver to potentially perform in a safety-sensitive function, will initiate the process of onboarding by adding them to the employer specific Driver Status Page in the Database. The onboarding process includes the retrieval of all required consents; electronic or physical. Regardless whether the Database identified previous violations, a Limited Query of the Clearinghouse will be performed. If violation information is found in the Database, or in the Clearinghouse as part of the Limited Query, MPCS will immediately notify the

prospective employer that the driver is prohibited from operating in a safety-sensitive position. If a Limited Query finds information, MPCCS will immediately request consent from the driver to allow it to obtain a Full Query and obtain all details about the driver's violation(s).

Additionally, we are requesting the Agency permit MPCCS, as the C/TPA of production-related employers, to request, receive and retain a special written consent ("General Consent for Limited Queries of the Federal Motor Carrier Safety Administration (FMCSA) Drug and Alcohol Clearinghouse") ("Exhibit C") by drivers on behalf of its member employers for Limited Queries only. Under 49 C.F.R. §382.703(a), employers must obtain this consent prior to requesting a Limited Query. Unfortunately, the definition of employers explicitly excludes service agents, necessitating this exemption request.<sup>5</sup> The exemption will increase efficiency and speed the process, allowing MPCCS to meet the rigorous demands of the motion picture industry, while still requiring the driver to provide written consent.

Congress and the FMCSA have already recognized the unique industry model and exemplary safety of motion picture production drivers by exempting them from typical daily HOS driving and on duty time limits in 49 C.F.R. § 395.3(a)<sup>6</sup> and by exempting them from ELD requirements in 49 C.F.R. Part 395, Subpart B.<sup>7</sup> In granting their exemption request FMCSA recognized the "unique arrangement under which drivers of the motion picture industry routinely operate for multiple carriers over brief periods of time." FMCSA went on to determine that the ELD exemption should be granted due, at least in part, because RODS are reviewed by a third-party auditing company, resulting in accelerated reporting of HOS compliance and an independent assessment of accuracy." That 'third-party auditing company' is MPCCS which has been working to ensure the safety and compliance of the motion picture industry for many years. MPCCS's commitment to going beyond compliance is pursuit of safety is missional and preserves a level of safety that greatly exceeds that experienced by other industry players. aspects of the motion picture industry's operations

### ***Exemption application requirements under 49 C.F.R. §381.310***

#### ***49 C.F.R. §381.310(b)—Identifying information***

Motion Picture Compliance Solutions, located at 1030 Celis Street, Suite 100, San Fernando, CA 92340, is requesting this exemption from 49 C.F.R. §§ 382.701(a) and 382.703 on behalf of its members. The exemption would apply to member employers of drivers providing transportation to or from a theatrical, commercial or television motion picture production site.

#### ***49 C.F.R. §381.310(c)(1-6)***

#### **(c)(1) Reason the exemption is, including the time period during which it is needed.**

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<sup>5</sup> 49 C.F.R. §382.107 – ". . . Service agents are not employers for the purposes of this part."

<sup>6</sup> See section 4133 of SAFETEA-LU (119 Stat. 1744)

<sup>7</sup> 86 Federal Register 2869 (January 19, 2018)

All industry drivers are considered “Day Players” and have no guarantee of continued employment. This is due to the volume of productions and daily changes in terms of the vehicle make-up and numbers. A production on stage requires a significantly smaller number of vehicles when on locations (meaning not on a sound stage). Productions alternate between stage and location frequently, as such, they hire and dismiss drivers daily. This volatile process requires expedient onboarding protocols as in most cases drivers get notified the evening prior to the start of a “job” which averages about 8-10 hours of advance notice only. Union rules require drivers not to work for a production unless they are “on the clock” preventing them from engaging in any type of onboarding protocols prior to “clocking in”. Subsequently, any additional layers such as the Clearinghouse consent a driver must complete due to a Full Query, every time many times over, would significantly slow down the process without improving the level of safety the agency is eager to achieve.

The exemption is needed because compliance with the rule to conduct full queries would prevent employers from implementing a more efficient or effective operations that would maintain a level of safety equivalent to, or greater than, the level of safety achieved without the exemption.

The term of the requested exemption is five years, subject to renewal upon application.

**(c)(2) Regulation from which exemption is requested.**

49 C.F.R. §382.701(a)(2) and 49 C.F.R. §382.703

**(c)(3) Estimated total number of drivers and CMV’s that would be operated under the terms and conditions of the exemption covered by the request exemption.**

12,000 drivers, and a similar number of CMVs. 12,000 drivers represent less than one-third of one percent of drivers subject to FMCSA’s drug and alcohol testing requirements.<sup>8</sup>

**(c)(4) Assess the safety impacts the exemption may have.**

This minor modification will not jeopardize operational safety.

