Please stand by for realtime captions.

Thank you for your patience. Please continue to hold as your conference will begin momentarily.

[Pause]

Ladies and gentlemen thank you for your patience. Please continue to hold as your conference will be underway in approximately 5 minutes. Thank you for your patience.

[Pause]

-- There a couple spots up front. Don't be shy.

Before we officially kick things off this morning I'm going to turn things over to Alice will give you a brief safety presentation and a little information about the facility.

Good morning. A couple housekeeping rules. The first thing is cell phone, if you have one, can you turn it off and put it on vibrate. If you need to make a phone call, there are two exits, just walk out in the hallway.

Restrooms, if you're looking for the restrooms, just out these doors, take a left. They are in the corner.

If for some reason we have to evacuate the building, we are going to go out the third Street exit. Remember where you came in right here, you're going to turn right and walk down to the waterfront. That is where the whole building goals goals during a fire drill. Any reason if it occurs, just get up, take your personal belongings, go out, take a right, walk all the way down the waterfront work when it is over with, come back. We will meet outside the third Street -- between the two buildings. Okay?

Make sure you have got your badge. Please do not wander off , and make sure you wear your badge with you. When you leave today, make sure you just turn that into the security guard. That is all I have. Any questions?

Thank you.

Again, if you are standing in the back of the room it would be fantastic if you could find a steed if you're going to be staying for the meeting today, and don't be shy, like I said. Welcome, everyone, and good morning and [Indiscernible] specifications meeting. To kick things off this morning, we are going to have the FMCSA deputy administrator come up and the director of office enforcement and compliance.

[Pause]

Good morning, everyone.

Good morning.

I want to thank you all for coming. This is a good opportunity for us to talk about electronic logging devices. This technical meeting has gotten a lot of attention so we appreciate everybody coming in . As you notice, it is a little crowded in the building today. We have a group of about 500 people here for the Department of Justice cyber security Summit so if you're here for the cyber security Summit, you are in the wrong room. I will give you a quick minute to exit.

But I also want to thank the folks old are joining us on the webinar today. We have gotten a lot of interest and we appreciate it. We want to ensure that this is a rich, full discussion, and we really based it on questions that we have gotten so far. We have had people submit questions, and throughout the process, we welcome your questions . We have got a great group here today. We have got to deal Lorenzo who is our director of the office of enforcement compliance, and he is the ELD team led by Ms. Tanya [Indiscernible]. We've got great support from [Indiscernible], and so as you know, at DOT, safety is first and always our top priority, and at [Indiscernible] -- FMCSA our mission is to reduce crashes involving large trucks and buses, and a final ELD rule that was published in December of ELD rule that was published in December 2015 is one of those key efforts at advancing highway safety, and also improving our service compliance and prohibiting harassment.

As we move closer to the implementation of the ELD final rule in December of this year, we want to bring people to gather now to ask technical questions and share information . We really intend for this to be an open dialogue with ELD manufacturers and to continue the development as we go along and

promote carriers to work toward integrating ELD into their operations.

But we also want to make sure that you are aware that our outreach efforts are continuing and will be ramping up as we move into the summer and getting closer to implementation.

It is a wealth of information available on the FMCSA website on the ELD page. Of their our Q& A that are constantly being updated, so that is a great source for information .

In addition to that, as we go through the summer, we will be working with some of our partners and stakeholders like OID a I'm getting out to meet with drivers and we heard a lot of feedback that drivers are very interested, concerned about ELD so we want to make sure that we are getting out there, as well work

We will be hearing more as we go through scheduling some days across the country

and we are actually going to put Joey and his team on the road, so they will be spending their summer vacation and probably some far gone places desolate places and a few truck stops along the way.

The ELD manufacturers play a key role, and we look to partner with them for CMD safety and this is the reason why we are here today. We hope to be able to share some common interest and ensuring that the minimum technical requirements established by the ELD final rule are clear and well understood. It is essential that these devices self certified by the manufacturers and [Indiscernible] with [Indiscernible] are in fact, in compliance back

The ultimate goal really is to provide mobile carriers -- motor carriers and [Indiscernible] with a wide range of options when it comes to ELD that will improve safety and make their jobs easier and saving time and money along the way.

ELD benefit the industry and law enforcement by reducing the time necessary at the roadside to review hours of safety compliance .

Today's agenda is full and it is customized to meet your needs based on the questions you have asked in advance. We want to hear from you, and this really is an interactive event . We encourage your therapist that's my participation. We also encourage people joining us on the webinar to submit questions through the webinar function .

As we continue to move toward implementation, we will continue to provide information , be available for questions, and try to make a smooth off his implementation as possible .

And before we get started, I would like to take an opportunity. We have got a new member of our FMCSA family . Randy Hutchinson, would you please stand? FMCSA new chief counsel and she is it part of Sec. Chao's noncareer team that is helping to support our safety mission here at DOT and we think Randy and she has gotten actively involved with ELD in other rulemaking across tran1.

With that, I want to thank you in advance for your time and your participation, and we are really excited about getting going, and now I will turn the program over to Joey DeLorenzo.

Thank you.

[Applause]

Thanks. Welcome everybody. Good to see everybody.

I just want to take a couple minutes. Tanya said there was room in the agenda so I only have 15 or 20 minutes of remarks so that should be okay.

[Applause]

[Indiscernible] still awake over their perspective the couple quick things. I wanted us to talk for second kind of the origin of this meeting which I think will help level set us all and what we are hoping to accomplish with this and also remember like that reason, we don't want this to be one conversation. This is one part of our ongoing

conversation as we move forward towards ELD implementation, but the origin of this meeting is a few months ago
that everyone was starting to get really active in terms of ELD manufacturers registering, or can't technical issues, and we start working on the issues of data transfer, we started getting questions coming up that I was having a conversation with this group of manufacturers and some other people in some of this was convenient for me, maybe I can get everybody in the same room were written get all the questions answered at once, but part of the wall idea was what we really started understanding as I talked with the manufacturers
and with the truncating companies involved is that there is this real intersection between technical aspects and operational aspects. The idea this meeting was to get everybody together and get this conversation going and it is any issues that we have morning forward come December.

The timing of it, the idea here is as we have this conversation, I want -- and Tanya will go over that rule, I believe, and talk a little bit about where we are, but just kind of remembering where we are in terms of implementation is that the big date that we are moving forward with is the December is that the big date that we are moving forward with is the December 2017 date, and it is important to remember that what happens on that date really is paper logs go away for those carriers that are subject expect we will be down from three ways of doing things down to two. The grandfather devices, devices will still be allowed to be used, and we will be moving forward with anybody that has a registered ELD.

As we focus on the technology aspects of things as we are driving towards this December date to try and make it as smooth as possible, I think we just want to keep that in mind.

As Daphne said, the Fars format of this goes today, we really tried to build this around your questions , so we have a question-and-answer session after his module and about 50, 55 minutes towards the end, just to answer questions. We are going to try and get to as many of them as we can. If we don't, obviously we will get them taken care of later and myself and some of the other staff are going to be around if there are operational questions because we want to make sure that we at least cover the technical stuff today. There is operational stuff. We might but some that off to the side and get back to you and focus on that as we go forward.

We will be available. We will be around if we need to catch up on things later , we can, but during those discussions, as I started off saying , part of it is that there is a lot of people here in this room that have a lot of information, as well beyond what the regulations say and how these things work , so we want this conversation to not just go this way but to go this way, as well . We appreciate your help with that. We appreciate everybody taking the time to be here today and we are looking forward to a good discussion as the day goes on. I will be here all day or most of it anyway if anybody has any questions relating to this or anything else. Just let me know.

I am going to go ahead and turn it over to our facilitator to get the ball rolling and we will go ahead and get started.

All right. Welcome again. I am Juliann Schwarzer. I work with the [Indiscernible] and I will be facilitating our meeting today. I'm going to introduce our panel is an presenters briefly and then we will go over the agenda and some ground rules for today.

We have from FMCSA Tanya Mimms, Daniel Smith, Brian Lucier and Ray Handley , and then we have the ELD technical team at the table over there, so Brian Baker, while the Zack, and [Indiscernible].

Just to talk to briefly to the agenda, will have a full program between now 1:30. I'm sure you notice when you book online . Whereby to start things off at overview the final rule and some other instructor immaterial us to put everyone on the same page. Then we will go over technical specifications for manufacturers, the functional specifications, technical requirements data transfer and the registration process , and as Joey mentioned, after each of the modules assigning the overview section we will have a break for questions and answer which really the bulk of the questions and answers happening at the end.

That is the plan. There will be one brief break, about 15 or so minutes , and we will let you know when that is happening and exactly when you should be back in the room and we can remind you of where the restrooms are at that time, and we will plan to adjourn Ray at 1:30. Just be prepared for that.

In terms of our ground rules, as a reminder to everyone in the room, the purpose of our gathering is to review the technical specifications for ELD in order to assist manufacturers and ensuring devices are compliant with ELD final rule. We won't be discussing elements of the enforcement of the ELD rule , so just as a reminder, as you are drafting your questions.

I wanted too disc over briefly what the question-and-answer sessions will be like today. We have three different kinds of questions coming in. For those of you who submitted -- pre-submitted questions, we have all those laws . We also talk in one second about questions in the room and we have a very large webinar

part is been gathering which is being managed at the back of the room and so we are going to be on an questions from all three of our groups today. To ensure that we get to as many questions as we can in person, when you settle you may have noticed on your chair you had a few index cards. During the meeting when questions come up, it up them down, and there will be a couple runners coming up and down the aisles to collect them from you. We will be answer questions and two different ways. One will be reading questions and also [Indiscernible], we will be making sure that if they are our questions that have answers to the materials today, that you can highlight that, and then as Joey mentioned, anything that we don't answer today get some type of response and FAQs or otherwise.

My last ask of the questions would be when you write your question, you could also write your name on your card, that would be fantastic in case we are clarifying question for you, or in case we need to follow up with you after the fact, and then as Joey mentioned, after the session today, some of the FMCSA staff will be available to follow up with and they can let you know if they need to get back to you to answer your follow-up quickly.

With that, going to turn things over to Tanya to get started on the presentation.

Good morning, everyone.

Just to provide you a quick overview of the ELD rule, it has set specific , standard and design performance standards that must be adhered to in order for the divide to be compliant device. The rule also requires all manufacturers to sell certify and register the device with FMCSA .

Where going to go into very much detail on the technical specifications [Indiscernible].

Some dates that should be remembered, December 18 .17 is the beginning of phase 2, and as Mr. DiLorenzo mentioned earlier, at that time the motor carriers are subject to the ELD rule will only have two devices that they can use to record the drivers hours of service, that being registered ELD's an automatic onboard recording devices also known as AL BRD.

There are significant similarities that the key difference is that the ELD's have specific technical specifications that must be adhered to in this ensures that we have a consistency between the data that is being shared between [Indiscernible] investigator to make sure driver compliances [Indiscernible].

Where going to go into more detail about electronic data transfer methods as you all may be aware there are two different options that are available to you and the investigators and the inspectors have their own options that they have to use to receive that electronic data. It is very important that the data file is consistent with what is in the ELD rule .

I'm going to pass on to my counterpart and she's going to go into some more details.

Good morning.

