RULE IMPACT STATEMENT

1) A statement of the need for the rule and legal basis supporting it.

The proposed rule corrects citations to provide accurate references and address grammatical and spelling errors. The proposed amendments also remove cash as a payment option for permits, in accordance with ODOT's financial services operations, security, and efficiency concerns.

2) A classification of the rule as major or nonmajor, with a justification for the classification, including an estimate of the total annual implementation and compliance costs that are reasonably expected to be incurred by or passed along to businesses, state or local government units, or individuals and a determination of whether those costs will exceed One Million Dollars ($1,000,000.00) over the initial five-year period following the promulgation of the proposed rule. Provided, if the costs exceed One Million Dollars ($1,000,000.00), the agency shall classify the rule as a major rule.

The proposed rule is classified as a non-major rule. Based on historical transaction data provided by the agency: 2025 Cash Transactions: $2,224.00 out of $46,040,754.89 in total payments (approximately 0.0048% of total volume), and 2026 Cash Transactions: $1,727.35 out of $43,002,229.69 in total payments (approximately 0.0040% of total volume). Because physical cash usage accounts for less than one-thousandth of one percent of total permit revenue (roughly 15 to 20 individual cash transactions per year statewide), the number of affected cash-reliant permittees is exceptionally nominal.

3) A description of the purpose of the proposed rule, including a determination of whether the proposed rule is mandated by federal law, or as a requirement for participation in or implementation of a federally subsidized or assisted program, and whether the proposed rule exceeds the requirements of the applicable federal law.

The purpose of the proposed amendments is to correct citations and to conform language on cash payments in the administrative code to match the current practices of ODOT's financial services operations. A determination was made that the proposed rule is neither mandated by federal law nor required for participation in or implementation of a federally subsidized or assisted program. It was determined that the proposed rules do not exceed the requirements of applicable federal law.

4) **A description of the classes of persons who most likely will be affected by the proposed rule, including classes that will bear the costs of the proposed rule, and any information on cost impacts received by the agency from any private or public entities.**

Individual permit carriers who still use cash to purchase permits may be affected by the proposed rule. While the permit price will remain the same, a merchant transaction fee may be charged for credit or debit card transactions. As the number of permits purchased with cash is minimal, ODOT has not received any information on cost impacts from any private or public entity.

5) **A description of the classes of persons who will benefit from the proposed rule.**

The general public will benefit from having citations correct. Citizens will also benefit from cashless permit transactions because it will improve security by reducing the risk of physical theft or loss, increase the accuracy of financial tracking by recording transactions in an automated system, and reduce the labor required to process cash transactions.

6) **A comprehensive analysis of the rule's economic impact, including any anticipated impacts on the full-time-employee count of the agency, any costs or benefits, and a detailed quantification of implementation and compliance costs on the affected businesses, business sectors, public utility ratepayers, individuals, state or local government units, and on the state economy as a whole. The analysis shall include a listing of all fee changes and, whenever possible, a separate justification for each fee change.**

Eliminating cash payments will likely reduce the overall FTE hours required to manage permit intake at physical counters. Time spent on daily cash drawer balancing, bank deposit runs, and auditing petty cash/drawers will be eliminated. Rather than laying off staff, the agency will reallocate administrative personnel to higher-value tasks, such as backlog reduction, expediting permit reviews, or improving customer service response times. Businesses already utilize electronic banking, corporate checks, or credit cards. Costs are limited to adjusting internal accounting workflows. Small or sole-proprietor businesses, or the unbanked population, operating on a strictly cash basis may, however, incur bank setup fees or credit card processing surcharges.

7) **A detailed explanation of the methodology and assumptions used to determine the economic impact, including the dollar amounts calculated.**

By utilizing a Cost-Benefit framework, the agency assessed current permit volume, the percentage of cash transactions versus electronic transactions, and current labor hours dedicated to cash handling, quantified the direct financial savings to the agency (reduced labor

and security risks) alongside direct compliance/adaptation costs for applicants (banking fees, alternative payment tools), and evaluated how the impacts are distributed across different stakeholder groups (particularly permit companies vs. unbanked citizens).

8) **A determination of whether implementation of the proposed rule will have an economic impact on any political subdivisions or require their cooperation in implementing or enforcing the rule.**

   Implementing the proposed rule will have no economic impact on any political subdivisions or require their cooperation in implementing or enforcing the rule.

