

*Hours of Service*

11:00 AM Eastern Time (New York)  
 10:00 AM Central Time (Chicago)  
 9:00 AM Mountain Time (Denver)  
 8:00 AM Pacific Time (Los Angeles)





---

---

---

---

---

---

---

---

---

---

## Webcast Logistics

- The webcast, "Hours of Service," will be starting in a few moments.
- The handout is available to print. You'll find it in the "Webcast Handouts" box on the lower right-hand side of your screen.






---

---

---

---

---

---

---

---

---

---

## Webcast Logistics

- Participants' phones will be muted during the webcast.
- Please use the "Q&A" function in the upper right corner of your screen to ask a question or if you need a dial in number.
- Additional Q&A time will be provided at the conclusion of the webcast.






---

---

---

---

---

---

---

---

---

---

## Webcast Logistics

Visit [jjkeller.com/nptcinfo](http://jjkeller.com/nptcinfo) to view:

- This recorded webcast,
- Archived J. J. Keller & NPTC webcasts, and
- Future events!




---

---

---

---

---

---

---

---

## Webcast Logistics

- **AUDIO:** Participants' phones will be muted during the webcast. Listen through your computer's speakers or chat us through the Q&A for a dial in number.
- **QUESTIONS:** Send your questions through the "Q & A" box on your screen. We'll get to as many questions as time permits.
- **HANDOUTS:** Download today's handout in the "Webcast Handouts" box found on the bottom of your screen.

**Thank you for participating in today's webinar!**




---

---

---

---

---

---

---

---

A slide titled "Hours of Service" for "October 18, 2017". The background is a blue gradient with a grid pattern. At the bottom left is the J.J. Keller &amp; Associates, Inc. logo (Since 1953). At the bottom right is the NPTC logo (National Private Truck Council).

---

---

---

---

---

---

---

---

## Hours of Service

This webcast will cover ...

- A regulatory overview
- How industry best practices are raising the bar on compliance
- A case study in implementation
- Question & Answer

**Attention Attendees:**

- + Thank you for attending!
- + You will be muted during the event.
- + Please use the Q&A feature to send in questions to us. We'll try to answer them during the Q&A period if they are not covered in the presentation.
- + The slides and recording will be posted within 7 days at: [www.jjkeller.com/nptcinfo](http://www.jjkeller.com/nptcinfo)



**Gary Petty**  
President & CEO  
National Private Truck Council



## Meet Your Presenters



**Gary Petty**  
President & CEO  
National Private Truck Council



**Tom Bray**  
Industry Consultant - Transportation  
J. J. Keller & Associates



**Tom Moore, CTP**  
Senior Vice President  
National Private Truck Council



**Sean Dubman, CTP**  
Transportation Safety Coordinator  
Wegmans Food Markets



## Regulatory Overview



**Tom Bray**  
Industry Consultant - Transportation  
J. J. Keller & Associates, Inc.



## Made up of Three 'Core' Areas

- Limits (§395.3 and §395.5)
- Records of duty status: "Logs" (§395.1, §395.8, §395.15, and Subpart B to Part 395)
- Exceptions (§390.3(f), §390.23, and §395.1)

---

---

---

---

---


---

---



---

---

---



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.

## Not Covered

- Some drivers are exempt from all of the hours-of-service requirements, including logs and limits
  - Drivers that are covered under one of the exemptions at §390.3(f)
  - Driver providing emergency relief during a declared emergency (§390.23)
  - Agricultural drivers, utility service vehicle drivers, railroad signal employees, drivers of covered farm vehicles, and pipeline welders are exempt from limits and logs under exemptions in §395.1 (provided conditions are met)
- All other commercial vehicle drivers are covered!!!

---

---

---

---

---


---

---



---

---

---



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.

## Limits

- Property-carrying drivers (§395.3)
  - 8 hour/30 minute break
  - Driver must stop driving once it has been 8 hours since the last break of 30 minutes or more
    - Driver can work once the limit is reach, just cannot drive
  - Multiple exemptions
    - **No break required: "Short-haul" drivers that use time records, oversize/overweight, and livestock and bee haulers**
    - Can use 30 minutes on duty: Radioactive, munitions, HM under terms of security plan that requires attendance, ready-mix drivers
    - Some are found in the regulations, some were published in the Federal Register

---

---

---

---

---


---

---



---

---

---



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.

