

# BASICS

## Improving Hours of Service Compliance



You want to continue bypassing weigh stations, saving time and money. But you have Alerts in some BASICS and your ISS (Inspection Selection System) score is too high. It's time to take action.

## WHERE DO YOU START?



As you've seen, the FMCSA has a language of its own, mostly expressed in acronyms. To understand how your company is evaluated by FMCSA, you must first understand its language.

BASICS (Behavior Analysis and Safety Improvement Categories) are areas of a company's safety and regulatory compliance. FMCSA compiles data in seven BASICS and compares the results of similar motor carriers. The result provides an individual motor carrier's overall CSA (Compliance, Safety and Accountability) safety percentile ranking. The seven BASICS are:

- Vehicle Maintenance
- Unsafe Driving
- Hours of Service Compliance
- Driver Fitness
- Controlled Substances & Alcohol
- Hazardous Materials Compliance
- Crash Indicator

Overwhelmingly, the BASICS data results from commercial vehicle enforcement inspections. Data comes from the number of truck inspections and the violations uncovered during those inspections. It also results from citations issued on the road, post-crash analysis and from FMCSA or state investigations of motor carriers. Therefore, good truck inspections are fundamental to good BASICS scores.

Truck inspections commonly occur at weigh stations and roadside inspection sites. But not every truck gets inspected. Why? Two factors: first impressions and ISS.

State enforcement agencies have broad discretion over which trucks to inspect. Often, the officer will make a decision based on their first impression of the truck and the driver.

- Visible mechanical problems will almost always get a truck pulled in for a thorough inspection. A torn mudflap or missing clearance light may not represent an immediate safety issue, but it can cause an inspector to wonder what else may be wrong with the truck.
- Reckless driver behavior is another trigger for immediate enforcement action. But even short of unsafe driving, law enforcement will notice the driver who, when approaching a weigh station or roadside site, appears to be scrambling to get his paperwork in order. You can be sure that truck will be pulled in and the driver's credentials, permits and bills of lading will receive a thorough review.





# WHILE NOT A MANDATE, THE ISS SCORE IS THE SINGLE BEST INDICATOR OF THE LIKELIHOOD THAT A CARRIER MAY RECEIVE AN INSPECTION.

ISS is the Inspection Selection System, the numerical score FMCSA provides to agencies responsible for commercial motor vehicle compliance. Those agencies use ISS scores to determine which motor carriers they should prioritize for weigh station pull-in or roadside inspection. ISS scores range from 0 to 100. The lower the score, the better.

While not a mandate, the ISS score is the single best indicator of the likelihood of receiving an inspection. Not surprisingly, carriers must maintain a good ISS score to qualify for or to continue participating in a weigh station bypass program like PrePass. The good news is that a motor carrier's ISS score is within the carrier's control. It starts with doing well on the seven BASICS.

## QUICK QUIZ

1. What does the "B" in BASICS stand for?
2. Where does FMCSA get most of its safety data?
3. True or False: FMCSA tells states which trucks must be inspected.

### Reduce Inspections

- Clean trucks give a good first impression. Dirty trucks can raise a red flag for inspectors.
- In addition to safety and compliance repairs, pay attention to visible items like peeling decals, which may cause an inspector to conduct further inspection.
- Organize your paperwork and have it easily accessible. If you are disorganized, law enforcement may assume your maintenance is as well.

(Quick Quiz answers: 1) Behavior; 2) truck inspections; 3) False. FMCSA provides the ISS score, but states have broad discretion.)

# How does FMCSA calculate the ISS score? What are Alerts?

The BASICs, CSA and ISS scores are all data-driven. The calculations FMCSA goes through can be complex – but there are four aspects of this process you should understand.

1

When determining a carrier's BASIC percentile, FMCSA applies a mathematical formula to a carrier's violations in the last 24 months. Violations that are more recent have greater impact in the equation, as do violations that are more severe. This is commonly referred to as Time and Severity weighting.

Having recent "clean" inspections will tip the scales in your favor as older inspections, those with violations, age out. Similarly, even minor violations can be an improvement over past problems, particularly those that placed a truck or driver out of service (OOS). Improvement in your scores may require close attention over several months, but you are not stuck in the past.

2

You do need enforcement inspections. Because inspections produce the data FMCSA uses to calculate ISS scores, FMCSA will prioritize for inspection those motor carriers who simply do not yet have enough inspections to generate a safety profile.

