

EROAD

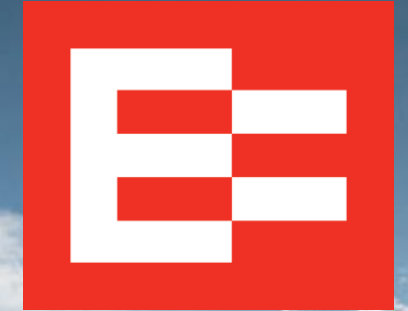
Are you Compliant with your ELD? *Mandate Review and “Need to Knows”*

AEMCA Conference

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Overview

- What is an ELD
 - Definition
 - Who needs it
- ELD vs AOB RD vs ELS
- Exemptions
- Intrastate carriers



ELD Review



Definition of an ELD



§ 395.2 -“Electronic Logging Device (ELD) means a device or technology that automatically records a driver’s **driving time** and **facilitates** the accurate recording of the driver’s hours of service, and that meets the requirements of subpart B of this part.”

➤ *Drivers must still manually enter On-duty, Off-duty, Sleeper berth, etc.*

Key requirements:

- Not necessarily a physical device but a technology platform
- Integrally connected to the CMV’s engine to automatically track vehicle movement and operation
- Date, time and location automatically captured
- Must satisfy display and data transfer requirements
- Resistant to tampering and ability to monitor compliance and detect malfunctions
- Allow for annotation by both driver and carrier to explain or correct records

All drivers that require RODS must transition to ELDs



Except for the following drivers:

- Drivers currently allowed to use timecards could continue to do so under § 395.1(e)
- Drivers that are intermittently required to record HOS duty status (because they go outside of the specified short haul criteria), but for no more than 8 days in any 30 day period
- Drivers who conduct driveaway-towaway operations, where the vehicle being driven is the commodity being delivered
- Drivers of vehicles manufactured before model year 2000.



ELD compliance requirements



- Must be registered with the FMCSA registry; and
- Must be certified by the provider that it meets all technical specifications.

FMCSA Registry*: <https://3pdp.fmcsa.dot.gov/ELD/ELDList.aspx>

United States Department of Transportation

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 **FMCSA**
Federal Motor Carrier Safety Administration

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Registered ELDs

Here you may view a list of Electronic Logging Devices registered with this site. These devices are self-certified by the manufacturer and not by the Federal Motor Carrier Safety Administration. Click [here](#) to return to the homepage.

Device Name	Model Number	Software Version	ELD Identifier	Image	User Manual	Company	Contact Company (Phone)	Contact Company (Email)	Company Website
EROAD ELD	Ehubo 2	v1.33.104 or higher	EROAD1	EROAD ELD - Confidence in Every Mile.png	EROAD ELD User Manual.pdf	EROAD	855-503-7623	eld@eroad.com	www.eroad.com/eld

**Currently over 300 vendors on site*

AOBRDs, ELDS and ELS



Comparing the technical specifications



	Electronic Logging Device (ELD)	Automatic On-board Recording Device (AOBRD)	Electronic Logging System (ELS)
Features / Functions	SNPRM issued March 28, 2014	§395.15 1988	FMCSA guidance issued July 10, 2014
Engine connection – “integral synchronization”	<ul style="list-style-type: none"> Engine power and hours, motion, miles driven ECM or other electronic device connected to CMV 	<ul style="list-style-type: none"> Required but not defined 	<ul style="list-style-type: none"> Not required
Recording location	<ul style="list-style-type: none"> At change of duty status Engine on and off Log in and out Every 60 min while moving unless Personal Use 	<ul style="list-style-type: none"> At change of duty status Manual or automatic 	<ul style="list-style-type: none"> At change of duty status Manual or automatic
Automatic Driving status	<ul style="list-style-type: none"> Default to Driving when CMV in motion 	<ul style="list-style-type: none"> Not addressed 	<ul style="list-style-type: none"> Not required
Graph grid display	<ul style="list-style-type: none"> Must be able to present graph grid on unit or print 	<ul style="list-style-type: none"> Not required Time and duty change sequence sufficient 	<ul style="list-style-type: none"> Must be able to present graph grid on unit or print
Timezone and drift	<ul style="list-style-type: none"> Sync to UTC Absolute deviation no more than 10 min 	<ul style="list-style-type: none"> Not addressed 	<ul style="list-style-type: none"> Not addressed

Comparing the technical specifications

Features / Functions	Electronic Logging Device (ELD)	Automatic On-board Recording Device (AOBRD)	Electronic Logging System (ELS)
Annotations and edits	<ul style="list-style-type: none">• Driver must accept all edits proposed by carrier	<ul style="list-style-type: none">• Not addressed• Driver or carrier edits	<ul style="list-style-type: none">• Not addressed• Driver or carrier edits
Tamper resistant	<ul style="list-style-type: none">• No alteration of original ELD records• Require data integrity check functions• Require record versioning	<ul style="list-style-type: none">• Must be tamper-proof	<ul style="list-style-type: none">• Not addressed
Identifying sensor failures	<ul style="list-style-type: none">• Capable of detecting malfunctions and data inconsistencies and gaps• Audit record of these occurrences	<ul style="list-style-type: none">• Must identify sensor failures and edited data	<ul style="list-style-type: none">• Not addressed
Enforcement and data transfer methods	<ul style="list-style-type: none">• Display or print out• Option 1 – Telematics, or Option 2 – Local connectivity type	<ul style="list-style-type: none">• Not addressed• Outlined print out format	<ul style="list-style-type: none">• Display• Print version to be available upon request