## Limits

- Property-carrying drivers
  - 14 consecutive hours
    - 16 hours once per week or since last restart if driver returns every night (§395.1(o))
    - 16 hours twice a week for drivers operating property-carrying vehicles that do not require a CDL to operate (§395.1(e)(2))
  - 11 hours driving
    - Adverse and emergency conditions are the only exceptions (§395.1(b))
  - Driver cannot drive when limit is reached
    - Driver can work, just not drive
    - 10-hour break required to "reset" 14- and 11-hour clocks
    - Exception: "Split breaks" are allowed for drivers with sleeper berth (§395.1(g))



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.




---

---

---

---

---

---

---

---

---

---

## Limits

- Property-carrying drivers
  - 60 hours in 7 days or 70 hours in 8 days
    - Only exception is for "driver salespersons" (§395.1(c))
  - Driver can "restart" period with 34-consecutive hours off duty
    - No restrictions on restart period anymore
    - Exceptions: 24-hour restart for oilfield, water-well, and construction drivers (§395.1(d)(1), (l), and (m))



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.




---

---

---

---

---

---

---

---

---

---

## Logs

- Before December 18, 2017
  - Time records for "short-haul" drivers (§395.1(e)(1))
  - Paper logs (§395.8)
  - Automatic onboard recording device (§395.15)
  - Electronic logging device (Subpart B to Part 395)



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.




---

---

---

---

---

---

---

---

---

---

## Logs

- After December 18, 2017
  - Time records for "short-haul" drivers
  - Paper or "digital equivalent" for only certain drivers
    - Drivers that must log 8 days or fewer in any 30-day period
    - Certain driveaway/towaway drivers
    - Drivers operating a vehicle older than model year 2000 (based on VIN or engine serial number in case of engine replacement)
  - Automatic onboard recording device
  - Electronic logging device

---

---

---

---

---


---

---



---

---

---



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.

## 'Other' Exemptions

- Oilfield waiting time
- Retail store deliveries during December 10 to 25
- Alaska and Hawaii
- Travel time
- Motion picture
- Hi-rail vehicles

---

---

---

---

---

---

---

---

---

---



Tom Bray  
Industry Consultant – Transportation  
J. J. Keller & Associates, Inc.




## Beyond Compliance

---

---

---

---

---

---

---

---

---

---



Tom Moore, CTP  
Senior Vice President  
National Private Truck Council




## Keeping Up With the Changes

- 2003/2004: Property-carriers get new limits
  - 11/14 and 10 hour break
  - 34-hour restart
- 2011/2013
  - 8-hour/30-minute break added
  - Restart restriction added
  - **"Egregious" violation added**
- 2014
  - Congress orders suspension of restart restrictions
- 2015/2017 ELD mandate
- 2017
  - Study released: Restart restrictions cannot be reapplied
  - Exemption/exception explosion
    - 36 exemptions in the regulations (§390.3(f) and §395.1)
    - 16 temporary exemptions in place
    - At least 12 more exemption applications filed and pending action

