

# TRUCKERNATION POLL REPORT

US DEPARTMENT OF TRANSPORTATION  
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION

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INFORMATION COLLECTION REQUEST (ICR)  
HOURS OF SERVICE (HOS) OF DRIVERS REGULATIONS

FMCSA-2019-0023

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A handwritten signature in black ink, appearing to read 'Tony Justice', is written over a light gray rectangular background.

APRIL 22, 2019



## **Executive Summary**

TruckerNation is the largest grassroots, wholly social media based, trucker advocacy membership group representing the interests of truck drivers and companies across the broad commercial transportation industry. TruckerNation and its associated organization has approximately 32,000 followers located all across the United States.

TruckerNation believes the Federal Motor Carrier Safety Administration (FMCSA) has a duty to address all Hours of Service (HOS) concerns. This report is being presented in response to FMCSA's request for approval to renew an Information Collection Request (ICR) (FMCSA-2019-0023) titled, "Hours of Service (HOS) of Drivers Regulations. TruckerNation's poll results show that 62% of drivers indicated that it takes them 6.5 minutes or longer to input their daily duty status and complete a daily record of duty status (RODS) according to current HOS rules when using an Electronic Logging Device (ELD). This contradicts FMCSA's estimation that the use of ELDs will reduce the driver's time to input duty status from 6.5 minutes to 2 minutes and an annual reduction in the burden hours from 99.46 million hours to 41.03 million hours. Various factors are outlined below which support the claim that to complete a daily RODS would take a driver 6.5 minutes or longer, according to 62% of TruckerNation's poll respondents.




## **Background and Objectives**

TruckerNation commissioned this survey in a direct response to FMCSA's ICR (FMCSA-2019-0023) published and opened for public comment on March 8, 2019. The goal of the poll and this report is to provide FMCSA with data which supports a claim that ELDs have not decreased the daily or annual time burden on commercial transporters and the commercial transportation industry. Additionally, TruckerNation received anecdotal data which supports the claim that it may take a driver even longer than the 6.5 minute and 99.46-million-hour annual time burden which is estimated in the Agency's current Information Collection (IC) approved by the Office of Management and Budget (OMB) on June 13, 2016. It is expected that this quantitative and anecdotal data will be used in defining a more accurate daily and annual time burden estimate and as an input to reviewing the current technical specifications which ensure that manufactures develop compliant devices and systems for uniform enforcement of hours of service.

### **Polling Method**

TruckerNation included all social media followers and registered members in our poll which was dispatched solely on social media. The target population, as defined in the polling question, was for those users of ELDs. The data collection method was a simple one-question, two-answer poll which used the daily time burden estimates outlined in




FMCSA's ICR (FMCSA-2019-0023) published and opened for public comment on March 8, 2019.

## **Polling Results**

The social media poll commissioned by TruckerNation show that 62% of drivers indicated that it takes them 6.5 minutes or longer to input their daily duty status and complete a daily RODS according to current HOS rules when using an ELD. This contradicts FMCSA's estimation that the use of ELDs will reduce the driver's time to input duty status from 6.5 minutes to 2 minutes and an annual reduction in the burden hours from 99.46 million hours to 41.03 million hours. Various factors are outlined below which support the claim that to complete a daily RODS would take a driver 6.5 minutes or longer, according to 62% of TruckerNation's poll respondents.

Additionally, TruckerNation received anecdotal data which supports the quantitative data outlined above. Summarized below is the anecdotal data:


- ELDs take extensive amounts of time when updating or rebooting which is reported to happen monthly, weekly, and sometimes, multiple times daily.
- Delays when device changes duty status result in inaccurate time recording and additional time spent correcting inaccurate duty status by the driver and/or administrative staff.

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- ELD systems do not recognize HOS exemptions which results in drivers and/or administrative staff having to make annotations or simply allow HOS to be wrong and on duty time is not editable.
  - Drivers are forced to approve daily HOS even if errors exist because they cannot correct on duty time.
  - Technology not compatible with older mobile devices for users that use AOBDRs.

The anecdotal data listed above support a theory that the technical specifications established by FMCSA are not uniformly being programmed into ELDs by manufacturers which drastically impacts usability and reliability for drivers, commercial transportation companies, and potentially, law enforcement. As a result, it is suggested that a comprehensive review of the technical specifications, individual ELD manufacturers, the self-certification process, and usability/reliability be conducted. A comprehensive review may result in reconsidering self-certification and revising current technical specification regulations which TruckerNation suggests be negotiated rulemaking if such actions were taken.

## **Conclusion**

In conclusion, TruckerNation believes the FMCSA has a duty to address all HOS concerns. in response to FMCSA's request for approval to renew ICR (FMCSA-2019-0023) titled, "Hours of Service (HOS) of Drivers Regulations. TruckerNation's poll results show that 62% of drivers



indicated that it takes them 6.5 minutes or longer to input their daily duty status and complete a daily record of duty status (RODS) according to current HOS rules when using an Electronic Logging Device (ELD). This contradicts FMCSA's estimation that the use of ELDs will reduce the driver's time to input duty status from 6.5 minutes to 2 minutes and an annual reduction in the burden hours from 99.46 million hours to 41.03 million hours. Various factors are outlined below which support the claim that to complete a daily RODS would take a driver 6.5 minutes or longer, according to 62% of TruckerNation's poll respondents.