FMCSA-ELD-395-Q080(2023-07-31)

**Question:** In an electronic logging device (ELD) with multiple components, which component must generate the event sequence identifier number?

**Guidance**: The event sequence identifier number (sequence ID) must be consistently applied as required per section 4.4.4.1 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). While the component(s) used to generate the sequence ID is not specified and is left to the discretion of the provider, *section 4.4.4.1 requires the sequence ID to be assigned at the time the event is recorded. ELD events must be recorded when they occur, not at a later time using cached data.* [Clarification italicized].

**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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