---

---

---

---

---

---

---

---

---

---

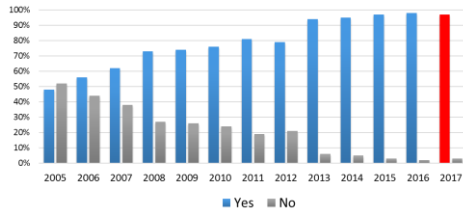
---



**Tom Moore, CTP**  
Senior Vice President  
National Private Truck Council




## Onboard Technology Dominates




---

---

---

---

---

---

---

---

---

---

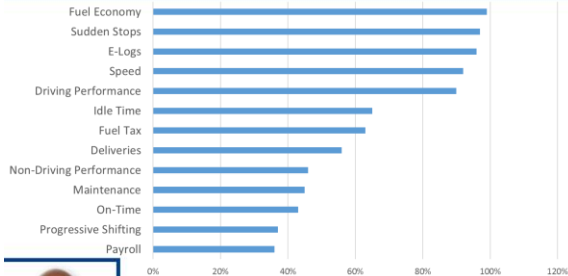
---



**Tom Moore, CTP**  
Senior Vice President  
National Private Truck Council




## How Fleets Deploy Technology




---

---

---

---

---

---

---

---

---

---

---



**Tom Moore, CTP**  
Senior Vice President  
National Private Truck Council




## CSA Scores



|      | Unsafe Driving | Fatigued Driving | Driver Fitness | Controlled Substance | Vehicle Maintenance | HazMat | Crash |
|------|----------------|------------------|----------------|----------------------|---------------------|--------|-------|
| 2012 | 12.8           | 17.9             | 17.77          | 1.7                  | 24.91               | 19.78  | 22.14 |
| 2013 | 11.3           | 13.46            | 11.9           | 0.99                 | 20.86               | 1.06   | 29.8  |
| 2014 | 12.1           | 10.9             | 10.7           | 0.91                 | 20.8                | 1.94   | 27.2  |
| 2015 | 11.9           | 12.9             | 13.0           | .05                  | 21.9                | 1.3    | 22.3  |
| 2016 | 14             | 12               | 6.3            | .12                  | 18                  | 1.7    | 25.7  |
| 2017 | 9              | 10               | 7              | 0.8                  | 17                  | 2.6    | 20    |



Tom Moore, CTP  
Senior Vice President  
National Private Truck Council




---

---

---

---

---

---

---

---

---

---

## Hours of Service

- Most runs are the same every week
  - Hours do not vary much
  - Days do not vary
  - Hours of service are the same most weeks
- Issues occur when
  - Runs leave late productions issues
  - Vehicle breakdowns
  - Weather
  - Holidays
  - Traffic



Tom Moore, CTP  
Senior Vice President  
National Private Truck Council




---

---

---

---

---

---

---

---

---

---

## Why the Regs Aren't Followed

- Poor communication
- Conflicting goals
- Processes that lead to poor follow-through



Tom Moore, CTP  
Senior Vice President  
National Private Truck Council




---

---

---

---

---

---

---

---

---

---



## Driving with in the Regulations

- Train the drivers that:
  - They own their hours of service
  - Captain of the Ship Policy
  - Review the regulations regularly
  - How to use the on-board system
- Private fleets use
  - On board systems to find violations
  - Coach drivers when they violate the regulations
  - Document coaching and training

---

---

---

---

---

---

---

---



Tom Moore, CTP  
Senior Vice President  
National Private Truck Council





## The Fleet Perspective

---

---

---


---

---



---

---

---



Sean Dubman, CTP  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.

## Sean Dubman - Transportation Safety Mgr. - CTP

20 Years+ Combined Project & Service Management Experience

**Certifications**


- Certified Transportation Professional - NPTC
- DOT Motor Carrier Safety & Compliance Certification from TSI (Transportation Safety Institute)
- HAZMAT Instructor Training – SWA (Sustainable Workplace Alliance)
- Emergency Preparation & Response for Shipping HAZMAT – SWA

**Experience**



- **WFM – 2005 -Present**
- Manager Transportation Safety & Compliance Wegmans Food Markets
- Transportation Team Leader Wegmans Food Markets
- Service Team Leader Store Operations

**Member NPTC**

- Safety Committee member Member Truck Association of New York
- Board of Directors – Regional Vice Chair
- Safety Maintenance Management Council
- Membership Committee
- Member PA Motor Truck Assoc.
- Project Manager Custom Home Building, Licensed Contractor, Winner of 2000 NHQ Gold & 2001 America's Best Bullder



Sean Dubman, CTP  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.


---

---

---

---

---

---

---

---

## Fleet Background

Wegmans Food Markets, Inc.