First of all let's talk about roles and responsibilities. We are in this together for compliance for [Indiscernible] service regulations. To talk about first FMCSA, FMCSA, we published the rules . We are putting it into effect , and so it is our responsibility to get with you guys to make sure that we are on the same level playing field, that we make sure that the technical specifications are exactly what this

motor carrier needs for us to ensure that they are compliant and for them to ensure that they are in compliance.

One of the things I was like to start out with what I'm talking about the ELD rule is that the ELD rule does not change the hours of service regulation . Those regulations stay the same. The only thing that ELD rule did was change the way that we record hours of service.

Keeping that in mind, we have got to train our folks as far -- and as far as when the train will come, probably be late summer. We have a team in it right now that is compiling curriculum for law enforcement training and investigator training.

As far as the ELD listing, we've got the registration where the manufacturers are registering now
and then there also will be a renewal process for the ELD, just like there's a process to get on our list, there will be a process to remove from the list in a van we cannot resolve technical difficulties or situations that may arise.

As far as the motor carrier , motor carrier is going to need to select the ELD that best suits their needs. It is not a one shoe fits kind of every situation. Carriers are all different. Some do the same things, but they all have their own different methods to go about that. With the ELD rule did was set that minimal technical standard, but carriers might want something else to go along with that ELD that they can incorporate this information in their operation and best serve themselves.

You as a manufacturer any provider of [Indiscernible], it is very important that you understand their operations . It is not just selling a device to help them with hours of service. It is making sure that that device fits their operation.

Training their drivers on how to use ELD, that is going to take time. Not only
are we having to train law enforcement, we have to make sure that the drivers are trained, as well, and that the drivers understand what kind of device they are actually using right now since we have the compliance state for ELD and then we have a grandfather period, so the drivers need to understand what type of device they are using and ensure that non-exempt vehicles have functioning ELD. Of course, all drivers are not subject to the ELD . Once again, did not change hours of service regulation, so that driver is subject to record the hours of service on a regular [Indiscernible], then they are going to be required to use ELD

As far as a manufacturer, it goes without saying that it is your responsibility to register with FMCSA. Then you are going to sell certify that those devices meet those minimal technical specifications that is listed in the appendix a of some Part B.

They have to ensure security of devices, and we have got drivers information that launched us to the driver and we need to protect that

information that is being transmitted . And respond to carriers quickly to respond to any ELD manifold doesn't malfunction. During this period those characters the carriers are going to be looking at you to ensure that the device that they have purchased , that they have implemented into their fleet meets the technical specification and stays up and running to record driver hours of service.

In keeping ELD self certification up-to-date within [Indiscernible], we have changes and we will need to know about those changes we need to constantly keep that updated.

Technical difficulties . We may have some technical difficulties out there. [Indiscernible] dealing with computers.

As far as what is [Indiscernible], something need to keep in mind there's really looking at the Hickory to have an eight day window and get that device back up and running again.

[Pause]

Make sure that as far as once we get these devices out there, get them into the carriers, get the drivers train picked there's also going to be follow-up to that. Keep in mind that those carriers are going to be looking back to you for that support.

Let's look at the technical requirements for the manufacturers . Of course that was the whole thing about the ELD rule was that functional specification for all ELD . With the ARB OD that came out in 1988 back in 98 back in 9888 we had no -- back in 1980 it with no tech out that might know [Indiscernible] and takes all is good functional requirements of those to date ARBOD and put it together that one technical standard so that it is uniform and we do have a consistent output to be able to assure those hours of service are compliant.

Within the ELD system, within the ELD rule we talked about driver counts. Those are basically the two accounts that need to be set up. The support personnel , the administrative account, that would be your IT support , those that are going to monitor the ELD system, keep that up and running, and also set up the user account for the driver.

As you know what the CMD driver, the ELD regulation, that is required to be tied to a CDL issuing state. Us so [Indiscernible] does not have tappers that might CDL so that does not have the same requirement but on the [Indiscernible] driver, only one user account per CDL .

In addition to the two types of accounts we have something called an unidentified driver profile. What that is going to do is that is going to capture all movement of that commercial motor vehicle without a driver login. Any unauthenticated movement of that commercial motor vehicle will be assigned to an unidentified driver profile. The driver will be able to review that , should be able to review that, see that moment belongs to the driver or not or decline it and then that goes back to the motor carrier support personnel and it is up to them to

either assign it out to the correct driver or annotate the reason for that movement.

Within the regulation you're also going to see us talk about an exempt driver account, and this is something that you guys need to understand is the driver account is there for that motor carrier if they want to use that to assign a driver -- set up a driver for that exempt driver account to help manage that identify driving. The motor carrier sets up the exempt status for the driver, it no longer goes toward that unidentified profile, it will go to that exempt driver account . This helps manage the occurrences of that unidentified driver profile.

ELD function. Are many ELD functions, but what we did was take the most important ones that you guys had asked a lot of questions about and that is what we are going to focus on today because those were the [Indiscernible] , the recording of data and certifying the record.

[Pause]

As far as powering on, we send [Indiscernible] ELD must be powered on and fully functional within one minute of it engine receiving power. This is important that one thing and at ELD rule, was set that minimal technical standard, but we did not
set a certain architecture to what an ELD was. Which is stated what the ELD had to do and what the ELD could not do. We need to keep this in mind and some of the structural designs coming out there, they require something from the driver first. For example, we see a lot of application that are coming through . If we are using that type of architecture, then you have got to make sure that that driver understands that may be that application needs to be launch. Maybe that iPad or [Indiscernible] needs to be turned on before we actually start cranking the ignition, et cetera.

That is going to be in the training to make sure that the carrier that gets that product that is designed that way understands what they need to do in order to be in compliance. If the devices in the vehicle or if the device failed to launch the application, then the driver could possibly be operating without an ELD when the ELD is required. This goes along with the training, read with understanding that carriers operation and knowing the type of ARBOD system they need.

One of the things, most important things is [Indiscernible] automatically sends most and status , vehicle miles, engine hours, CMV position and [Indiscernible]. As far as the section 7, the data element, I have found it that is my most useful source of information . If I'm going through that regulation and I can see a term that I may think has too many different meanings , always go to that section 7, because it is going to explain to you what the source of that data is, what it means, how is populated and what it is used for so that is a very important section that you definitely should reference.

Okay. As far as recording data, this is one of the think big things. The three 9515 compliant device is required to be synchronized with the vehicle . The ELD rule continues the same. When we talk about the

intramural synchronization we are talking about actually pulling that engine data. This is going to be at a connection with the CVM. We understand that some vehicles may not have any

CVM, and some carriers may want to do voluntary compliance with the vehicle that does not have an engine control module work you are also going to find accuracy limits our level, that if you do not have any CM that you can use other sinking devices to achieve that accuracy which is equivalent to the DCM data.

The vehicle -- the ELD pulls information from the vehicle, and the ELD records electronic and any supporting event, and it is going to have to retain the data and also generate said data, that standard data output file. That is the key behind ELD. We will start talking about other technical specifications, whether it be a display requirement or print requirement that we need to keep in mind that the number one element within the rule is that data transfer for their hours of service and compliance.

When the ELD captures the data , for the most part, the main information that we are looking at, date and time, vehicle position, and of course those vehicle parameters from the engine control module.

It is going to record the date and time as well. This must be tagged aspect that the contract and UTC standard. There is a time sent offset from the ET CNN is going to be associated to calculate the difference between drivers home to about the terminal. That driver is required to keep that regular duty status and home terminal time as established by the motor carrier. That is why we have that UTC offset in their.

As far as the categories , these are the only duty status categories that ELD rule will recognize, the off-duty , self explanatory, sleep or birth, , driving, emotion status, and on-duty not stand that make driving.

They are within -- within the emotion status, that is basically driving. There are other -- I'm getting ahead of myself. These are the only two automatic duty status within the ELD rule, driving, and the default to on-duty not driving once the vehicle has been stationary for five minutes , the driver has been [Indiscernible] and the driver has failed to respond to the problems in 1, the devices automatically devoted to [Indiscernible].

Within the ELD rules, there is a prohibition that there are to be no other show next changes. That is that driver [Indiscernible] that drivers are the certified [Indiscernible] throughout the course of the day so the driver is required to manually enter the duty status is that make that recommendation [Indiscernible] accurate. Where going to automatically capture the drivetime and then from the driving status only when the vehicle stationary for five minutes , we will have the prompt to the driver and then one minute after the driver does not respond to you want to continue driving or be on-duty not driving, it that driver does not respond to the prompt, it is automatically going to change the number four on-duty not driving.

Within the driving, everything [Indiscernible] captured , and within that driving there are two special categories that do not affect that time that the driver has that vehicle in motion, does not count towards the driving time that is the authorized personal use of the court-martial motor vehicle and yard move , and these are parameters that need to be set within that ELD , but it is not mandatory that the motor carrier allow the driver to use these two options, however, if it is in the appendix, it is required to be within the ELD system so that the motor carrier can assign these two special categories to a driver if they see fit to do so.

It will still show -- for example, on the authorized personal use, the driver will set the device to off-duty, then they will indicate personal use , and then it will still be captured as movement, but it will be shaded within that off-duty , however the provider decides to represent that personal use , will still be able to see that, but it does not count towards that drivers hours of service against the driving time.

Same with yard move. The driver will set themselves to on-duty, not driving so that yard move, and then the driver can do the movement within the yard until he goes through a power cycle and then it goes ahead and defaults back.

Once again those are the only two special driving categories that the appendix addresses . There are other instances within the regulations, like a second hours of service did not change, so there may be other circumstances that do not impact the drivers drivetime such as adverse conditions . A driver is allowed extra driving time in the event they occur [Indiscernible] and adverse driving condition that would impact their hours of service , but yet had they not run across that adverse action, they could have made that trip within the allotted hours, so those types of things we expect to see annotations. If it is not a yard move or personal conveyance, those are programmed in, we have got a standard set for that, if anything else within the hours of service regulation, that impacts the drivers drivetime or does not impact the drivers drivetime, it needs to be annotated that there are certain special conditions that a driver drives under, certain exemption, or something like that, once again, yard move, person [Indiscernible], the only two that are allowed to be preset in the ELD, and everything else will have to be annotated by the driver.

As far as self-monitoring , of course, the ELD needs to be able to review its internal integrity I guess we could say.

As far that, the power compliance. The indicator would be the device Stromectol Reformation from the ECM or alternative source, however the ELD gets its power. If we haven't aggregated amount of 30 minutes or more, then it is going to record that malfunction .

Engine sequence donation compliance. The device fails to send engine information and [Indiscernible] . Once again, 30 minutes of aggregate time during a 24-hour period that it is going to record that malfunction.

Timing compliance. If you cannot verify that the timing is accurate , position compliance, [Indiscernible] within 5 miles of a commercial [Indiscernible] movement. This what his failure to acquire [Indiscernible] persists for 60 minutes over a 24-hour period, we understand that you are going to have [Indiscernible] in GPS work that is not necessarily going to trigger a malfunction. It is when that persists .

And the data recording compliance, very important. We need to record that malfunction when that ELD can no longer retain the information or can no longer retrieve the information from the external source.

We have our automatic events that the ELD is required to record and of course where going to have to have some manual input, as well.

