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

Webcast Logistics

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- **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!

**Hours of Service**

October 18, 2017
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

Meet Your Presenters

Gary Petty
President & CEO
National Private Truck Council

Tom Moore, CTP
Senior Vice President
National Private Truck Council

Tom Bray
Industry Consultant
J. J. Keller & Associates

Sean Dubman, CTP
Transportation Safety Coordinator
Wegmans Food Markets

Regulatory Overview
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)

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!!!

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
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(o)(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))

• 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))

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)
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

‘Other’ Exemptions

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

Beyond Compliance
Keeping Up With the Changes

- 2003/2004: Property carriers get new limits
  - 10-24 and 30-hour break
  - 24-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
  - Exception/exception explosion
    - 26 exemptions in the regulations (§390.1) and §395.1
    - 16 temporary exemptions in place
  - At least 12 more exemption applications filed and pending action

Onboard Technology Dominates

How Fleets Deploy Technology
CSA Scores

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<th>Year</th>
<th>Unsafe Driving</th>
<th>Speeding</th>
<th>Controlled Speed</th>
<th>Substance Abuse</th>
<th>Vehicle Maintenance</th>
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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 production issues
  - Vehicle breakdowns
  - Weather
  - Holidays
  - Traffic

Why the Regs Aren’t Followed

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

The Fleet Perspective

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

20 Years+ Combined Project & Service Management Experience

Certifications
- Certified Transportation Professional - NPTC
- ODOT Motor Carrier Safety Compliance Certificate from TSI (Transportation Safety Institute)
- HAZMAT Instructor Training – SWA (Sustainable Workplace Alliance)
- Emergency Preparedness & Response for Shippers

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 Builder
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. 5th 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

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

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
What This Means for Wegmans

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

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

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 (Red Breech) is now up and running and ready for your review.
- Completion is required by September 30th
- Good news! It is only a 10 minute video!

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

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Continuously Educate Drivers & Dispatch Team

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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

- Daily 2: morning alert for drivers if 6 or more hours of driving remain

- The initial rule suggests that if more than 6 consecutive hours on duty have passed, the driver must take a break.
- If the driver is in the process of completing a longer trip, the driver must take a break once the trip reaches 11 hours.
- The break must be at least 30 minutes.
- The driver must be off-duty for at least 11 hours.
- Any other off-duty time of less than 30 minutes qualifies as a break.

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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

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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

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Transportation Safety Coordinator
Wegmans Food Markets, Inc.
Question & Answer Session

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More Questions?

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Thank you for participating!

Please join us for tomorrow’s webcast:

Electronic Logging Devices
October 19, 2017

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Thank you for participating in today’s webcast!

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