

HOS Escalation Procedure

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BOF TRANSPORTATION & LOGISTICS | SAFETY & COMPLIANCE DIVISION

Hours of Service Escalation Procedure

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APPROVAL CERTIFICATION This policy has been reviewed and approved by authorized company personnel as of the effective date listed above. This document supersedes all prior versions of BOF-POL-003. All personnel listed in Section 10 are bound by the provisions herein. Director of Safety & Compliance Chief Operating Officer
Director of Safety & Compliance | Date: _____ Chief Operating Officer | Date: _____

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1. Purpose and Scope

1.1 Purpose

This policy establishes the formal escalation protocols governing the detection, response, documentation, and corrective action procedures for Hours of Service (HOS) violations, near-violations, and regulated exceptions within Bof Transportation & Logistics operations. The objective of this procedure is to ensure consistent, timely, and legally defensible responses to HOS events across all operational levels - from driver self-monitoring through executive-level intervention - in full conformance with applicable federal regulations promulgated by the Federal Motor Carrier Safety Administration (FMCSA).

This document defines graduated response tiers, assigns clear accountability to specific roles, integrates real-time Electronic Logging Device (ELD) platform data into operational decision-making, and establishes the documentation standards necessary to demonstrate regulatory compliance during roadside inspections, compliance reviews, and litigation proceedings.

1.2 Scope

This policy applies to the following personnel and operations:

- ? All commercial driver's license (CDL) holders operating commercial motor vehicles (CMVs) under company authority, whether company-employed or leased;
- ? Owner-operators dispatched under company DOT authority;
- ? Dispatch personnel responsible for load assignment and driver communication;
- ? Compliance Coordinators and Safety personnel responsible for HOS monitoring and violation response;
- ? Operations Managers and the Director of Safety & Compliance in escalation roles;
- ? Human Resources personnel involved in disciplinary proceedings related to HOS violations.

This procedure integrates directly with the company's approved ELD platform alert infrastructure and Transportation Management System (TMS) dispatch workflows. All monitoring activities, escalation responses, and documentation requirements described herein operate within the context of those integrated systems.

SCOPE CLARIFICATION Drivers operating under a valid Short-Haul Exemption (100 or 150 air-mile radius, as applicable) are exempt from certain ELD logging requirements but remain subject to the HOS limits applicable to their exemption classification and to company monitoring standards described in Section 6.3 of this policy.

2. Regulatory References

This policy is developed and maintained in conformance with the following federal regulations and guidance documents. All personnel subject to this policy are expected to maintain a working familiarity with applicable provisions. Compliance personnel are expected to maintain current knowledge and monitor for regulatory updates.

Regulatory Citation	Subject Matter
49 CFR Part 395	Hours of Service of Drivers - primary regulatory authority governing all driver HOS limits, logging requirements, and exceptions
49 CFR Part 395.8	Driver's Record of Duty Status - requirements for accurate, complete, and timely logging of on-duty, off-duty, sleeper berth, and driving time
49 CFR Parts 395.22 - 395.32	ELD Technical Standards and Mandate - requirements for certified ELD devices, driver interaction, data transfer, and malfunction procedures
FMCSA ELD Mandate (Final Rule)	Federal mandate requiring use of certified ELD devices; governs device certification, driver training, and data retention
49 CFR Part 395.1(b)(1) - Short-Haul (100 Air Miles)	Exemption for property-carrying drivers operating within 100 air-mile radius and returning to home terminal within 12 hours
49 CFR Part 395.1(b)(2) - Short-Haul (150 Air Miles)	Exemption for non-CDL drivers operating within 150 air-mile radius under qualifying conditions
49 CFR Part 395.1(b)(3) - Adverse Driving Conditions	Exception permitting up to 2 additional hours of driving time when unexpected adverse conditions are encountered
49 CFR Part 395.1(b)(6) - Emergency Exception	Exception relieving drivers from HOS compliance during federally or state-declared emergencies within defined parameters
49 CFR Part 395.1(g) - Sleeper Berth Provision	Rules governing use of sleeper berth time, including 2024 split sleeper berth updates permitting 7/3 and 8/2 splits
49 CFR Part 390.6 - Coercion Prohibition	Prohibition on motor carriers, shippers, receivers, and intermediaries coercing drivers to violate HOS or other FMCSA safety regulations
FMCSA Personal Conveyance Guidance (2018 / Updated)	Guidance on permissible use of personal conveyance (off-duty driving) and ELD annotation requirements

REGULATORY CURRENCY OBLIGATION The Director of Safety & Compliance is responsible for monitoring Federal Register publications, FMCSA guidance updates, and CVSA enforcement bulletins for changes to applicable regulations. This policy must be reviewed and amended within 60 days of any material regulatory change. All personnel must be notified of amendments through the distribution process described in Section 13.

3. Definitions

The following terms are used throughout this policy. All definitions are consistent with 49 CFR Part 395 unless otherwise noted.

Term	Definition
Hours of Service (HOS)	The federal regulations governing the maximum number of hours a commercial motor vehicle driver may drive and be on duty, designed to prevent fatigue-related accidents.
11-Hour Driving Limit	A driver may drive a maximum of 11 hours after 10 consecutive hours off duty. This is the maximum driving time permitted within a single duty period for property-carrying drivers.

Term	Definition
14-Hour On-Duty Window	A driver may not drive beyond the 14th consecutive hour after coming on duty, following 10 consecutive hours off duty. Non-driving on-duty time counts against this window.
30-Minute Break Requirement	A driver must take a 30-minute break after 8 consecutive hours of driving time without a break of at least 30 minutes. The break must be recorded as off-duty or sleeper berth status.
60/70-Hour Rule (7/8-Day Recap)	Property-carrying drivers may not drive after accumulating 60 on-duty hours in any 7 consecutive days (60/7 rule) or 70 on-duty hours in any 8 consecutive days (70/8 rule), depending on the carrier's operating schedule.
34-Hour Restart	A driver may restart the 7/8-day period by taking at least 34 consecutive hours off duty. The restart resets the cumulative on-duty hour count for the applicable 7 or 8-day cycle.
Sleeper Berth Provision	Allows drivers to extend their on-duty window by splitting required off-duty time between the sleeper berth and other off-duty time, subject to defined minimum time requirements for each rest period.
Split Sleeper Berth	Permits drivers to split the required 10-hour off-duty period into two segments: either 8/2 (at least 8 hours in sleeper berth plus at least 2 hours off duty or in sleeper berth) or 7/3 (at least 7 hours in sleeper berth plus at least 3 hours off duty or in sleeper berth), per 2024 regulatory updates.
ELD (Electronic Logging Device)	An FMCSA-certified device that electronically records a driver's Record of Duty Status (RODS) by synchronizing with the vehicle's engine to automatically capture driving time, engine hours, vehicle miles, and location data.
Unassigned Driving	Driving time recorded by the ELD that has not been assigned to a specific driver profile. Unassigned driving must be reviewed and either claimed by the appropriate driver or documented with a supporting explanation within the ELD system.
HOS Violation	Any event in which a driver exceeds a federally mandated HOS limit, as recorded on the ELD or as determined through compliance review. Violations are subject to FMCSA civil penalties and carrier out-of-service orders.
Near-Violation	For the purposes of this policy, a condition in which a driver has 30 minutes or fewer remaining on any applicable HOS limit. Near-violations trigger immediate escalation response as defined in Section 5.
Adverse Driving Conditions Exception	An exception to the 11-hour and 14-hour limits allowing up to 2 additional hours of driving time when a driver encounters unexpected snow, ice, sleet, fog, other adverse weather, a highway closure, or unusual traffic conditions that could not have been anticipated before the trip began.
Personal Conveyance (PC)	The use of a CMV for personal transportation while off duty, recorded as off-duty driving on the ELD. Personal conveyance does not count against HOS driving limits but must meet FMCSA reasonableness standards and must not be used to advance the commercial load.

