



ELDs and AOBDRs

What must carriers have to comply?



U.S. Department of Transportation
Federal Motor Carrier Safety Administration

Companies with vehicles subject to the ELD rule must install and use **either** an electronic logging device (ELD) or an Automatic On-Board Recording Device (AOBRD) compliant with 49 CFR 395.15.

AOBRDs installed and in-use before the ELD rule compliance date (December 18, 2017) may continue to be used until December 16, 2019, in keeping with the grandfather clause.

What is the difference between an ELD and an AOBRD?

One basic difference is that ELDs must be able to transfer data electronically to FMCSA's servers, or locally, for review in eRODS, while AOBRDs cannot. Learn more about the different [methods of record keeping](#).

How do I determine whether a device is an ELD or an AOBRD?

Ask the driver for the manual

In accordance with 395.15(g), all drivers using an AOBRD must possess onboard a commercial motor vehicle an AOBRD information packet containing an instruction sheet describing, in detail, how data may be stored and retrieved from the recording device. In addition, 395.22(h) requires all drivers using an ELD to possess onboard the manual and instruction sheet for an ELD. This information can be used to determine whether the device is an ELD or AOBRD.

Check the list of self-certified devices

If the required information is unavailable, check the list of self-certified devices and the list of revoked devices in eRODS or on [FMCSA's ELD registration website](#).

If the device is on FMCSA's list of self-certified devices, treat the device as an **ELD**.

- If a device on FMCSA's list of self-certified devices does not appear to be a compliant ELD, do not take enforcement action; report the device following the instructions on next page.

If the device is on the revoked list, do not cite the carrier unless there is evidence that they have been notified. Review the logs using the printout or display.

If the device is not on either list, treat the device as an **AOBRD** and subject to the requirements in 395.15 and the grandfather clause (see above).

- Some devices listed on the ELD Registration website actually operate as an AOBRD. Such a device should be treated as an AOBRD subject to the requirements above.

Do not let this hold up the inspection or investigation. If you cannot determine if you are working with an ELD or AOBRD, treat the device as an AOBRD and complete the review.

How do I confirm a “grandfathered” AOB RD?

At roadside, there may be no way to independently verify whether a device was installed and in-use prior to December 18, 2017. Ask the driver when it was installed and use the response given.

During an inspection, this could be verified using supporting documents.

Reporting a problematic device

If you encounter a device that is malfunctioning or appears to be non-compliant with the ELD rule, report this device to FMCSA. Be sure to include all the information listed below to ensure FMCSA can conduct a thorough investigation.

Send an email to ELDTech@dot.gov with the following:

1. Date of issue
2. Brief description of issue
3. Motor carrier name/DOT number associated with device
4. ELD provider name
5. Device name
6. Software version
7. ELD model number
8. Date of installation
9. Carrier's plan of action in regard to the alleged non-compliant device

Need more details about the differences between ELDs and AOB RDs?

Automated On-Board Recording Device (AOBRD)

Under 395.2, an AOBRD means an electric, electronic, electromechanical, or mechanical device capable of recording a 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. An AOBRD installed and required to be used prior to December 18, 2017 can be "grandfathered" and continued to be used until December 16, 2019.

Electronic Logging Device (ELD)

An ELD is a device or technology that automatically records a driver's driving time, facilitates the accurate recording of the driver's HOS, and meets the requirements of 49 CFR subpart B of Part 395. An ELD must be integrally synchronized with the engine of the CMV, self-certified, and registered with FMCSA.