This is another opportunity to improve your scores. Reach out to your local state commercial vehicle enforcement agency and see whether they will conduct voluntary truck inspections. If not – they may be short on manpower – perhaps they do give demonstrations to motor carrier groups. You can learn directly from the inspectors themselves.

3

FMCSA applies an Alert symbol to a carrier's BASIC when the carrier's percentile is at or above the "Intervention Threshold" established for that category. It can also apply when the carrier has Acute and/or Critical Violations. These are one-time occurrences discovered during an investigation of noncompliance so severe that immediate corrective action is required. The Alert triggers direct contact by federal or state officials with the motor carrier.

The FMCSA "intervention" contact may simply be a warning letter that the carrier needs to pay closer attention to one area of safety compliance or it may entail a targeted or full compliance review. Interventions can result in fines, penalties and, in severe cases, disqualification as a motor carrier. Alerts are not just an opportunity to improve your scores, they are an alarm bell that improvement must occur. Heed that alarm by looking closely at the sections below for any BASIC where you have an Alert.

## 4

Finally, in the calculation of ISS scores, FMCSA gives greater mathematical weight to three of the BASICS: “Unsafe Driving,” “Hours of Service Compliance,” and “Crash Indicator.” “Unsafe Driving” covers speeding, reckless driving, improper lane change, inattention and not wearing seat belts. “Hours of Service Compliance” means noncompliance with hours-of-service regulations and improper time and duty records. The “Crash Indicator” considers a carrier’s history of crash involvement.

To improve your ISS score, look first to any BASIC where you may be in Alert status. Then see where you stand in these three priority BASICS: “Unsafe Driving,” “Hours of Service Compliance,” and “Crash Indicator,” paying particular attention to “Hours of Service Compliance.” Review the sections for each BASIC, below.

In the end, once FMCSA applies its mathematical formula, the result for that carrier is compared to similar carriers and a percentile ranking is set for that carrier. The percentile ranking says that the carrier’s safety compliance in that BASIC is worse than that percent of similar carriers. So, a high percentile ranking in any BASIC, in the carrier’s CSA score or its ISS ranking is not desirable. And again, a percentile ranking at or above the Intervention Threshold for that BASIC prioritizes that carrier for federal and state interventions.

# QUICK QUIZ

1. How long do past inspections affect your ISS score?
2. What is an “Intervention Threshold”?
3. True or False: All BASICS are created equal.

## Improving BASICS

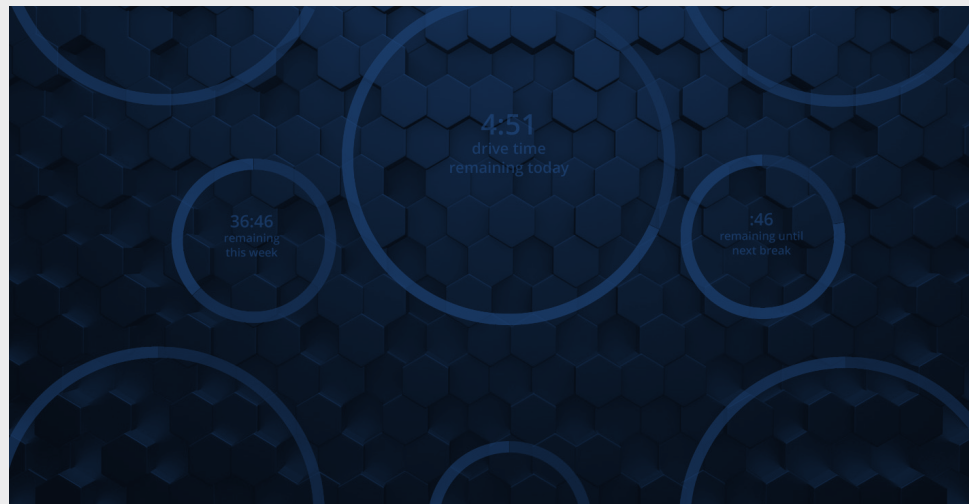
- Stay on top of your BASICS scores. If you see an Alert, immediately focus your attention on improvement in that BASIC.
- Use the 24-month data cycle as the basis for your BASICS improvement plan, charting steps you will take each month to improve your scores.
- Review every violation, citation and audit/investigation finding. Challenge mistakes or inaccuracies through the FMCSA DataQs process.
- Use the FMCSA Crash Preventability Determination Program to remove non-preventable crashes from consideration in the “Crash Indicator” BASIC.

(Quick Quiz answers: 1) 24 months; 2) the percentile for any BASIC that will trigger direct FMCSA or state contact with a carrier; 3) False. FMCSA gives greater priority to three of the seven BASICS, with “Hours of Service Compliance” being #1.)