Term	Definition
Yard Move (YM)	Movement of a CMV within a facility or yard under the direction of the motor carrier, recorded as on-duty not driving on the ELD. Yard moves are limited to authorized company or customer facilities and may not be used for revenue-generating moves on public roads.
Short-Haul Exemption	An exemption from ELD requirements and certain HOS record-keeping obligations available to qualifying drivers operating within a defined air-mile radius (100 or 150 air miles depending on CDL status), returning to the work reporting location within the applicable time window, and not using the exemption for more than 8 days in a 30-day period.

4. HOS Monitoring Architecture

4.1 ELD Platform Integration

The company maintains contracts with one or more FMCSA-certified ELD providers as designated by the Director of Safety & Compliance. The company's approved ELD platform(s) shall be documented in the Safety Department's vendor register and updated upon any change in platform provider or certification status.

The following integration standards apply to all approved ELD platforms:

- ? Real-time dashboard access shall be provisioned to all Compliance Coordinators, Dispatch Supervisors, Operations Managers, and the Director of Safety & Compliance;
- ? ELD alert feeds shall be integrated into the company's TMS platform where technically feasible, providing dispatch with concurrent HOS visibility during load management;
- ? ELD alert thresholds shall be configured in accordance with Section 4.2 of this policy and reviewed annually;
- ? All ELD platform access shall be governed by role-based permissions; driver record access by unauthorized personnel is prohibited;
- ? ELD platform vendor must maintain FMCSA registered device certification continuously; lapse in certification shall be reported immediately to the Director of Safety & Compliance.

4.2 Alert Threshold Configuration

The following alert levels shall be configured within the ELD platform and shall govern the escalation framework in Section 5. Thresholds apply to the 11-hour driving limit, 14-hour on-duty window, 30-minute break requirement, and 60/70-hour weekly limit.

Level	Status	Trigger Condition	System / Operational Response
GREEN	Compliant	More than 2 hours remaining on all applicable HOS limits	No alert generated. Normal operations continue. Dashboard displays remaining time in green indicator.
YELLOW	Near-Violation Alert	60 minutes or fewer remaining on driving or on-duty limit; OR 2 hours or fewer remaining on 14-hour window	ELD generates Yellow Alert; alert transmitted to Dispatch dashboard and TMS load record; Dispatch initiates Tier 1 protocol (Section 5).

Level	Status	Trigger Condition	System / Operational Response
ORANGE	Critical Alert	30 minutes or fewer remaining on any driving or on-duty limit; OR 30-minute break requirement not yet satisfied within required window	ELD generates Critical Alert; alert transmitted to Dispatch and Compliance Coordinator simultaneously; Tier 2 protocol initiated; driver stop order may be issued.
RED	Violation	Any applicable HOS limit exceeded as recorded by ELD	ELD logs violation event in driver's RODS; alert transmitted to Compliance Coordinator and Director of Safety; Tier 3 protocol initiated immediately; violation recorded in compliance system.

4.3 Monitoring Responsibility Assignment

HOS monitoring is a shared responsibility across multiple organizational roles. The following assignment of primary and secondary monitoring duties applies during all operational hours:

Role	Monitoring Responsibility	Escalation Authority
Compliance Coordinator	Primary: real-time ELD dashboard monitoring; Orange and Red alert response; daily unassigned driving review	May issue stop order at Tier 2; escalates to Director of Safety at Tier 3/4
Dispatch (Supervisor and Staff)	Secondary: Yellow alert monitoring via TMS integration; driver contact at Tier 1; load status management	Initiates Tier 1 response; escalates to Compliance Coordinator at Tier 2 trigger
Operations Manager	Tertiary: oversight of Tier 2 events; load reassignment authorization; customer communication	Signs off on Tier 2 documentation; authorizes load reassignment
Director of Safety & Compliance	Executive: Tier 3 and Tier 4 response; violation investigation; regulatory reporting decisions	Full authority over driver stop orders, compliance holds, and corrective action
Driver (Self-Monitoring)	Continuous: driver must monitor their own ELD status and proactively notify dispatch per Section 7.1	N/A - driver notifies dispatch; does not self-escalate beyond notification

5. Escalation Tiers and Response Protocols

The following escalation framework governs all HOS alert events. Each tier has defined triggers, responsible parties, required actions, mandatory documentation, and conditions that escalate to the next tier. All timelines are measured from the point of alert generation or detection, whichever occurs first.

MANDATORY COMPLIANCE NOTICE Failure to initiate escalation protocols within the timeframes specified herein constitutes a policy violation subject to disciplinary action under Section 11. Ignorance of an alert due to inattentiveness does not constitute a defense against non-compliance with this policy.

Tier 1 - Near-Violation Alert (Yellow)

Element	Detail
Trigger Conditions	60 minutes or fewer remaining on driving time limit; OR 2 hours or fewer remaining on the 14-hour on-duty window
Responsible Party	Dispatch (primary contact and response)
Required Actions	Immediately contact driver via ELD messaging, company app, or phone; Confirm driver awareness of remaining HOS hours; Assess current load status - distance to delivery, current location, traffic conditions; Identify the nearest safe stopping location (company-approved truck stop or rest area); Update estimated time of arrival (ETA) in TMS to reflect potential stop; Document all contact attempts and outcomes in TMS load record.
Required Documentation	ELD alert log entry; Dispatch note recorded in TMS load record (timestamp, contact method, outcome, driver response)
Escalation to Tier 2	Driver unreachable within 15 minutes of alert generation; OR driver indicates refusal to comply with stop guidance; OR assessment indicates violation is imminent within 30 minutes
Timeline	Initial driver contact attempt within 5 minutes of Yellow Alert; escalation to Tier 2 no later than 15 minutes after alert if driver unreachable

Tier 2 - Critical Alert (Orange)

