FMCSA-ELD-395-Q060(2022-03-10)

**Question:** If the vehicle does not track engine hours, can the record begin with “0”?

**Guidance**: If it is not possible to obtain the engine hours from the electronic control module (ECM), then the electronic logging device (ELD) may begin recording engine hours at “0” for the given engine the first time the ELD is used with that engine. After the first use, the ELD must continue to keep and use an aggregate total from the first time it was installed or used with an engine. Ideally, back office systems can share this aggregate total so that any other ELD used with the engine can start at the aggregate total, rather than “0.”

**Contact Info:** FMCSA ELD Information, 1-800-832-5660 or [ELD@dot.gov](mailto:ELD@dot.gov).

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*Note: This guidance document does not have the force and effect of law and is not meant to bind the public in any way.  It is intended only to provide information and clarity regarding existing requirements under the law or agency policies.*

**Regulatory Topic: ELD Guidance**

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