

Motor Carrier Safety Advisory Committee (MCSAC)
Task Statement
Task 11-04

I. TASK TITLE

Electronic On-Board Recorders (EOBR) communications protocols, security, interfaces, and display of hours-of-service data during driver/vehicle inspections and safety investigations.

II. BACKGROUND

On April 5, 2010, FMCSA published a final rule that revised the Federal Motor Carrier Safety Regulations (FMCSRs) to incorporate new performance standards for on-board hours of service (HOS) recording devices. See 75 FR 17208, as amended by 75 FR 55491 (Sept. 13, 2010). These devices, known as Electronic On-Board Recorders (EOBRs), will take the place of the initial generation of HOS recording devices, Automatic On-Board Recorders (AOBRDs), the subject of a 1988 rule.

Although EOBRs share a fundamental requirement with AOBRDs – that the devices must be integrally synchronized with the engine of the commercial motor vehicle (CMV) for the purpose of obtaining engine use status and distance traveled – many of their other performance requirements go far beyond those of AOBRDs. Among other things, EOBRs must automatically record the CMV's location at each change of duty status and at intervals of no longer than 60 minutes while the CMV is in motion. They also must record data in a format specified by FMCSA to facilitate review of that data during roadside inspections and during on-site compliance reviews.

FMCSA believes it is necessary to obtain additional information to ensure that roadside inspection officials are able to obtain and/or retrieve EOBR data in order to assess drivers' compliance with the HOS regulations. In the time since the final rule was published, stakeholders in the CMV safety enforcement and EOBR supplier communities have expressed concern that specific requirements of the performance-based final rule should be revisited. Some communications methods that were presumed to be viable at the time of the development of the rulemaking appear to be less appropriate now as technology and government security standards have evolved.

III. PROBLEM STATEMENT

Clarification is needed on the functionality of communications standards noted in Appendix A to Part 395 for the transmittal of data files from Electronic On-Board Recorders (EOBRs). Examples of areas where clarification is needed include the following: (1) An EOBR being able to wirelessly identify external networks and devices and securely connect to them to transmit HOS information; (2) Establishing a secure and reliable communications protocol that will allow data transmission in a timely manner; and (3) Clarification of methodologies and the required interfaces and applications to securely and reliably transmit HOS data via telemetric applications services (TAS), USB, and 802.11. In determining the scope of this endeavor, it is essential that the subcommittee keep in mind the implementation date of June 2012 for the EOBR Final Rule and how we can successfully get EOBRs on the road and functioning by that date or as close to it as possible.

IV. TASK

The Committee should perform the following tasks, considering the time constraints inherent to this process:

- a) Consider the advice of technical experts on data communication and display technologies with input from stakeholders to include law enforcement, the motor carrier industry, FMCSA information technology/security experts, and technical product manufacturers.
- b) Make recommendations on technical questions to improve the functionality of the information reporting requirements described in the Electronic On-Board Recorders for Hours-of-Service Compliance Final Rule of April 5, 2010.
- c) The Subcommittee should work within the context of the rule first, deciding what approach would be best to accomplish full functionality and by what date. Once the possible outcomes are determined within that context, the Subcommittee should determine what aspects of the task recommendations would require a technical amendment to the rule.
- d) Submit a report outlining findings and recommendations to the Chairman of the MCSAC for its deliberation and subsequent submission to the FMCSA Administrator.

V. ESTIMATED TIME TO COMPLETE TASK

The Committee should submit a report to the Federal Motor Carrier Safety Administration outlining findings and recommendations at its August 2011 meeting.

VI. FMCSA TECHNICAL REPRESENTATIVES

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Key persons recommended to serve on a subcommittee.