Element	Detail
Trigger Conditions	30 minutes or fewer remaining on any applicable driving or on-duty limit; OR Driver was unreachable at Tier 1 escalation threshold; OR 30-minute break requirement violation is imminent; OR Tier 1 driver contact did not result in confirmed stop plan
Responsible Party	Compliance Coordinator (primary) and Operations Manager (sign-off and customer communication)
Required Actions	Compliance Coordinator makes direct contact with driver - phone call required (messaging insufficient at this tier); If driver is within 15 minutes of a violation: issue immediate verbal stop order, confirmed in writing via ELD message or company app; Identify specific safe parking location by name and coordinates; communicate to driver; Initiate customer notification for anticipated delivery delay; document customer contact in TMS; Operations Manager notified and provides sign-off on all actions taken; If driver cannot be reached: attempt contact via all available channels; notify Operations Manager and Director of Safety of unreachability; Document all actions with timestamps.
Required Documentation	Tier 2 Incident Log entry (compliance system); Customer notification record; Operations Manager sign-off on incident log; ELD alert screenshot retained in driver event file
Escalation to Tier 3	Driver refuses to stop; OR driver is already in HOS violation as recorded by ELD; OR driver remains unreachable and ELD indicates continued driving past limit

Element	Detail
Timeline	Compliance Coordinator contact with driver within 5 minutes of Tier 2 trigger; Operations Manager notification within 10 minutes; Incident log entry completed within 30 minutes

Tier 3 - Active Violation (Red)

Element	Detail
Trigger Conditions	Any HOS limit exceeded as recorded by ELD; OR Driver refused stop order at Tier 2; OR Tier 2 escalation conditions met and violation event confirmed
Responsible Party	Director of Safety & Compliance (primary decision authority)
Required Actions	Director of Safety issues mandatory stop order - driver must cease all driving immediately and park safely; Log violation event in company compliance management system with full details (driver, location, time, limits exceeded, ELD data); Assess whether Adverse Driving Conditions exception applies (Section 6.1); if applicable, document and annotate ELD accordingly; Issue formal Compliance Notice to driver (see Appendix D for template); driver acknowledgment signature required; Determine whether violation is a first occurrence or part of a pattern (refer to driver compliance history); Initiate corrective action process per Section 11 based on occurrence count; Notify company insurance carrier if violation may affect liability coverage (consult policy terms); Advise Operations on load reassignment; customer communication updated.
Required Documentation	Violation Report (Appendix D template); Corrective Action Form; Full ELD data export for the duty period; Driver acknowledgment signature; Insurance notification record (if applicable); Compliance system entry
Escalation to Tier 4	Review of driver compliance history reveals this is the second or subsequent violation within a 90-day rolling period; OR investigation reveals systemic dispatch-pressured violations
Timeline	Initial violation report within 2 hours of detection; driver compliance notice issued within 24 hours; full investigation complete within 48 hours of violation event

Tier 4 - Pattern Violation / Systemic Issue (Repeat / Escalated)

Element	Detail
Trigger Conditions	Same driver accumulates 2 or more HOS violations within any rolling 90-day period; OR Investigation reveals systemic dispatch-pressured or operationally-driven violations across multiple drivers; OR FMCSA Safety Management Cycle (SMC) data or DataQ records indicate carrier-level HOS compliance concern
Responsible Party	Director of Safety & Compliance + Human Resources + Chief Operating Officer

Element	Detail
Required Actions	Driver placed on Compliance Hold - no dispatch until hold is lifted by Director of Safety; Formal investigation initiated jointly by Safety Director and HR; Root cause analysis conducted to determine primary failure category: (a) driver behavior and awareness; (b) dispatch pressure or coercion; (c) route planning failures; (d) load scheduling conflicts; COO briefed on investigation findings and proposed corrective action; Formal written Corrective Action Plan (CAP) developed with specific milestones, responsible parties, and completion dates; If systemic issue: dispatch practices, load planning procedures, and scheduling reviewed for systemic reform; Determine whether regulatory notification is required (Section 12).
Required Documentation	Pattern Violation Report; HR file notation; Investigation Summary Report; Root Cause Analysis document; Corrective Action Plan (signed by driver, Safety Director, HR, and COO); Timeline of all prior violations
Timeline	Compliance Hold effective immediately upon Tier 4 determination; Investigation initiated within 24 hours; Root cause analysis and CAP draft within 5 business days; Final CAP approved within 10 business days

6. Exception Handling Procedures

6.1 Adverse Driving Conditions Exception

The Adverse Driving Conditions Exception permits drivers to extend the 11-hour driving limit and 14-hour on-duty window by up to 2 additional hours when unexpected adverse conditions are encountered during a trip. The following standards govern the application and documentation of this exception:

Qualifying Conditions: The exception applies exclusively to conditions that could not reasonably have been anticipated before the trip began, including: unexpected snow, ice, sleet, freezing rain, or fog significantly reducing visibility or road traction; highway closures due to accidents, emergency road work, or hazardous material incidents; or unusual traffic conditions causing significant delay. Conditions that were foreseeable based on published weather forecasts or known construction schedules do not qualify.

Operational Limits: The exception extends driving time by a maximum of 2 hours beyond the 11-hour limit (maximum 13 hours driving) and extends the 14-hour window by a maximum of 2 hours (maximum 16 hours on duty). The exception does not restart HOS limits; all accumulated hours remain as logged.

ELD Annotation Requirements: The driver must annotate the ELD at the time the adverse conditions are encountered, recording: the specific nature of the adverse condition; the location and time at which the condition was encountered; the expected duration of the condition's impact. The annotation must be completed before the driver exceeds the standard HOS limits.

Post-Trip Documentation: The driver must complete a written Adverse Conditions Exception Report (Appendix C) within 24 hours of completing the trip. The report must be submitted to the Compliance Coordinator, who will review for qualification and retain in the driver's file. A copy must be attached to the corresponding ELD record in the compliance system.

Compliance Review: The Compliance Coordinator will review all adverse conditions exception claims within 48 hours of submission. Exceptions that do not meet qualifying criteria will be reclassified as HOS violations and processed accordingly under Section 5 Tier 3.

6.2 Emergency Exception

During a federally or state-declared emergency, drivers operating under qualifying circumstances may be relieved of compliance with certain HOS provisions as authorized by the applicable emergency declaration or FMCSA emergency exemption.

- ? The Director of Safety & Compliance must verify the applicable declaration number, geographic scope, and temporal limits before authorizing emergency exception use;
- ? Drivers must record the emergency declaration reference number in their ELD annotation for any hours claimed under the exception;
- ? Normal HOS rules resume immediately upon expiration of the emergency declaration or upon the driver's exit from the declared emergency area, whichever occurs first;
- ? The company shall maintain a log of all trips operated under emergency exception, including declaration reference, driver, dates, and nature of emergency cargo or relief operations.

