Technical Memorandum 1
FM-MHP-0889: An Equity-Informed Study on Commercial Motor Vehicle Drivers' Perceptions and Compliance with Electronic Logging Devices (ELD) Mandates

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Re:	Focus Interview Results

1. Background

This Technical Memorandum (TM) documents findings from focus interviews conducted under Task 5.1 (originally designed as a focus group) to understand stakeholder perspectives on ELD implementations. As proposed, this standalone TM serves as a deliverable to summarize the insights obtained.

The Key takeaways from the individual interview session are listed as below:

1. The ELD has improved the monitoring and scheduling of CMV drivers by the safety managers and thereby enhancing the overall efficiency and safety of CMV drivers.
2. The safety inspectors mentioned compliance and violations have improved over time as the falsification of logs has decreased by the use of ELD. The ELD has made it easier for them to inspect the driver logs and check the real time location of drivers.
3. The mid-sized company manager and drivers appreciated the ELD mandate as it has made their life more disciplined
4. The small to middle sized company owner suggested the need for forming a regulatory body that could monitor and overlook the certification of ELD devices.
5. Some drivers (e.g., from smaller companies) indicated that reduced micromanagement of their schedules (through ELD) would be preferred.

2. Introduction

This study gathered insights from a diverse group of stakeholders in the trucking industry, including a safety training administrator, policymaker, owner-operator, driver, small carrier representative, and enforcement officials. The goal was to understand perceptions of the Electronic Logging Device (ELD) mandate, focusing on its benefits, challenges, compliance, and impact on safety and operations. We scheduled a one-hour individual focus interview, conducted either online or in person depending on the participant's location. At the start of each interview, we obtained the participant's consent to audio recording and briefly introduced the purpose of the research project and the meeting. We then asked seven pre-prepared questions and included follow-up questions as needed during the discussion. Participants were also allowed to skip any questions at their own discretion.

The participants' names and affiliations were anonymized. Their information was de-identified by assigning each participant a number (for example, Participant #1). We also reported their background information so that their responses could be understood within context and help explain the basis for their attitudes and comments. Table 1 shows a list of the participants and the stakeholder groups they represent.

Table 1. Stakeholder Groups in ELD Implementation

#	Stakeholder Group	Description	Example Titles	Participant Code	Meeting Time
1	Operational	Individuals who directly use ELDs and are affected by HOS recording, inspections, and OOS consequences	Truck driver, owner-operator	P#4	Feb 16, 2026. 10:00-11:00
				P#3	Feb 11, 2026 12:30-13:30
2	Carrier safety compliance	Personnel responsible for driver training, audit readiness, and ensuring drivers remain legally compliant	Safety administrator, safety manager, compliance officer	P#1	Feb 9, 2026 12:30-13:30
3	Carrier management	Decision-makers responsible for ELD acquisition, implementation costs, fleet operations, and business logistics	Fleet manager, carrier owner, owner-operator	P#5	March 2, 2026 10:00-11:30
				P#4	Varied *
4	Regulatory	Federal agencies that establish ELD mandates, set HOS regulations, and coordinate inspection standards across jurisdictions	FMCSA official, CVSA official	P#2	Varied *
				P#7	Feb 10, 2026 13:00-14:00
5	Enforcement	State-level officers who conduct CMV inspections, verify ELD data, issue citations, and place drivers or vehicles OOS	State patrol officer, roadside inspector	P#6	Varied *
6	Technology	Companies that develop, certify, and support ELD devices and software	ELD vendor, ELD manufacturer	P#8	Still trying to get hold of them
7	Industry association and advocacy	Organizations representing the interests of owner-operators, small carriers, or larger carriers	OOIDA representative, NTA representative	P#9	Varied *

* Date/Time varies due to multiple discussion sessions and based on summary notes

The seven questions prepared to be discussed in the meeting are listed below. Due to time constraints, some questions were combined (e.g., questions 1&2 were asked together, questions 3&4 were asked together, etc.), and discussions flowed naturally back and forth rather than following a strictly linear sequence.