- Founded in 1916
- Family owned and operated grocery store chain
- 94 Stores in 6 States – store #95 opening Nov. 5<sup>th</sup> in Medford, MA
- 2017 Honors
  - #2 on Harris Poll Reputation Quotient ranked for Corporate Reputation
  - #2 on Forbes list of 100 Best Companies to Work For
  - #6 on People Magazine and Great Places to Work first annual list of Companies that Care



**Sean Dubman, CTP**  
 Transportation Safety Coordinator  
 Wegmans Food Markets, Inc.




---

---

---

---

---

---

---

---

---

---

## Wegmans Supply Chain



- 10 Company Owned Distribution Centers
- 1 3PL Distribution Center
- 2 Reclamation Centers
- 2 Manufacturing Centers
- 1 Affinage
- 1 Organic Farm
- 360 Company Drivers
- 90 Dedicated Lease Drivers
- 176 Tractors
- 955 Trailers
- 3 Fuel Tankers
- 1 Passenger Bus (21 seat)
- 19.4 Million Miles in 2016



**Sean Dubman, CTP**  
 Transportation Safety Coordinator  
 Wegmans Food Markets, Inc.




---

---

---

---

---

---

---

---

---

---

## Hours of Service

### Regional Carrier

- Mix of Local and mileage runs
- Utilized Onboard Recording Device since 2006
- Require drivers to maintain electronic logs 24/7
  - #1 Priority is Safety – Aligns 100% with Company Values and High Standards
  - Although runs are fairly consistent drivers may have weeks where runs are blend of short haul and long haul
  - Majority of our drivers work 6 days p/week
  - Utilize Part Time Drivers
  - Fleet operates in North East & Central East Coast where inclement weather is expected
  - Assurance to avoid violations
  - Consistency in Auditing process



**Sean Dubman, CTP**  
 Transportation Safety Coordinator  
 Wegmans Food Markets, Inc.




---

---

---

---

---

---

---

---

---

---

## What This Means for Wegmans

- Maintain clear updated policy
- Constantly educate drivers & dispatch team
- Have set process for all facets of maintaining HOS Compliance

---

---

---

---

---


---

---



---

---

---



**Sean Dubman, CTP**  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.

## Wegmans' HOS Goals

- We strive to go beyond compliance
- Our goal is zero violations
- We do not utilize any exemptions – There are too many exceptions to the exemptions
- **Overtime is not scheduled more than 4.5 hours from driver's regular start time**
- Part-time drivers are not permitted to drive without submitting Record of Duty or copy of HOS logs

---

---

---

---

---


---

---


---

---

---



**Sean Dubman, CTP**  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.

## Maintain Clear Updated Policy

### Commercial Motor Vehicle Operations Policy

1. HOS is one of 15 detailed sections within policy
2. HOS policy outlines requirements for Company policies as well as federal, state or local regulations or orders related to Hours of Service
3. Covered in Policy:
  - 14 hour rule
  - 11 hour rule
  - 30 minute break
  - 70 hour rule
  - 34 hour reset
  - Requirement to use electronic logging system
  - Log retention
  - Submission of all hours worked- driving and non-driving
4. Policy reviewed & distributed with all drivers




---

---

---

---

---

---

---

---

---

---



**Sean Dubman, CTP**  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.




## Continuously Educate Drivers & Dispatch Team

- Web-based safety video training system
  - Monthly assignments to all drivers & supervisors
    1. Regulatory updates
    2. CSA Education
    3. Policy review
    4. Safety/HOS tips from safety team

### Video TRAINING Assignment

- The September training video (*Rest Break*) is now up and running and ready for your review.
- Completion is *required* by September 30th
- Good news! It is only a *5 minute video!!!*



**APRIL'S TRAINING**  
*The Importance of Wearing Your Safety Belt*  
Is ready for your review  
Completion is required by April 30th

Always wear a seat belt. **SE PROTECTED** Seat belts and air bags **SEATBELT** SAFETY technology.



Sean Dubman, CTP  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.



---

---

---

---

---

---

---

---

---

---

## Continuously Educate Drivers & Dispatch Team

- Annual Transportation Safety Days – Education from enforcement included, Health & Wellness Specialists, Fleet Maintenance Team & Guest Key Note Speakers
- Periodic Driver Communication meetings



Sean Dubman, CTP  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.



---

---

---

---

---

---

---

---

---

---

## Continuously Educate Drivers & Dispatch Team



Sean Dubman, CTP  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.