6.3 Short-Haul Exemption

Drivers may qualify for the Short-Haul Exemption from ELD use and certain HOS record-keeping requirements if all of the following conditions are met and documented:

Criterion	100 Air-Mile Exemption (CDL)	150 Air-Mile Exemption (Non-CDL)
Air-mile radius from home terminal	100 air miles or fewer	150 air miles or fewer
Return to home terminal	Within 12 hours of reporting for duty	Within 12 hours of reporting for duty
Time records required	Start/end time and total hours on-duty each day; retain 6 months	Start/end time and total hours; retain 6 months
Maximum days per 30-day period	No more than 8 days using exemption	No more than 8 days using exemption

The Compliance Coordinator shall audit short-haul exemption eligibility on a monthly basis. Any driver found to have exceeded the qualifying radius or return-to-terminal time requirement will have the exemption reclassified and the affected day(s) will be treated as requiring full ELD records. If full ELD records are unavailable due to reliance on the exemption, the event will be investigated for HOS compliance and documented accordingly.

6.4 Personal Conveyance (PC)

Approved Use Cases: Personal conveyance is permitted when a driver uses a CMV for personal transportation while off duty, such as traveling from a customer facility or truck stop to a nearby restaurant or lodging; returning to a home terminal or domicile after being released from duty; or traveling between drop-off and pick-up locations for personal purposes unrelated to the commercial load.

ELD Annotation Requirements: The driver must annotate the ELD with "PC" status and record the purpose of the personal conveyance move at the time of activation. The annotation must describe the destination and purpose in sufficient detail to demonstrate the move is not advancing the commercial load.

Mileage Reasonableness Standards: Personal conveyance distances must be reasonable given the stated purpose. Excessive personal conveyance mileage (generally defined as more than 75 miles from the driver's last duty location) requires prior supervisor approval and must be documented with a written justification.

Prohibited Uses: Personal conveyance may not be used to: advance a load toward its delivery destination; travel to a new load pickup location; circumvent HOS limits by repositioning the vehicle in a manner that benefits the commercial operation. Any PC use found to have advanced a commercial load will be reclassified as driving time and applied to the driver's HOS log.

Supervisor Approval for Extended PC: Any personal conveyance move exceeding 50 miles requires prior verbal authorization from the dispatcher on duty, confirmed in writing via ELD message or company app before the move

begins.

6.5 Yard Move (YM)

Yard move status is permissible only under the following conditions:

- ? The vehicle is being moved within the boundaries of a company-designated facility, customer facility, or authorized intermodal terminal under the specific direction of the motor carrier or facility management;
- ? The driver activates YM status on the ELD before beginning the yard move and deactivates it immediately upon completing the move;
- ? The ELD annotation describes the specific move (e.g., "Moving trailer from Door 12 to staging area");
- ? Yard move status is prohibited for any movement on public roadways, even brief movements;
- ? Yard move status may not be used for revenue-generating moves. Any move that advances a load toward a delivery destination must be logged as driving time.

The Compliance Coordinator will review yard move annotations during the monthly audit process (Section 9.4) and flag any yard move annotations that appear inconsistent with facility locations or trip context.

7. Driver Obligations and Communication Protocol

7.1 Driver Notification Responsibilities

Drivers bear a primary obligation to monitor their own HOS status and proactively communicate with dispatch before approaching any applicable limit. The following notification standards are mandatory for all drivers subject to this policy:

- ? 2-Hour Notification Requirement: Drivers must notify dispatch when 2 hours or fewer remain on either the 11-hour driving limit or the 14-hour on-duty window. Notification must be made via ELD message, company application message, or phone call - whichever is safest given the driving context;
- ? ELD Self-Check Requirement: Drivers must review their ELD status display at minimum every 2 hours during active duty periods, when safe to do so at rest locations or during breaks. Self-checks must not be performed while the vehicle is in motion;
- ? Break Monitoring: Drivers must monitor and plan for the 30-minute break requirement independently, without reliance on ELD alerts. The break must be planned and taken before the 8-hour driving window closes.

7.2 Safe Stopping Plan

Drivers are required to maintain situational awareness of available stopping locations throughout their trip and must not wait until HOS limits are nearly exhausted before identifying a safe stop. The following standards apply:

- ? Drivers must identify at least one viable truck stop, rest area, or weigh station parking location within 60 minutes of their current position at all times during the final 3 hours of their driving window;
- ? The company will provide access to company-approved parking resources including national truck stop directories and state rest area databases through the company driver application;
- ? Parking on highway shoulders is strictly prohibited except in a genuine roadside emergency (mechanical failure, medical emergency, or law enforcement directive). Drivers must report any shoulder stop to dispatch immediately;
- ? Drivers who cannot locate available parking must notify dispatch immediately and follow dispatch guidance for alternative stopping solutions.

7.3 Communication Standards

The following communication standards apply to all drivers on long-haul runs (defined as trips exceeding 500 miles or 12 hours of estimated driving time):

Communication Type	Frequency / Trigger	Method
Routine position check-in	Every 4 hours of active driving or upon significant route deviation	ELD messaging or company app (preferred); phone if messaging unavailable
HOS 2-hour notification	When 2 hours remain on any applicable driving or on-duty limit	ELD messaging, company app, or phone call
Break notification	Upon going off duty for 30-minute break and upon returning to duty	ELD auto-logs duty status; driver message to dispatch recommended
Delay notification	Immediately upon encountering an event that will affect delivery ETA by 30 minutes or more	Phone call to dispatch required; ELD annotation encouraged
Emergency / adverse conditions	Immediately upon encountering qualifying adverse conditions or roadside emergency	Phone call to dispatch required; ELD annotation required
Response expectation (dispatch to driver)	Dispatch must respond to all driver communications within 10 minutes during business hours; within 20 minutes during after-hours operations	Via same channel used by driver; escalation to on-call dispatch manager if unresponsive

7.4 Falsification Prohibition

The falsification or unauthorized manipulation of ELD records is a serious violation of federal law (49 CFR Part 395.8) and company policy, and is grounds for immediate termination and referral for regulatory investigation. The following standards are mandatory:

- ? Drivers may not edit ELD records except to correct a genuine logging error, apply an appropriate special driving category (PC or YM), or annotate an exception - and only within the timeframes permitted by the ELD technical standard;
- ? All edits to ELD records must include a written annotation explaining the specific reason for the edit. "Correction" alone is not sufficient - the annotation must describe what was incorrect and what the correct information is;
- ? Any edit requires electronic acknowledgment by the driver and review by the Compliance Coordinator within 24 hours of the edit;
- ? Retroactive edits that alter duty status records to eliminate or reduce apparent violations are prohibited and will be treated as falsification regardless of claimed intent;
- ? Drivers who are pressured by any person - including dispatch, management, or customers - to edit ELD records inappropriately must report that pressure immediately through the coercion reporting process described in Section 8.3.