1. What do you see as the main benefits of complying with the ELD mandate?
2. What challenges or drawbacks have you experienced, or do you expect to encounter, when complying with the ELD mandate?
3. Do you think falsification would increase or decrease if the ELD mandate were implemented uniformly across all carriers, with no exemptions or differential enforcement?
4. Why do you think drivers feel compelled to violate HOS requirements or ELD mandates?
5. Do you think a compliant ELD system makes it more difficult for drivers to falsify their logs?
6. What do you think is a fair and effective approach to ensure that all carriers comply with HOS requirements?
7. In what ways do you think FMCSA can improve both driver safety and economic conditions while strengthening compliance with HOS rules?

3. Results

To present the interview findings in a clear and useful way, the results are organized in three complementary formats from high-level summary to detailed notetaking. **Section 3.1** provides a concise set of overall cross-cutting takeaways that highlight the main themes emerging from most of the interviews. This section is intended to provide a quick understanding of the most important findings. **Section 3.2** presents the findings from the perspective of different stakeholder groups. This section is intended to see how views vary based on context in professional role, responsibilities, and experience with ELD use and enforcement. **Section 3.3** lists a question-by-question summary of each participant's responses to preserve the connection between the interview questions and the detailed comments offered by individual participants.

3.1 Overall Cross-Cutting Takeaways

The overall quick takeaways from the interviews are summarized in five main aspects, as listed below. These aspects were repeatedly raised in the one-on-one interviews and highlight where participants showed broad agreement, where concerns remained, and where current ELD-related requirements appear to create tension between compliance, operations, and safety in practice.

- **Operational Impacts and Management:** Participants #1, #6 and #7 consistently emphasized that the ELD mandate has improved record accuracy and accountability and increased operational efficiency. The safety managers highlighted that ELD has improved the monitoring and scheduling of drivers. The drivers had an otherwise different perspective Participants #4 (owner operator) and #5 (drivers from small carriers) noted that rigid enforcement of HOS limits sometimes force them to stop when conditions are safe to continue driving and resume driving when fatigued. Dispatch expectations, detention delays, and tight delivery schedules were identified as major contributors to operational stress and compliance challenges. Independent owner operator and driver (third generation driver and manager) from both small sized carriers also suggested that the sense of micromanagement associated with ELD use is one of the root causes of driver dissatisfaction and attempts to circumvent or cheat the system.

- **Safety Outcomes:** Participants #1, #6 and #7 agreed that ELD implementation has improved safety by reducing log falsification, minimizing paperwork errors, and strengthening enforcement transparency. Participant #6 (i.e., enforcement personnel) highlighted that electronic tracking simplifies inspections and supports consistent compliance verification. They further mentioned that ELD has made it difficult for drivers to alter their logs.

- **Economic Effects:** Economic pressure emerged as one of the strongest themes across interviews. Mileage-based pay structures, uncompensated detention time, and reduced productivity under strict HOS enforcement were identified as key factors influencing driver dissatisfaction and non-compliance behavior. It was mentioned by second generation drivers and managers that ELD has indirectly reduced their productivity as some drivers have the ability to drive more than 11 hours from their 14 HOS, but ELD bound them to drive no more than 11 hours. They also mentioned about wages and productivity being directly proportional and related It was reiterated by the driver, especially owner operators, that they should be allowed complete flexibility for managing their 14 hours of duty. Few

drivers (Participants #4 and #5) mentioned that sometimes they feel like driving all the way for 11 hours so that they can come back and sleep at their home at night and making the mandatory stops like taking 30 mins break even though if they don't feel tired it makes it hard for them to comply. Secondly, they also mentioned that the payment structure is by mile so they feel pressured to drive longer mile distances for the number of hours they could drive. If congestion due to accident or inclement weather conditions makes them drive less miles, it's a loss for them as drivers.

