Hours of Service Records of Duty Status

**§395.8 Driver’s record of duty status.**

## Guidance Q&A

***Question 19:*** Regulatory guidance issued by the FMCSA states that a driver’s record-of-duty-status (RODS) may be used as the 100 air-mile radius time record “provided the form contains the mandatory information.” Is this “mandatory information” that required of a normal RODS under section 395.8(d) or that of the 100 air-mile radius exemption under section 395.1(e)(5)?

***Guidance:*** The “mandatory information” referred to is the time records specified by §395.1(e)(5) which must show: (1) the time the driver reports for duty each day; (2) the total number of hours the driver is on duty each day; (3) the time the driver is released from duty each day; and (4) the total time for the preceding 7 days in accordance with §395.8(j)(2) for drivers used for the first time or intermittently.

Using the RODS to comply with §395.1(e)(5) is not prohibited as long as the RODS contains driver identification, the date, the time the driver began work, the time the driver ended work, and the total hours on duty.