

Worked Example: One Month of HOS Self-Audit

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Example only. Names and dates are illustrative. Ridgeline Haul & Aggregate doesn't exist. Every driver name, unit number, timestamp, mile figure, work order, and receipt below was made up so the routine is visible on paper instead of described in the abstract.

Everything regulatory is flagged. The citations, hour limits, retention periods, and return windows carry markers naming exactly what a human checks before this prints. Those aren't the specimen's inventions and they aren't decoration; the rules move, and the flag says where to look.

One convention, so nothing looks unflagged by accident: hour figures and rule references also appear *inside* the specimen forms, where a real form would carry no markers at all. Their flags sit in the prose where each figure is first stated, not in the artifacts.

What you're looking at

This is Chapter 5's seven-step monthly hour, run once. One office manager, one month of data, five drivers, an hour and change of actual work. Three things come out of it that you can hold: a log of what was unassigned and what happened to it, one annotation written the way an annotation should be written, and the one-page note she signs at the end and leaves in the file.

Read it once before you run your own. The point isn't the numbers: it's what the screen looks like when somebody is finally reading this data on purpose.

The carrier

Ridgeline Haul & Aggregate, LLC. Eleven power units, five drivers, one office. Three drivers run regional aggregate and demolition debris on electronic logging devices. Two run local dump trucks inside the short-haul exception and keep time records instead of logs. Terri Boyd does the books, the insurance renewals, and since last spring, this.

She ran March 2026 on April 2 and 3, at the kitchen-table hour. Total time: about eighty minutes, because March had a backlog in it.

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Step 1: The unassigned driving log

The device records the miles whether or not anybody is logged in. The carrier **must** review those records and either assign each one to the driver who drove it or annotate why the time isn't a driver's at all.

Here's what she wrote down. This table is the artifact, one row per segment, and no row closes without a disposition and a date.

#	Date	Unit	Time (local)	Miles	Duration	Start → end	Disposition	Closed
1	3/03	214	07:12– 07:19	0.4	7 min	yard → wash bay	Annotated: shop move, mechanic C. Boone, work order 4471. Not driver time.	4/02
2	3/06	207	05:48– 06:31	28.6	43 min	terminal → Weld Rd. pit	Assigned to T. Okafor: didn't log in after his pre-trip. Driver accepted.	4/02
3	3/12	203	13:02– 13:14	1.1	12 min	yard → fuel island → yard	Annotated: shop move, C. Boone, work order 4488.	4/02
4	3/17	211	15:33– 17:00	96.0	1 h 27 min	Ashland pit → Vermilion yard	Assigned to J. Whitcomb: swapped into the spare mid-day, profile wasn't on that device. Driver accepted. Puts his 3/17 driving at 11 h 25 min.	4/02
5	3/22	209	09:41– 09:49	0.6	8 min	yard, roll-off repositioned	Annotated: shop move, C. Boone, work order 4502.	4/02
6	3/24	214	06:02– 06:38	22.4	36 min	yard → SR 60 → yard	Re-annotated (see near miss 4): road test after brake work, driven by C. Boone, 22.4 mi on a public road. Open item 3.	4/03
7	3/28	205	20:14– 21:28	62.0	1 h 14 min	unknown at first pass	Fuel receipt (Perrysburg, 20:51) plus the dispatch record matched R. Alvarez. Assigned; driver accepted.	4/03

Seven segments, 211.1 miles, all seven closed. Three of them were the shop moving trucks around its own yard, which is a configuration problem rather than a compliance one; most devices have a yard-move category that keeps those out of this queue entirely. That went in the note as a fix for next month. A fourth segment looked like a yard move on the first pass and turned out not to be one. That's near miss 4, and it's the reason the count in the note reads three and not four.