For example, [Indiscernible], shipping document number, these are all manual entries , and within the appendix, within a technical standard, we set that design for that ELD. We did not discuss that that office system so much as it talks about incorporating and our service engine or other monitoring systems for that motor carrier to ensure compliance. Those are all additional tools for that motor carrier to help them and their monitoring. If you do have a system that wants to manually populate [Indiscernible], and of course, once again at driver will have to accept that information , and if it is manually populated, that driver needs to be able to change that information if it is not actually accurate. A dispatch system, for example, may populate that trailer number

when a driver does the location, the trailer number has been changed so that driver needs the ability to go in and change at information if it has been automatically import by an other system.

Recording data, the driver manual entry for [Indiscernible], Amos Bill to make entries of records whether vehicles in motion. Coal drivers must not be able to switch drivers while vehicles in motion. That is pretty much a driven -- given.

But a check to make sure not forgetting something will show you.

[Pause]

The driver certification of their own records, this is what I was talking about earlier. That driver has got to state that that record of duty status is true and accurate and that it actually reflects what the great that make driver does.

Within the system, at the closure of each day, I hereby certify that my data entry and my [Indiscernible] for this the 44 hour period are true and correct. They'll either agree or disagree. We have edits and we will probably discuss later, but as far as the driver is going to agree that these entries are true and correct .

Time offset for VTC must be included in the driver certification, so that is [Indiscernible] to that drivers home terminal TimeZone .

Data availability. Once again we started out talking about the different ways to retrieve the drivers hours of service from the ELD but the number one reason for the ELD rule is to get that electronic data transfer , so at any time the device must be able to display data from the current day, as well as those previous set days.

In addition to the data transfer the dire was mailed to display and print out or authorized capital official.

And ELD rule your choices as provider what you want to offer the display requirement or if you want to offer the print option perspective you choose the display requirement you are not subject to the printing. If you choose printing are not subject to the display requirement. Either way, that backup method that we like to call it, is a way you choose, it still needs to contain all the required data elements that we would get with that transfer of information.

Data integrity, of course, once again they've got to make sure that this information is not compromised . So as far as with the event data check, that will not be validated by FMCSA. However, the line data check in the file data check will be validated by FMCSA and I'm sure we were going to the quite a bit later on when we get to the other portion of the presentation .

Any questions?

All right. I have noticed many of you jotting down some questions , so our questions will come through the audience and if you could just pass your index card , and we will have another one in a minute to come through, but will start to go through them, and when we go through your questions, we can get started out a few questions that we have here. You can also [Indiscernible] applicable to handle the card.

The first question that I have here is the login of engine power status, does the ELD device need to be in an always on mode to detect the engine power up status or will powering on it develops from the engine [Indiscernible] connector suffice for a power on status?

Can you repeat the question?

[Indiscernible - multiple speakers].

Sorry about that. For logging of the engine power status , does the ELD device need to be in an always on mode to detect the engine power up status or will powering on the device for engines J193 connector suffice for a power on status? [Indiscernible - low volume] .

If it is an application, then the device will have to be up before the engine is turned on. I think this question is asking if they can retrieve power from the [Indiscernible] for the device [Indiscernible - low volume] is a device would be powered on when the truck is turned on and he has to meet the one minute.

I think we have seen several devices that whether you are going to an ancillary [Indiscernible] or just retrieving power specifically right from the 1939, either way [Indiscernible], just as long as it meets the specification of powering up with in one minute, and of course it takes an application that is on a separate device, it depends on how -- if it is going to receive his power, if there not some black box in their to prompt that device to come on, however that might happen, then that driver needs to understand that that manual power is going to have to be on prior to the starting of the vehicle.

Another long one. Auto duty selection -- auto duty status selection, what should on YM yard move default to? Should it remain on yard move forward changed to on when power cycled -- I will pass this to the site does not panel is. What should off personal use default to after five minutes at 0 mph? After a power cycle, what should off PC show as?

As far as that five-minute no motion, that only goes to the on-duty not driving from the drive status. If they are in yard mold does not mode, the driver will select the beginning and end of that yard move period and go through the power cycle. Once it goes through the power cycle and correct me if I am wrong, but it defaults to zero and then the driver once again [Indiscernible], the driver will enter it manually whether they are on duty or sleeper berth or off duty. You will have that automatic [Indiscernible] motion for the driving status and that would be the same for personal conveyance . The driver would select [Indiscernible] in and add that special condition and then once the vehicle goes through a power off, it will default to zero and when it goes to the power cycle, the driver will have to still like status perks but great. Thank you.

Please clarify on slide eight compliant ELD will display and print hours of service data . Printing is not required in the rule as far as my understanding.

[Indiscernible - low volume]

[Pause]

If it's the display and print --

That was a question perks but it is either or. At the programs on the provider, whichever one you want to select. Of you select, like I said earlier, if you select the display requirement , the device is not required to print. If you select print option, the print that's make the device is not required to meet the display, but the name of source of information will be that daily transfer and it is up to you as the provider if you want to support the display requirement or you want to support us print. If it is print and display, then it should be [Indiscernible] in there.

Great. Thank you.

There are a couple [Indiscernible] over here.

A couple questions came in. -- They came online about the plant and display requirement that it would be great if you could address -- the question I came up several times was is the generation of a PDF and an email to the inspector and quite adequate for the purposes of the printing requirement and the ELD rule?

No.

[Indiscernible].

No. The rule did not address that PDF version. The driver will have to print that's Michael we did not address the emailing of that PDF. It either has to be a print option there in a commercial motor vehicle for the driver or the display . The emailing of a PDF does not addressed in the rule, so that is not an option that would be maybe a roadside discretion type of thing but it is not compliant to the ELD rule.

Is. The purpose of the printer display is that fall back, assuming that you cannot email because you have no connectivity, for example.

Fantastic work that is a great reminder of the many webinar participants to feel free to type questions into the Q&A pod.

Fantastic.

Next question perks but how are we supposed to handle the deletion of hours of service status events marked as an active?

How are we supposed to handle the deletion of hours of service status event ? Showing marked them as an active?

Duty status changes?

[Indiscernible - low volume]

A microphone is coming your way.

The idea is a driver makes a mistake on his logs where he supplied this might press a sleeper berth and was supposed to be on duty and an [Indiscernible] and he wants to delete sleeper berth and wanted to go away, how would you handle that?

The first thing is that there will not be any deletions. The ELD rule does support [Indiscernible].

One of the key elements with limited edited ability is the all original information must be retained. As far as the driver can go in and change that sleeper berth status to off-duty or on duty, not driving, et cetera, that original data is required to be retained.

[Indiscernible - low volume]

From that example we gave, it is okay to have -- the guys let us a sleeper berth and duty driving right after and he edits to sleeping not

driving, but as lively preserve the history it is okay to [Indiscernible] perks but guess. It is little more complex than that . Programmers may have to chime in, but as far as when the driver does make an edit they will have to imitate it perks but they're not just changing from the [Indiscernible], they are also having to go in and annotate that mistake.

Understood.

[Indiscernible] of anything you want to add to that?

I one thing I would ask is that all the data should be transferred to the data file. We should of the original record, the correction to make it on duty, and that other on-duty record [Indiscernible] and those first two. We have to have annotation [Indiscernible] conifers which it at one thing was saying changed and then [Indiscernible]. Each one of those things should be [Indiscernible - low volume] in a unique events related to each other in the device.

If you have a follow-up question, jot it down.

Okay. The next question is can a single driver account be subject and exempt ?

More than likely, yes the cause, once again, the driver can operate under that exempt status and one of the limited exceptions to the ELD rule is, for example, the hundred mile radius driver policy may have a driver that normally stays in that exempt status so that driver will log into the ELD as the extent driver status current that driver will not be held to ELD -- they will not be held to the standard of that ELD just because log didn't [Indiscernible] the lead vehicle, but then the driver may go out in 100 mile radius more than eight times in a three-day period and in that scenario they are going to have to be able to record their hours of service on the ELD. We can only have one driver account , so that driver account, they have to be program to wear that driver has the option to remain in the exempt status and on [Indiscernible] when they leave, [Indiscernible] the hundred mile radius for that extended period of time over the eight days [Indiscernible], because they would have to be able to use that ELD under one account.

Thank you.

I'm over here, again. [Indiscernible] perks but general questions Several cups -- questions came in around us.

If you could talk a little bit more about how the exempt driver account works, particularly for couriers that have an under 10,000 pound DPW, that is something they are subject, and it switching back and forth, we have asked several questions looking for clarification on that as well as maybe a couple seconds more on how this issue of yard moves actually works , and a couple questions whether or not you need to have more than

one account if you have multiple drivers making yard moves? Maybe tell us a little bit about mothers exempt driver thing works because we have got several questions about that.

I am trying to figure out exactly where to start that there were a lot of things there that were put on the table -- spots start with the driver and this would be true for [Indiscernible] 10,000 other or [Indiscernible], when you go back and forth between exempt a nonexempt service and how does that work and tie into the ELD ?

Exactly. One of the things I think we have seen come up a lot is that commercial motor vehicle that all of a sudden is no longer commercial motor vehicle.

For example, the pickup truck that once it is articulated now becomes a commercial motor vehicle, but then [Indiscernible], that element, and now it is not required to be recorded on the ELD.

Once again, if a driver is -- this is going to go back to hours of service because when the driver is not subject to creating a regular duty status, they might

that's what may not have to record that on the ELD. However, at that time and that non-CMV [Indiscernible] toward the drivers hours of service , so this is where a driver could go in the EOD, and the that missing hours, so that the carrier wants to use that back-office to monitor the driver hours of service electronically, they may do so . They are not required to go in and put that information to the ELD as opposed to the ELD was not [Indiscernible], so that is going to be a motor carrier decision on how they want to monitor that drivers hours of service, whether they want to do it manually, keep multiple records or if they want to plug the information into that system electronically to keep track of the our [Indiscernible].

If that device is installed into the commercial motor vehicle and the vehicle itself gets [Indiscernible] status , but yet the ELD is hardwired and eight choose not to use the exempt driver account, then the ELD detects that vehicle in motion, and once again the driver will have to annotate that. For example, I think we have had several questions come in about [Indiscernible]. Once the commercial vehicle gets on that rail, it is no longer going to be [Indiscernible], so that would have to be annotated because I am sure that more than likely it is integrated within the same system, same powertrain that runs on a highway as [Indiscernible] dozen high real, so that would have to be annotated as such, operating a high real, for example.

And I think the thing that your hearing Daniel talk about that has come up a lot is that everybody is really concerned about trying to jam all of their scenarios into a different driving status, but this is exactly why we have the annotation feature. We understand that there are going to be different things that are going to come up, so that is a really important key thing that has come up and it came up in a lot of online questions.

One last question and I think I will cover have them in question here and online is can you just over yard moves a little bit more detail, exactly overcome how company canceled the account . There are questions about is it based on speed or miles or power , hours .

Explained a little bit about that and a conversation you you have at about if you have multiple people moving the same truck during the yard move.

All right. And [Indiscernible], that is one of the things that you have to take into consideration is that for equipment utilization, not everybody is going to have extra power unit sitting around when shuffling trailers, et cetera, so we need [Indiscernible] drivers command to a carrier facility or [Indiscernible], then you may have other personal that gets into the commercial motor vehicle, within a carrier facility to hustle trailers, stage trailers, back into doors, swap around [Indiscernible] the trailers, whatever that they need to do to facilitate the next movement, so once that driver gets to that facility , one of the things that we definitely stress is it to make sure you all go. If a driver is on an ELD and a specific piece of equipment, they need to make sure when they are subject or someone else to drive the vehicle they make to [Indiscernible] system.

