

Inspection Bulletin

North American Standard Inspection Program

2012-05 – Automatic On-Board Recording Devices

Created: June 6, 2012 Revised: Dec. 6, 2017 Revised: Sept. 28, 2020

Summary

This Inspection Bulletin reviews the requirements for devices used to record a driver's hours of service according to 49 CFR 395.15 – Automatic On-board Recording Devices (AOBRD). It will identify the minimum requirements for a compliant AOBRD and information that must be displayed and available to roadside enforcement inspectors for hours-of-service compliance.

Effective Dec. 17, 2019, an AOBRD cannot be used in place of a compliant electronic logging device (ELD). However, an AOBRD may be used to record hours of service for drivers who are exempt from the ELD rule but are required to have a record of duty status (RODS). When used for this purpose, the AOBRD must meet requirements in 395.15.

Definitions

As defined in 49 CFR 395.2, **automatic on-board recording device** (AOBRD) means an electric, electronic, electromechanical or mechanical device capable of recording driver's duty status information accurately and automatically as required by 395.15. The device must be integrally synchronized with specific operations of the commercial motor vehicle (CMV) in which it is installed. At a minimum, the device must record engine use, road speed, miles driven, the date and time of day.

AOBRD Information

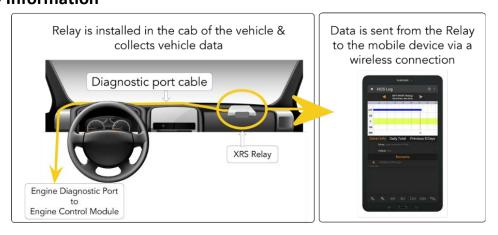


Diagram: Integrally synchronized with specific operations of the CMV.

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Information Requirements

AOBRDs must produce, upon demand, a driver's **hours-of-service chart, electronic display or printout** showing the time and sequence of duty status changes, including the driver's starting time at the beginning of each day. A device unable to print a copy of the driver's RODS is not a violation if the device displays an hours-of-service chart or electronic display of each duty status change for the current day and the previous seven days.

Support systems used in conjunction with AOBRDs at a driver's home terminal or a motor carrier's principal place of business must be capable of providing federal, state or local officials with summaries of a driver's hours-of-service records.

Minimum Electronic Display Requirements - 395.15(i)(5)

AOBRDs with electronic displays shall have the capability of displaying the following:

- Driver's total hours of driving today
- The total hours on duty today
- Total miles driving today
- Total hours on duty for the seven consecutive day period, including today
- Total hours on duty for the prior eight consecutive day period, including the present day
- The sequential changes in duty status and the times the changes occurred for each driver using the device

The AOBRD must also be capable of recording each driver's duty status separately when there is a multiple-driver operation.

There is a requirement to record locations of each duty status change that needs to be noted. For each change of duty status (e.g. the place and time of reporting for work, starting to drive, on-duty not driving and where released from work), the name of the city, town or village, with state abbreviation shall be recorded. Motor carriers are permitted to use location codes in lieu of the name of the city, town, village or state. When using location codes, the list of codes showing all possible location identifiers must be carried in the CMV and made available to an enforcement official upon request.

AOBRD Inspection Guidance

Federal, state and local officials need to check for the following during a roadside inspection when an AOBRD is being used:

- Verify the device is integrally synchronized with the CMV
- Ensure the device is capable of displaying the six data elements listed above under Minimum Electronic Display Requirements for the last seven days, plus the current day



- Each CMV with an AOBRD installed must have on-board an information packet containing an instruction sheet describing, in detail, how data may be stored and retrieved from the recording device
- A supply of blank RODS sheets (graph-grid) in case the AOBRD device fails to function is onboard the CMV for the duration of the current trip
- The driver can demonstrate the use of the device

The AOBRD is **not required** to produce a printed copy of the driver's RODS at the time of the inspection.

The required on-board information may be any electronic means (including on the AOBRD) or hard copies.

Examples of AOBRDs























The following is a chart that outlines the significant differences between an AOBRD and an ELD.

	AOBRD	ELD
Integrally Synchronized	Yes	Yes
Automatic Recording of HOS	Yes	Yes
Technical Specifications	Limited	Yes
Registered with FMCSA	No	Yes
Printing Requirements	None	If No Display Screen
Data Transfer Requirements	None	Telematics or Local
Permitted Use	After Dec. 16, 2019 (only for ELD exempt vehicles)	Dec. 18, 2017