9) **A determination of whether implementation of the proposed rule may have an adverse economic effect on small businesses as provided by the Oklahoma Small Business Regulatory Flexibility Act.**

   The implementation of the proposed rule will not have an adverse economic effect on small businesses as provided by the Oklahoma Small Business Regulatory Flexibility Act.

10) **Any measures taken by the agency to minimize the cost and impact of the proposed rule on business and economic development in this state, local government units of this state, and individuals.**

    Because the number of unbanked individuals who purchase size and weight permits is nominal, and the rule imposes no adverse effects on businesses or local government units, the proposed amendments will significantly enhance agency efficiency and physical security. Consequently, the rule minimizes administrative overhead and fosters broader economic development by reallocating staff resources from manual cash handling to higher-value, mission-critical services.

11) **A determination of the effect of the proposed rule on the public health, safety, and environment, and, if the proposed rule is designed to reduce significant risks to the public health, safety, and environment, an explanation of the nature of the risk and to what extent the proposed rule will reduce the risk.**

    The proposed rule has no direct negative impact on public health or the environment. The rule positively affects public safety by removing large amounts of physical currency from agency facilities. Eliminating on-site cash drawers and daily cash deposits reduces security vulnerabilities, deterring potential robberies, theft, and workplace violence directed at agency counters and staff. Furthermore, streamlining the payment process accelerates permit issuance

for commercial motor carriers, ensuring that heavy transport operators can quickly secure legal clearance to travel, thereby supporting efficient and safe logistics.

12) A determination of any detrimental effect on the public health, safety, and environment if the proposed rule is not implemented.

If the agency continues to accept cash specifically for size and weights permits, several ongoing operational, security, and safety vulnerabilities will persist. Retaining on-site cash drawers and keeping physical currency on government premises continuously exposes frontline administrative staff and facilities to security threats, including the risk of theft, burglary, or armed robbery. Continuing manual cash handling leaves the agency vulnerable to internal cash discrepancies, human error during daily drawer balancing, and the physical safety hazards associated with staff transporting cash deposits to financial institutions. Cash transactions inherently slow down counter processing times. If commercial motor carriers or their agents must physically stand in line with cash to obtain urgent size and weight permits, it creates administrative bottlenecks. Failure to implement the rule perpetuates these friction points, occasionally delaying commercial logistics and heavy transport mobility.

13) The date the rule impact statement was prepared and, if modified, the date modified.

This rule impact statement was prepared on October 30, 2026.

14) An analysis of alternatives to adopting the rule.

Because the affected demographic is negligible and alternative digital or remote payment methods are widely available to commercial carriers, a complete removal of cash maximizes agency security and efficiency. Therefore, there is no alternative to adopting the rule.

15) Estimates of the amount of time that would be spent by state employees to develop the rule and of the amount of other resources that would be utilized to develop the rule.

The agency estimates the time required to draft the initial rule text, conduct economic and impact analyses, draft the statement of reasons, and manage public comment responses to be 20 hours. It estimates time for reviewing draft proposals, signing off on fiscal impacts, and authorizing public notice filings to be about 15 hours. It also estimates time for reviewing statutory authority, ensuring compliance with state administrative procedures acts, formatting the rule for formal submission, and advising on public feedback to be around 10 hours combined.

16) A summary and preliminary comparison of any existing or proposed federal regulations that are intended to address activities to be regulated by the proposed rule.

There are no federal regulations governing the internal payment methods, cash-handling policies, or revenue-collection procedures used by state administrative agencies for state-issued permits. Permit issuance—specifically for size and weight limits on commercial motor vehicles—falls entirely under state jurisdiction. While the Federal Highway Administration (FHWA) and the Federal Motor Carrier Safety Administration (FMCSA) establish baseline federal standards for highway safety, bridge formulas, and maximum weight limits on the National System of Interstate and Defense Highways (e.g., 23 CFR Part 658), the federal government does not issue oversize/overweight vehicle permits, nor does it regulate how states collect fees for them. The state agency's proposed rule to eliminate cash payments for permits operates entirely within state administrative authority. It does not conflict with, duplicate, or overlap any federal rule, as federal agencies exercise no oversight over state treasury collection methods or administrative fee payment options.