We have different scenarios that came up, and there is a process with the unidentified driving and with edit, et cetera, so with the [Indiscernible] driver gets to that yard and other personal dry that equipment within a carrier's yard, within a facility , some of the arts may be small enough you can go fast enough for the vehicle , for the ELD to take the vehicle moment because we do have that five mile-per-hour maximum, however, it can be's that more stringent and we could detect every moment . Some of these yards as you know can be used, and they can very well exceed that five mile-per-hour in motion status.

With that we have discussed other options and you more than likely have [Indiscernible]. We hadn't FAQ -- we had an FAQ come out come out to where what the driver log note, the other logged or does my drivers, rather than logging in every single time, the carrier does [Indiscernible],. There is not supposed to be a system change or an algorithm change to that drivers record status . The driver has to accept the change proposed to the record and duty status, but in a back-office system, once again we are talking operationally , there is nothing that would prohibit that unidentified driving being notated somehow within a dispatch system, and occurring within [Indiscernible], the net supervisor -- the system could sort those movements within that [Indiscernible] to that particular area and know that it did not leave that [Indiscernible] and that supervisor could [Indiscernible - low volume] what the annotation [Indiscernible] and that was definitely [Indiscernible].

We have looked at that , as well because once again you don't have a lot of extra tractors or whatever sitting around the help of the trailers and with equipment utilization that is an option that we are looking at [Indiscernible - low volume].

We get quite a few questions regarding the ELD automatically changing the driver to [Indiscernible] , the geo-fencing area because that is not allowed.

Danielle has already gone over what is allowed as far as automatic change of the driver duty status and changing the driver duty status in the yard automatically is not allowed.

[Indiscernible - low volume]

Just as a reminder if you have not [Indiscernible], please do.

Our next question is about email transfer . I was previously given guidance that the roadside inspector can provide an email address in addition to the [Indiscernible] . Is is permissible or do we always send datafiles to FMCSA During phase 1, which is currently going on right now , for any of the ELD's that are currently so certified and registered, it is at the inspectors discussion on whether or not they're going to provide their email address and [Indiscernible] electronically because of right now they are not required to receive data electronically. They can't does Mike will be required to do so starting phase 2 starting December , 2017 per

Also to elaborate on the little bit, to get the registration
-- conifers started accepting registrations, there were items listed on the test procedures that were required to be done. There were also within the regulation [Indiscernible] was to provide an address, and what we did and [Indiscernible] had not occurred yet, we went back through the test procedures and relisted those items that were not listed [Indiscernible] so within the structure [Indiscernible], some of those systems were set up to [Indiscernible] versus address versus [Indiscernible], so the structures [Indiscernible - low volume] . It is not a requirement in regulation, but if our structure to do so, then it is acceptable , but once it is up and running again to test things and that will be provided [Indiscernible] [Indiscernible - low volume].

All right. I think that was [Indiscernible].

One thing to add on that, once we go live, the emails are desperate that we send will be encrypted email so the facility will be able to send it to an inspector and that is not a useful mechanism after rollout and after those [Indiscernible] come into play. The only be a way to use the email system would be to [Indiscernible] and sending it to the roadside inspector with encryption key that they cannot decrypt will not be a useful function.

Okay. If a driver forgot to use start move or PC, canned the deed log be edited after-the-fact? Tenant carrier meet us at it or doesn't need to be done by the driver?

First thing on edits, the motor carrier only proposes edits to the drivers record of duty status, so whether it is assigning the identified driving or the driver or the carrier post submission has

discovered an error in the drivers record and duty status, they will propose that added to the driver. The driver will either accept it or they will decline it stating that it was not accurate and then that will be between the motor carrier and the driver.

As far as removing driving time from the record of duty status and putting
it in a special condition or category, no. Wants that driving time has been captured, you cannot remove the driving time. You can only annotate it as such. That is why we require the annotation . We can go back and have a annotation to see if the driver drove , personal conveyance by annotating, but it should not go towards the drivers hours of service , but once it is automatically captured by the ELD, then it has to stay there and be annotated.

You cannot have [Indiscernible] later [Indiscernible - low volume].

The annotation layer. Yes.

Great.
Does an and identified driver logging require UPS data. How to differentiate between real failures and driver induced to move paper logs and can a phone tablet at in the vehicle and then communicate over cellular?

Part one.

Does unidentified driving logging require GPS data?

Yes.

It collects everything that is required [Indiscernible - low volume] . The two automatic status is that we discussed, the automatic driving status and the automatic default to on-duty not driving after the five minutes is going to collect all of that. Within each of those events, it is going to collect the other required data. The only thing within that unidentified driver, it is going to prompt that driver to pull over and log in a system. At the vehicle continues to be moved, then that's when [Indiscernible] unidentified
driver profile, all the data elements that are automatically captured and required to be captured goes to that profile. The driver is not allowed to make any manual entry to that profile , but until the driver is pulled over and logs in and accepts the data. Once accepted, then they can go back in and enter the missing data that they should have entered while it was accumulating this unidentified driver.

Great. Part two. How many differentiate between real failures and driver induced [Indiscernible] paper logs?

Differentiate between real failures S

Real failure and driver induced to move paper logs.

That is why we have the data elements within there. Of course where there is a will there is a way. Folks will find out things , and so we have checks and balances within the technical specifications that is required to be recorded. We see a malfunction, and when they are required to be recorded, annotated, et cetera, so this will clean more towards enforcement and the indicators -- when the ELD's are working fine [Indiscernible], and that kind of gears toward enforcement that will be discussed at a later period.

Are a. And then lastly on the start that's my card, get a phone tablet best iPhone or tablet act in the vehicle engine communicate over cellular?

Yes. The device does have to be hardwired -- does not have to be hardwired. Can be Bluetooth plugged into the connector that transmits to the tablet or phone. I am not so sure how old work over cellular , but I had is not that difficult, but as long as it gets the data that we require, both [Indiscernible] data elements, it could be wireless . To mean that means Bluetooth but I might be a good and to the cellular part of it transmitting.

I think what I am hearing is that question , some of these bring your own devices we like to call them systems, will have a black box I guess you could say for a lack of a better term and actually plugged into the ECM that is retrieving and the data, and then the driver will have their own device.

If they are not communicating locally within the vehicle , Bluetooth, that doesn't what Brian is discussing, there are some devices that will communicate from the black box for lack of a better term and [Indiscernible] to the driver device.

We did not have
prohibition against that type of communication. However, when your customers are shopping, if they operate in a tightly contested areas such as the DC area, that may be fine because we always have continuous coverage, but if your customers are operating out West where there is very spotty coverage, they may need to understand that that bring your own device may not be kept current. That device might not be able to populate that drivers record of duty status if they do not have that cellular communication .

That is very important to understand an architecture. We did not prohibit that Burkett is accessible , but the cares need to understand
even in the passenger carrier world where a lot of their destinations maybe national parks, there may not be
spotty coverage are covered it on a national park. Depends on the type of operation, whether that would be beneficial to you or not , but once again the drivers record of duty status has to remain current in the device these go through power cycle you cannot populate the drivers hours of service was pouring backup , then that might not be the best system for the type of operation that is not prohibited. Is something to take into consideration perks but -- consideration,.

When will the data transfer release codes become available and how will this information be released?

Accident is something that we are going to talk about in the next module so we will come back to that question and make sure we answer it after I go to the next module perks but that would be a good point of transition .

Somebody really did ask it. I did not fabricate that.

I'm going to turn things over to Ray Handley, and we also went to move the microphones around a little bit so you can hear our panelists, and he is going to give your presentation on technical requirement data transfer.

I'm going to get [Indiscernible] of the presentation.

Good morning, everyone. My name is Ray Handley and I'm going to talk today about how we are going to do data transfer from the ELD device to FMCSA .

As you know, therefore supported methods of data transfer , we have Web services, email, USB and Bluetooth. [Indiscernible] specifications devices are required to support a combination of these four depending on which option a select, so during this presentation I'm going to go through each data transfer method, give it summary of how the rules specified that it should work, and go to in more detail of what is going to happen from [Indiscernible] FMCSA side and all type of [Indiscernible], how the data will actually be transferred in what type of additional information that should be coming in the future to facilitate you guys doing these data transfer methods.

Before we get into that, despite talk a little bit about the data file validation .

Every time a data file is transferred back to FMCSA, we are going to perform validations on the data file to make sure that it does conform to the technical specification guidelines and the rule, basically checking the required fields are there, making sure the checks are under there, making sure that registration values that we get from you and we give to you when you so certify your device that they match, and [Indiscernible] like that.

We are planning that once the data file is sent to us, we will either respond with a list of issues that were found during the the data file validation or provide an okay [Indiscernible] message so that the device knows that the data transfer was successful in that the data file was successfully validated.

The first data transfer method is the Web services . Web services is one of the remote data transfer most that's what methods were essentially the device will connect to FMCSA Web services via the Internet , submit the data, and then receive a response from the Web services . As part of the submission process the device should send a

certificate and output file comment which is the comment of the driver can add to the output whether [Indiscernible].

We will -- I'll get to this later but we will provide more information, but if you look at your hand out , goes into little bit more detail of exactly how the [Indiscernible] . We put this on a handle so that you can reference is later after the meeting , don't look back at something or have additional questions, but the Web services will be using a [Indiscernible] set up where we can [Indiscernible] data file and output file comment . Again, after we validate the data file we will determine whether or not there were any errors or if there were errors we will [Indiscernible] error code [Indiscernible].

I will finish this later but we will be setting up a way to test for [Indiscernible] each of these data transfer methods before December 17 so that you can verify that your [Indiscernible] data transfer methods will function once they go out to your customers.

Also in his handle we have the instructions of how you will be able to test each data [Indiscernible] method, and essentially it will be submitting the data, but we will [Indiscernible] so that we specifically know this is a test submission and not real submission and can send responses back.

That is the Web services . The next data transfer method is the email . Again the emails one of the remote data transfer methods , so instead of connecting to a full-service, this will be submitting the data file via email using the [Indiscernible] format, encrypted. Email will be encrypted with FMCSA public key and signed by the vendor's private key. The public key will will provide that you want to sell certified. At this point in time it is not available but once the email data transfer method is set up we will provide. It is so certified so everybody will [Indiscernible].

Again, your private key will be your private key.

Again, in the handout , you have the format that the email should be [Indiscernible], the
and the data files should be attached to the email so the [Indiscernible] is located in a handout and also the instructions on how to attach the email once it becomes available .

Another [Indiscernible], the for those that are too remote there to transfer methods and [Indiscernible] is the first and to support this data transfer method, the device should be -- should have a USB [Indiscernible] and support [Indiscernible] .

The inspector will have their own security USB key which they will plug into the device in order to pull the data off of it. The data will be encrypted by the USB device, not necessarily by [Indiscernible] . Wants the driver initiates data transfer and inspector connects the USB device to the ELD they will pull the data and then connect that USB device to the inspector's PC in order to review the information perks but because that USB method only goes from ELD two inspector, this will

be the only data transfer method weather is not a return of cold given. However, [Indiscernible] the data file is in the correct format that is in the same format [Indiscernible], data transfer method, then it will [Indiscernible] successfully validate during the [Indiscernible].