Segment 4 is the one worth stopping on. Assigning it pushed Whitcomb's March 17 driving over the 11-hour limit by twenty-five minutes. She assigned it anyway, because the alternative is a record that isn't true, and a record that isn't true is the one thing in this chapter that can't be fixed later. The violation printed on the report, the driver got coached, and both facts went in the note.

What the auditor cross-checks: unassigned driving

They count the segments before they read a single one. An open queue with a number on it is the cheapest finding on the screen, and it doesn't require them to understand your operation at all.

Then they read your dispositions against records you didn't make for this purpose. A "shop move" annotation gets laid next to the work order and the gate log. An assignment gets laid next to the fuel receipt and the weight ticket. And the date you closed each row gets laid next to the date the segment happened: a queue cleared in one panicked afternoon eight months later reads differently from a queue cleared every month.

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Step 2: The edit log: one edit that needed a note, one that didn't

A carrier **may** propose an edit. The driver has to accept it, and the original entry stays put beside the change with who made it, when, and why. Automatically recorded driving time **must not** be edited into something else.

March had nine edits. Six were routine. Three are worth printing: two here, and the one she got wrong on the first pass, which is near miss 2 further down.

The edit that needed an annotation

T. Okafor went off duty at 14:20 on March 11 and was still on the dock at Sandusky Ready-Mix until 15:05. The dock check-in slip says so. That's on-duty time recorded as off-duty time, so the office proposed the change and he accepted it.

Before the annotation, a field-length warning, because this is where good intentions die. The annotation field on most devices is short; the technical specification sets both a floor and a ceiling on it. So write two things: the short version that fits the device, and the full version in your review file, with the short one pointing at it.

In the device (51 characters):

Off-duty 14:20 corrected to on-duty; see Mar review

In the March review file:

Record: T. Okafor, 3/11/2026, 14:20-15:05, unit 207
Proposed by: T. Boyd (carrier), 4/02/2026 09:22
Change: off duty -> on duty, not driving (45 min)
Accepted by: T. Okafor, 4/02/2026 17:05
Reason: Driver selected off duty at 14:20 but remained at the
Sandusky Ready-Mix dock until released at 15:05.
Evidence: Dock check-in slip 3/11, out-time 15:05; dispatch record
shows load released 15:04.
Effect: Adds 45 min on-duty. No change to driving time. Day still
inside the 14-hour window.
Notified: Driver called 4/02; coached to select on duty while waiting
to load.
Signed: T. Boyd, 4/02/2026

Why that one works. It names the record, says what changed, says why the gap existed, points at two documents that prove it, states the effect on the day instead of leaving it to be discovered, and says who was told. A stranger reading it eight months from now needs no phone call. Length isn't the standard: answering the question before it gets asked is the standard. "Correction" answers nothing.

The edit that didn't need one

Okafor left the shipping document number blank on his March 6 record and added it the next morning before he certified the day. No duty status changed. No discrepancy existed. Nothing was corrected. A blank got filled.

Her disposition, in the review file, was one line: *"3/06 Okafor: shipping doc number added by driver pre-certification. Data field, no status change. Looked, nothing to explain."* Writing down that you looked and decided nothing needed saying is itself the record that you were reading this data.

One honest wrinkle: devices differ on this. Some require a note on any change at all, in which case write one; ten words costs you nothing and an empty required field is a finding.

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Step 4: Personal conveyance: one that qualifies, one that doesn't

A driver **may** record time as personal conveyance when the movement is for personal purposes and the driver is genuinely off duty, relieved from work and from all responsibility for performing work.

March had six segments. Two make the point.

Qualifies. 3/06, T. Okafor, 19:12–19:26, 6.2 miles, terminal to the motel on Bellevue Road. His day ended at the terminal, the trailer was loaded for the morning, and he drove himself to bed. The trailer being loaded doesn't decide it. Direction and purpose both point away from the load. His annotation read *"Off duty, terminal to lodging, Bellevue Rd."*, eleven words, and it's finished.