- **Compliance behavior and enforcement fairness:** Participant #6 agreed that ELD systems make log falsification more difficult than paper logbooks. However, concerns remain regarding the self-certification process for ELD vendors. The owner operators mentioned that because of self-certification of ELD devices, only the devices thoroughly checked and inspected by law enforcement and reported to FMSCA not being compliant with the ELD rule gets caught or banned. Every device is not thoroughly inspected by law enforcement and FMSCA before launching into the market. There should be a mechanism of check and balance on the ELD devices approved to be used in the market instead of certification. Participants suggested that stronger oversight of ELD providers and greater focus on carrier-level responsibility would improve fairness and compliance outcomes.

- **Need for regulatory modernization:** Across stakeholder groups, there was strong agreement that improving safety requires modernization of HOS regulations alongside continued technological enforcement. Participants #4 and #5 emphasized that aligning regulatory requirements with real-world trucking operations would reduce economic pressure on drivers and support long-term compliance. ELD rule has been evolving overtime but the drivers feel like it is taking away the control/autonomy of decision making from them like how they want to plan their 14 hours, they want complete modernization of the ELD rule in a way that they should have the autonomy to decide when to stop, when to take a break and how much break do they want to take. So ELDs or ELD mandates should have flexibility to accommodate each individual's needs. Participant 4 also mentioned that as the drivers are usually paid per mile in most cases so putting a limit on hours of service reduces their economic well-being.

The interviews seem to suggest that participants generally acknowledged clear benefits of ELDs for record accuracy, accountability, and in some cases safety oversight, but they also raised repeated concerns about operational rigidity, economic pressure, enforcement fairness, and mismatch between regulations and real-world operations.

3.2 Stakeholder-Specific Perspectives

This section organizes the interview findings by stakeholder perspective to distinguish how ELD implementation is experienced and assessed across different roles in the trucking system. Although common themes emerged across interviews, drivers, carrier representatives, and enforcement or regulatory stakeholders placed different weight on operational, economic, compliance, and safety issues.

Three stakeholder groups are summarized into worker-level effects, company-level effects, and system-level effects. They represent (1) drivers' perspectives where the focus was on operational flexibility, fatigue, schedule pressure, detention, pay effects, and perceived

micromanagement; (2) carrier and fleet management perspectives, where the focus was on operating costs (including insurance), dispatch efficiency, liability, staffing, compliance burden, and business impacts, especially for small and mid-sized carriers; and (3) enforcement and regulatory perspectives, where the focus was on compliance consistency, enforcement practicality, safety oversight, accountability, and broader public safety goals, the views of larger carriers were also more closely aligned with this perspective.

- **Operational stakeholders (e.g., truck drivers),** especially owner operators and small sized company operators emphasized reduced flexibility, productivity losses, and increased time pressure associated with strict HOS enforcement through ELD systems. The mid-sized company driver and operators appreciated the support system that has been developed via use of ELD. They emphasized that ELD helps them plan their trips and brings operational efficiency. The small sized company manager/driver while acknowledging improved accountability, stressed that financial incentives and scheduling expectations continue to drive violations. The participants 4 and 5 emphasized the importance of balancing compliance enforcement with economic sustainability, especially for small carriers and independent drivers.
- **Regulatory representatives (e.g., patrol)** emphasized the role of ELDs in reducing human error, improving transparency, and supporting consistent enforcement nationwide. Inspection officials reported that ELD systems significantly simplify roadside inspections and improve their ability to verify compliance through GPS-supported trip records and edit histories. The CVSA director also mentioned that as advocates of ELD policy and sister organization of FMSCA.
- **Carrier Management Stakeholders (e.g., safety managers, compliance officers)** highlighted improvements in record accuracy, reduced paperwork burden, and better monitoring of driver activity. However, they noted that technical glitches and system rigidity sometimes create unintended compliance challenges. Fleet managers and owners focus primarily on implementation costs, productivity impacts, and operational efficiency. They emphasized that regulatory rigidity rather than technology itself is the primary constraint affecting performance.