[Pause]

Lastly, the Bluetooth data press for method, for that, what it essentially is happening is the ELD device will use a Bluetooth connection to the inspectors device, and that [Indiscernible] connection will essentially facilitated connection to FMCSA Web services . It is not a direct transfer of the data file to the inspector via Bluetooth. It is transferring the information to FMCSA Web services using a Bluetooth connection provided by the inspector . Again, the validation and the response will happen very much exactly the same way using the [Indiscernible] services but the connection to the Web services will be provided via the inspector [Indiscernible] Bluetooth inspector connection as opposed to connecting to the Internet.

All right.
The slightest basically shows a different combinations of options that may [Indiscernible] for option one you can have Web services and email or you can choose option two which is local transfer [Indiscernible] and Bluetooth or you can select both options if you would want your do work [Indiscernible].

Also it is important to remember that each does back the device should allow the driver to initiate the data transfer and that [Indiscernible] needs to be a simple, single step driver interface, so we don't want the devices have the driver having to do multiple steps in order to initiate a data transfer. That should be a single step for the type of job that needs to be done.

[Pause]

Great.

We are going to move into her next Q&A session . Same sort of situation as before. You can hold up your card if you want to be collected and a notice many of you passing of forward. In the meantime.

We will begin with this question.

After annotation will total hours change and violation not shown ?

Say that again perks but after annotation , will total hours change and violation not be shown?

[Indiscernible - low volume].

Okay. As far as the violations not being shown, you will be using a software [Indiscernible] to analyze the status . The status [Indiscernible] does not necessarily going to be able to identify the

drivers annotation to take an account for out of service violations that may be picked up by [Indiscernible] and then we clear these [Indiscernible] [Indiscernible - low volume] that may be picked up and the reason I say is because of annotations are made me provide explanation as to why there may be hours of service violations discovered. No. Your annotation are not going to clear any hours of service violations but it could explain perhaps why that driver has gone over, for example, yard move . Adverse driving conditions, things of that nature.

All right., Next the rule states that the minimum crap died is 1.5 is 1.5 x 6". Does this apply to smart phones as few smart phones have six-inch long displays . For example, the ice phone seven is 5 1/2 inches.

[Indiscernible] versus screen audiences saying.

Assuming the question is implying that someone would have to slightly swiped the screen back and forth left and right to see the whole display.

And then also sort of refers to the part of the rule that describes must be visible to the officer at the side of the truck or something [Indiscernible - low volume].

Please keep in mind that during phase 2 which begins DecemberPlease keep in mind that during phase 2 which begins December 6, .17 will be to say that might be saving data electronic [Indiscernible]. That is not the go to method. The method is electronic data transfer.

[Indiscernible - low volume]

We will follow that up but folks should not --
we will follow up but folk should not shout out questions. That would be great.

[Indiscernible].

After December were still the requirement to view the display outside the cab trucks but that requirement will only build this might be in place at the data cannot be [Indiscernible] electronically.

[Indiscernible - low volume]

Correct, sir.

All right.

[Indiscernible - low volume]

[Indiscernible - multiple speakers]

[Laughter]

Let me clarify. At all times every ELD that needs to be inspector requires to be printout are displayed. It has to have that capability because we don't know when it is not going to work, so you always have to have the display or the printout. The display set is not specify a size, so you cannot apply the printout 1.5 by 6 to the display. All it says is it has to be displayed and be able to be visible to the office so at a reasonable [Indiscernible] outside of the vehicle.

Does that clarified?

[Indiscernible - low volume]

As part of the ELD [Indiscernible], when you sell certified, you are so certifying that you meet all this other stuff, data transfer and all these things, but were also certifying that the device has either a printout that are display that can be read at a reasonable distance outside of the vehicle.

Maybe just by a show of hands, does that clear to folks?

Okay. Need more clarification.

[Laughter]

Would like to go with it in our circle back where?

Let me try one more time and see if we can get what your issue is.

Thank you so much. I thought I heard the display requirement visible from outside the cab would not be in effect after December, but that is not the case.

That is correct. It is part of the ELD stack.

All right. Next question. A driver takes that's what accepts or rejects unidentified driving time with a vehicle . That is a set up a question. At the driver rejects the unidentified driving time, should that be displayed on the ELD for roadside inspection view an output file would be removed?

[Captioners Transitioning]
>>
The unidentified driving cannot be viewed. So if the driver rejects that but it still may respond and is part of the alternative file. >> Just on that question, we do hear from CBSA for driving time that showed up on the data file or record that it will be a attributed to that driver is that correct?

There could be unidentified driving that does not belong to the driver. That's why they have the right to decline it. Then it's up to the motor carrier to ensure that it is signed out properly or annotated. As far as when we talk about. ERODS.. But the roadside official is still going to have to use their investigative skills to ensure that it does not apply. Just like a driver who is now outside the 100 mile radius

driver. If it's required to be made it does not have to be with him. So it's going to be in training. Of how they can get to the source if possible. So that is an enforcement item that can only be addressed in the future.

What is the resolution process on the FMCSA data transfer mechanism incorrectly rejects a data file during transfer. >> So, if the datafile has passed the validation we will make it available to before the December date. If the datafile passes that validation then we don't really see a way to have the actual transfer. >> So it's actually a fully validated file and your validation code has about in it somewhere. A resolution process for one it's discovered. If there is an issue with the data transfer then it's either the mechanism not working or the datafile. At the time we can fall back or try an alternate data transfer method. It may be that the validation fails when you do the web services. But maybe if all of it doesn't work then we can follow up with that. When the validation does fail it does provide error codes and we hope that the manufacturer will have a process you can still execute the data transfer while going back to the printout and the longer-term resolution if there is a violation failure. And also, the testing that were going to have available will be available throughout. So if you start getting datafiles that fail in certain conditions it can do a test harness and we can try to troubleshoot dashed troubleshoot to see what the issues are. That's one of the things that will be able to if the issue is with air validation software [Indiscernible] If there is an error somewhere else then it's the vendors responsibility.

So what do you do if there is no Internet to use web services for Bluetooth Internet.

If your option 1 and there's no Internet available then that would be a situation where we have to go to the fallback. If your option 1 there is no connectivity available than it will fall back to the screen print out.

Is there a drop dead date for the release of the ELB public key email address and system?

We are asking if you have an account already with the DOD registration site, then you'll be notified through that company contact information. If you describe the newsletter or check the website we will post that information there but, the best way to get notified is to set up your main account and set up the company contact. As soon as these things become available we will notify the people preach manufacturing account. >> From of resources standpoint internally, everybody is trying to figure out how much resource we need at any given time during the year.

At this time we don't have a date .

With you be able to provide an updated key in the event of a security breach?

For self certification, anytime you change something like that your public certificate, software version numbers, user manuals and things like that, we ask you update that information on the self certification site. Once you get that selected we can change it.

The self certification is for the nominal method. We will have that data available. For device using USB transfer, the keys that are stored in the laptop are going to have some kind of delay. If you're doing updates and your updating your IDs. It's a good idea to give yourself some flexible time before the release goes out. Those laptops for some period of time will recognize both of those ideas.

Can a marker annotation be added to an event type or are they required to be associated with the duty status change or other event type.

I'm not sure what other event. Drivers large should be one of the duty status types. CMAC they required to be associated with the duty status change event type?

[Indiscernible - Low Volume] as far as adding annotation. Generally those are added as a result of the duty status change I don't know if we needed a little more clarification or if that satisfies the question. And annotation is not an event is associated with an event.

Although you say in general, most of the time, other annotations occur in a prior day. Do you want to see those forced into the first event of the day . CMAC that could be something in addition. It would not be in advanced it would more or less be a remark section for a driver. Because we said that it does not have to be a standalone advice. It can be incorporated. So, that is something that would be a part of an application that would be in addition to the ELD for the driver to enter remarks. But it's not a requirement.

How are they still certified as compliant window vendor can demonstrate data transfer roadside. >> Those connectivity services are not available yet. What we have noted for example, in the test procedures that we developed for anyone to use, it's about 10 sections of the functionality check that we are stating since they can't be trialed from our web services they don't have to be tested. But being said, if they required file will work in the web services. And like Ray mentioned. You called it a file validator that we will have available someday. >> Regarding data transfer the slide showed that it will connect with FM CSA services directly but would it be acceptable for the transmission to be initiated by the ELD related through communicated services from the vendors backend.

As long as the transfer is initiated how that is technically omitted is up to the vendor. It's being triggered by that action at the roadside. It has the upper file comment that was entered and how you technically pick up that is entirely up to you. >> [Indiscernible - Low Volume] would it be central as an ELD you're required to transfer that via Telematics. And within telematics web services. Or local transfer. For

USB and Bluetooth. We are only required to do one of those methods for each option. So if you're doing telematics you have to have both services and its web services or email.

The point of that is that we are dealing with a lot of different states. So we needed to give options to the industry for how you transfer. But we also need to give options to the enforcement people to choose what option is best for them. That is why we have it set up this way. We can discuss more if you want to go into the logic. But at this point this is where we are. So I don't want to squish your question. But, the way it's set up now is to have options for both the carrier and enforcement to choose which way they're going to go. That was the logic behind having options one and two in terms of going forward. So if you want to chat more about it we can do so during the break. >> So when will the test environment be available for web services and email?

We don't have it scheduled yet but will share that information as soon as we can.

Getting keys and files for submitting logs and time services. So.

Technically it's all the same. For the first part we are going to do for the registration site. Once the web services are available so that for those who have already self certified and supporting that data method of services to provide your data information and to get the information that you need for web services for email. Those will be pushed out to the people who have made those data transfer methods that we are supporting as well as when it becomes available to everybody.

Were basically going to take a file and embed it within the method. The format that we are transmitting during the self-service will be identical to the data file. But for the data itself we are going to package it up as a parameter and send it along as an email or a USB.

Once web services are available. Will there be a deadline for certified vendors to verify that they need the new specs?

There is not going to be any newly created deadlines after those services as mentioned before we are acknowledging that there are some test steps that can be done until those services are available. But, as said, if you build it into the specs you can still self certify on the website.

Please clarify, can a mobile device be used as an ELD if it interfaces to ECM information via some wireless connection which would transmission to a server and back?

Yes.

Data file validation. We have been told to say it's okay to leave certain fields blank. For records that were originally obtained from an AOBARD. Please confirm that you won't reject these. >>

There should not be any rejections unless it's found to be noncompliant with the 395 15 limited technical [Indiscernible]

If you login yesterday and do your logging. And today you log into an ELD because you have a mixed fleet, your record of duty status will contain entries which will not have a sequence number because it was not an ELD that was reported on.

That is subject to the edit limitations. If you login to an ELD it should not automatically populate that. That's subject to the edit limitations. The driver would have to accept those and then, if it does work that way. Like we said, the motor carrier can propose it. If there's an algorithm or something that wants to propose changes to a drivers written duty status. Then the driver has to accept those changes. So if that did happen that information would be like a proposed edit and the driver would have to review that information and accept it. In that scenario there are certain data elements that were not collected as a part of that stream or entrance for the technical term.

Those data elements within that event that could not be populated would not be there. It only had to be populated when the commercial motor vehicle was powered. So they would pretty much fall under the same scenario.