Doesn't qualify. 3/24, J. Whitcomb, 20:41–21:58, 63 miles, truck stop at Exit 118 to a lot four miles from the next morning's shipper. His 14-hour window had closed at 20:15. The movement was long, it fell at the end of the duty day, and it ended within sight of tomorrow's pickup. That advances the load, so it isn't personal conveyance no matter what button got pressed.

The fix, and read this part carefully. The driving minutes don't move. What comes off is the off-duty flag on them: the office proposed the duty-status change, the driver accepted, and the annotation said why. The day then showed driving after the close of the 14-hour window, and that violation stayed on the report.

Her annotation in the device, 51 characters: *"PC removed 3/24 20:41; movement toward next shipper"*, with the full version, the evidence, and the resulting violation written out in the March review file the same way as the edit above.

Ridgeline's own rule is stricter than the guidance, which is allowed and which is the cheapest thing on this page. Every driver signed a one-page policy, and the house standard is an annotation on every segment. That's Ridgeline's rule, not the government's.

What the auditor cross-checks: personal conveyance

The endpoint against the next stop on the bill of lading. A segment that ends four miles from tomorrow's shipper explains itself, and your annotation doesn't get a vote: the location data already said it.

The segment's clock against the close of the 14-hour window. Personal conveyance immediately after the window shuts is the pattern they're looking for, because it's the one that pays.

And your annotations against your own signed policy. A written house standard nobody follows is worse than no policy at all, because you documented the gap yourself.

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Step 5: One duty period, all the paper

You keep **supporting documents** (the ordinary paper a trip generates) up to eight per driver per 24-hour period, on file for six months, each carrying the driver's name or identification, the date, the location, and the time.

The asymmetry runs opposite to what everyone assumes. Eight is the cap. It's the carriers still on paper logs who owe more: they must additionally retain toll receipts, and those don't count against the eight. So "we haven't gone to ELDs yet, so this part is simpler" is backwards.

She picked a day at random: **R. Alvarez, Tuesday March 10**. Six documents came out of the folder. Then she laid them next to his log, which is exactly the exercise, and this is what the comparison looked like.

Log says	Document	Document says	Reads clean?
On duty 05:40, Vermilion yard	Dispatch record 3/10	Assigned 05:35, Vermilion	Yes
Driving 06:02–07:48	Toll transaction	06:44, I-80 Elyria plaza	Yes
On duty (loading) 07:48–08:26, Ashland pit	Weight ticket 88109	Gross 08:19, Ashland	Yes
Off duty 12:15–12:52	Fuel receipt	13:41, Perrysburg	Looked wrong: see below
On duty 14:06–15:44, receiver	Bill of lading 41772	Delivered 15:39, Bowling Green	Yes, once the slip was found
Total on duty 11 h 04 m	Settlement line 3/10	Paid 11.1 hours	Yes

Two findings here, and the boring one matters more than it looks. Take them in order.

The fuel receipt. The pump printed 13:41 and the log had him off duty at 12:15, an hour and a half apart, which looks like a hole until you notice the truck stop's pump clock runs Central and the log runs the terminal's time zone. Nothing was wrong. She annotated the discrepancy once, in the review file, so the next person who finds it doesn't spend twenty minutes on it, and she left the log alone, which is the entire lesson.

The missing dock slip. The log showed 98 minutes on duty at the receiver and the folder held nothing to support the back half of it. The slip existed; it was in the customer's email, not in the truck. She pulled it, filed it, and changed the rule about what comes back in the cab.

She also did one targeted pull, on purpose, which is not the same exercise. The weight ticket and the afternoon fuel receipt for March 17 both put Whitcomb in unit 211, which is what let her assign segment 4 on evidence instead of on a guess. The random pick tests your filing. The targeted pull answers a question step 1 handed you. Do both when step 1 hands you one.