The interview findings indicate that while the ELD mandate has significantly improved safety, accuracy, and transparency in HOS compliance by reducing human error and limiting log falsification, its effectiveness is constrained by rigid regulatory structures and economic pressures within the trucking industry. Stakeholders widely acknowledged that ELDs enhance accountability and support enforcement; however, drivers and small carriers emphasized that strict time limits reduce operational flexibility, negatively affecting productivity, income, and job satisfaction. Financial incentives, tight delivery schedules, and detention delays were identified as key drivers of non-compliance, suggesting that violations are often economically motivated rather than intentional disregard for safety. Although ELDs make falsification more difficult, concerns remain regarding system manipulation due to the self-certification of providers. Participants highlighted the need for regulatory improvements, including modernization of HOS rules, stricter oversight of ELD systems, more consistent enforcement, and greater focus on carrier and shipper practices. Overall, the findings suggest that achieving sustainable compliance and improved safety requires a balanced approach that integrates technological enforcement with regulatory flexibility and better alignment of economic and operational conditions for drivers

The findings suggest that the ELD mandate has been effective in enhancing compliance, improving record accuracy, and promoting safer driving practices across the trucking industry. However, its full potential is limited by rigid Hours-of-Service regulations and persistent economic and operational pressures faced by drivers and carriers. While technology has reduced opportunities for log falsification, it has not addressed the underlying incentives that drive non-compliance, such as mileage-based pay structures, tight delivery schedules, and detention delays. To achieve meaningful and sustained improvements in both safety and compliance, policymakers must move beyond enforcement alone and adopt a more balanced approach, one that includes modernizing HOS rules, strengthening oversight of ELD systems, ensuring fair and consistent enforcement, and addressing industry-wide economic conditions. Such reforms would better align regulatory objectives with real-world operations, ultimately supporting both driver well-being and roadway safety.

3.3 Question-by-question Participant Summary

A detailed breakdown of responses for each question is provided below for reviewers seeking additional detail.

1. What do you see as the main benefits of complying with the ELD mandate?

- P#1 emphasized that the ELD mandate helps improve safety by ensuring drivers remain within legally permitted hours of service and are forced to take appropriate breaks, which reduces fatigue and long-term burnout. ELDs also make recordkeeping much easier compared to paper logs, which were described as exhausting and prone to error. By automating time tracking and paperwork, ELDs save drivers time and reduce the burden of manually reconstructing their workday. Additionally, ELD data allows managers to better understand driver work patterns and resolve scheduling misunderstandings, promoting more realistic expectations about driving habits.
- P#2 that the biggest benefit of ELD compliance is the reduction of human error in recording hours of service. Before ELDs, many violations occurred not because drivers intended to break rules but due to misunderstandings, miscalculations, or simple paperwork mistakes. ELDs automatically record driving time, which improves accuracy for drivers, motor carriers, and enforcement officers alike. This leads to fairer compliance reviews, fewer incorrect citations, and better accountability across the industry. The participant also highlighted that ELDs protect drivers from being wrongly judged as intentionally violating regulations when in reality many past errors were unintentional.
- P#3 believes that ELDs are beneficial when applied correctly and uniformly. He explained that although he initially disliked them, he has come to see them as necessary. In his view, ELDs protect drivers, especially company drivers, from being pushed beyond safe fatigue limits because dispatchers cannot legally force them to exceed their available hours when everything is electronically recorded. He emphasized that ELDs create accountability and transparency, particularly in the event of a serious accident, where data can clearly show whether a driver was over hours or compliant. He also stated that returning to paper logs would reopen widespread falsification. For him, the key benefits are transparency and fatigue accountability, not micromanagement.
- P#4 did not see any meaningful benefits associated with complying with the ELD mandate. He stated that, in his experience, the system does not improve driver well-being or operational efficiency. Instead, he believes it primarily benefits large trucking corporations,

shippers, and dispatch operations rather than individual drivers or smaller companies. According to him, the system forces drivers to stop when they may not be tired and to drive again when they may actually feel fatigued, which he believes contradicts the intended purpose of improving safety.