8. Dispatch and Operations Integration

8.1 Load Planning HOS Compliance

Dispatchers bear a direct responsibility for verifying driver HOS availability before assigning any load. The following requirements apply to all load assignment activities:

- ? Before assigning a load, the dispatcher must review the driver's current ELD status in the TMS integration dashboard to confirm the driver has sufficient available hours to complete the assigned run legally;

- ? The TMS shall be configured to display driver HOS availability in hours and minutes for all applicable limits at the time of load assignment;
- ? Assigning a load to a driver who does not have sufficient HOS availability to complete the run legally is strictly prohibited and constitutes a policy violation subject to disciplinary action;
- ? Dispatchers must account for estimated driving time, on-duty loading/unloading time, and required breaks when evaluating HOS sufficiency - not driving time alone;
- ? When a driver's available hours are insufficient for a full load assignment, the dispatcher must either delay departure until the driver has completed a qualifying rest period or reassign the load per Section 8.4.

8.2 Delivery Appointment Management

Customer delivery appointments must be scheduled in a manner that accounts for realistic driver HOS constraints. The following standards apply:

- ? Dispatch and customer service representatives must apply a minimum buffer of 90 minutes to delivery appointment times to account for unforeseen delays, parking time, and check-in procedures;
- ? Appointments must not be scheduled that require a driver to operate at the absolute limit of their HOS availability with no margin for contingency;
- ? When HOS constraints prevent a driver from meeting an existing appointment, the Operations Manager must be notified immediately and a formal appointment renegotiation must be initiated with the customer within 2 hours of the determination;
- ? The company will not accept delivery appointment terms from customers that structurally require HOS violations. Any customer contract clause that could result in driver HOS pressure must be reviewed by the Director of Safety before execution.

8.3 Coercion Prohibition

The company strictly prohibits any form of coercion directed at drivers regarding HOS compliance, consistent with 49 CFR Part 390.6. Coercion is defined as any threat, intimidation, or pressure - whether explicit or implied - that induces a driver to operate a CMV in violation of any FMCSA safety regulation, including HOS rules.

ZERO TOLERANCE - COERCION IS A FEDERAL VIOLATION Under 49 CFR Part 390.6, motor carriers, shippers, receivers, and transportation intermediaries are prohibited from coercing drivers to violate HOS or other FMCSA safety regulations. Violations may result in civil penalties of up to \$16,000 per incident against the carrier. Company personnel found to have coerced drivers will be subject to immediate termination and may be referred for federal investigation.

Examples of Prohibited Conduct (non-exhaustive):

- ? Threatening termination, suspension, or reduced load assignments for a driver who refuses to drive beyond HOS limits;
- ? Implying that a driver's future dispatch opportunities depend on their willingness to accept loads that require HOS violations to complete;
- ? Pressuring a driver to falsify ELD records or misuse PC, YM, or exception annotations;
- ? Making statements such as "just get it there" or "figure it out" in contexts where the driver has indicated HOS constraints.

Reporting Mechanism: Drivers who experience or witness coercion may report the conduct through any of the following channels without fear of retaliation:

- ? Direct report to the Director of Safety & Compliance (Appendix B contact information);

- ? Submission of completed Coercion Complaint Form (Appendix E);
- ? Report to the company's anonymous compliance hotline (number published in driver portal);
- ? Filing a complaint directly with FMCSA via the National Consumer Complaint Database.

Anti-Retaliation Protection: No driver who reports coercion in good faith shall face adverse employment action, reduced dispatch priority, or any other form of retaliation. Any retaliation against a driver for reporting coercion is itself a separate policy violation and federal regulatory violation, subject to the full range of disciplinary and legal consequences.

8.4 Load Reassignment Procedure

When a driver's HOS availability is exhausted or insufficient for a load, the following procedure governs load reassignment:

- ? Dispatch identifies the HOS constraint and determines that load reassignment is necessary;
- ? Operations Manager is notified and authorizes the reassignment;
- ? Dispatch identifies the next available qualified driver in the spare/available driver pool with sufficient HOS availability;
- ? New driver assignment is entered in the TMS; original driver's load record is updated to reflect the reassignment and the reason;
- ? Customer is contacted by Operations Manager or customer service with updated delivery timeline and confirmation of reassignment;
- ? Original driver is directed to proceed to the nearest safe stopping location and begin mandatory rest period;
- ? If no qualified driver is immediately available, Operations Manager escalates to Director of Safety for determination of alternative arrangements, which may include delayed dispatch or third-party carrier engagement.

9. ELD Data Management and Audit

9.1 ELD Record Integrity

The integrity of ELD records is foundational to this company's regulatory compliance posture and legal defensibility. The following standards govern all ELD record management activities:

- ? ELD records, once created, may only be edited for legitimate, documented reasons within the time windows permitted by 49 CFR Part 395.28 and the company's ELD platform capabilities;
- ? Any proposed edit to an ELD duty status record must be reviewed and acknowledged by the driver electronically before it takes effect. No edit may be forced on a driver's record by compliance personnel without driver acknowledgment;
- ? If a driver disagrees with a proposed edit, the disagreement must be documented in the ELD record and escalated to the Director of Safety for resolution. The original record must be preserved;
- ? All edits must carry a written annotation meeting the standards of Section 7.4;
- ? Both the driver's electronic acknowledgment and the compliance reviewer's approval must be recorded in the ELD for every edited record.

9.2 Data Retention

Record Type	Minimum Retention Period	Storage Location
ELD RODS (Records of Duty Status)	6 months on ELD device; 6 months additional on company servers (12 months total)	ELD device (current 6 months); company compliance server (archived)
Roadside inspection output / Data transfer records	Minimum 1 year from inspection date	Compliance system driver file
Violation reports and corrective action forms	Duration of driver employment + 3 years	Compliance system and HR driver file
Adverse conditions exception documentation	1 year from event date	Compliance system; attached to ELD record
Coercion complaint records	5 years from complaint date	Compliance system and HR file (confidential)
Unassigned driving investigation records	1 year from event date	Compliance system

9.3 Unassigned Driving Review

The Compliance Coordinator shall conduct a daily review of all unassigned driving events recorded by the ELD platform. The following procedure applies:

- ? Each business day, the Compliance Coordinator reviews the ELD platform's unassigned driving report for the preceding 24 hours;
- ? For each unassigned driving event, the Compliance Coordinator attempts to identify the responsible driver based on dispatch records, load assignments, and vehicle movement history;
- ? If the responsible driver is identified, the driving time is assigned to that driver's record with a supporting annotation;
- ? If the responsible driver cannot be determined, the event is flagged for investigation and documented in the compliance system;
- ? A pattern of unassigned driving events for a specific vehicle or time period will trigger a formal investigation by the Director of Safety to determine whether unauthorized vehicle use or systematic logging failures have occurred;
- ? All assigned and unassigned driving determinations are recorded in the compliance system with timestamps and reviewer identification.