**(c)(5) Describe how MPCs would ensure that it could achieve a level of safety that is equivalent to, or greater than, the level of safety that would be obtained by complying with the regulation.**

Requesting the Agency allow prospective production-related employer members, and MPCs as their C/TPA, to exercise a Limited Query first will not jeopardize operational safety because if the Limited Query shows that information exists in the Clearinghouse about the

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<sup>8</sup> U.S. Department of Transportation, Chief Information Officer’s Final “Supporting Statement, Commercial Driver’s License Drug and Alcohol Clearinghouse”, December 2016

individual driver, the employer and/or their C/TPA will then conduct a Full Query, with the driver providing consent in the Clearinghouse as required. The end result is the same screening and safety outcome for the employer. At the same time, the Database's instant protocol will already have identified potential DOT violation(s) prior to these queries.

**(c)(6) Impacts (e.g. inability to test innovative safety management control systems, etc.) you could experience if the exemption is not granted by FMCSA.**

Due to the fast-paced production velocity and the significant variances of how motor carriers in the motion picture industry operate, the impact would be substantial. Primarily, it would significantly slow down our members' ability to hire at the speed needed to keep pace with the needs of the motion picture industry, subsequently increasing the number of production days and adding millions of dollars of increased production costs operating in the United States. Secondly, the recent trend of returning productions back to the United States from Canada will without doubt be considerably and adversely affected.

**Summary & Conclusion**

In conclusion, for the foregoing reasons MPCS respectfully requests an exemption of five years, subject to renewal upon application, from the Full Query requirements in 49 C.F.R. Part 382.701, Subpart (G)(a)(2), and special dispensation to allow a driver to provide consent for Limited Queries to MPCS on behalf of employers of drivers of commercial motor vehicles providing transportation of property or passengers to or from a theatrical, commercial or television motion picture production site.

If this exemption is granted, we propose to allow FMCSA and State enforcement partners access to our Database and internal systems at any requested time.

Please let us know if you have any questions or need additional information regarding this petition.

Respectfully submitted,

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**List of Exhibits to the Petition of Motion Picture Compliance Solutions For Exemption From 49 CFR Part 382.701, Subpart (G)(a)(2)**

- Exhibit A – Previous Alcohol and Drug Test Statement
- Exhibit B – Carryover Release
- Exhibit C – General Consent for Limited



Company Name - Production Name

- 1. Have you tested positive or refused to take a **pre-employment** controlled substance and/or alcohol test administered by any employer to which you applied for work in a safety-sensitive position covered by DOT drug and alcohol testing rules and regulations in the previous 3 years?  Yes  No
- 2. During your employment with any employer have you tested positive or refused an **alcohol** test with a confirmed breath alcohol concentration of 0.04 or greater in the previous 3 years?  Yes  No
- 3. During your employment with any employer have you tested positive or refused a **controlled substance** test (including verified adulterated or substituted results) in the previous 3 years?  Yes  No
- 4. Are you currently in a follow-up testing program?  Yes  No

I certify that answers 1- 4 were completed by me and that all the information I have provided is accurate.

**X**

Applicant's Signature

Date:

Print Full Name:

Last 5 digits of SSN

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**If you marked "Yes" to any of the questions above (1- 4) you MUST complete section below.**

Please provide the date(s) of your DOT violation(s)? (Date(s) may be more than 3 years ago.)

MM/DD/YY		MM/DD/YY

The employing Motor Carrier is: Company Name

**A**  I cannot provide proof that I successfully complied with my SAP prescribed education and/or treatment program.

**B**  I am able to prove to the employing Motor Carrier that I completed the DOT return-to-duty process and will provide all applicable documentation to Motion Picture Compliance Solutions, Inc. ("MPCS"), who is acting on behalf of the employing Motor Carrier. I authorize MPCS to release all documentation on file that is associated with my DOT return-to-duty process (including SAP reports, return-to-duty test results and all follow-up test results) to the employing Motor Carrier.

If you marked **B** above, you must provide the contact information requested below for the most **recent** employer for whom you performed safety-sensitive functions (e.g. driving a vehicle 10,001 lbs. or more). This employer is not necessarily the employer for whom you tested positive.