---

---

---

---

---

---

---

---

---

---

## Continuously Educate Drivers & Dispatch Team

- Dispatch Pre-shift – Supervisor communicates policy or process changes
- Safety Screen in Dispatch – HOS reminders, safety tips, update on monthly violations



### HOS REMINDERS

395.3 - driving is not permitted if more than 8 hours have passed since the end of the drivers last off-duty or sleeper-berth period of at least 30 minutes.

The final rule requires that if more than 8 consecutive hours on duty have passed since the last off-duty (or sleeper-berth) period of at least half an hour, a driver must take an off-duty or sleeper berth break of at least 30 minutes before driving.

- Recommended to take between the 5<sup>th</sup> and 6<sup>th</sup> hour (will reduce chance of having to take a 2<sup>nd</sup> break)
- Be sure to break for at least 31 or 32 minutes. (Onmitsys system cannot recognize more than 1 status per minute).
- Drivers on duty for an additional 8 hours from their first DOT break will be required to take their additional DOT break within the next 8 hours
- You are responsible for finding a safe location to take your DOT break as you are not allowed to move the tractor once the break has begun
- If you move your tractor during your DOT break you will be required to restart your break

The driver must be off duty for at least a half hour. Meal breaks or any other off-duty time of at least 30 minutes qualifies as a break.



**Sean Dubman, CTP**  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.



---

---

---

---

---

---

---

---

## Continuously Educate Drivers & Dispatch Team

- Transportation Safety Teams with Driver Safety Captains at each campus
  - Create SOPs
  - Incident review
  - Weekly safety tips



**Sean Dubman, CTP**  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.



---

---

---

---

---

---

---

---

## Have Set Process for All Facets of Maintaining HOS Compliance

- Daily audits for violations
- Regular reporting in monthly Management as well to drivers
- Operational ownership – Dispatchers own auditing, P/T log verification, coaching conversations, Safety Screen Messages & Daily Dispatch Pre-Shift Reminders

|                  | ACT  | REM  | CT   |                  | ACT  | REM  | CT   |
|------------------|------|------|------|------------------|------|------|------|
| 08/24/2017 08:00 | 1:41 | 1:41 | 1:41 | 08/24/2017 08:00 | 1:41 | 1:41 | 1:41 |
| 08/24/2017 08:00 | 1:41 | 1:41 | 1:41 | 08/24/2017 08:00 | 1:41 | 1:41 | 1:41 |
| 08/24/2017 08:00 | 1:41 | 1:41 | 1:41 | 08/24/2017 08:00 | 1:41 | 1:41 | 1:41 |

| Driver Name (Driver ID) | Start Time       | Duration | Violation Type(s) |
|-------------------------|------------------|----------|-------------------|
|                         | 7/20/17 22:00:00 |          | Food Break        |

Report Time: 10/18/2017 11:41:00 AM Page 1 of 1



**Sean Dubman, CTP**  
Transportation Safety Coordinator  
Wegmans Food Markets, Inc.



---

---

---

---

---

---

---

---

## Question & Answer Session



**Gary Petty**  
President & CEO  
National Private Truck  
Council



**Tom Bray**  
Industry Consultant-  
Transportation  
J. J. Keller & Associates



**Tom Moore, CTP**  
Senior Vice President  
National Private  
Truck Council



**Sean Dubman, CTP**  
Transportation Safety  
Coordinator  
Wegmans Food Markets, Inc.



---

---

---

---

---

---

---

---

---

---

## More Questions?



**Tom Bray**  
Industry Consultant-Transportation  
J. J. Keller & Associates  
tbray@jkkeller.com



**Tom Moore, CTP**  
Senior Vice President  
NPTC  
tmoore@nptc.org



---

---

---

---

---

---

---

---

---

---

## Thank you for participating!

Please join us for tomorrow's webcast:

Electronic Logging Devices  
October 19, 2017

Visit [www.jkkeller.com/nptcinfo](http://www.jkkeller.com/nptcinfo) to register



---

---

---

---

---

---

---

---

---

---

Thank you for participating in  
today's webcast!

Visit: [www.jjkeller.com/nptcinfo](http://www.jjkeller.com/nptcinfo)  
for today's presentation and to learn more  
about future NPTC and J. J. Keller webcasts



---

---

---

---

---

---

---

---