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](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

<table>
<thead>
<tr>
<th></th>
<th>AOBRDs</th>
<th>Devices Installed with Software</th>
<th>ELDs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrally Synchronized</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Automatic Recording of HOS</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Technical Specifications</td>
<td>Limited</td>
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<td>Yes</td>
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<tr>
<td>Registered with FMCSA</td>
<td>No</td>
<td>No</td>
<td>Yes*</td>
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*To see the list of ELDs registered with FMCSA, go to: [https://www.fmcsa.dot.gov/hours-service/elds/equipment-registration](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

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<tr>
<td><strong>Section 395.8(d)</strong></td>
<td>No</td>
<td>Yes</td>
<td>No</td>
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<tr>
<td><strong>Section 395.15</strong></td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td><strong>HOS Limitations (10, 11, 14, 15, etc.)</strong></td>
<td>Yes</td>
<td>Yes</td>
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- 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
# Comparing the 3 Devices

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Purchasing an ELD

- **Must** be registered on the FMCSA Registration site
  - Tips for choosing a Compliant ELD device
    - 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?

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
Got Questions?

- Email: ELD@DOT.GOV

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