Employer's Name: \_\_\_\_\_

Address, City, St & Zip: \_\_\_\_\_

Contact Name: \_\_\_\_\_ Contact Phone: \_\_\_\_\_

I authorize the employer listed above to provide MPCS with all documentation on file associated with my DOT return-to-duty process. I also authorize my Substance Abuse Professional to release my SAP written reports to MPCS and the employing Motor Carrier. I understand this information will become part of my positive file and be retained at MPCS for the employing Motor Carrier.

**If you selected B above you MUST sign and date here.**

Applicant's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# EXHIBIT B

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Completed by Prospective Employer		MPCS V Date: 10/13/19	382.301
Prospective Employer Representative: DOT Admin			
I have asked the driver if he/she has had any drug and/or alcohol testing violation(s) within the prior 6 months. Joe Driver answered:		<input type="checkbox"/> Yes <input type="checkbox"/> No	
I also acknowledge that this Carryover will only be valid if: 1. Driver signs this document on or before the expiration date; 2. Driver is hired on or before the expiration date; and 3. Driver is added to the Captain's Report on his/her hire date.		Expiration Date	11/11/19
Please note: The completed form must be sent to MPCS on or before the provided expiration date to be considered valid. If the driver is being hired into a regulated position, the driver will not be entered into the random testing pool (will not be compliant) until all of the above conditions have been met.			
Prospective Employer Signature:	<input checked="" type="checkbox"/>	Date:	

Completed by Driver			
Requested by: Test Driver	ID #: 12345	Local #: 728	Request Date: 11/04/19
I am submitting this written request to obtain copies of my Department of Transportation controlled substances testing results for all tests taken in the six months previous to the above request date. Specifically, I am requesting results that are in the following categories: Pre-employment, Post-accident, Random, Reasonable Suspicion, Return -to-duty, Follow-up, Refusal and any test with a positive result. I also request all alcohol tests taken in the six months previous to the above request date. By signing below I authorize Motion Picture Compliance Solutions, Inc. to forward the test results that I requested to the prospective employer listed below.			
Previous Employer: Test Picture Studios LLC - 10202 West Washington Blvd. Culver City, CA 90232	Contact: DER Name	Phone: 818.111.2222	
Production Name	Email: dename@company.com		
Send to: Motion Picture Compliance Solutions, Inc. 1030 Celis St., Ste. 100, San Fernando, CA 91340	Phone: 818.792.4135		
MPCS: Contact: Monse Cortez	Email: monse@mpcompliance.com	Fax: 818.792.4138	
Prospective Employer: Prospective Employer Name Inc. - 1234 Peach Tree Lane Ste. 3 Atlanta, GA 30341	Contact: DER Name	Phone: 757.888.5555	
New Production Name	Email: dename@gmail.com		
Driver's Signature:	<input checked="" type="checkbox"/>	Date:	

Completed by Previous Employer / Service Agent	
Program: Central Drug System 3000 W. MacArthur Blvd. 310, Santa Ana, CA 92704	This program conforms to 49 CFR Part 40.
1. Has this driver participated in a random controlled substances testing program within the previous 30 days? (If Yes, provide the last participation date.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 11/04/19
2. Has this driver had a verified negative DOT controlled substances test within the previous 6 months? (If Yes, provide the verification date of the DOT controlled substances test.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 10/22/19
3. Has this driver participated in the DOT random controlled substances testing program for the previous 12 months? (If Yes, provide the date the driver started participating.)	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
4. Do you have knowledge that this driver refused to be tested for controlled substances within previous 5 years?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Certified by:	Phone: 818.792.4135
Signature & date of person providing information:	

**EXHIBIT C**

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**General Consent for Limited Queries of the Federal Motor Carrier Safety Administration (FMCSA) Drug and Alcohol Clearinghouse**

I, \_\_\_\_\_,  
DRIVER NAME

hereby provide consent to Motion Picture Compliance Solutions (“MPCS”) on behalf of participating production-related employers to conduct limited queries of the FMCSA Commercial Driver’s License Drug and Alcohol Clearinghouse (Clearinghouse) to determine whether drug or alcohol violation information about me exists in the Clearinghouse.

I expressly consent to unlimited numbers of limited queries being conducted over a five (5) year period by MPCS on behalf of my prospective employers, commencing with the date of signature.

I understand that if the limited query conducted by MPCS indicates that drug or alcohol violation information about me exists in the Clearinghouse, FMCSA will not disclose that information without first obtaining additional specific consent from me. I further understand that if I refuse to provide consent to conduct a limited query of the Clearinghouse, the employer must prohibit me from performing safety-sensitive functions, including driving a commercial motor vehicle, as required by FMCSA’s drug and alcohol program regulations.

\_\_\_\_\_  
Driver’s Signature

\_\_\_\_\_  
Date