- P#5 stated that ELDs themselves are not inherently problematic and that they can provide value in monitoring driver activity. However, he emphasized that the benefits have been overshadowed by unintended consequences created by rigid enforcement of the mandate without updating the underlying HOS rules. According to the participant, before the ELD mandate drivers used paper logs and sometimes adjusted them slightly to maintain productivity and return home sooner. Once electronic logs were strictly enforced, this flexibility disappeared, which reduced driver productivity, lowered wages, and reduced driver satisfaction. The participant indicated that the mandate increased transparency in theory but, in practice, created economic pressures and operational challenges for compliant carriers.
- P#6 focused that ELD technology has made it easier for them to inspect the drivers for their HOS criteria as compared to paper logs because they are able to view the ELD and the GPS location of the driver for their trip. It makes it easier for them to check for compliance with the ELD system and has made falsification difficult for the drivers and CMV companies.

2. What challenges or drawbacks have you experienced, or do you expect to encounter, when complying with the ELD mandate?

- P#1 pointed out that a major drawback of ELDs is their strict time constraints, which can prevent drivers from working longer even when they feel rested and capable. Unlike paper logs, ELDs offer limited flexibility, and minor mistakes such as incorrectly using personal conveyance or yard move status can result in significant disruptions to available work hours. Technical glitches and rigid system coding may force drivers into unnecessary long breaks or falsely indicate violations, leading to lost productivity. Overall, the participant viewed ELDs as beneficial but sometimes overly rigid and unforgiving of human or system errors.
- P#2 identified cost as a major challenge, particularly for trucking companies that must purchase, install, and maintain ELD systems. Smaller carriers and owner-operators may feel this financial burden more heavily than large fleets. Another significant drawback is technological issues, including software glitches, compatibility problems with older vehicles, and system updates that sometimes malfunction, similar to problems people experience with smartphones or computers. The participant also criticized the self-certification process for ELD providers, explaining that many devices enter the market without proper vetting and are only addressed after problems arise. This places unfair responsibility on drivers and enforcement officers to deal with faulty systems they did not choose or design.
- P#3 stated that the main problem is not the ELD technology itself, but the rigid structure of the HOS rules. He criticized the 14-hour clock, the forced 30-minute break, and what he described as sleeper/off-duty micromanagement. According to him, this rigidity sometimes creates unsafe situations, such as driving in bad weather to beat the clock, parking in unsafe areas because time has expired, or editing logs to fix technicalities. He believes the technology is good, but the structure needs refinement to better reflect operational realities

- P#4 described several drawbacks of the ELD mandate. He explained that the system creates constant time pressure because drivers must complete deliveries within strict time limits while staying within the 11-hour driving rule and the 14-hour on-duty limit. Since the clock continues running once a driver starts the workday, drivers often feel rushed to maximize driving time to meet delivery schedules. He also noted that electronic tracking allows dispatchers and companies to monitor drivers closely through satellite systems, which increases stress because drivers are frequently questioned about why they stopped or took breaks. Overall, he felt that this constant monitoring and time pressure contribute to fatigue and stress rather than reducing them.
- P#5 argued that rigid electronic enforcement significantly reduces driver productivity. The participant described several challenges associated with the ELD mandate. First, he argued that rigid electronic enforcement significantly reduced driver productivity because drivers must strictly follow time limits even when they are close to completing a trip or returning home. This reduced productivity, according to the participant, lowered driver earnings and worsened driver quality of life. Second, he claimed that the system has enabled widespread fraud because many ELD providers self-certify their systems, which allows some companies to manipulate electronic logs through overseas IT departments that digitally reset or recreate logbooks. He stated that this has created an uneven playing field where compliant companies lose business to non-compliant carriers that manipulate logs to operate longer hours and lower costs.

3. Do you think falsification would increase or decrease if the ELD mandate were implemented uniformly across all carriers, with no exemptions or differential enforcement?