# The Hours of Service Compliance BASIC

## How does a motor carrier improve its Hours of Service Compliance BASIC?

Of all seven BASICS, the Federal Motor Carrier Safety Administration (FMCSA) places the most emphasis on the Hours of Service Compliance BASIC. Why? Research shows that fatigued drivers make mistakes, often with safety consequences. Experience shows that drivers who try to cheat the system, by falsifying logs or bending the hours of service (HOS) rules, may take other shortcuts in highway safety. Simply put, at FMCSA and among highway patrols, HOS compliance is an enforcement priority.



Staying compliant with HOS looks simple: follow the HOS rules and keep log books up to date and accurate. From one perspective, HOS compliance appears to have become even easier in most cases – with an electronic logging device (ELD) keeping track of driver hours.

But as important as proper HOS recordkeeping may be, improvement in the Hours of Service Compliance BASIC begins much earlier in the process:

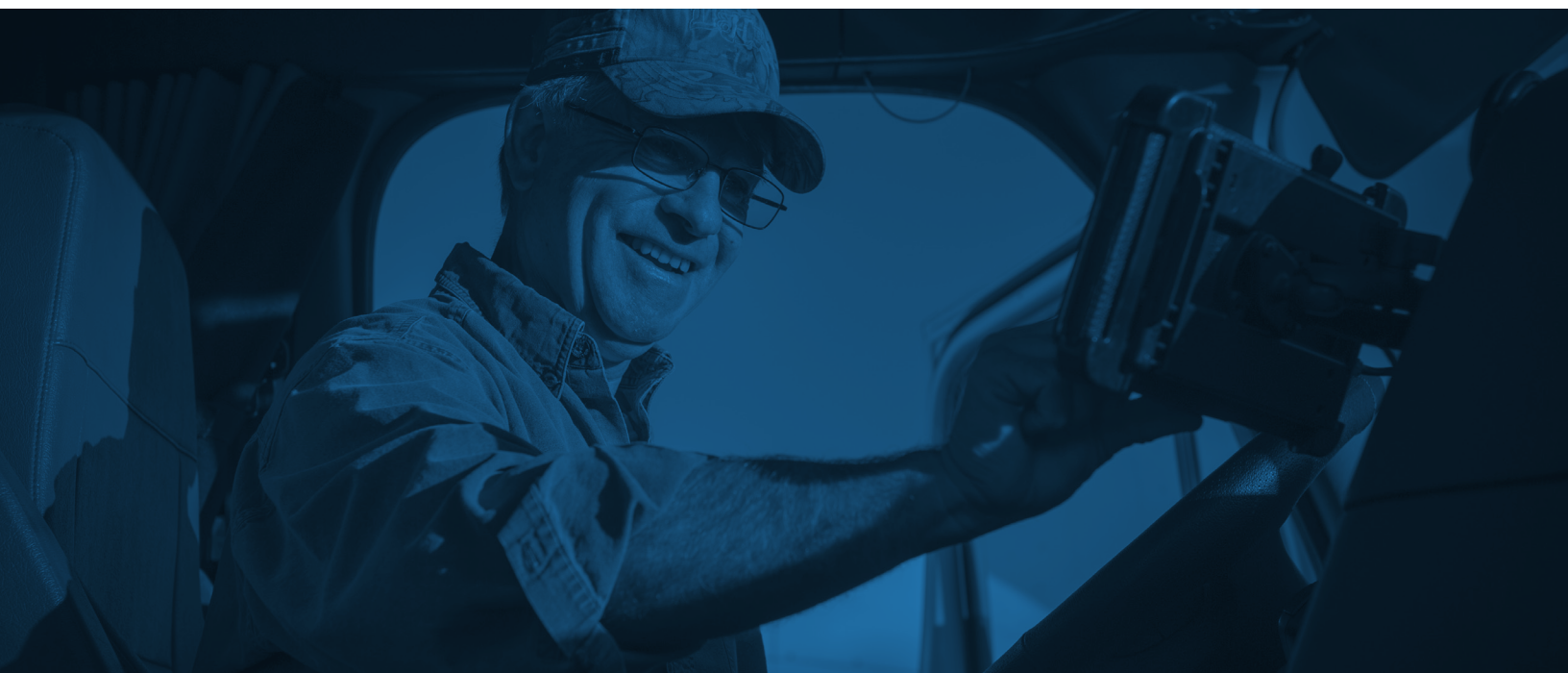
- HOS improvement starts with honest assessment of the commitments management makes to shippers.
- HOS improvement then requires careful planning of routes and available rest areas, with continual feedback and sharing of what works and what doesn't.
- HOS improvement anticipates the unexpected on the highway and provides clear communication to drivers on what they can and cannot do in those situations.
- HOS improvement incorporates active management oversight of driver violations – in all areas, not just HOS.
- HOS improvement certainly means knowing the HOS rules, but also any exceptions that fit within a carrier's operations and a heightened awareness of what rules may change.

