



THE 100 AIR-MILE RADIUS

THE MISUNDERSTOOD EXCEPTION TO THE ELD RULE

Fred Fakkema | Vice President of Compliance



Understand the solution you choose, since it is the responsibility of the driver or fleet to be in compliance, not the vendor. Ask about over-the-air update capability when shopping your options.

Do I need an ELD?

The FMCSA's ELD rule applies to all commercial motor vehicles (CMVs) as defined by [49 CFR 390.5](#). Most tend to forget about the fact the federal definition of CMVs can include pick-up trucks or large passenger vans. If you operate in intrastate commerce, you will need to check with your local authorities. Some states adopt federal regulations while others rewrite the rules. Changes can include different definitions of what a CMV is or HoS limits.

Know the ELD rule and its exemptions.

In this report, we will focus on the 100 air-mile since it's one of the more commonly talked about exemptions for short-haul operations. The final ELD rule is 500+ pages. Work with a compliance expert(s) to fully know and understand the requirements, including exemptions such as [395.1\(e\) Short-haul operations—\(1\)](#) 100 air-mile radius driver.

What are the 100 air-mile exemption requirements?

To help you make sense of it, here are the highlights.

- The driver must operate within a 100 air-mile radius of his/her normal work reporting location.
- The driver must start and end the day at the same location.
- The driver must be released from work within 12 consecutive hours.
- The driver must have at least 10 consecutive hours off-duty between each 12-hour shift.
- The driver must not drive more than 11 hours.

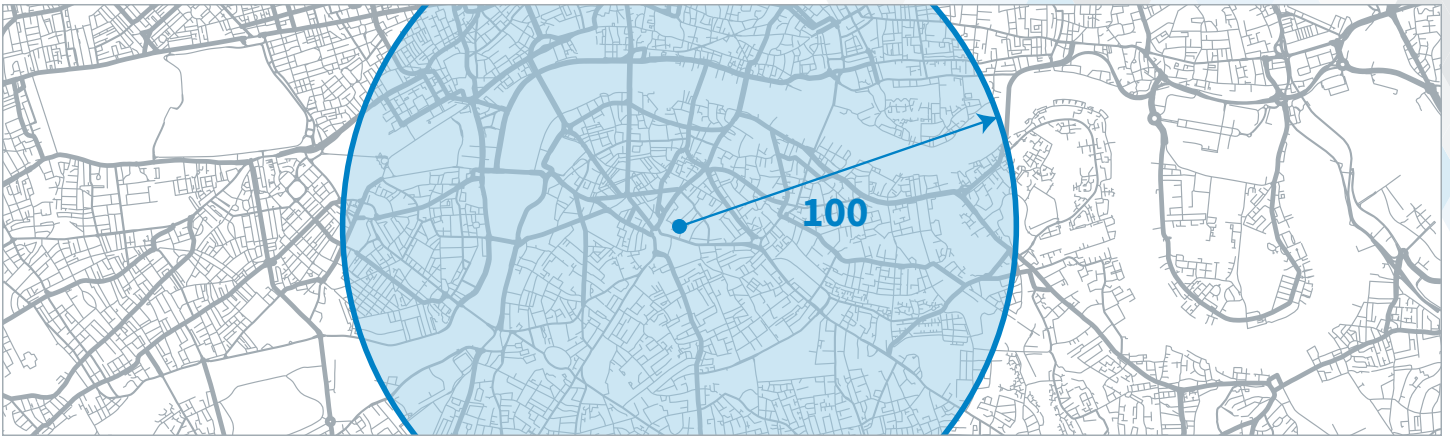
Every condition must apply.

The 100 air-mile exemption applies if a driver meets each condition previously summarized. If a single requirement is unmet, the driver must complete a log for the day.

For example, if a driver has a special assignment and ends the day at a different reporting location, the exemption does not apply for that day. This is probably the most common mistake made. Furthermore, if a driver breaks any condition previously mentioned more than eight times in a rolling 30-day period, the driver is required to install and use an ELD from that point forward, according to the final ELD rule.

What is an air mile?

An "air mile" is a nautical measurement of distance which does not account for roads, terrain or other variables. Basically, an air mile is the shortest path between two points, or "as the crow flies." You can easily plot a rough 100 air mile radius from your reporting location using one of many free online tools.



What is the exemption?

