FMCSA-ELD-Specialty Operations-FAQs(2018-04-09)-CORR1

**ELD Specialty Operations FAQs**

**Question:**In an operation that involves a tillerman and a driver, what method should the tillerman use to record his or her hours-of-service? **Guidance:**Because the electronic control module (ECM) will not support two electronic logging devices (ELDs) and only one driver can be logged into the ELD, the driver in the front cab must log into the ELD and make an annotation that he or she is operating with a tillerman.

The tillerman has the option of manually adding their hours of service to the ELD under their ELD driver account or keep the previous 7 days of their record of duty status (RODS) in their possession for roadside inspections. The same options apply to the motor carrier maintaining the tillerman’s RODS for 6 months.

**Question:**Is a driver required to maintain their record of duty status (RODS) on an electronic logging device (ELD) while operating a rental vehicle? **Guidance:**The Federal Motor Carrier Safety Administration (FMCSA) issued a limited exemption to motor carriers that operate with a rented commercial motor vehicle for 8 days or less. This limited exemption provides that all drivers of property-carrying commercial motor vehicles rented for 8 days or less, regardless of reason, are not required to use an ELD in the vehicle. To meet this exemption, the driver and the motor carrier must maintain the following:

* A copy of federal register notice (FRN) 82 FR 47306 [Hours of Service of Drivers: Application for Exemption; Truck Renting and Leasing Association (TRALA)](https://www.regulations.gov/document/FMCSA-2016-0428-0303) or equivalent signed FMCSA exemption document. This document must be provided to the safety official upon request;
* A copy of rental agreement with parties to the agreement clearly identified, the vehicle, and the dates of the rental period; and
* A copy of the driver’s RODS for the current day and the prior 7 days if required on those days.

For additional information see FRN 82 FR 47306 Hours of Service of Drivers: Application for Exemption; Truck Renting and Leasing Association (TRALA), published on October 11, 2017.

**Question:**Are drivers that operate in Canada and Mexico required to use an ELD when driving in the US? **Guidance:**Yes, if a driver that operates in Canada or in Mexico operates and drives in the US, and does not meet one of the ELD exemptions, said driver must use an ELD while operating in the US.

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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