In other words, HOS improvement begins with management's responsibility to provide a framework for safe and legal carrier operations, and the expectation that drivers stay within those guardrails.

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## HOS COMPLIANCE IS AN ENFORCEMENT PRIORITY.

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# Management Responsibility

Whether in the Hours of Service Compliance BASIC, or any other BASIC, only management can give the necessary direction, authority, tools and oversight to improve a motor carrier's safety performance. Consistency of results is the goal, and consistency is achieved when employees carry out their directions each and every time.

## 1

### Provide Direction

For hours of service, the following directions, when carried out consistently, will assure that the motor carrier and its drivers achieve and maintain compliance with HOS rules:

- All pickup and delivery times offered to customers by the carrier's sales personnel are legally achievable, allowing for all variables that affect performance, including loading, unloading, fueling, driver rest breaks, traffic and applicable speed limits.
- All routes planned by carrier operations personnel include designated truck parking and rest areas that are safe and legal, including alternative sites when designated areas are unavailable.
- All drivers report any difficulties with routes, parking or rest areas and any newfound parking or rest areas.
- All drivers immediately report unexpected circumstances in transit and follow carrier directions.
- All citations or warnings issued to drivers for any type of violation are immediately reported.
- All drivers immediately report vehicle defects discovered on the road so that repairs can be made quickly and driver schedules adjusted.
- All driver operations outside of standard HOS rules are approved by the carrier and annotated by the driver.
- All carrier functions that affect driver availability or remaining hours of operation, such as vehicle repairs and maintenance, dispatch adjustments or changes in customer demands, are transparently shared among carrier team members.



## 2

## Give Authority

To support employees in carrying out these directions, management must give authority:

- To carrier sales personnel to reject customer demands that are clearly outside of legal HOS compliance.
- To carrier operations personnel to conduct test runs of potential new routes and to obtain permission for truck parking where necessary.
- To drivers to discontinue operations when unsafe, impractical or whenever the driver is ill or fatigued.
- To drivers to return vehicles for service before operation when safety- and compliance-related defects are discovered or when reported defects have not been repaired.

## 3

## Provide Tools

To complete their tasks successfully and efficiently, management must provide employees with the proper tools, both physical and financial. For hours of service compliance, those tools include:

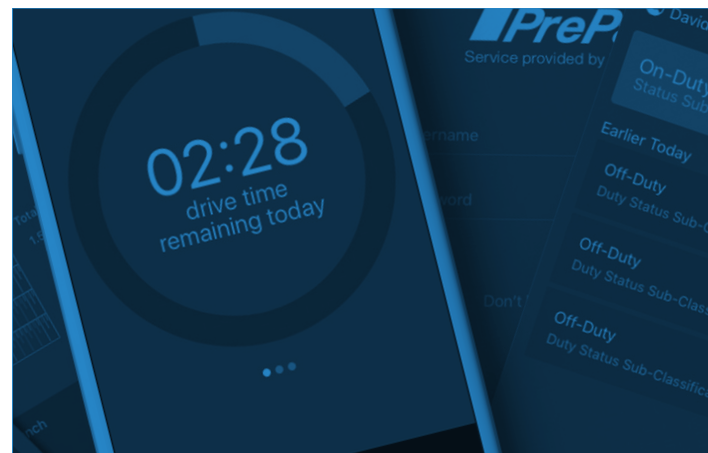
- ELDs, or standard driver record of duty status (RODS) forms where ELDs are not required. (If the carrier also conducts operations in intrastate commerce, the ELD must accommodate any differences in HOS rules for in-state operations.)
- For operations using ELDs, the federally required “ELD information packet” in each truck, containing:
  - » 1) A user’s manual detailing how to operate the ELD.
  - » 2) An instruction sheet describing the data transfer mechanisms supported by the ELD being used, and step-by-step instructions to transfer the driver’s hours-of-service records to a safety official.
  - » 3) An instruction sheet with ELD malfunction reporting requirements and recordkeeping procedures.
  - » A supply of blank driver’s RODS graph-grids to record the driver’s duty status and related information for a minimum of 8 days. Items 1, 2 and 3 can be in electronic form.
- In addition to the “ELD information packet,” clear, written instructions on how to use the ELDs in any rented or leased vehicles, reminding drivers that the ELD operation in those vehicles may differ.
- Routing software to facilitate route planning. Ideally, the software chosen will allow carrier input, such as designated parking and rest areas, and will clearly display which roads do not allow operations by commercial motor vehicles.
- Secure, mobile communications allowing direct coordination between all team members.

