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