9.4 Monthly HOS Audit

The Compliance Coordinator shall conduct a comprehensive monthly HOS audit covering the preceding calendar month. The audit shall include:

- ? Review of all Tier 1, Tier 2, Tier 3, and Tier 4 events - including the adequacy of responses and documentation;
- ? Analysis of all ELD-recorded violations and near-violations, including trend identification by driver, route, customer, and dispatch team;
- ? Verification that all violation documentation was completed within required timelines;
- ? Review of all exception annotations (adverse conditions, PC, YM) for compliance with applicable standards;
- ? Unassigned driving summary and resolution status;
- ? Identification of any systemic patterns that warrant operational or policy intervention.

The Monthly HOS Audit Report shall be submitted to the Director of Safety & Compliance and the Operations Manager within the first 10 business days of the following month. Material findings requiring immediate attention shall be escalated in writing to the COO. Audit reports shall be retained for a minimum of 3 years.

10. Roles and Responsibilities

Role	Core Responsibilities	Escalation Authority	Accountability
Driver	Self-monitor ELD status every 2 hours Proactive 2-hour HOS notification to dispatch Accurate, contemporaneous ELD logging Comply with all stop orders immediately Report coercion immediately No falsification under any circumstance	N/A - notifies dispatch; does not issue orders	Director of Safety; subject to Section 11 disciplinary framework
Dispatch	Real-time HOS monitoring via TMS/ELD dashboard Tier 1 Yellow Alert response HOS-compliant load planning and assignment Coercion-free dispatch culture and communications TMS documentation of all driver contacts	Tier 1 response; escalates to Compliance Coordinator at Tier 2	Operations Manager; subject to Section 11 if coercion is found
Compliance Coordinator	Primary ELD alert monitoring Tier 2 Orange Alert response Violation logging in compliance system Monthly HOS audit completion and reporting ELD platform management and configuration Exception documentation review	May issue stop order at Tier 2; escalates to Director of Safety at Tier 3	Director of Safety & Compliance
Operations Manager	Tier 2 escalation sign-off and documentation Load reassignment authorization (Section 8.4) Customer communication for HOS-related delays Dispatch supervision for HOS compliance culture Monthly audit report review	Authorizes load reassignment; signs Tier 2 incident logs; escalates to Director at Tier 3	COO; Director of Safety & Compliance
Director of Safety & Compliance	Tier 3 and Tier 4 response and investigation Formal violation investigations and root cause analysis Corrective action decisions and CAP approval Regulatory reporting determinations (Section 12) Policy ownership, review, and amendment Pattern and systemic violation analysis ELD vendor management and platform certification oversight	Full authority - compliance hold, stop orders, corrective action, regulatory reporting	COO; regulatory authority (FMCSA)

Role	Core Responsibilities	Escalation Authority	Accountability
Human Resources	Driver file notation for Tier 4 violations Disciplinary procedure administration Coercion complaint confidentiality and investigation support Anti-retaliation policy enforcement Termination proceedings for fourth violations or pattern violations	Joint authority with Director of Safety at Tier 4; no independent dispatch authority	COO; General Counsel
Chief Operating Officer	Policy approval and executive sponsorship Tier 4 joint decision authority Systemic operational reform authorization Regulatory compliance culture leadership	Final authority on Tier 4 outcomes including termination	Board of Directors; regulatory authority

11. Corrective Action and Disciplinary Framework

The following framework governs corrective action and disciplinary consequences for HOS violations. All occurrence counts are calculated on a rolling 90-day basis unless otherwise specified. Prior violations outside the 90-day window remain in the driver's permanent file and may be considered as aggravating factors in subsequent proceedings. Corrective action decisions must be applied consistently across all drivers without regard to seniority, tenure, or load volume.

Occurrence	Consequence	Additional Requirements	Dispatch Status
First Violation (non-pattern, isolated)	Formal Compliance Notice issued; documented in driver file; driver coaching session with Compliance Coordinator	Driver must sign acknowledgment of compliance notice; coaching documented; ELD re-training if indicated	No dispatch restriction if determined to be isolated incident; dispatch eligibility reviewed by Compliance Coordinator
Second Violation (within 90 days)	Formal written warning; mandatory HOS refresher training assigned	Compliance hold imposed pending completion of refresher training; Operations Manager review of dispatch patterns to determine whether dispatch pressure contributed; training completion documented	Compliance Hold - no dispatch until training completed and compliance clearance issued by Director of Safety
Third Violation (within 90 days)	Final written warning; 3-day dispatch suspension without pay	Formal root cause investigation by Director of Safety; driver must submit signed Corrective Action Plan; Operations Manager review of all associated loads; suspension documented in HR file	3-day dispatch suspension; return to service requires Director of Safety clearance and signed CAP

Occurrence	Consequence	Additional Requirements	Dispatch Status
Fourth Violation or Established Pattern	Termination consideration; Safety Director and HR joint decision; COO final approval required	Full investigation including dispatch practice review; regulatory notification if required per Section 12; documentation provided to HR for employment file; legal counsel notification recommended	Immediate Compliance Hold pending termination decision; no reinstatement without COO and Director of Safety approval

MITIGATING AND AGGRAVATING FACTORS The Director of Safety retains discretion to adjust corrective action based on documented mitigating factors (e.g., verified adverse conditions that were not yet documented, first-time occurrence with strong safety record, immediate self-reporting) or aggravating factors (e.g., deliberate falsification, refusal of stop orders, violation resulting in safety incident). All departures from the standard framework must be documented with written justification and approved by the COO. Violations resulting from substantiated dispatch coercion will not be applied to the driver's disciplinary record. The coercion investigation will be handled separately per Section 8.3 and Appendix E, with potential disciplinary action directed at the responsible dispatch personnel.

12. Regulatory Reporting Obligations

The company maintains obligations to federal regulatory authorities with respect to certain HOS violation events. The Director of Safety & Compliance is responsible for all regulatory reporting determinations and submissions. The following standards apply:

12.1 FMCSA and DOT Reporting Triggers

- ? HOS violations that result in a roadside citation or out-of-service order must be entered into the company's compliance management system within 24 hours of receipt of citation or order;
- ? The Director of Safety must assess each citation for DataQ challenge eligibility if the citation is determined to be inaccurate or improperly issued;
- ? Violations resulting in accidents or incidents that meet FMCSA recordable accident thresholds must be reported in accordance with 49 CFR Part 390.15 and company accident reporting procedures.