The sequence ID would not be something that's optional. Because in that scenario from the ELD point of view, these are edits to the past day they would assign sequence just like they would for any entrance that goes into that device. >> What is the reference to Internet and Bluetooth transfer when all specs are local. >>

Why is the reference Internet Bluetooth transfer when all specs are local.

Since Bluetooth is considered a local data transfer, wire way referencing the Internet? Bluetooth is essentially using the inspectors creating a local network so that the device can contact the web service. It's considered local because the ELD device itself does not need to connect web services. It connects via the network provider locally by the inspector. I think that might be what the questions referring to. The Internet connectivity is provided by the inspector.

In here there is a lot of reference to Internet. When you look at the spec, your developing Bluetooth to Bluetooth network and web service transfer but no reference to Internet and spec, that is why we are confused. Is it peer to peer?

The Bluetooth is going to be provided. Once you're connected from the ELD, you will transmit the data to the web service via that Bluetooth connection.

Why does it say that your developing a secure network between you and enforcement locally?

To collect to that Bluetooth provides a secure network.

This is a good question we should follow up with. >> When will FMCSA behavior interface control documents and the ELD web services development handbook be available to ELD providers? >> This will be posted to the site when they become available. And we will have that information available on the link. Will let you know when that link is available. It will also be on the DOD website when it comes out.

Can you provide were that ELD data guide transfer location information will be?

It will be on the website.

You mentioned this transfer process should be a single step. Is it necessary to put user credentials before starting the data transfer process?

The user should login at the beginning of the day once they are recording their driving record. They should not need to login again to transmit the data record.

To piggyback on that, if you read verbatim how the section discusses that. It's a one step compilation. So the driver does not have to go back and say I want these certain days. It's a one step compilation but as far as the driver hitting a button that says compile it. Then he might have to put in an address or hit the send button. When we talk about that one step it's the one step compilation so the driver does not have to go back to figure out what data has to be sent. Does anybody concur with this?

Yes, but not an address. >> Will the FMCSA standards be applicable in both the U.S. and Canada. Or are the difference for the requirements. [Indiscernible]

As far as states having their ELD roles, Canada has come out with one. We have worked with Canada and discussed some of the differences and the similarities as far as there are some differences. However, it's like being in state. You'll comply with that ELD standards if you're in Canada than that specification needs to comply with tears.

Fine -- defined the term reasonable distance. >> We get calls and emails about how these numbers have to be on the side of the truck it says visible from 50 feet. We are trying to avoid defining these inches to strap in the spec too much. So it became reasonable distance because we do not know whether it's going to be on and early iPhone that's only so big or we did not want to put it into a corner really. And that is how we came up with that language.

The point of that is to say no roadside officer wants to get in the cab of your truck. You don't want any roadside officer getting in the Of your truck. So make sure that they can hand it outside of the vehicle so that the officer can do their hours of service check.

The idea is somewhere in the vicinity of that truck in the distance outside that, but they can do it. So think about it in practical terms. That is what we are after. Being able to hand the logbook outside of the vehicle in order for them to conduct that.

Please clarify the requirement roadside is it print, display, or transmitted electronically. If a driver sends an electronic file. The first two options are not required?

The ELD is required to meet those technical specifications at all times. The number one method for reviewing out services is the transfer mechanism. The backup method is the display or the print. This ELD at all times has to meet that requirement depending on the special conditions at the time of inspection. That determines what method is used. The number one method required is the most, the me say this again. The whole purpose was to transfer. That's our number one option. In the event that there is not connectivity either it's the ELD for the officer etc. That is where we have the print and display come into play. Either way, the ELD has to make that technical specification at all times. Whether the data transfer is used. If we don't have that opportunity then the display or the print is the backup method. So keep in mind that although it may not be 100% at the time, that we will use the display or the print option. Were going to go for that data transfer first. But if something goes wrong and the transfer cannot be completed. Then the safety official has to verify that drivers hours of service so the other specifications need to be available. >> It is 11:30 AM let's take a break and come back at 11:45 AM. Restrooms are outside. Please do not stray too far out of the immediate vicinity. We will be back at 11:45 AM.

[Meeting is on break until 11:45 AM, captioner standing by.] Please take your seats at this time so we can get started . >> Thank you for joining us and for coming back from the break. This is a clarifying point to help you follow along a little easier. On the back of the presentation package that you may have picked up, the handouts are located there. So when somebody says handouts, that is where it is. For those of you on the webinar you can download it it is on the files pot. You can look at that if you would like.

This is our last presentation segment. The registration process. I will turn it over to Brian to speak on that. >> As most of you in this room have already done this part. The manufacturer registration. You can visit our website. When you get to the home page there is scrolling pictures across the top. Once you stop that and click on that you will get into menus where you can find places to register. Visit the website, create an account provide company contact information, you can assign the address and email and a telephone number. Anybody can do that at any time. If you look at registered users right now we have hundreds of them, but we do not have hundreds of ELD registered yet. So you can register and get an account anytime you would like.

Once you get the account you want to register the advice of devices and login to your account. Click on register your device. You'll provide several details about your device in a matrix format. So

There are 10 items in this section. I won't read them all. Name, model number, software version of the product. Identifiers need to be letters and numbers combined. A screenshot picture of the product. A users manual to be reviewed and your data transfer mechanisms. And this last one is certifying a statement that you certify that you manufactured your device to meet all specks of the rural.

The removal process in the rural and outlined. Once you register your product. And as we mentioned into few of the Q and a questions earlier. Once the data transfer web service steps with what you call a test harness that might be available also. These are out of the compliance test procedures that we have available for anybody to use or not use. They relate to connecting through web services. Some sort of connectivity that is not available. If you were using those test procedures you can obviously not test that yet. So we added this paragraph and bullet list. Just to be aware. If it has been written the way we outlined in the test aspects the pile should be decipherable . Keeping the device current. I do not have a cut and dry as to when you decide to use your device as you update software. If you feel it is sufficient. You need to go into the website and updated. If you're using it to look for product you will know you're looking at the latest version of your product.

There is a removal process in the rural. There is a list of self certified ELD websites. If we find that it devises suspect or does not conform to the EOD rule which can come in many ways.

If they suspect it's not giving that device data to the rural, it's outlined where you'll be notified and have 60 days to rectify the problem. Otherwise the ELD will need to be removed. There is a appeals process and the goal of that is to make sure that everybody has a compliant ELD for their hours of service.

Coming soon. I think we have already hit this a little bit with the Q&A, the supplemental information required by the rule will be collected and we will provide the public key email address for web services. Control document and the 2 blue items the file validator and the data transfer test our new additions so that somebody can do a data transfer test before they actually hit that self certified button that they have on the website

Our last question and answer session. Were going to do this in a combination of ways. We still have the cards thanks we will read through these and we will allow for people in the audience to ask some questions. Just giving you some ground rules so that there is some forum as to how we do this. If you have a question and would like to be called upon be sure you raise your hand. I will bring you a microphone. Please don't start asking questions before you have the microphone. Making sure that people in the room can hear you and the people on the webinar .

I noticed that the D.O.T might have a few hundred companies on board with equipment. Wondering how it was working out. It looks like to me, that we might be puzzled about answers and questions. My other question

is, yard time. When we have a motorcoach it takes a good hour to clean the motorcoach. So it can be certified and ready for the customers. Once we do that, are you going to get a fine for that if we have the bus running. They were saying that somebody needs to be in there. That we hire kids to clean the bus. Once six months go away , will they find me for every little thing we made a mistake with? >> We are mostly looking from the manufacturing that it meets all the technical specifications. To incorporate that into those technical specifications. That movement that you're talking about on the carrier facility yard itself. It would be captured by the unidentified driver. If those other individuals do not have a driver account. So with that said, the motor carrier is required to manage those unaccepted unidentified records. So when you have these instances. Whoever's managing those account reports etc., they would be making the annotations that this is what's going on during these periods of movement.

What about the other 45 companies out there , does D.O.T have a problem with those companies today? Because I was told Sprint has his equipment.

I do not know if you have had problems with these companies or not. We need to know what company equipment we add to the motorcoach bus. Say we are in an area that has D.O.T. Will the driver get fined because the state trooper does not have the proper equipment on him .

The current list of self certified registered ELD who are public right now. This is where you need to start when you select and ELD. We also have a checklist that will help you identify a device that is compliant. Inspectors will have access to this list to ensure you have questions to this. I can follow up with you for more discussion. >> There are 44 registered ELD on the site . We don't have the information of everybody registered. We do not know if there are working well for their customers or not. >> When will FMCSA start testing ELD that's certified and registered and removed them from the list that's noncompliant.? >> We will remove any ELD that are not compliant because it's a phase 1. Phase 2 is one we will start enforcing the rural we will confirm that the device meets the specifications. As mentioned earlier for those who have encountered this device .

When there's a problem , when the provider says I know where that lit is that your officer pointed out to you, .

Can I ask a question that's more operational in nature?

We have had this from some of our customers who encountered these issues. Some for multiple organizations that have different D.O.T numbers. Will the drivers need separate numbers in the different organizations and will they have to add and edit hours before they drive? What is expected from a compliance audit for instance.

That's a lot, so if I missed something please remind me. As far as ELD rule. We did not require interoperability. So one device does not have to speak to another device. In those scenarios your driver will have an account for each motor carrier. The driver can only have one account

for each motor carrier. If there is no interoperability, the provider has worked out some type of solution to be able to accommodate. For drivers who are logging on from different devices from different motor carriers. The minimal would be that the driver would have that printed record of duty status etc. If the driver was required for the status they could have that with them to reflect their previous 7. As far as compliance standpoint for the motor carrier, once again we are going to hours of service regulation if that doesn't change. Every motor carrier utilizes that driver and is responsible for keeping up with the drivers hours of service. So if the duty status is required than that driver would submit those to the other motor carrier in whatever form they were required to use. If there is normally a short-haul driver then they could continue to use that prior set of duty status. It depends on how long the have to keep them. At a minimum the could have this printed records with them. There is a regulation where the driver can enter missing data. There not required to go back to put those hours into that system. But if the motor carrier chooses to do so if they do it manually, then there is a provision in the regulation. But it is not required.

Is it possible for us to pass sample data to check violations to assist with debugging of our system.

That's something we talked about. Will make it available for file validator's so you can get those responses back. I do not know if are going to provide information as to how that will be displayed for our enforcement users. But we will let you know at least how the file validates if you want to submit sample files.

To confirm on that, we would be validating the structure of the file. We are not giving you back how we would interpret this data. As long as the data that you are submitting matches up to what's in the ELD device that's what's expected. It can potentially flag a violation. It's the inspector that notices the violation for specific regions. So it comes down to them.

Unidentified driving. How does FMCSA expect to handle for the jumps from the black box. Should it be captured as unidentified drivetime even though it is missing many requirement data elements?

As the provider, you can definitely supply a tool for the motor carrier to manage that. For connectivity issues there's different elements that would have to be determined. To identify odometer jumps according to the ELD rule that is not something that is required. Can you calculate all these violations. It's a tool to give your customers and assisting them in managing your drivers hours of service. By providing in the report of odometer jumps. That motor carrier would be able to take that information and determine if it was an actual disconnect, or if the odometer jump went along with some other malfunctions. That is a part of that motor carrier policy when we addressed enforcement. And procedures and practices to give recommendations. It's something we suggest to them to have in their policy. How they will handle those type of disconnects. The ELD is required to be tamper resistant and

tamperproof. Where there is a will there is a way. The more tools you give your customers the safer it will be for all of us.

