ELD guidance

**Frequently Asked Questions --Electronic Logging Devices and Hours of Service –Exemption Pre-2000 Model Year**

**Question 20: When does the pre-2000 model year exception apply?**

**Guidance:** When a vehicle is registered, the model year should follow the criteria established by the National Administration (NHTSA). Generally, the model year is determined by reviewing the VIN on the vehicle registration. If the model year is pre-2000 based on the VIN, an ELD is not required.

However, there may be instances when the model year reflected on the vehicle registration is not the same as the engine model year, most commonly when a vehicle is rebuilt using a “glider kit” or when an engine is swapped from one vehicle to another. Vehicles with engines predating model year 2000 are also accepted and are not required to have an ELD, even if the VIN number reported on the registration indicates that the CMV is a later model year. While the driver is not required to possess documentation that confirms the vehicle engine model year, 49 CFR Part 379 Appendix A requires motor carriers to maintain all documentation on motor and engine changes at the principal place of business.