## 4

## Conduct Oversight

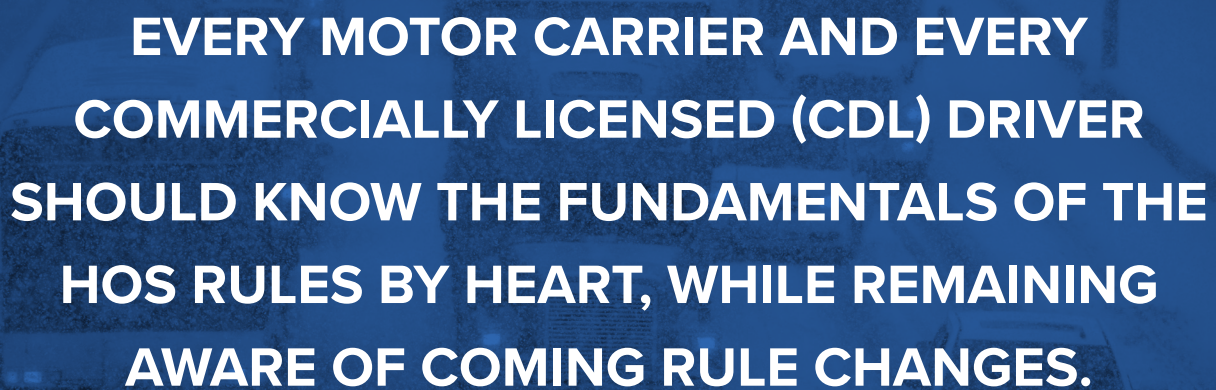
Management holds responsibility for oversight. To assure consistency of results in hours of service compliance, management must:

- Review the thoroughness of all route planning.
- Coordinate with carrier sales personnel and customers on any pickup and delivery requests that are not standard.
- Work with customers to reduce driver detention time. Clarify which customer facilities are open to drivers, where trucks can park while waiting to load/unload at docks, and whether drivers may park and take rest breaks on customer property.
- If truck parking is not possible on customer property, seek customer assistance in locating safe and legal truck parking nearby.
- Review all driver violations, of any type, and challenge discrepancies through the FMCSA DataQs process as needed.
- Ask whether driver violations are potentially system-wide or specific to a person, HOS rule, route or customer.
- Take action appropriate to findings, whether as reminders, enhanced training, improved ELD equipment or routing software, customer contact or discipline.
- Drivers must review and accept ELD edits suggested by the carrier. Follow up with drivers to develop a common understanding of how to record time and ELD mode.
- Review a sampling of driver HOS records, paying attention to edits and annotations made by drivers. These may reveal attempts to cast HOS noncompliance in a different light.
- Pay attention to unidentified driving hours in ELD records. Those log entries can indicate a driver attempting to use HOS time that another driver has available, a mechanic failing to log in when driving the truck, or they can simply lead to inaccurate driver records, with potential violations down the road.
- If an ELD malfunctions, provide clear directions to drivers. The “ELD information packet” required in each truck must contain a supply of blank driver’s RODS graph-grids to record the driver’s duty status and related information for a minimum of 8 days.
- Document all employee training and all corrective actions taken, whether in regard to personnel, specific HOS rules, routes, customers, or in response to driver violations.



Be assured, FMCSA or state investigators will look for policies and procedures supporting these same management steps – directions, authority, tools and oversight -- when investigating hours of service compliance issues at a motor carrier. Investigators will also take note of documented carrier actions to correct HOS issues.

In particular, during federal and state audits of carrier hours of service compliance, investigators will review HOS records from new drivers and any drivers who have a violation history, regardless of the type of violation. New drivers have less experience with HOS rules. Drivers with any sort of violation history may also display HOS shortcomings. For these reasons, management must support enhanced HOS training and stay on top of all driver violations when seeking to improve the carrier's Hours of Service Compliance BASIC.