The data submission and certification. Will it be done as a one time effort or do you need to get your product certified every year.

You only need to do that once and again if you have major changes to your device. If you put out a device and never change it then you only need that initial sub certification.

We are going to make those test services available to you. But to you it's still self certifying that you meet those requirements. We are not tying your data files to say all of that, we are providing tools to make it easier for vendors to self certified. Not instituting the testing process ourselves. >>

We deal with the stands. And we have a lot of problems with temperature and battery running out.

If the driver runs out of charge or power or something happens to the device. We understand that they are required to keep seven days in advance. So how do you see this working out. Can there be any option for the host carrier to send information to the inspector? How do you see this playing out in that situation?

You answered your own question but to build on that, it would be considered as a malfunction normally. If it is malfunctioning and the drivers got to have that record of duty status with them, during periods of malfunction, the driver has those blank records with him and can go back and reconstruct. But if it is a common occurrence then, you get into other things about it meeting technical specifications, but if it cannot perform the functions and the driver is constantly doing a duty status. Like you said, will with re-creating the status perhaps the back office system has captured that. Maybe it's a real-time type of transmittal. You reconstruct the records of duty status and I think there will be more policy towards enforcement that comes out on this type of situation. Just to touch on that right now.

What constitutes a major change to the ELD device. And if they're in Mexico or Canada, do they get to start their own duty time when they start the border ? What's the expected interaction. It seems like some would be required from the U.S. compliant ELD system and the Canadian system. Or can somebody have one for each?

We did not define the kind of change or the magnitude that you would make to your device to change your registration that's on purpose to put a finite definition on it. Certainly if there is a bring your own device, and ELD is a system that not only includes your phone or your tablet or your laptop, the thing that connects you but as far as a software change, we did not want to put up a parameter there. >> Basically this goes back to the hours of service regulation for cost border operations. When you're in the state you required to operate within an ELD. You're required to have your previous setting with you. If you weren't required to use it in Canada you got to have your hours. So again it would go back to how it the cross-border we

recognize in what forms we want the hours of service to be recorded in. I know we require Mexican drivers to create?

It doesn't really matter , you don't just forget about what happened in Mexico when you come to the United States. When you're in college you might want to do that. For now, what you're getting now is what rules apply. So if you're driving. The easiest example is you get more in Canada. When you cross back into the United States you still get the hours. The ELD different manufacturers are handling these different roles differently. So it's why Andrew pointed out a part of what is going to happen with the data transfer we need to know a part of the process of the inspection. What rules are you operating under.

What constitutes a major change. One example would be is if your certificate will change. Or if you've fixed a bug because he realized something wasn't compliant or something wasn't correct. >> You mentioned earlier that when you're validating files, you'll validate force structure not initially for content. I believe you mentioned you were debating sharing law enforcement views on that. Can I request on behalf of other manufacturers but that data is shared with us? Or some view on it so we can try and debug as we try and see what is presented to law enforcement. We don't need to see everything but have enough so that we don't get into a he said she said scenario at the roadside with our customers. Is that feasible?

I can't give an answer one way or another it's something we're looking at.

How do you suggest an owner operator supervise themselves in terms of operating as a supervisory account and a driving account separately. Is there any guidance that you would suggest around that?

Not everyone has a back office.

As mentioned earlier, there 2 types of accounts the user account and the support personnel as well as the driver. The support personnel is not allowed to record ELD data. The driver account is not allowed to have administrative rights. So within that ELD system there are parts of that business aspect as well so they will be managing their own accounts. It sounds a little bit out there, but it's just that type of operation. That is why we have the 2 accounts separated so that we can see those administrative changes and see when the record is recorded. There is no writing of the data. There are still checks and balances.

One is associated to a CDL member and the other is not.

One question we get from our customer is, with vehicle hacking being such a hot topic how do they handle security with the ELD seeing that it is interfacing with the OBD?

Yes we are aware of, like any other device that you bring in that has potential hacking issues. We do not regulate cyber security so we do not have any guidelines or rules so to speak on it. With that being said, we are involved with cyber security within the agency and also

with some outside partners to try to keep the awareness up, I believe there are some associations writing guidelines, what to look for to ask your provider what they are doing to help you be uninhabitable or safe.

Some vehicles are broadcasting only a part of the VIN. Is allowed to present the driver the option to manually input the Vin from a valid list registered by the fleet manager? If these options are not okay can the partial value will be obtained for the report? >> I do not know for sure it will have to be an I get back to question. It's a unique identifier for that vehicle so if the last seven digits of the VIN for one of your vehicles is the same as the other, then that is not a good situation. Drivers entering the VIN manually. I do not think we have a provision for that.

I would reference this section to see the source. To see if it would support manual entry. This kind of goes back to a proprietary that may or may not be available. If it is there, then you know it is required to be populated through the ECM. If it's not there we have provisions in there like we discussed earlier with the accuracy and integrity of the information. If you have got a partial cross reference with the actual that can be updated. I think it would probably run under the same type of provision to meet that other data information that is not there. We can look it up in the dictionary and see if it does specify. Because as you look through this data element dictionary, to define what the data is it generally tells its source and will say from motor carrier or ECM. We will reference that real quick.

It does provide it but if you put a -- before it, obviously that's not the preferred method and were still checking the validity of the VIN make sure you validate that what they enter is an accurate number. Just to make sure you check on the driver, it's easy enough to validate that entry.

Having a hardware and software provider using competitions for hours of service, who should certify compliance of the system? >> If it's separate from your software provider and are used in combination who certifies the compliance? >> When I was talking about discussing the software update part. If you
asking about iPhone capability, Samsung capability, I will have a Bluetooth conductor and a hardware connector each of those is a package then, this with the software that your giving it is an ELD. If you've got a software package that works on a different operating phone or tablet that is another package with the connector. For the device. >> It doesn't broadcast the odometer. Many vendors use a synthesizer odometer, is this acceptable?

Yes, there is a section in the rule that outlines tolerances for the data retrieved by a method other than the preferred method of
connection.

When you plug it in it populates with the miles and hours that can be 275,000 miles or X number of hours and that's day one of ELD. >> Some vehicles don't broadcast or its priority very. You've got to have the

keys to the kingdom basically to get those total hours for the life of the vehicle. So if you don't have that, can you start at zero? You can then report total vehicle hours from that point forward?

If it is not there and you cannot retrieve it then it would be the alternative source as long as you know it meets those accuracy levels. We talked about proprietary information. I have talked to some ELD providers who made agreements with some of the OEM to where they can get those specific proprietary information. It may be on that vehicle but it's on private rather than public. So it would be nice for all attending if we could get together and get that information., But it talks about those alternative sources and accuracy. >> This question is about ELD ID up into vacation values. In the case of hours of service portals or kiosks where the driver starts Thursday manually. How do we handle those values as a part of the record that we send.

The authentication value and ID are all unique to the device. For the sequence ideas. As long as they are consistent within the hours of duty without the record of duty status for that driver. There is not a requirement that they follow a certain format. So even if they skip or do something like that. Or if they were reimporting old records and such. We are not really concerned about a sequence number as long as it is consistent by the file validator. I know that sounds vague, but we are not too concerned about validating these sequence numbers. >> Basically each device has its own generator and should be considered within that device. You could potentially have graphing sequence IDs and out of sequence ideas. Each device needs to generate within itself. So it should be using the sequence ID generator that is a part of that device and that should be consistent. It should be generating the sequence IDs within that format. This question I know it came up earlier. That authentication ID defined as a part of the registration process what were looking to get out of that is your definition of have how you authenticate the file. It should contain elements that are specific to the vendor. Something that's a specific to you. It's not something were going to validate every time we get a data file there's a scenario for the authenticity of the records that is in question. It's important that the information supplied is sufficient for us to reconstruct if necessary. >> Following up on what Amy asked about. If we are unable to get total vehicle miles or total engine hours, I think you mentioned that there were other ways that you could get it with certain accuracy levels that were identified. The way that I understand it if the vehicle does not have an ECM, that is when you can use these alternative sources to measure how much the vehicle is moving with accuracy levels associated. The vehicle does have that and we can get a reading is that not a malfunction?

It still required to be synchronized if there is missing data within that ECM connection that's when you have to remind your other sources. >> It almost seems like that in many cases this technical discussion of the provider you know for example we can figure it out. But for somebody who has not done it can they revert back to it being private that they can't figure it out, does any of that make sense?

I'm just asking got 30 guys running around the country plugging into various pieces of equipment and we spend millions of dollars on this. But if I don't do that I can revert back to that section. That's the alternative method. Do you guys have a comment from the question?

Curious, because we spend a significant amount of money to get that. >> Let's come back to this later.

If you're creating an application to be used on phone or tablet giving the self registration model of hardware [Indiscernible] .

If it's the operating system that works on certain brands or devices that would be the registration. We don't expect people to say that it works on the iPhone whatever number, I think it's the operating system. >> Is a motor carrier purchase is a bring your own device system, we heard that when it hits a dead zone coverage area it continues to coordinate even though it is not on display. Once the coverage comes on then the data becomes uploaded does this affect being transferred to FMCSA in any way?

If I understand correctly, yes that is acceptable and it should be a part of the package for when there are periods of no connectivity that there ways to record and obtain the original data. As far as recording and obtaining and then providing once you regain coverage. It's certainly different from that record of duty status being current and up-to-date with that driver at that point of inspection. Like we were talking earlier when we first started out with some of these technical specifications where he did not prohibit that transfer between the black box, for lack of a better term, to the driver interface that bring your own device. We did not prohibit that cellular communication. However, at the point of inspection whether it be once or twice a year. If you're in a location with no coverage and that drivers record of duty status has not been updated and they cannot provide the hours of service at that time, that would be an hours of service violation

Will FMCSA notify the industry when they are in the correction stage of decertification?

No, it will not notify the public will me haven't manufactured noncompliant device. There's a list you can access from the registration list on the top right-hand corner once you click on that it shows the list. That's where you would find it out if we had some.

This issue of decertification comes up the most so everything that's being said I just want to expand a little bit on this whole issue. As Brian mentioned earlier we are not actively reviewing ELD, we are going based on the self certification of a carrier. There is a check that happens here. Make sure all of the basic information is there. If during the course of an investigation we suspect that there is an issue with that device, and compliant with the spec, we cannot really talk about it. That is like any open investigation. Until we have a conclusion we can't really discuss that. Then the question becomes say there is this rare circumstance where there are a number of devices

that are out there and somebody goes through the decertification process than what happens. Well it goes back up on the list and then we would have some other way to notify the industry that this is an issue. So some of you who have been around for a while and have seen this you'll probably note that there is a noncompliant vehicle or another issue that comes up letting people know that we need to work with people to get this taken care of. After that it depends on what the issue actually is. Because there are some questions that came in about this. What happens then is, the first default is the 8 day period. If your device is completely noncompliant your have this 8 day period where you can use records of duty status. Understanding that some of these things may be an easy fix and some of them may be more complicated based on the circumstances that surround that event of decertification. We work with the manufacturer and effective carriers to make sure that they have the time and that the motor carrier is not getting penalized for something that was an issue in the certification process by a manufacturer. So thinking about it in terms of that whole process, how this works, some people are concerned about what happens in that case, the main answer to that question is, we will work with people to make sure the situation gets addressed . Hopefully addresses the questions that I saw relating to decertification .