What the auditor cross-checks: the duty period

One driver, one week, everything at once. Log time and place against the fuel receipt's time and town. The weight ticket against the on-duty block at the pit. The toll transaction against the driving segment. The settlement sheet against the total hours, because payroll is the document nobody thinks of as a log, and it's the one your company had the most reason to get right.

The failure they see most isn't a missing receipt. It's that the receipts live in a card statement, the bills of lading live in a billing folder sorted by customer, and nobody can assemble Tuesday the 10th inside the window the letter allowed.

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The two drivers with no logs

Ridgeline's dump trucks run inside the short-haul exception, so those drivers owe no record of duty status. What they owe instead is **time records**: start time, end time, total hours, kept on file. Two conditions have to

hold: the driver works within a 150 air-mile radius of the normal reporting location, and returns to that location inside the return window.

The exception is per day and per driver, and the hours still bind these drivers whether or not they keep logs. So step 1 for a short-haul operation is the time records against payroll, and it takes ten minutes.

March 19 broke. D. Pruitt ran a load 141 air miles out (inside the radius) and came back 14 hours 40 minutes after he went on duty. The radius held; the return window didn't. He owed a record of duty status for that day and there wasn't one.

You can't write a log for March 19 in April. What she did instead: a dated one-page note in the file saying what happened and what was missing, the time record kept as-is, blank paper logs put in both dump trucks, and one dispatch rule: any job past 120 air miles gets a log started that morning, no judgment call required. Fixing it honestly with today's date is the only version of this that survives being read.

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Five near misses: each one wrong, with the fix beside it

- 1. Bulk-assigning the queue.** *Wrong:* select all seven segments, assign each to whoever had that unit last week, done in ninety seconds. That's not a review; it's a guess wearing a review's clothes, and a driver who accepts hours he didn't drive has certified a false record. *Fix:* match each segment to a person with evidence: receipt, ticket, work order, gate log. Where the evidence runs out, annotate what you actually know and say what you couldn't determine.
- 2. "Corrected."** *Wrong:* Alvarez's March 23 on-duty start moved from 06:15 back to 05:50, because he'd begun the pre-trip before he logged in. The annotation read "*corrected*." It cleared the required-field check, so the software was satisfied and the record explained nothing. *Fix:* the sentence form: what the record said, what it says now, why, what proves it, who was told. Her rewrite was 54 characters in the device ("*On-duty start 06:15 to 05:50; pre-trip. See Mar review*") and eight lines in the review file.
- 3. Making segment 7 go away.** *Wrong:* call the provider's support desk and ask them to clear the 62 unexplained miles off the account. The original never disappears, the request itself is now a record, and this is the exact door the criminal cases come through: no driver and no motor carrier **may** make a false report in connection with a duty status. *Fix:* assign it or annotate it. If assigning it creates a violation, the violation is the cheaper outcome by a distance you can't measure.
- 4. "Shop move" on a segment that left the property.** *Wrong:* segment 6 got annotated "*shop move*" on the first pass, and it ran 22.4 miles on State Route 60. The annotation described something that didn't happen, which is a worse problem than the blank would have been. *Fix:* re-annotate with what occurred: road test after brake work, driven by the mechanic, on a public road, and open an item, because a person driving a commercial vehicle on a public road raises a driver-qualification question that has nothing to do with logs.
- 5. Editing the log to match the receipt.** *Wrong:* the pump said 13:41 and the log said 12:15, so change the log. That takes a true record and makes it false to agree with a document you misread. *Fix:* work out the time zone first. Then annotate the difference once, leave the log exactly as recorded, and put the explanation where the next person will find it.

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The findings note she signed and left in the file

Step 7, and the step carriers skip. The review is the work; this page is the proof the work happened.