You are exempt from maintaining a logbook and the 30-minute rest break rule if you report on a time card, but you are not exempt from HoS regulations. Although drivers are not required to maintain a detailed log, they are still required to record on-duty time on paper or electronically.

What if I go beyond the exemption requirement mid-day?

If you plan to operate under this exemption and break the requirement mid-day, you must recreate the day on a paper log. Again, as a reminder, if any of the conditions are unmet more than eight times in a rolling 30-day period, the driver is required to install and use an ELD from that point forward.

What should I do next?

If you think this exemption applies to you, contact an industry expert. A safety and compliance expert should be able to help you interpret your specific situation. Also, something to remember—while you may not be subject to the ELD mandate, there are still many benefits of keeping electronic logs.

How Zonar can help

Our compliance and safety experts are within your reach.

Our experts are available for compliance consulting and will work with you to better understand your specific needs. Zonar's dedicated team of [compliance experts](#) have decades of experience in transportation. They work closely with our product development teams to innovate, design and implement smart fleet solutions that help you adhere to federal and state regulations.

Ensure ease-of-use for drivers, fleet managers and law enforcement.

Our focus is ease of use, reliability and compliance for drivers as they log HoS and fleet managers maintaining back-office reports. Our [Zonar Logs® Hours of Service](#) application features a function called Roadside View, which displays only the required information for roadside inspections. By displaying nothing more than what is required, Zonar Logs helps law enforcement more quickly do their job and have you on your way. It also maintains a sense of privacy for the driver.

Contact Us

If you have any questions about current or proposed industry regulations, contact Zonar for a complimentary consultation. [206.878.2459 #2](tel:206.878.2459) | compliance@zonarsystems.com

Meet Our Compliance Team Leadership

Our experts are available for [compliance consulting](#) and will work directly with you to better understand the specific needs of your business. Contact us to start the conversation.



Fred Fakkema | Vice President of Compliance

Fred is Vice President of Compliance for Zonar, where he leads product development to meet the safety and compliance needs of customers today and tomorrow. Fred has been deeply involved in the development of the ELD (electronic logging devices) mandate, from the policy level down to the compliance level for Zonar's mobile telematics tablet.

Prior to joining Zonar in 2010, Fred enjoyed a successful a 25-year career with the Washington State Patrol (WSP). During his career, he commanded the WSP Academy, Government and Relations Division and the Commercial Vehicle Division. He is the Past President for the Washington Chapter, FBI National Academy Associates. Fred is a member of the American Trucking Association (ATA) Safety Policy Committee, Technology and Engineering Policy Committee, Association of Equipment Management Professionals (AEMP) Safety Committee, Truck Renting and Leasing Association's Government Relations Committee and Equipment Technology Advisory Council. Fred earned his Master's Degree in Public Administration from the University of Washington.



Ron Cordova | Compliance Manager

Ron Cordova recently joined Zonar as Compliance Manager. Ron served more than 21 years with the New Mexico Department of Public Safety, Motor Transportation Police, where he worked up to the Rank of Major. He retired with the Curry County Sheriff's Office. While in law enforcement, Ron served in many different capacities with the Commercial Vehicle Safety Alliance (CVSA) including president in 2005-2006. Safety Policy Committee, Technology and Engineering Policy Committee, Association of Equipment Management Professionals (AEMP) Safety Committee, Truck Renting and Leasing Association's Government Relations Committee and Equipment Technology Advisory Council. Fred earned his Master's Degree in Public Administration from the University of Washington.



Jill Snyder | Compliance Manager

Jill joined the Zonar team in September of 2018. With more than 33 years of experience in transportation safety, Jill is the second person in Washington State to receive her nationally certified Director of Safety credentials from the North American Transportation Management Institute in 2000. Jill has been an active member of the WTA's Safety Management Board of Directors since 1995 and recently was recognized as Safety Professional of the Year in 2013.



About Zonar

Founded in 2001, Zonar has pioneered smart fleet management solutions throughout vocational industries. Zonar helps fleets of all sizes maximize the use of their assets with technology solutions dedicated to improving compliance, efficiency, maintenance, safety, and tracking. Cloud-based services with open APIs drive Zonar's smart fleet solutions by making it easy for fleet owners and managers to stay connected to their fleets and operators to dispatch. Headquartered in Seattle and part of the Continental AG family—a global leader in automotive technology—Zonar also has a Technology Development Center in downtown Seattle, a regional office in Cincinnati and a distribution center outside of Atlanta.

Visit www.zonarsystems.com to learn more.

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