12.2 Safety Measurement System (SMS) BASIC Score Monitoring

The company's HOS BASIC score within the FMCSA Safety Measurement System (SMS) is a direct indicator of regulatory compliance health and may trigger compliance reviews, investigations, or interventions at defined thresholds. The Director of Safety shall:

- ? Monitor the company's SMS HOS BASIC score on a monthly basis;
- ? Initiate a formal compliance review if the SMS HOS BASIC score exceeds 65% (intervention threshold for passenger and hazmat carriers) or approaches the intervention threshold for property carriers;
- ? Coordinate a DataQ challenge for any SMS entry believed to be inaccurate within the permitted challenge window;
- ? Report SMS score trends to the COO quarterly and upon any threshold approach.

12.3 Compliance Review Response

In the event of an FMCSA compliance review, focused investigation, or new entrant safety audit, the Director of Safety shall:

- ? Immediately notify the COO and legal counsel upon receipt of review notice;
- ? Compile all required ELD records, violation documentation, corrective action plans, and training records within the timeframe specified in the review notice;

- ? Coordinate with the ELD vendor for data export in FMCSA-required formats;
- ? Designate a primary company contact for all review communications;
- ? Ensure all personnel cooperation with the review consistent with legal counsel advice.

13. Policy Review and Amendment

13.1 Scheduled Annual Review

This policy shall be reviewed by the Director of Safety & Compliance on an annual basis, with the next scheduled review occurring in July 2027 prior to the July 16, 2027 anniversary of this version's effective date. The annual review shall assess:

- ? Changes to applicable federal regulations (49 CFR Part 395 and related provisions);
- ? Findings from the preceding year's monthly HOS audit reports;
- ? Pattern violation data and corrective action outcomes;
- ? ELD platform changes and certification status;
- ? FMCSA guidance updates, enforcement bulletins, and advisory notices;
- ? Feedback from drivers, dispatch, and compliance personnel.

13.2 Triggered Reviews

In addition to the annual review, a triggered policy review shall be initiated within 60 days of any of the following events:

- ? Material change to 49 CFR Part 395 or any applicable regulatory provision;
- ? FMCSA compliance review resulting in a corrective action finding related to HOS;
- ? Identification of a systemic pattern violation or operational failure attributable to policy gaps;
- ? Change in approved ELD platform or significant platform update affecting alert functionality;
- ? Merger, acquisition, or significant expansion of company operations that alters driver population or operational scope.

13.3 Version Control and Amendment Process

All amendments to this policy shall be assigned a new version number (2.1, 2.2, etc., or 3.0 for major revisions), documented in the version history log maintained by the Director of Safety, and approved by the COO before taking effect. Amendments take effect on the date of COO signature unless a specific future effective date is designated.

13.4 Distribution

Upon issuance of a new or amended version, the Director of Safety shall distribute the updated policy to all personnel listed in Section 10 and to all active CDL drivers subject to this policy. Distribution shall be documented in the policy distribution log. Drivers must acknowledge receipt of the policy as a condition of continued employment, and acknowledgment records shall be retained in each driver's personnel file.

Appendices

Appendix A - HOS Quick Reference Card

This quick reference summarizes applicable HOS limits for property-carrying commercial motor vehicle drivers under standard operating conditions. Exceptions (adverse conditions, emergency, sleeper berth) modify these limits as described in Section 6.

HOS Limit	Maximum Allowed	Reset/Qualifying Condition	Notes
Driving Time	11 hours driving	After 10 consecutive hours off duty	Adverse conditions exception: up to 13 hours
On-Duty Window	14 consecutive hours	After 10 consecutive hours off duty	Window does not pause; adverse conditions: up to 16 hours
Mandatory Break	30-minute break required	After 8 hours of cumulative driving time	Must be off-duty or sleeper berth status
Off-Duty Rest	Minimum 10 consecutive hours off duty	Resets 11-hour and 14-hour limits	Split sleeper berth rules: 7/3 or 8/2 splits permitted (2024)
Weekly Limit (7-Day)	60 on-duty hours in 7 consecutive days	34-hour restart resets the cycle	Carrier must elect 60/7 or 70/8 schedule
Weekly Limit (8-Day)	70 on-duty hours in 8 consecutive days	34-hour restart resets the cycle	Carrier must elect 60/7 or 70/8 schedule
34-Hour Restart	At least 34 consecutive hours off duty	Resets 7/8-day cumulative counter	No restriction on frequency of restarts (2024 rule)
Sleeper Berth Split	8 hours + 2 hours; or 7 hours + 3 hours	Longer period must be in sleeper berth; shorter may be sleeper or off-duty	Neither period counts against the 14-hour window
Short-Haul Exemption (CDL)	100 air-mile radius; return within 12 hours	Must return to home terminal same day; max 8 days/month	ELD not required; time records required
Short-Haul Exemption (Non-CDL)	150 air-mile radius; return within 12 hours	Must return to home terminal same day; max 8 days/month	ELD not required; time records required
Adverse Conditions Extension	Up to 2 additional driving hours; up to 2 additional on-duty hours	Unexpected adverse weather, traffic, or road closure encountered en route	Must annotate ELD at time of event; post-trip report within 24 hrs

Appendix B - Escalation Contact Directory

This directory must be reviewed and updated by the Director of Safety & Compliance at minimum annually or upon any personnel change. All personnel listed below must maintain availability for urgent escalation communications during operational hours.

Role	Name / Position	Primary Contact	After-Hours	Escalation Tier
Dispatch Supervisor (Day)	[Name - Update Annually]	[Phone / ELD Platform]	[Cell]	Tier 1
Dispatch Supervisor (Night)	[Name - Update Annually]	[Phone / ELD Platform]	[Cell]	Tier 1
Compliance Coordinator	[Name - Update Annually]	[Office Phone / Email]	[Cell]	Tier 2
Operations Manager	[Name - Update Annually]	[Office Phone / Email]	[Cell]	Tier 2
Director of Safety & Compliance	[Name - Update Annually]	[Office Phone / Email]	[Cell - 24/7 for Tier 3+]	Tier 3 / Tier 4
Human Resources Manager	[Name - Update Annually]	[Office Phone / Email]	[Cell]	Tier 4
Chief Operating Officer	[Name - Update Annually]	[Office Phone / Email]	[Cell - Tier 4 / Executive]	Tier 4

Role	Name / Position	Primary Contact	After-Hours	Escalation Tier
Company Insurance Carrier (Liability)	[Carrier Name]	[Policy Number / Claims Line]	[24-Hr Claims Line]	Tier 3 (if required)
ELD Platform Support	[Vendor Name]	[Support Line]	[24-Hr Technical Support]	All Tiers (technical)
Anonymous Compliance Hotline	Coercion / Compliance Reporting	[Hotline Number - Published in Driver Portal]	24/7 availability	Coercion / Section 8.3

Appendix C - Adverse Driving Conditions Exception Documentation Form

This form must be completed by the driver within 24 hours of any trip utilizing the Adverse Driving Conditions Exception (49 CFR Part 395.1(b)(3)) and submitted to the Compliance Coordinator. Incomplete forms will be returned and the exception claim will be held pending completion.

