Electronic Logging Devices

Federal Motor Carrier Safety Administration

Agenda

- Are You Subject?

  - Exemptions

- ELD Phase I

- ELD Phase II

- How to get Ready

  - ELD Checklist

  - Driver Responsibility

  - Motor carrier Responsibility

Are you subject?

- If a driver is currently required to prepare a paper record of duty status, the driver is required to use an ELD.

- UNLESS, the driver or commercial motor vehicle meets one of the limited exemptions...

Agriculture Exemption

- Transporting agricultural commodities from source of the commodities

- Delivering supplies and equipment for agricultural use from a wholesale or retail distribution point

- Within 150 air mile radius

Exempt from recording the driving and working hours performed within 150 air mile radius

Exemptions

- 100 air-mile radius drivers

- 150 air-mile radius non-CDL freight drivers

- Required to prepare paper RODS for not more than 8 days during any 30-day period

- Conducting "drive away-tow away" operations – when the vehicle is the commodity including towing recreational vehicles

- Driving vehicles manufactured before model year 2000

ELD Webinars

FMCSA ELD Rule and Implementation Plan Webinars and Events

- https://www.fmcsa.dot.gov/hours-service/elds/training-and-events

- ELD Phase I: Awareness and Transition

- ELD Phase II: Phased In Compliance Phase

- Electronic Logging Device Technical Specification Public Meeting

Phase I
February 16, 2016 through December 18, 2017

Comparing the 3 Devices

	AOBRDs	Devices Installed with Software	ELDs
Integrally Synchronized	Yes	No	Yes
Automatic Recording of HOS	Yes	No	Yes
Technical Specifications	Limited	No	Yes
Registered with FMCSA	No	No	Yes*

*To see the list of ELDs registered with FMCSA, go to:
https://www.fmcsa.dot.gov/hours-service/elds/equipment-registration

Vehicle Equipped with an Electronic Device

- Motor Carrier/Driver declares official method

- Inspector can use electronic device as a supporting document

Citing During Phase I: Roadside and Investigations

	AOBRDs	Devices Installed with Software	ELDs
Section 395.8(d)	No	**Yes**	No
Section 395.15	**Yes**	No	No
HOS Limitations (10, 11, 14, 15, etc.)	**Yes**	**Yes**	**Yes**

- If the ELD is not registered with FMCSA, the device must meet the definition of an AOBRD or meet the requirements of §395.8(d)

- The CVSA Out of Service Criteria is applicable to all devices

Phase II
December 18, 2017 through December 16, 2019

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Center

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Purchasing an ELD

- **Must** be registered on the FMCSA Registration site

  - Tips for choosing a Compliant ELD device

    - https://www.fmcsa.dot.gov/hours-service/elds/choosing-electronic-logging-device-checklist

  - Use due diligence when purchasing equipment

- Consider your operations an when choosing an ELD

  - Device Architecture

    - Hardwire or BYOD

    - Telematics or Local only

Is the Device Registered with FMCSA?

https://3pdp.fmcsa.dot.gov/ELD/ELDList.aspx

Driver's Responsibilities

- User's Manual

- Data Transfer Instruction Sheet

- ELD Malfunction Instruction Sheet

- Supply of blank record of duty status graph grids

- Any supporting documents in the driver's possession must be provided to the safety official upon request

Manual Input

- Off duty or Off

- Sleeper berth

- On-duty not driving

- Annotations

- Driver's location

- Commercial Motor Vehicle Power Unit number*

- Trailer number*

- Shipping document number*

Multiple Employers and Transitioning to ELD Use

Providing the Previous 7 Days Records of Duty Status

- Paper Logs

- Printout form device installed with logging software

- Printout from an Automatic On-Board Recording Device (AOBRD), if now using an ELD

*Driver may insert missing data into the ELD

Electronic Data Transfer

ELD Requirements

- ELD provider is required to select 1 of 2 options:
    - Telematics

    or

    - Local

- Within the selected option, the ELD must support both methods:
    - Telematics; email and webservices

    or

    - Local; USB and Bluetooth

All Else Fails

- ELD Display Screen

- Printout from ELD

*The rule does not address a motor carrier providing a driver's hours of service via fax or email

Nominal Hours of Service

- Hours of service violations that is 15 minutes or less

- Identify patterns of hours of service non compliance

- Less impact on safety management score

ELD Malfunction (Driver)

- Note the malfunction

  – Provide written notice to motor carrier within 24 hours. (Maybe include an electronic message, such as an email and/or a Fleet Management Systems (FMS) message.)

- Reconstruct the previous 7 days

- Continue to manually prepare records of duty status

End of working day

- Change duty status to on-duty not driving

  – Log off

- Log back in

  – Enter missing data

- "I hereby certify that my data entries and my record of duty status for this 24 hour period are true and correct."

- Submit to motor carrier within 13 days of being generated.

Edits

- Drivers can make edits to their ELD record

  - Must re-certify ELD data after edit is made

- Carrier can request edits after ELD records have been submitted

- Driver has the right to decline edits

- Assigned miles must be addressed prior to operating the commercial motor vehicle

  - Accepted or declined

Motor Carrier Responsibilities

Record Retention

- Paper Logs

- Printout from device installed with logging software

- Printout from an Automatic On-Board Recording Device (if now using an ELD)

- 6 Months Retention

Lists of Users

395.22 – Driver Accounts

● Driver's first and last name as reflected on the driver's license

● Unique ELD username

● Driver's license number; and

● The state or jurisdiction that issued the driver's license.

List of Users, continued

- Support Personnel

  - First and last name

  - Unique ELD username

- Multiple persons cannot share one account.

- All drivers of the CMV may have a driver account. For example:

  Exempt Driver Account

Unidentified Driving

- Annotate

- Assign

- Maintain Unidentified driving records for 6 Months

- Must provide to requesting safety official

Company Policy on Unidentified Driving

- Unidentified driving prevention

  - Know when to login

  - Make sure you logout

  - Create appropriate accounts (exempt driver)

- Drivers can decline assigned driving

- Later accepted driving/time can contribute to hours of service violations

Editing ELD Data

- Carrier can request edits

  - Annotate

  - Maintain original data

- Driving time **cannot** be shortened

  - Team drivers only

To Be Maintained

- List of users

- Unidentified Driving

- Original ELD Data

- Paper Logs

ELD Malfunction (Motor Carrier)

- Paper Logs generated during the malfunction

- 8 days to repair or replace

- Can request an extension

Electronic Data Transfer

- Telematics Option – Select 1 of 2 methods:

    – Email

    – Webservices

- Local Option – Select 1 of 2 methods:

    – USB

    – Bluetooth

Automatic On-board Recording Devices

- Not subject to the technical specifications in the ELD rule

- Expansion of fleet = ELD installation

- Replacement of CMV = AOBRD reinstall

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Got Questions?

- Email: ELD@DOT.GOV

- ELD Website: https://www.fmcsa.dot.gov/hours-service/elds/electronic-logging-devices

PAPER**LESS**
ELECTRONIC LOGGING IS HERE.