FMCSA-HOS-ELD-395-FAQ012(2017-03-12)-CORR1

**Question:** If the vehicle registration for a commercial motor vehicle (CMV) reflects a model year of 2000 or newer, but the vehicle was manufactured without an electronic control module (ECM), is the carrier required to comply with the Electronic Logging Device (ELD) rule?

**Guidance:** Yes, a motor carrier operating a vehicle with a manufactured model year of 2000 or newer and without an ECM is subject to the ELD rule, as established by 49 CFR [395.8(a)(1)(iii)](https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-395#p-395.8(a)(1)(iii)). If the currently installed engine does not support an ECM and is unable to obtain or estimate the required vehicle parameters, then the operator must use an ELD that does not rely on ECM connectivity, but nevertheless meets the accuracy requirements of the ELD rule. See sections 4.2 and 4.3.1 of [49 CFR part 395, subpart B, Appendix A](https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-395#Appendix-A-to-Subpart-B-of-Part-395) for accuracy requirements.

**Contact Info:** FMCSA ELD Information, 1-800-832-5660 or 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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