Exemptions and Waivers



- UPS Exemption
 - <http://www.ttnews.com/articles/fmcsa-grants-ups-several-eld-exemptions>
- TRALA Waiver
 - <http://www.ttnews.com/articles/fmcsa-grants-rental-group-trala-90-day-eld-waiver>
- Agriculture
 - <https://www.fmcsa.dot.gov/hours-service/elds/limited-90-day-waiver-transportation-agricultural-commodities>
- Asphalt Haulers
 - <https://www.equipmentworld.com/fmcsa-grants-two-hours-of-service-exemptions-for-asphalt-haulers/>
- Peoplenet + JJ Keller
 - <http://www.truckinginfo.com/channel/drivers/news/story/2018/02/peoplenet-explains-need-for-aobrd-waiver-for-eld-rule.aspx>

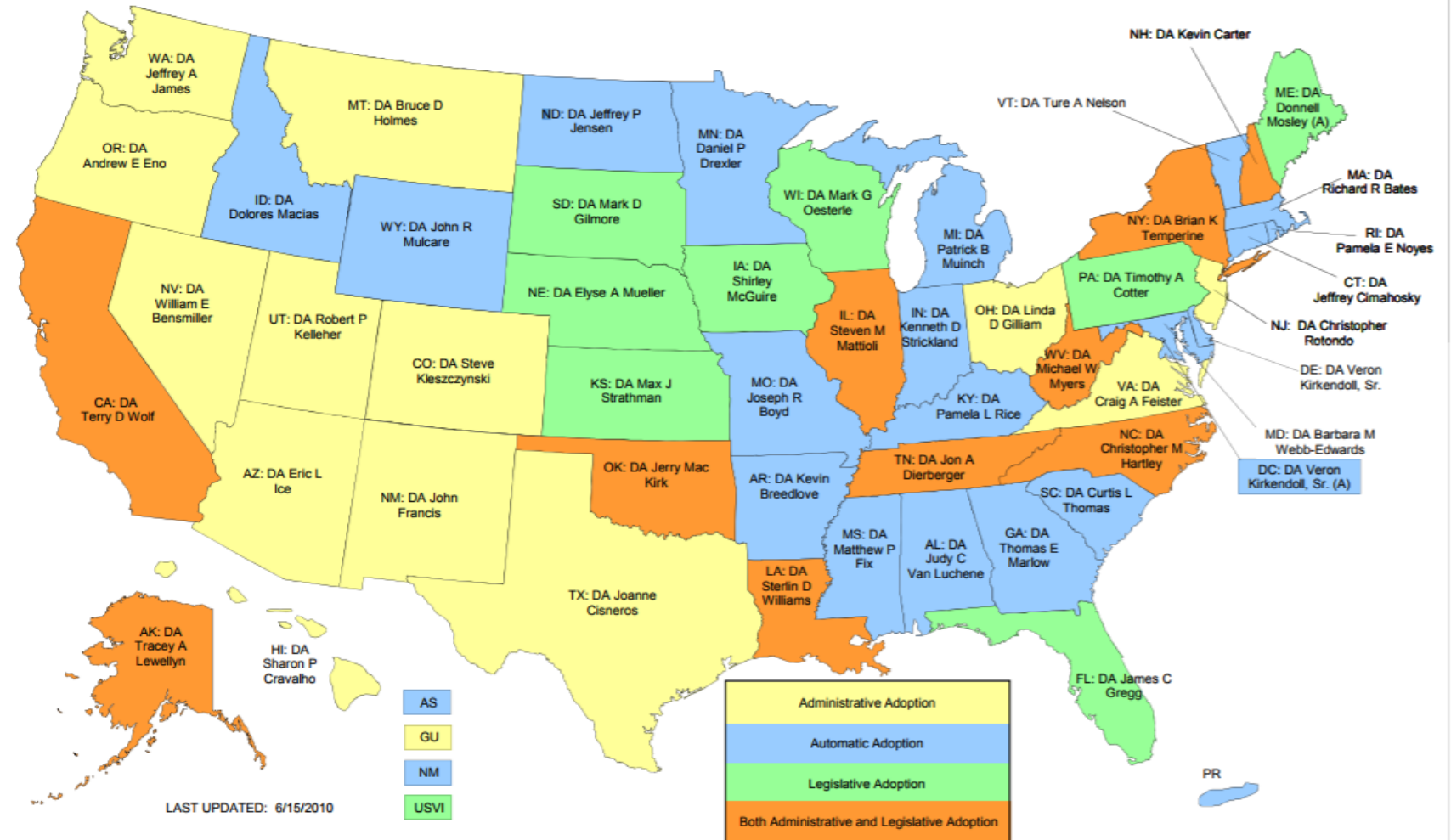
Intrastate Carriers



States can adopt 4 ways:

1. Administrative
2. Automatic
3. Legislative
4. Both Administrative and Legislative

FMCSR Adoption Map



Challenges with ELDs



- Unidentified Trips
- TRAINING
- Logging OUT and not changing DUTY STATUS
- Not understanding HOS Rules
- Yard Moves and Personal Conveyance
- Dealing with Data Diagnostics and Malfunctions
- Roadside Inspections



THANK YOU

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