## **EVERY MOTOR CARRIER AND EVERY COMMERCIALLY LICENSED (CDL) DRIVER SHOULD KNOW THE FUNDAMENTALS OF THE HOS RULES BY HEART, WHILE REMAINING AWARE OF COMING RULE CHANGES.**

### **Hours of Service Rules and Exceptions**

Every motor carrier and every commercially licensed (CDL) driver should know the fundamentals of the HOS rules by heart, while being aware of coming rule changes. Violation of any of these HOS rules will negatively impact a carrier's Hours of Service Compliance BASIC:

#### **The 14-hour rule (can be extended to 16 during adverse conditions)**

- In interstate commerce, drivers for property carriers have a 14-hour window in which to complete their driving. Once 14 hours are up, the driver must take 10 consecutive hours off-duty. Drivers for passenger carriers operate within a 15-hour window and then must take eight consecutive hours off-duty.
- Property carrying drivers that report to and are relieved from duty at the same work reporting location for five consecutive days may extend the 14 hours to 16 hours once during any 'tour of duty'.

#### **The 11-hour rule (can be extended to 13 during adverse conditions)**

- Within the 14-hour window, a property-carrying driver can drive up to 11 hours. For a passenger-carrying driver, the driving limit is 10 hours within the 15-hour window.





### The 7/8 consecutive day limits

- A driver may not drive after 60 hours on duty in seven consecutive days for carriers who do not operate every day of the week, or 70 hours on duty in eight consecutive days for carriers who do operate every day of the week.

### The 34-hour restart rule

- A driver can “restart” the seven or eight consecutive day limit if they take 34 or more consecutive hours off-duty, allowing new driving time to begin.

### The Short-Haul Exception

- Short-haul drivers are those who return to a normal work reporting location at the end of each workday and operate within a defined air mile radius. Short-haul drivers have an allowable workday of 14 hours and may operate within an air mile radius of 150 miles.
- Short-haul drivers have a maximum 11 hours of driving time for short-haulers remains in effect. These drivers are not required to have electronic logging devices (ELDs) in their trucks or to maintain paper logs (RODS), but their employer is required to maintain time records. Short-haul drivers also are not required to take 30-minute rest breaks.
- There are two categories of short-haul drivers, those that require a CDL and those that do not. Drivers who do not require a CDL may drive after the 14th hour after coming on duty on 5 days of any period of 7 consecutive days, and after the 16th hour after coming on duty on 2 days of any period of 7 consecutive days.

### The 30-Minute Rest Break

- Drivers must take a 30-minute rest break after eight hours of driving time. The rest break may be taken while performing on-duty/not driving tasks (such as fueling or loading).

### The Sleeper Berth Exception

- The sleeper berth exception requires drivers to spend seven hours in the sleeper berth. Drivers may spend the balance of the required ten-plus consecutive hours off-duty inside or outside of the berth. For example, a driver may choose a seven/three split. Neither time period counts against the driver’s 14-hour driving window, with the intent that drivers do not feel tempted to speed or operate unsafely as the end of their workday approaches.

## The Adverse Road Conditions Exception

- Drivers who encounter adverse road conditions may extend their driving time by two hours, from 11 hours to 13. Drivers may also extend the 14-hour driving window by two hours, to 16 hours for the same reason. This exception allows drivers nearing the end of their workday to have time to proceed slowly or find a safe location to park.
- FMCSA defines “Adverse road conditions” as road conditions which were unknown, or could not have been reasonably known, immediately before a motor carrier dispatched a driver or which drivers themselves discover immediately before starting a duty day or right after a sleeper berth break. “Adverse road conditions” can include weather-related issues, accidents, road closures or extreme traffic – but all must be unforeseen to qualify.

## The Emergency Conditions Exception

- Federal and state governments can lift some or all of the hours of service restrictions during emergencies, such as fires, floods, hurricanes or tropical storms, by formally declaring a state of emergency. These emergencies often cause road closures and detours, so the HOS relief granted may be paired with operational limitations.

The federal hours of service rules have changed considerably over time and continue to be adjusted. Motor carriers and drivers must stay on top of HOS developments by following FMCSA announcements and reliable industry sources. Occasionally, as with the implementation of ELDs, FMCSA may offer a stated period of enforcement leniency. Motor carriers who seek to improve their Hours of Service Compliance BASIC are best served by demonstrating their adjustment to HOS rule changes as of the effective date of those changes.