- P#1 believed that while uniform ELD implementation would reduce some falsification, it would not eliminate cheating entirely. Drivers and carriers often find loopholes in systems, such as creating multiple logins or using poorly designed ELD software that lacks proper safeguards. Smaller companies in particular may rely on cheaper and less secure systems that are easier to manipulate, while larger carriers typically invest in more advanced and compliant technology. Additionally, some unethical carriers may actively encourage rule-breaking to maximize profits, suggesting that technology alone cannot fully prevent falsification.
- P#2 explained that ELD enforcement is already largely uniform across carrier sizes, with only limited exemptions such as local short-haul operations. They did not believe that removing exemptions or applying the rules more strictly across all carriers would significantly affect falsification. In their view, falsification is more about individual and company ethics rather than exemptions or carrier size. Economic pressures, family needs, and business demands exist regardless of the logging method. While acknowledging that smaller companies may face greater financial strain, the participant felt that falsification decisions are driven by personal choice and external pressures rather than regulatory structure itself.
- P#3 believes falsification would decrease if ELDs were mandatory across all carriers without exemptions. He argued that current exemptions create uneven enforcement and competitive pressure. However, he added that if HOS rules were rigidly identical across all sectors without flexibility for operational differences such as livestock hauling falsification might increase because drivers would feel pressured to meet delivery demands. He emphasized that every truck operating under an MC number should have an ELD, but

flexibility in hours should reflect different operational realities while maintaining universal technology.

- P#4 believed that falsification would likely increase if the mandate were applied uniformly without exemptions. He explained that certain trucking operations such as livestock transportation or oversized loads face unique operational constraints that make strict compliance difficult. For example, livestock carriers cannot simply stop for long periods because animals require airflow and continuous movement, and drivers hauling oversized loads often cannot find safe places to stop. Because of these operational challenges, he suggested that removing exemptions could lead to more instances where drivers feel compelled to falsify records in order to continue operating
- P#5 strongly supported uniform enforcement across all carriers and argued that regulations should apply equally regardless of company size. However, he also stated that outdated rules combined with strict enforcement could still encourage falsification if productivity limitations remain unresolved.
- P#6 discussed about the inspections for the ELD and mentioned that falsification of logs has become difficult for the drivers as they are able to see in the logs if any edits in the ELD logs is made either by the company or driver itself. So overall the ELD mandate implementation has improved the CMV safety. Moreover, the participant also mentioned about the specific categories like agricultural and livestock hauling trucks that are exempted from ELD requirements and deemed exemption necessary for the operation of these categories.

4. Why do you think drivers feel compelled to violate HOS requirements or ELD mandates?

- P#1 mentioned that violations are largely driven by economic and operational pressures rather than disregard for safety. Drivers frequently experience long delays at loading and unloading facilities while their clocks continue to run, reducing available driving time. At the same time, they face pressure from dispatchers and customers to meet strict delivery deadlines. Because most drivers are paid by miles, sitting idle directly affects their income, increasing financial stress. These combined pressures often push drivers to exceed legal limits in order to maintain earnings and satisfy performance expectations.
- P#2 emphasized financial pressure is the primary reason drivers intentionally violate regulations. Some drivers weigh the risk of fines against the additional income they can earn by driving longer hours and may conclude that violating is financially worthwhile unless they are caught. Others face direct pressure from employers who threaten job security or push unrealistic delivery schedules. The participant also mentioned extreme situations involving exploitation or human trafficking, where drivers are forced to work excessive hours under coercive conditions. Additionally, resistance to technology particularly among older drivers contributes to violations, as some feel uncomfortable or frustrated with digital systems after decades of paper logging.
- P#3 mentions that drivers violate HOS rules primarily due to money and pressure. He stated that pay is often tied to miles, which directly affects income, and drivers may also feel pressure to meet delivery windows, get home, or respond to dispatch expectations. However, he noted that once drivers understand that there is no way around the electronic clock, they adapt and plan better. In his opinion, consistent and uniform enforcement reduces violations over time because expectations change.