SECTION 1 - DRIVER AND TRIP INFORMATION	SECTION 1 - DRIVER AND TRIP INFORMATION
Driver Name	
Driver License Number / State	
Vehicle Unit Number	
Trailer Number	
Load / PRO Number	
Trip Origin	
Trip Destination	
Date of Occurrence	
SECTION 2 - ADVERSE CONDITIONS DESCRIPTION	SECTION 2 - ADVERSE CONDITIONS DESCRIPTION
Nature of Adverse Condition	(Check all that apply: ☐ Snow/Ice ☐ Fog ☐ Flooding ☐ Highway Closure ☐ Accident/Traffic Delay ☐ Other: _____)
Location Where Conditions Encountered (City, State, Highway)	
Time Conditions First Encountered	
Time Conditions Cleared / Trip Completed	
Were conditions foreseeable before trip began?	☐ No (exception may apply) ☐ Yes (exception does not apply)
Describe why conditions could not have been anticipated	
SECTION 3 - HOS IMPACT	SECTION 3 - HOS IMPACT
Standard 11-Hour Limit Remaining at Time of Condition Encounter	
Total Additional Hours Driven Under Exception	(Maximum 2 hours permitted)
ELD Annotation Completed?	☐ Yes - Time of Annotation: _____ ☐ No - Explain: _____
SECTION 4 - CERTIFICATION	SECTION 4 - CERTIFICATION

SECTION 1 - DRIVER AND TRIP INFORMATION	SECTION 1 - DRIVER AND TRIP INFORMATION
Driver Certification	I certify that the information above is accurate and complete, and that the adverse driving conditions described genuinely prevented completion of this trip within standard HOS limits. Driver Signature: _____ Date: _____
Compliance Coordinator Review	Exception claim reviewed: ☐ Approved ☐ Denied - Reason: _____ Reviewer Signature: _____ Date: _____

Appendix D - HOS Violation Investigation Template

This template must be completed for all Tier 3 (Active Violation) events within the timelines specified in Section 5. The completed investigation report must be retained in the driver's compliance file and in the compliance management system.

SECTION 1 - VIOLATION IDENTIFICATION	SECTION 1 - VIOLATION IDENTIFICATION
Investigation Report Number	
Driver Name	
Driver License / State	
Date and Time of Violation	
Violation Type	(☐ 11-Hour ☐ 14-Hour Window ☐ 30-Min Break ☐ 60-Hr/7-Day ☐ 70-Hr/8-Day ☐ Other)
Minutes of Excess (Over Applicable Limit)	
Vehicle and Load at Time of Violation	
Location at Time of Violation	
SECTION 2 - ESCALATION TIMELINE	SECTION 2 - ESCALATION TIMELINE
Yellow Alert Generated (Time)	
Tier 1 Response Initiated (Time / By Whom)	
Orange Alert Generated (Time)	
Tier 2 Response Initiated (Time / By Whom)	
Violation Detected / ELD Red Alert (Time)	
Director of Safety Notified (Time)	
Stop Order Issued (Time / Method)	
SECTION 3 - ROOT CAUSE ANALYSIS	SECTION 3 - ROOT CAUSE ANALYSIS
Primary Cause Determination	(☐ Driver failure to monitor HOS ☐ Dispatch pressure / coercion ☐ Route planning failure ☐ Customer detention delay ☐ Adverse conditions (undocumented) ☐ ELD/technical failure ☐ Other)
Contributing Factors	
Driver Explanation / Statement	
Adverse Conditions Exception Applicable?	☐ Yes - Documentation attached ☐ No
SECTION 4 - CORRECTIVE ACTION	SECTION 4 - CORRECTIVE ACTION

SECTION 1 - VIOLATION IDENTIFICATION	SECTION 1 - VIOLATION IDENTIFICATION
Occurrence Count (90-Day Window)	(☐ First ☐ Second ☐ Third ☐ Fourth+)
Corrective Action Imposed	
Compliance Notice Issued?	☐ Yes - Date: _____ ☐ No - Reason: _____
Driver Acknowledgment Signature	Signature: _____ Date: _____
Director of Safety Signature	Signature: _____ Date: _____

Appendix E - Coercion Complaint Form and Investigation Procedure

This form may be submitted by any driver who has experienced or witnessed coercion in violation of 49 CFR Part 390.6 or company policy (Section 8.3). Submissions are treated as confidential to the extent permitted by law and company policy. Retaliation against any person who files a good-faith coercion complaint is strictly prohibited.

SECTION 1 - COMPLAINANT INFORMATION (Optional - May Be Submitted Anonymously)	SECTION 1 - COMPLAINANT INFORMATION (Optional - May Be Submitted Anonymously)
Driver Name (Optional)	
Contact Information (Optional)	
Date of Submission	
SECTION 2 - INCIDENT DESCRIPTION	SECTION 2 - INCIDENT DESCRIPTION
Date and Time of Coercive Conduct	
Name / Role of Person Who Engaged in Coercion	
Nature of Coercive Conduct	(☐ Verbal threat of termination ☐ Implied threat of reduced dispatch ☐ Direct instruction to violate HOS ☐ Pressure to falsify ELD records ☐ Other)
Description of What Was Said or Done	(Provide specific words, dates, and context)
Witnesses (Names, if known)	
Any Supporting Documentation Available?	(☐ ELD messages ☐ Text messages ☐ Voicemail ☐ Other: _____)
SECTION 3 - DRIVER RESPONSE	SECTION 3 - DRIVER RESPONSE
Did the driver comply with the coercive instruction?	☐ Yes ☐ No ☐ Partially
Did an HOS violation result?	☐ Yes ☐ No ☐ Unknown
SECTION 4 - INVESTIGATION PROCEDURE (Completed by Director of Safety)	SECTION 4 - INVESTIGATION PROCEDURE (Completed by Director of Safety)
Complaint Received By	
Date Received	
Complaint Assigned to Investigator	
Investigation Initiated Date	
Interviews Conducted (Names and Dates)	
Investigation Findings	

SECTION 1 - COMPLAINANT INFORMATION (Optional - May Be Submitted Anonymously)	SECTION 1 - COMPLAINANT INFORMATION (Optional - May Be Submitted Anonymously)
Substantiated?	☐ Yes - Proceed to disciplinary action ☐ No - Document and close ☐ Inconclusive
Action Taken Against Respondent	
Complainant Notified of Outcome?	☐ Yes - Date: _____ ☐ Anonymous (notification not possible)
Director of Safety Signature	Signature: _____ Date: _____

FMCSA EXTERNAL REPORTING RIGHT Nothing in this policy limits a driver's right to file a coercion complaint directly with the Federal Motor Carrier Safety Administration. FMCSA complaints may be submitted at www.fmcsa.dot.gov or by calling 1-888-368-7238. The company will not interfere with or discourage any driver from exercising this federal right.

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