There were some required fields in the ELD specification that if the driver wasn't manually entering information for things that were to record at the time. CMAC the engine hours could be left blank in that scenario. If it was one of those other codes than those fields are not required. For the launch and latitude you should still be adding in date and time and such. But the specific engine hours can be optional in that stereo.

You need to put it in under that scenario. There is a location for you to put the place name.

Is a compliant to Mark the event stream would be transferred as a part of the data. It's not lost it's just marked as inactive. CMAC the inactive status is for the original event. There shouldn't be one without a follow-up event. The status is not intended for that purpose , that's not the purpose of that status code. CMAC in your recent FAQ. You add vehicles into 2018 or 2019. Those vehicles need to have an ELP even though the carrier is operating with all the other vehicles operating. This creates a mixed fleet. Why did the agency decide to require those ELD vehicles when that carrier is grandfathered, it's going to be very hard on the carrier and the driver and the vendor and enforcement on roadside when you have a driver doing a slip sleep operation. And five days later they are in and ELD. The guidance that was given to us was that that driver has to print those logs and carry them with him. So what you're really doing is causing that carrier who has been running ELD for an extended amount of time, to move sooner then they want to. Because the backend is going to be a mess as well. What's the reasoning why you did not allow that carrier to continue to install the ORBDs.

If you go back to the original applicability and implementation. After the compliance state it was supposed to be all BOD. With the

grandfathering we went back and rethought that position to allow to replace those vehicles within your fleet you can go back and reinstall those, now you're adding vehicles to your fleet than those new vehicles added would be the ELD. But still with a mixed fleet.

By making that decision you've created tons of problems not only for vendors but for those carriers. Because now you have completed a mixed fleet situation that is not beneficial for anybody involved. >> At some point you have to draw a line. I also think that, are you a carrier or a vendor? CMAC I am a vendor. [Indiscernible - Low Volume] . CMAC like said, I'm not sure it's going to be as difficult as you think. I guess we'll have to see. Because a lot of the fleet that I'm dealing with are telling me that at some point I'm going to convert them all over to ELD so the other thing we don't want. [Indiscernible] If it's that then why is it an issue? That is what I'm getting at. Because you're saying you can't upgrade your existing device?

[Indiscernible - Low Volume]
like I said earlier. At this point we are going to figure out how to make this work. The grandfather position was an ad in response to comments that we God desk got. At this point we can work with you to figure out .

There's a question over here?

[Captioners transitioning]

Can they use the same email address is or do they have to have a [Indiscernible -- low volume] most of them they don't have a separate email or something

User IDs? Not associated with email? Q if you assert a state an email at the account it's not anything we have an opinion about. >> Arik. Usurp.

-- All right. You sir.

Thank you. Going back to the light duty vehicle scenarios which you think are very important for example I was six does sell that information to other vendors. The other thing I would point out is there are quite a number of light duty especially gasoline powered vehicles that do not have engine hours at all stored in the ECM no matter how you want to try and get it. My question is to clarify that one point can we indeed started zero and those vehicles when a ELD is installed? For example if you were in use and integration approach. I don't see that as an feasible approach is long as the information is not tracking that approach. >> I think I sort of answer that before. You have an existing vehicle that has whatever many miles on it, you can't get the data , so when you install the ELD you call it zero and let the ELD have the odometer function, so to speak, that's what you're asking? I think we need to talk about that.

Thank you for raising Matt. -- That. The rule says you're required to get through the ECM. If it is not there you have alternative sources.

I agree for odometer. You can copy and get close enough. For a vehicle that's not [Indiscernible] does not have the information you camp without anywhere then you will have a starting point. You can install whatever equipment you want but fundamentally you're not getting get what the original hours buzz. It seems like you guys aren't even clear on this. I want to make sure we're all on the same boat.

We are relaying what is their. Were trying to assist everyone. This is something we need to address as a scene -- team. A make sure we get a consistent answer. That would be a follow-up to an FAQ.

As a follow-up to that, from the spec, engine hours must be obtained were estimated from a source that monitors the ignition power for the commercial vehicle and must be accurate within 1/10 of an hour of the engine's total. When you're starting in ignition are obviously moving. The makes rubber is referring to are a class III and a class V. Primarily Asian manufacturers. Using an OBD connection. This doesn't identify. Some way somehow you come to a happy medium. They can't be reverse engineering.

Thank you. >> I'm going to go to a couple more questions. Well FMCSA allow third parties state law enforcement systems to integrate back office. This would allow offices to view hours of service data on interface. >> Well FMCSA allow third parties date systems to integrate with the rod back office. This would allow officers to view the hours of service data on the interfaces they already use on the roadside and within their existing workflows. >> I can say the very least not at launch. That would be much further discussion to have. We're not undertaken at this point. >> This is something that not all states use with FMCSA software. It's something we're taking into account as to how to provide for the state. We're making sure they are read and analyze the [Indiscernible] cobra hopefully will have the output of those decisions soon as well. >> Is the identical identifier sequence number associated with the tablet or the vehicle in a mobile ELD scenario?

As long as it's consisting it doesn't matter where it's come from. Wherever the events are getting generated getting generated in the same way. You get a consistent ID from that device. You generate them from the black box that's fine. As long as you're consistent.

In general when created ELD files on doing motor carrier reporting for 9.2 when a field specifies activities on a per CM [Indiscernible] basis such as engine power and shutdown activities which records should be included? >> 4.9.2.

Is this just asking what CMB record should be included?

I'll read it again. In general, when creating ELD files when doing motor carrier data reporting when a field specifies activities on a per CMV basis such as angina power up and shutdown activities which records should be included?

I understand the question. In the data file there's a list of all CMV and there's an identifier that ties you to that list. Maybe that answers the question? If not, maybe the person on the web could clarify what they're trying to get at. >>

Can you think. Bluetooth would provide a connection for Web services use for the CMV if the vehicle does not have an Internet connection? >> Correct. >> Are there any other questions the room?

I have one question. We talked about a number of scenarios today where required fields can sometimes not be required. I want to confirm that own the data input file that the [Indiscernible] is not validating against our field populated or not ? I did see that on the PowerPoint. >> The [Indiscernible] against required fields in certain scenarios given certain data sources those fields may not be required. That does apply to a couple of fields. It is a required field you have an option to specify certain values if you can get the data. In those specific scenarios won't be validating that data is required . But not as a general practice.

I will follow question. On a login. If I'm logging in and I don't have a CMV, I'm blogging in on the ELD that's not driver generated. It would be missing some required fields. >> I think engine hours and --

Power unit .

Yes. It's a login outside the device. In that scenario you would not be able to populate those fields.

So will you be maybe open to talking about when our required fields not required. That's outside the scope of the published rules.

Once again, we did stay in the preamble those data fields when the ignition is on. If the CMB -- CMV is not on we don't expect those to be populated.

With time for a couple more questions. >> Whether several events there's clear that the recording environment -- requirements are hours engine and positive things that have to be there. As it says it has come from the ELD. It sounds like two different answers. This is in the final rig because there was other questions that other external systems and it was said no, there's a system administrator in the preamble. I'm a little confused about doing things not at the vehicle when you have very specific events and duty status changes and data capture requirements.

In the preamble we did discuss what we consider and ELD. Like I mentioned earlier, we did not dictate that type of architecture. We just stated that anything used to record ELD data would be part of the ELD. We didn't limit it to just the device in the commercial motor vehicle. Any back office system if one is used would also be considered ELD.app. Once again, if it's entering missing data and etc. that's going to be subject to the edit limitations. >> In a rental situation of customers adding a vehicle to their fleet and they may only have it for a period

of time. Anything ELD is already installed on that vehicle and there were unidentified driver hours recorded by another company and I is a renter get that vehicle I'm prompted what do I do with those hours because they are not mine? >> Is this something you guys want to confirm and get back to? >> If you pick up another vehicle because you have a broken down vehicle and it has an ELD and has previous hours on it , but they're someone else's , you just bring with you your previous hours and then up to that point when you rented the truck and then from then on from the truck ELD.

If it gets assigned to me as my company if I say I do not accept those as I understand it's attached to my record now not assigned to me but unidentified to my company so than in the back office system I would have unidentified hours that would never be assigned to anyone with modernization because I wasn't in possession of owning that vehicle on that time.

If you do not accept that proposed at it then doesn't go against your record. If it's not yours because actual policy thing within the company versus the driver. If the driver doesn't accept it that carrier is required to annotate why that driving wasn't assigned out. Did I hear you mention rental?

[Indiscernible -- multiple speakers] the whole regulation isn't really written for a rental situation at all. I'm not sure how one is a motor carrier , mice was to have a forever hundreds of hours unassigned and I entertain at such to say this is a rental?

They will be on the ELD as long as you are operating that ELD. Even though you've declined it.

So does that mean for six months or has to stay there and I gets wiped out? No one is ever going to take ownership of those hours. >> That would be a annotation within the unidentified driving report. These are miles from the rental. Through FMCSA it's always up to that safety official, etc. to investigate that further. If it is not yours and you've declined it it stayed on the ELD until the motor carrier indicated that it was mileage accrued in a rental process etc. , you've done your due diligence.

Okay. Thank you. >>

We've exhausted a question-and-answer timeline on a turn things over to [Indiscernible] to talk about next steps and timelines.

Great questions. Wouldn't identify areas we need to work on. We appreciate you asking those questions and being even more patient with us not being able to answer some the questions today for next steps you can look at the ELD [Indiscernible] with the file validator this summer. Today's meeting will be available online as well as the recording of this meeting. You get to hear yourself again and you can access this meeting and the notes on the link here. You can also continue to email questions to [Indiscernible] . As mentioned earlier, some of the questions asked and answered will be featured in ELD FAQs

which are currently published on our ELD website. We strongly encourage those. Although you may not be ready to self certify your device please consider registering a username so we can update you with information regarding file updater and all the information we provided to you. Also, please consider subscribing your email address which you get to this link here. We will also be pushing out information that way to you all. I'm going to leave the closing marks to Jill. >> I'll make it quick. I don't be the guy between you and the door. A couple things, a quick pitch for [Indiscernible] in the back. We were chatting a little bit earlier and they are putting together training session that the North American sectors training as many ELD's there so the inspectors can get the practice for any of you that are here you can go ahead and drop back there and see them for those of you that are online you can contact them over at [Indiscernible]. They asked me to pitch that because it was brought up here over the six or nine months is working hard with CBSA in the states to try and get the enforcement community where we need everybody to be moving forward. That's my pitch. My other one is a word of thanks. I appreciate all the participation. Everybody that join us online, everybody that came in here today and fought their way through DOT security and parking and all those kind of things. We appreciate it. We learned a lot. You take the questions back, figure out comic sure we get answer spam, figure out which ones feel post on the website. You do a double pitch for the website. A lot of people have talked to over the last couple weeks specifically did not know you could subscribe. You fix the wording. It says sign-up for the newsletter. If you click on that every time there's a major change will push something out will let you know what's going on and as I said earlier I just want this to be another piece of it continuing communication as we move forward towards implementation. If there's anything else we can do for you please let us know. To hang around down here. We will help escort people out. If you have questions or on things that didn't come up we will keep ourselves available for little bit longer. For now). Thanks everyone in the team for helping out. >>[Applause] >>

[event concluded]