- P#4 explained that drivers often feel compelled to violate HOS rules primarily because of economic pressure. Many drivers are paid by miles, which means their income depends on how many miles they drive. As a result, drivers try to maximize the number of miles they can complete within their available hours in order to earn a reasonable paycheck. In addition, some companies place pressure on drivers to keep moving and to fully utilize their available driving hours. According to the participant, these financial incentives and company expectations encourage drivers to find ways to exceed or work around regulatory limits.
- P#5 explained that economic pressure and reduced productivity are the primary reasons drivers violate HOS requirements or manipulate ELD records. He argued that current regulations limit drivers to roughly eight hours of productive work per day once all non-driving duties are considered. Because driver wages depend heavily on productivity, these limitations reduce income and create incentives for drivers or companies to cheat. He also stated that some drivers are pressured by companies or market competition to exceed legal limits, while others may violate rules simply to complete trips efficiently or return home instead of stopping short of their destination.

5. Do you think a compliant ELD system makes it more difficult for drivers to falsify their logs?

- P#1 stated that modern ELD systems significantly reduce the ability to falsify logs compared to paper systems, particularly through automatic status changes that activate driving time whenever a truck moves. Once these automatic triggers occur, the recorded time generally cannot be altered, which limits manipulation. Newer systems have closed many loopholes that previously allowed corrections or reassignment of driving time. However, the participant acknowledged that some system coding flaws still exist, such as misinterpreting split breaks, which can unintentionally benefit or penalize drivers.
- P#2 strongly believed that compliant ELD systems make falsification much harder. Because the devices automatically track vehicle movement and driving time, they remove opportunities for manual manipulation that existed with paper logs. ELDs also provide legal protection for drivers by creating objective data that shows where and when they were driving. This transparency reduces disputes with law enforcement and limits the ability to fabricate hours. While no system is perfect, the participants viewed ELDs as a major improvement in accountability and accuracy compared to handwritten logs.
- P#3 strongly believes that compliant ELD systems make falsification more difficult. He explained that ELDs record movement, show edits, create visible edit trails, and require justification for changes. While edits are possible, they are transparent and traceable. He emphasized that returning to paper logs would significantly increase falsification. He also suggested that simplifying HOS rules such as focusing on mandatory rest rather than rigid structures would further reduce falsification by eliminating unnecessary technical violations
- P#4 acknowledged that ELD systems do make it more difficult for drivers to falsify their logs compared to paper logbooks. He noted that under the previous paper log system drivers had more flexibility to adjust or manage their logs and could stop the clock when needed to rest or take breaks. With ELDs, driving time is automatically recorded, which restricts the ability to modify records and makes it harder for drivers to manipulate their logs.

- P#5 The participant stated that compliant ELD systems can make falsification more difficult, but he argued that many systems currently used in the industry are not truly compliant. According to him, the self-certification process allows companies to create or modify ELD software without strict oversight. He claimed that some companies manipulate logs by rewriting or recreating electronic records through IT departments, which makes falsification possible even with electronic systems. As a result, he believes technology alone does not eliminate falsification because computer code can always be modified.
- P#6 mentioned that they have observed a significant reduction in falsification of logs since the implementation of the ELD mandate, previously the drivers used to mis report the number of hours driven on paper logs as it was easy form them to manipulate the paper logs. The automatic recording of the HOS using ELD has improved the compliance and falsification of logs.

