ELD Guidance

**Frequently Asked Questions: Electronic Logging Devices and Hours of Service – Technical Specifications**

##### Question 91: If a manufacturer offers a white‐label device for sale to others with their logo on it, must all "providers" self‐certify so that their own offering with branding is listed on the self‐certified list?

As part of the registration process, three pieces of information are necessary to identify a device: ELD Identifier, ELD public key (both from registering company), and ELD Registration ID (from FMCSA). It is allowable to register multiple devices with the same ELD Identifier and public key, but each registered device will have its own unique ELD Registration ID.

The rule does not require that certification be done by the company manufacturing the device. Branding partners can use the certification performed by the white label company.