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ISSUE NAME

ELD Requirement for Blank Paper Logs

STATUS

Closed

Driver-Traffic Enforcement Committee

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AGENCY

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Carriers are seeing many HOS violations issued citing 395.22H4 for failure to maintain a blank paper logbook.

JUSTIFICATION OR NEED

395.22H4 is a regulation that doesn't consider our technological advances in the industry regarding modern DOT compliant ELD systems. One example is with Platform Science ELD software. Even if connection to the ECM is lost or data diagnostic events occur, the tablet is still able to record an accurate record of duty status and maintain compliance with DOT regulations. Issuing a violation for failure to maintain a "blank paper logbook" becomes redundant and is essentially requiring a "backup to the backup". Unless a tablet is physically destroyed or lost it will continue to function as a blank paper logbook in the event of a connection outage or malfunction, just as a physical paper logbook would unless lost or destroyed.

REQUEST FOR ACTION

The request is for the DOT to stop issuing 395.22H4 in respect to the advances in technology that allow ELDs to have the capability of accurately recording record of duty status while connected to the ECM, while not connected to the ECM, and in the event of a data diagnostic event/malfunction just as a blank paper logbook would be used in previous years.

SUPPORTING DOCUMENTS/PHOTOS

- [Tablet-Use-for-Paper-Logs-1-6500-TBLTPAPERLOG-Rev-A.pdf](#)
- [Inspection-Bulletin-2017-05-ELDs.pdf](#)

ACTION TAKEN BY COMMITTEE

The committee agreed to add the following guidance to Ops Policy 15:

Regulatory Guidance

b.(2) In the U.S., is an ELD that allows users to operate in manual mode to record their record of duty status (RODS) considered a substitute for the requirement to carry an eight-day supply of blank paper or electronic RODS as required in 395.22(h)(4)?

In Canada, is an ELD that allows users to operate in manual mode to record their record of duty status considered a

substitute for the requirement to carry a 14-day supply of blank paper or electronic RODS as required?

ANSWER: Yes, provided the driver can demonstrate the ELD has manual mode capability.

They also agreed to update the Inspection Bulletin 2021-05 - Electronic Documents to add a note in reference to the RODS outlining the 8-day blank RODS can be the ELD if it is capable of recording in manual mode.

- Record of duty status (RODS)
 - o 8-day blank paper RODS required for ELDs can be on the ELD providing the ELD is capable of recording RODS in manual mode