6. What do you think is a fair and effective approach to ensure that all truck carriers comply with HOS requirements?

- P#1 suggested that FMCSA should establish a standardized baseline ELD system available to all carriers as a minimum compliance requirement. This would ensure fairness and consistency regardless of company size while preventing reliance on low-quality or illegal logging applications. Carriers that desire more advanced features and monitoring tools could then choose private systems with additional capabilities. This approach would create an even playing field while allowing flexibility for companies with greater resources.
- P#2 emphasized rather than increasing penalties or granting more exemptions, the participant argued that fairness should come from improving the ELD provider system itself. The participant recommended eliminating self-certification and implementing proactive federal vetting of device manufacturers. Providers should be held accountable for system reliability and required to offer proper training to drivers and motor carriers. The participant also suggested that pricing structures should be scaled based on carrier size, similar to drug-testing consortium models, so smaller businesses are not disproportionately burdened. In their view, fairness comes from making compliance practical, affordable, and technically reliable.
- P#3 believes that mandatory ELDs in every commercial truck, without exemptions, is essential. He emphasized visible editing histories with required justifications for log changes. He advocated simplifying the HOS structure by requiring a mandatory 10 hours off within a 24-hour period, including a minimum consecutive rest block (e.g., six hours), while removing the 14-hour clock and sleeper/off-duty micromanagement. He argued that the government should ensure adequate rest and accountability but avoid dictating minute-by-minute details. He also stressed that uniform enforcement levels the economic playing field and prevents non-compliant carriers from undercutting compliant ones.
- P#4 mentioned that enforcement should focus more on trucking companies rather than primarily targeting drivers. In his view, drivers often receive the majority of the blame and penalties even though many operational decisions are controlled by companies, dispatchers, and shippers. He indicated that some companies already monitor drivers closely and ensure compliance, but smaller companies may attempt to find workarounds. Therefore, he believed stronger oversight of companies and their operational practices would be a more effective way to ensure compliance with HOS rules.

- P#5 argued that fairness should come from simplifying and modernizing the HOS rules rather than creating exemptions for certain carriers. He proposed replacing the current complex rules with a simpler system allowing drivers to work up to 14 hours on duty followed by a mandatory 10-hour rest period, eliminating other restrictions such as the weekly 70-hour limit and various detailed requirements. He believed that allowing greater productivity would reduce the incentive to cheat. Additionally, he suggested that strict penalties should be introduced for fraudulent log manipulation, including jail time for drivers caught falsifying logs and impoundment of the truck and trailer.

7. In what ways do you think FMCSA can improve both driver safety and economic conditions while strengthening compliance with HOS rules?

- P#1 argued that FMCSA should continue and expand tailored exemptions that recognize different operational realities within the trucking industry, such as agriculture, livestock hauling, local driving, and emergency response situations. Certain drivers face unique time pressures and safety risks that rigid rules do not adequately address. By developing targeted flexibility for specific job roles while maintaining core safety standards, FMCSA could reduce the economic pressure that drives violations and encourage more realistic compliance without compromising public safety.
- P#2 encouraged FMCSA to focus less on constantly adjusting HOS rules and more on regulating ELD providers and supporting driver well-being. They recommended mandatory training from ELD companies, stronger certification standards, and better oversight of device functionality. Beyond compliance, they suggested investing in fatigue management programs, driver education, nutrition initiatives, and healthier lifestyle incentives. Examples included training on sleep quality, providing healthier food options in trucks, and promoting wellness programs that address root causes of fatigue rather than just enforcing hours limits.
- P#3 suggested simplifying hour rules and removing rigid clock pressure while maintaining mandatory rest requirements. He believes FMCSA should allow flexibility in structure but ensure universal ELD adoption across all sectors. He emphasized equal enforcement to prevent competitive disadvantages for compliant carriers. In his view, when rules are realistic and applied uniformly, compliance increases naturally. He opposed exemptions for new entrants or training phases, arguing that exemptions create loopholes and economic manipulation. He also highlighted the importance of proper training at the company level rather than relying solely on CDL schools.
- P#4 stated that regulators should pay more attention to the role of companies and shippers in creating operational pressure on drivers. According to him, drivers are often treated as the primary problem, while the companies that schedule loads and impose tight delivery windows are not scrutinized as closely. He suggested that regulators should address company practices that push drivers to operate under stressful conditions. He also mentioned that scheduling practices and dispatch expectations sometimes require drivers to operate at times that do not align with their natural sleep rhythms, which can negatively affect safety and fatigue levels.
- P#5 stated that FMCSA should focus on updating outdated regulations and addressing fraud within the ELD system rather than adding more complex rules. He argued that regulators should either strictly enforce existing laws or revise them to better reflect modern trucking conditions. According to him, the current system reduces productivity and

drives compliant companies out of business while allowing fraudulent operations to thrive. He believes that updating the HOS framework to allow more productive work hours would improve driver's wages, reduce incentives for cheating, and create a more balanced and competitive industry.