



Transport of RVs and Electronic Logging Devices (ELD): Relief Option Needed for the Unique Nature of RV Delivery

Recreation vehicle (RV) trailers and motorhomes are transported in a one-time, one-way delivery where installation of an ELD is not practicable. In these instances, either the Record of Duty Status written form or an ELD should be sufficient to comply with commercial vehicle Hours of Service requirements.

Background

Section 31137 of title 49 USC requires a commercial motor vehicle operated by a driver subject to hours of service and record of duty status requirements to have an electronic logging device to improve compliance. The ELD requirement is not practicable for a driveaway towaway operator who is moving an RV trailer one-way with a pick-up truck or for an operator during a one-time, one-way motorhome delivery. Drivers delivering a motorhomes or operating pickup truck towing an RV trailer are currently required to prepare Hours of Service Records of Duty Status (RODs).

Rationale for Providing RV Transporters the Option of an ELD or Written Log

Limited Time Period the Unit is "Commercial"

- RVs are designed for personal use, not commercial use. The units are personal vehicles except for the short period of transport from a manufacturer to a dealer or to and from an RV show.

Cost Burden on Drivers

- The individual owner-operators in the business of leasing equipment and the individuals in the business of providing driving services would have to bear the (not inexpensive) cost of the ELD.

Practical Concerns

- If an ELD is required to be installed by the driver in the motorhome/tow vehicle for the duration of the trip from the point of manufacture to the dealer, there is no guidance as to recording the driver's personal time either operating his own tow vehicle or utilizing public transportation either to return home or to the original point of dispatch to accept another trip assignment.

Regulatory Option Does Not Present Safety Concerns

- RV driveaway-towaway accident frequency is over 600% less than the 1.5 accidents per million miles traveled threshold used by the FMCSA Safety Measurement System for 2012

Request

Recognizing there may be limited options to address "policy-type" highway legislative issues, RVIA plans to return to your office at a later time to explain why motor carriers, transporting RVs within the definition of "driveaway-towaway operation" (as defined in 49 CFR 390.5.) should have the option to require each driver to either: (1) use the Record of Duty Status form under the Hours of Service provisions or (2) require the driver to use an ELD installed in the vehicle.

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