# Driver Responsibility

Motor carrier management should provide a framework where all team members can operate within the law, including attainable transit times, practical routes, designation of safe and legal truck parking and rest areas, and clarity of operations at customer facilities. Management must set clear expectations for driver communication from the road, whether when a driver encounters unusual operational circumstances, uncovers a vehicle defect, or has a question about operations outside of standard HOS rules. Clearly, by law, management must allow a driver to call in and discontinue driving when sick or fatigued.

Communication is a two-way street. For improved HOS compliance, driver communication includes:

- Report any vehicle problems and defects from the road so carrier maintenance can plan repairs, dispatch can make adjustments, and drivers can take rest breaks.
- Report any violations or warnings immediately so management can intervene as needed and any unnecessary delays for drivers, vehicles and loads.
- Report any difficulties with routes, parking or rest areas and any newfound parking or rest areas so management can make adjustments and other drivers can utilize improvements.
- Report unusual operational circumstances so management can chart a course of action and minimize lost operational time.
- Report problems at customer facilities so management can intervene.
- Discuss HOS compliance issues so a legal solution can be determined for the benefit of both driver and motor carrier.
- If sick or fatigued, stop driving at a safe location and call in.







Just as management is responsible for providing a framework where carrier operations can be conducted legally, driver feedback is necessary to keep carrier operations on course, prevent HOS compliance problems, and preserve driver hours. Each instance of communication, from management to driver and driver to management, can save time and prevent mistakes, thereby improving HOS compliance.

Driver responsibility includes accurate HOS recordkeeping. Driver logs (RODS) are not a thing of the past:

- Drivers must still understand how to complete accurate paper logs if the ELD malfunctions. Each “ELD information packet” must contain RODS for a minimum of 8 days.
- Drivers should stay current on how changes in HOS rules are to be entered on RODS.

ELDs are the principle means of HOS recordkeeping. HOS compliance is improved when drivers take the following steps in ELD operation:

- Verify that the commercial motor vehicle (CMV) has the required “ELD information packet.”
- Understand how to log on, log off, transfer HOS data to safety officials, change modes of operation such as on-duty to off-duty, and how to edit HOS records and annotate entries.
- If operating a rented or leased CMV, review the instructions for the model ELD in that vehicle. Operational steps may be different than the ELDs in fleet vehicles.
- In particular, drivers should be well-versed in how to transfer, display or print HOS data for safety officials. Enforcement officers take note of drivers who have difficulties in data transfer and look more closely at their HOS records.



ELDs automatically record CMV movement (above 5 mph) and location. Even with ELDs, accurate HOS records require that the correct operator is logged on, the ELD is in the right operating mode (e.g., on-duty, on-duty/not driving, off-duty), and non-standard operations – “personal conveyance” and “yard moves” – are accompanied by explanatory annotations. HOS compliance is improved when drivers take these ELD steps:

- Log on at the beginning of each workday and log off at the end.
  - » If the motor carrier uses relay or slip seat operations, where different drivers immediately take over CMV operations, drivers who do not properly log on and log off may find additional HOS time attributed to themselves or the other drivers, creating a violation.
- Logging off is also important back at the carrier terminal.
  - » Maintenance personnel may drive the CMV in for repairs and possibly out for a test run. Those mechanics should themselves log on to the ELD and annotate the purpose for vehicle movement – but first the driver should log off or else risk having the maintenance time and “yard moves” shown on the driver’s HOS records.
- Take care to enter the right ELD mode.
  - » Enforcement officers will question vehicle movements during “off-duty” time. Drivers can edit mistakes, with explanatory annotations, but HOS compliance is improved by getting it right the first time.
  - » When conducting the required en route vehicle inspection (after three hours or 150 miles), enter the “on-duty/not driving” mode on the ELD and annotate the reason. Enforcement officials will check that the inspection was conducted, while the correct ELD mode will protect valuable driving time.
- Use “personal conveyance” with extreme care.
  - » Drivers are allowed to move a CMV while in the “off-duty” ELD mode, but only for personal reasons -- travel to en route lodging, restaurants, entertainment, commuting between home and the driver’s terminal or work site, or from a shipper or receiver location to reach the nearest, safe rest location, for example.

The ELD must first be in the “off-duty” mode before a “personal conveyance” move begins and an explanatory annotation must be entered by the driver. Enforcement officers will question any move that may further the carrier’s commercial or business purposes or to enhance “operational readiness,” such as repositioning equipment.

Not using an ELD? Annotations should also be entered on RODS for “personal conveyance,” “yard moves” or any non-standard HOS operations.

When in doubt of what to do, drivers should contact the carrier and discuss the HOS situation.



