FMCSA-ELD-395-Q085(2023-07-31)

**Question:** Can ELD data be cached to a black box, gateway, or server, and written to an ELD event at a later time?

**Guidance:** No. Per section 4.3.1.1 of 49 CFR part 395, subpart B, appendix A, an ELD must be powered and become fully functional within one minute of the vehicle’s engine receiving power and must remain powered for as long as the vehicle's engine stays powered. This means that the ELD must be able to record events, including assigning event sequence identifier numbers (sequence IDs) when the events occur. ELD data may not be stored to a black box, gateway, or server and then be written to an ELD event at a later time. If an ELD and all of its required components are not connected and fully functional—including the component that records an ELD event—then those components are no longer in compliance with the requirements outlined in 49 CFR part 395, subpart B, appendix A, because the ELD events would no longer obtain a sequence ID at the time they are recorded.

**Contact Info:** FMCSA ELD Information, 1-800-832-5660 or [ELD@dot.gov](mailto:ELD@dot.gov?subject=ELD%20Question).

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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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