



**U.S. Department
of Transportation**

Federal Motor Carrier
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

APR 7 2015

Refer to: MC-PSD

Mr. Steven Todd
Vice President
Specialized Carriers & Rigging Association
Trinity Centre One
5870 Trinity Centre Pkwy., Suite 200
Centreville, VA 20120

Dear Mr. Todd:

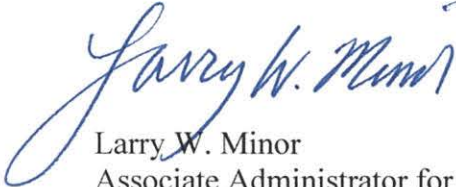
Thank you for your letter of December 29, 2014, concerning the terms "personal conveyance" and "laden."

Your members use "service trucks," which transport "tools of the trade," to remote job sites. They do not transport freight or cargo. You ask whether at the end of the day at the job site, drivers of these vehicles may travel in an off-duty status to motels, homes, or other accommodations within a reasonable distance, without off-loading their normal tools of the trade.

As used in regulatory guidance Question 26 to § 395.8, published in the Federal Register on April 4, 1997 (62 FR 16370,16426), we consider the term "laden" to refer to cargo or freight, not to include "tools of the trade" that are customarily stored on the vehicle when not in use.

Should you have any questions, please contact Mr. Thomas Yager, Chief, Driver and Carrier Operations Division, at (202) 366-4325, or by email at tom.yager@dot.gov.

Sincerely,



Larry W. Minor
Associate Administrator for Policy