## Team member responsibility

Other motor carrier employees – sales, maintenance, safety, dispatch – have their own responsibility for HOS compliance: open, transparent communication.

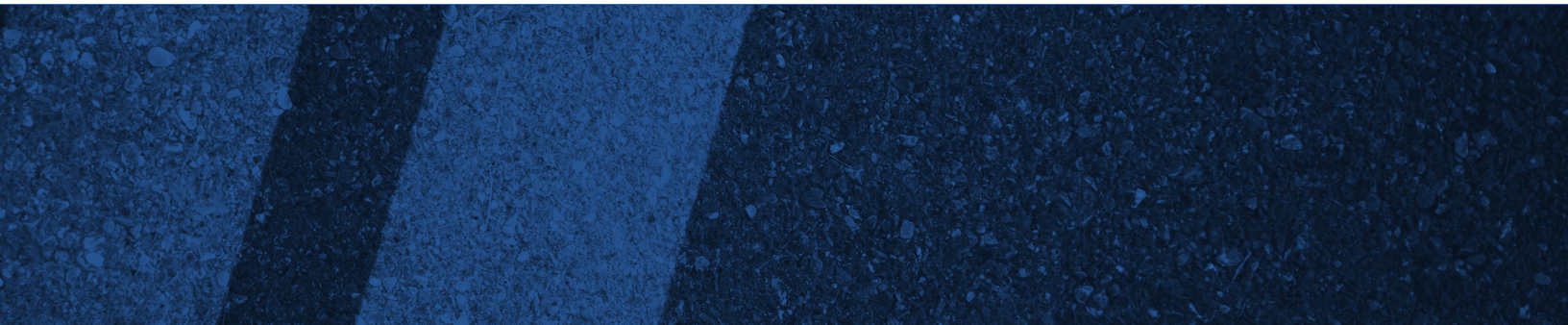
Of all the employees at a carrier, only drivers operate under regulatory time constraints. However, any employee who holds a CDL and may on occasion drive a CMV must be treated as a driver for HOS and other purposes, even if not employed as a driver. That includes mechanics who may take a repaired truck out for a test run, safety personnel who may drive a truck alongside a new hire, and even a company president who likes to make a delivery now and then.

The other, non-driver, employees must share information that can help any driver operate more safely, more efficiently, and within those time limits.

Updates on customer facilities, time needed for vehicle repairs, road closures or heavy traffic, or new schedules for dispatch can help drivers manage their time. When drivers stay within HOS limits, the carrier's Hours of Service Compliance BASIC improves. Team communication can help that happen.

Improving the Hours of Service Compliance BASIC requires consistency, with every customer commitment, route planned, rest area identified, and ELD entry. This BASIC also improves with communication between management and drivers and among other team members. Safe and legal hours of service compliance contributes to a good Inspection Selection System score. That leads to qualifying for and continuing in a weigh station bypass program like PrePass. Most important, it means improved safety and efficiency for all team members and for everyone sharing the road.

**IMPROVING THE  
HOURS OF SERVICE  
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# QUICK QUIZ

1. What does carrier sales have to do with hours of service?
2. Does anyone still use paper logs?
3. True or False: ELDs operate independently of drivers.

## Helpful Hints

- Logging on and logging off an ELD may seem too routine and rudimentary to mention as an important HOS compliance step. But federal investigators compare carrier records of which driver was assigned to a CMV to ELD records showing who was actually logged on at the time. When one driver attempts to use the hours another driver may have available, the result is a major violation and a setback for the carrier's Hours of Service Compliance BASIC.
- Don't mess with an ELD's internal electronics! ELDs are set to record all vehicle movements beginning at 5 mph. Resetting the ELD threshold to a higher mph may reduce the nuisance record of some "yard moves," but it will also generate an HOS violation, plus a thorough investigation the carrier's operations.
- When planning a new route, consider the legal speed limit for commercial vehicles, but also check any records of previous trips over the route and the average speed actually attained. Be sure to figure in the fleet's governed speed limit, if lower than the posted limit. Conduct a test run to confirm plans, and to show safety officials that the origin and destination can be driven within HOS limits.

(Quick Quiz answers: 1) Carrier sales works directly with customer pickup, delivery and transit time expectations, which must match what can be legally achieved under hours of service rules; 2) Yes. In fact, all drivers should be trained in properly filling out RODS in case the ELD malfunctions; 3) False. ELDs automatically track vehicle movements and GPS locations, but driver input is necessary to identify the operator, the proper ELD mode and to make annotations and edits.)





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