HOURS-OF-SERVICE SELF-AUDIT - FINDINGS NOTE
Ridgeline Haul & Aggregate, LLC

Period reviewed: March 1-31, 2026
Reviewed by: Terri Boyd, office manager
Dates run: April 2-3, 2026 Time spent: ~80 min
Drivers in scope: 5 (3 on ELD, 2 short-haul on time records)
Reports run: unassigned driving - edit log - violation and
 potential-violation - personal conveyance -
 certification status - malfunction/diagnostic -
 short-haul time records vs. payroll

WHAT I FOUND

1. Seven unassigned segments, 211.1 miles. Three were shop moves in our own yard. One was a mechanic road test on a public road, annotated wrong on the first pass. Two were drivers who didn't log in. One took a receipt and a dispatch record to identify.
2. Assigning segment 4 put J. Whitcomb at 11 h 25 m driving on 3/17. Over the limit. Recorded, not adjusted.
3. Nine edits. One (Okafor 3/11) needed an annotation and now has one. One (Alvarez 3/23) said "corrected" and has been rewritten. No edit attempted to change recorded driving time.
4. Six personal-conveyance segments. Five clean. One (Whitcomb 3/24, 63 mi toward the next shipper) was not personal conveyance; the off-duty flag was removed and the resulting window violation stands on the report.
5. Random duty period: R. Alvarez 3/10, six supporting documents. Fuel receipt time-zone mismatch, explained, log unchanged. One dock slip missing from the folder, retrieved and filed.
6. All 3 ELD drivers certified all duty days. No device left in a malfunction or diagnostic state during March.
7. Short-haul: D. Pruitt exceeded the return window on 3/19 and owed a RODS for that day. No log exists. See open item 1.

WHAT I DID

- Closed all 7 unassigned segments (assigned or annotated), 4/02-4/03.
- Coached Whitcomb on 3/17 and 3/24. Coached Okafor on dock waiting.
- Rewrote the Alvarez 3/23 annotation.
- Filed the missing dock slip; changed the rule on what comes back in the cab (per driver, per week, in the truck folder).
- Blank paper logs placed in both dump trucks.
- Dispatch rule: any job past 120 air miles starts a log that morning.

STILL OPEN

1. 3/19 Pruitt - no RODS, cannot be recreated. Dated note in his file describing what happened. Closed as unrecoverable, 4/03.
2. Yard-move category not configured on our devices - the reason three of seven segments were in the queue at all. Provider call booked 4/07.
3. C. Boone (mechanic) road-tests units on public roads and has no driver file. Referred to owner, 4/03. Not resolved.

NEXT REVIEW: May 5, 2026 Signed: _____

Three open items on a signed page beats a clean page with nothing behind it. A note with no findings reads like a note nobody wrote.

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The monthly six: READ-DO

Labeled READ-DO because you run this twelve times a year and not twelve times a day, and a step you touch monthly is a step you half-remember.

Pause point: the first business day of the month, admin account open, before you assign or annotate anything. Nothing in the account changes until these six lines have been read.

1. **Unassigned queue: every segment assigned to the person who drove it, or annotated with what actually happened.** Reviewed is not closed. A row without a disposition and a date is an open row.
2. **Every edit since last month carries a note a stranger could read,** and no automatically recorded driving time got turned into something else.
3. **Every personal-conveyance segment: read the annotation, then look at where the segment ended.** If it ended at tomorrow's stop, it wasn't personal conveyance.
4. **One duty period, picked at random, laid next to its paper.** Explain every mismatch in writing, including the boring ones. The boring one is usually a time zone.
5. **Certification and device state: every driver certified every day, and no device sitting in malfunction or diagnostic.**
6. **The note: dated, signed, and it says the ugly thing you found.** Findings and fixes, with owners and dates, and what's still open.

Six lines. If one of them can't be checked this month, the note says which one and why. That sentence is worth more than a list that looks clean.

Short-haul with no ELDs: lines 1, 2, 3 and 5 have nothing behind them. Lines 4 and 6 stand as written, with time records in place of logs, and add one line of your own: did every driver get back inside the return window every day.