



Going the extra mile to certify compliance

Your company's compliance relies on your ELD solution provider's road to certification

As a motor carrier, you are responsible for selecting and implementing a compliant ELD (electronic logging device) solution for your fleet. This, in essence, means that once you've chosen an ELD solution, you'll need to ensure that your drivers and support staff are properly set up and trained to use the system and able to handle different situations such as roadside inspections, annotating and editing log entries, or if the system malfunctions.

Clearly, you'll want a provider that can confidently assure your full compliance and will be there for you as you work through the transition alongside your team, so that you and your drivers can focus on what you do best – being out on the road.

Your chosen ELD solution provider will ultimately need to certify that their ELD meets the mandated requirements to be registered with the FMCSA. The solutions currently on the registry are self-certified by the provider and not by the FMCSA. The question is whether self-certification is sufficient because in order to keep your operations safe and compliant, not only should your provider register by the compliance date of December 2017, they should remain on the registry.

If, for whatever reason, the ELD solution you have implemented is removed from the registry, you may be exposed to risks that can cause disruption to your business and operations. At worst, your fleet of vehicles – and your business - may come to a grinding halt. You will need to quickly swap out some, or even all, of your ELD equipment and retrain your drivers and users in order to stay compliant and keep operating.

You've made a big investment so you need to be confident it will work

The ELD solution will become an integral part of your operation. It's therefore essential to be aware upfront of any potential worst case scenarios so you can plan ahead and put measures in place to minimize the impact.

An ELD provider that truly understands how much your compliance depends on theirs should at least match your efforts to plan ahead. As a technology specialist, your ELD provider has a duty to ensure that their ELD solution is technically compliant and operationally usable, now and into the future. Bottom line is: if your provider fails, you fail.

So let's explore what you should look for

What is the minimum standard?

The FMCSA requires that ELD providers register with the FMCSA, certifying that their devices meet the requirements and provide information on how the ELD works and how it was tested. Specifically, an ELD provider should support the motor carrier by providing:

MATERIAL	REASON
A user manual describing how to operate the ELD	To help you train your drivers and support users to learn about the system.
An instruction sheet for the driver describing the data transfer mechanisms supported by the ELD and step-by-step instructions for the driver to produce and transfer the driver's hours of service records to an authorized safety official	To ensure that your drivers know what to do at roadside inspections to avoid penalties and fines.
An instruction sheet for the driver describing ELD malfunction reporting requirements and record keeping procedures during ELD malfunctions	To ensure the driver knows what to do when malfunctions occur. Note: You will have only 8 days to resolve this issue for the driver, unless you seek an extension from FMCSA.



The FMCSA also developed optional test procedures, which providers could use to ensure their ELDs meet the requirements. While ELD providers are not required to use the FMCSA's test procedures, this is what the FMCSA will use, and rely on the results from, during any investigation of a complaint in determining whether an ELD system is to remain on the ELD registry. So although it is not mandatory, a prudent ELD provider should draw on the FMCSA's test procedures and/or design their own internal testing framework in order to ensure that they remain on the registry.

Is this sufficient?

The quality of the user materials we discussed above, supplied alongside your chosen ELD solution, may be an indicator of how well your provider understands the regulations and the operational demands on your drivers. For example, the information should demonstrate how intuitive and easy the ELD is for drivers to use under various operational scenarios. However, this may not sufficiently expose the robust operational capability of the system. For example, you should be asking: how frequently will malfunctions occur and how easy is it to tamper with the system?

Your ELD provider may test on their own and claim their ELD is compliant, but the bottom line is that it will ultimately be you that runs the risk of non-compliance if the ELD solution malfunctions or is removed from the registry. As a potentially high stakes consequence, this could mean you need to take your vehicles off the road until you find another option to stay compliant.

What about independent unbiased testing and verification?

The American Trucking Association (ATA) has said that "ultimately, verification of each device by the government or a third party would be ideal." This becomes very relevant as it promotes and affords additional checks on an ELD solution and ensures that the product meets the quality and requirements of regulatory standards.

A body conducting the testing and verification against the requirements will undertake its own testing procedures, independent of the ELD provider, to determine whether the solution satisfies FMCSA's ELD requirements. This could serve to supplement the internal testing practices for the ELD provider and offer extra confidence in the quality of their ELD solution.

However, the value of independent testing and verification depends on:

- **The reputation and credibility** of the verification body conducting the verification and their understanding of the US regulatory and policy context
- **The testing approach the body will adopt**, which tests not only for the technical accuracy of the product but also whether it makes sense from the fleet's operational user perspectives
- **The independence or unbiased** position taken by the body to recommend and publish the results of their findings with carriers and the industry.

Together, EROAD and PIT Group aim to set a new standard for ELD technology

At EROAD, the *minimum* has never been good enough for us. We know how much compliance matters to our customers, which is why we consistently follow rigorous internal testing procedures and protocols for our tax and compliance solutions. With our ELD, we plan to go the extra mile by partnering with industry experts, PIT Group, to independently test and verify our solution.

Together, EROAD and PIT Group seek to provide additional assurance for carriers around the quality of an ELD solution. To supplement EROAD's internal testing procedures, PIT Group will conduct independent testing and verification of the EROAD ELD solution, confirm that it satisfies FMCSA technical specifications, as well as the operational requirements of fleets.



As an unbiased, neutral testing organization with strong expertise in vehicle technologies and telematics, regulatory policies and requirements, PIT Group is uniquely qualified. As an exceptional industry leader, their extensive knowledge of the U.S. ELD standards, along with their appreciation of the wider North American landscape, enabled them to harmonize and develop the ELD standard for Canada.

PIT Group understands fleets. Having worked with fleet managers and manufacturers to provide and select the best technologies that reduce costs and accelerate implementation for the past eight years, they know it's about more than just meeting technical specifications; what really matters most is ease of use and how it can help the business overall.

Through this partnership, we seek to demonstrate the importance of independent testing and verification and the value it serves for you, the motor carrier: ensuring that your ELD satisfies not only the technical specifications, but also the operational demands of your drivers and users.

Bottom line is: our compliance = your compliance

At EROAD we've built an entirely new kind of technology: a scalable platform designed from the ground up to meet rigorous regulatory requirements and your business needs.

We consistently lead the way in quality, security and privacy through independent testing and validation. EROAD is the only company to have obtained an independent Secretary of State audit, which found our platform to be accurate, reliable, and secure for capturing, processing and storing data. Annual independent security audits provide confidence that EROAD does what we say with respect to data security and privacy for our customers.

It is this industry-leading standard that sets a strong foundation for building and maintaining customer trust. We pride ourselves not only on the accuracy of our technology, but also through the confidence we provide our customers. We understand that when we certify our compliance, it directly translates into your compliance: keeping your fleet on the road, your drivers safe, and having a trusted partner along for the ride.

This is the second in the series of EROAD Red Papers.

Read our first Redpaper: [Leverage a broader solution platform for ELD compliance](#)

ABOUT EROAD, INC.

EROAD, Inc. is a leading transportation technology and services company, headquartered in Tualatin, Oregon. EROAD's in-vehicle technology and global electronic platform enables carriers to efficiently utilize their capital and reduce the costs associated with fleet operations and management. EROAD offers a complete suite of user-friendly compliance and telematics solutions, including automated IFTA, electronic weight-mile tax, ELD-ready electronic logbook, support for driver safety, vehicle maintenance, fuel and fleet utilization reporting. EROAD's independently proven, secure platform guarantees accurate data that you can rely on to provide insight and competitive advantage.