**Electronic Logging Devices and Hours of Service - Provider Updates**

**Ensure your device is compliant and stays on FMCSA’s list of registered, self-certified devices**

FMCSA is investigating devices that have been reported as non-compliant with the ELD rule. Make sure your device follows all the technical specifications in the ELD rule so your device stays on FMCSA’s ELD list of self-certified and registered devices. FMCSA offers several tools to assist providers in developing and testing ELDs.

## Is Your Device Compliant?

As of December 18, 2017, safety officials are now using ELDs to transfer data files in the field. To successfully transfer these files, your device must be registered with FMCSA, and be compliant with the technical specifications in the ELD rule.

Our field staff have been encountering some devices that are malfunctioning or not compliant with the ELD rule. These devices are being reported to FMCSA for investigation, which starts FMCSA’s formal process for notifying vendors. This process could result in the removal of a device from FMCSA’s list of registered, self-certified devices if the reported issues are not satisfactorily resolved. We strongly encourage you to be proactive and identify and resolve any issues your device may have before it is reported. One step you can take is to check your device for any of the frequently reported issues listed below and resolve them as needed.

## Check Your Device For These Frequently Reported Issues

Below are some of the issues that FMCSA has encountered due to improperly set up devices. Any of these issues may result in the device being reported, investigated, and, when necessary, removed from the list of registered, self-certified devices. If you have any questions on how to resolve the issues below, contact ELDTech@dot.gov and our technical team will be happy to assist you.

### **Erroneous Fields In ELD Output File**

The ELD rule lists the fields required in an ELD output file and the acceptable ranges for these values. Files missing required fields, or containing fields with invalid values, will not be accepted by the Web Service or eRODS, and will not be viewable to the safety official.

Issues we are seeing with invalid ELD output files fall into the following categories:

* Invalid field lengths (e.g., CMV VIN, Shipping Document Number, Trailer Number)
* Field values outside valid range (e.g., Elapsed Engine Hours, Accumulated Vehicle Miles)
* Missing required fields (e.g., Event Sequence ID Number, CMV Order Number, Last Name, Carrier Name)  
  Note: In the near future, FMCSA will accept files that are transferred without a DOT number, to accommodate intrastate carriers, who do not have assigned US DOT numbers.
* Incorrect line and file data check values
* Invalid characters
* Invalid dates, times, or numbers

All of the above issues are checked when an ELD output file is run through FMCSA’s File Validator.

For more detailed information on these required fields, see Section 4.5 (Output File Data Dictionary) of the ELD Interface Control Document/Web Services Development Handbook.

### **File Contains Invalid Delimiters**

The ELD rule specifies that fields must be separated by commas and that lines must be separated by carriage returns (<CR>). If your ELD output file has a value that has a comma or <CR> in it, the rule requires that these be replaced with a semi-colon.

### **Device Is Not Pre-Configured With The Web Service End Points Or FMCSA Email Address**

For the telematics data transfer option, the ELD must be able to transfer an ELD file to the Web Service—this includes both the web services and email transfer methods. The ELD rule requires that all devices be pre-configured with this information (see 4.3.2.4, 4.10.1.1(b)(1), and 4.10.1.2(c) of Appendix A to Part 395). This information continues to be available in the ELD Provider Portal. An ELD should never send an email directly to a safety official, and a driver or motor carrier should never have to request the email address or end points from FMCSA or a safety official.

### **ELD Support System Is Not Offering a Complete Set of the Data Transfer Option**

While motor carriers are not required to use an ELD support system, any system they use must support data transfer through either the telematics (both web services and email) or local transfer (both USB and Bluetooth) options (4.9.2).

### **Device Not Able To Send Files With 30+ Days Of RODS**

The ELD rule requires ELDs to be able to send records for the current 24-hour period and the previous consecutive 7 days for review during a roadside inspection. An ELD must also produce a data file or a series of data files of ELD records for a subset of its drivers, a subset of its vehicles, and for a subset of the 6-month record retention period, to be specified by the safety official (see 4.9.2(b))—this includes files with 30 days’ worth of RODS. The device user manual should provide instructions on how the driver or carrier can specify the time period for the file being transferred.

### **Event Times Provided Incorrectly**

While date and time are recorded in UTC, in the ELD output file they must be provided in the time zone in effect at the driver’s home terminal (7.8, 7.40). If these times are provided in UTC, this will result in the incorrect time displaying for the safety official. You can test this by viewing the safety official view of your ELD output files that you have successfully run through the File Validator, or for test files successfully submitted to the Web Services test environment. See the ELD Provider Portal for more information.

## Help Carriers Remain Compliant

As an ELD provider, you are responsible for ensuring that your customers are operating with fully compliant devices. You also should be available as a resource to them, offering good customer service and guidance on how to properly use your device. Examples of good customer service include:

* Respond promptly to carrier questions or requests for assistance.
* Put parameters on device setup to ensure carrier is providing a valid file (e.g., have device require carrier to enter values in all required fields).
* Make sure your device’s user guide contains all useful information on device functionality (e.g., how to enter the output file comment during data transfer).