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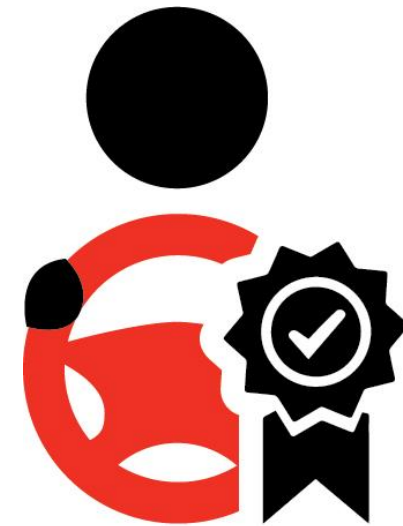
ELD Roadside Compliance: Phase 2



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April 24, 2018

- Post April 1st - *It's out-of-service (OOS) time*
 - *What can drivers be placed OOS for*
 - *What to do if driver has been placed OOS*
- Required in-cab documents
 - *ELD vs. AOB RD*
- Transferring driver logs roadside
- Back-office compliance
- Real world scenarios
- Q and A with CHP



LET THE GAMES BEGIN
Let's talk OOS

April 1, 2018 - It's OOS time



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You can be placed OOS if:

- Eligible CMV is not properly equipped with ELD
- Using a non-compliant/non-authorized ELD that does not fulfill FMCSA's requirements
- Driver was unable to **Transfer** the required ELD data to enforcement or could not meet backup **Display or Printout** requirements
- Still using paper logs after 8 days
 - *If an ELD malfunctions, only have 8 days to use paper - ELD must be replaced or repaired*
 - *Driver must carry waiver from FMCSA*
- Driver not using the ELD
- *Not in compliance with HOS rules*



What if you are placed OOS?

- Drivers will be OOS for full 10 hours
- After 10 hours, drivers allowed to travel to their next scheduled stop
- **Drivers will not be able to be dispatched again until they are in compliance**
 - *How fast can I get an ELD?*
 - *Why aren't you on the registry?*
 - *Where's my printer?*
 - *What waiver?*
 - *I can't figure this thing out and I never will*
- If a driver is dispatched without being in compliance, the carrier "will be subject to further enforcement action."

Required in-cab documents



ELD In-Cab Required Documents

- Each CMV with an **ELD** installed must have on-board an information packet containing:
 - *User manual*
 - *Data transfer and backup display or printout instruction sheet*
 - *Data diagnostic and malfunction instruction sheet*
- The on-board information packet may be in electronic format (including on the ELD) or hard copies
- Minimum 8 day supply of blank driver's RODS graph-grids

CVSA Inspection Bulletin 2017-05 – Hand-Held and Electronic Logging Devices (ELDs), created: Dec. 6, 2017

AOBRD In-cab Required Documents



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§395.15 Automatic on-board recording devices (AOBRD)

(g) On-board information. Each CMV must have on-board the CMV an information packet containing the following items:

1. An instruction sheet describing in detail how data may be stored and retrieved from an AOBRD; and
2. A supply of blank driver's records of duty status graph-grids sufficient to record the driver's duty status and other related information for the duration of the current trip.

(2) Motor carriers are permitted to use location codes in lieu of the requirements of paragraph (d)(1) of this section. A list of such codes showing all possible location identifiers shall be carried in the cab of the CMV and available at the motor carrier's principal place of business. Such lists shall be made available to an enforcement official on request.

https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&ty=HTML&h=L&mc=true&=PART&n=pt49.5.395#se49.5.395_115

Transferring Driver Logs Roadside

It takes two to make the thing go right



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COMMUNICATION = CONNECTION



Transferring driver logs roadside

- Have drivers trained on what to do
 - The driver is responsible for initiating the eRODS file transfer upon request
- Make sure ELD is in **inspection mode**

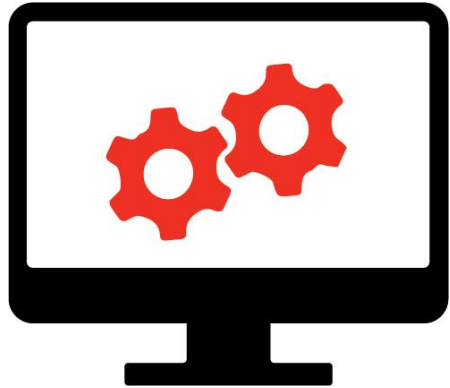
2 Types of data transfer available:

1. **“Telematics”** transfer type ELD. Must electronically transfer data via wireless Web services and email
2. **“Local”** transfer type ELD. Must electronically transfer data via USB2.0 and Bluetooth®

*Driver must be able to provide either the **display** or a **printout** when an authorized safety official requests a physical display of the information*

Transfer Method	Web Services/Email	Bluetooth®	USB 2.0
Driver's Responsibility	Driver invokes email process on the ELD device/system and enters the SI/badge code provided by the safety official. The ELD device attaches the file to an email message and sends the message to the email address provided to the provider during the ELD registration process.	Driver ensures the safety official's device is discoverable on the ELD and enters the Bluetooth® code provided by the safety official. The driver enters the unique code and transfers file from the ELD to web services.	Driver downloads ELD data to self-encrypting USB provided by the safety official.
Safety Official's Responsibility	Safety official provides SI or badge code and retrieves the ELD data transferred by the driver/motor carrier through web services.	Safety official activates Bluetooth® on his/her computer and ensures the ELD device is discoverable. Provides Bluetooth® code and unique code to the driver for the ELD to send data from web services.	Safety official provides self-encrypting USB device to the driver, retrieves data from the USB device through eRODS.

Back-office compliance

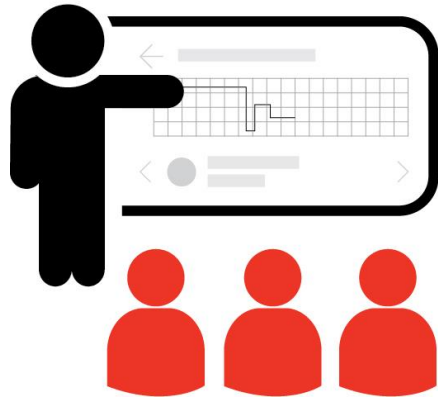


Clarify roles and responsibilities

- Identify individuals responsible for managing driver's logs
- Understand the different levels of system access
- Make it clear who's doing what
- Routinely monitor system use

Protect your information

- Set expectations to protect PIN and other personal information
- Develop company policies around privacy and security
- Understand data retention and storage requirements



Fleet and Safety Managers / Dispatchers / Mechanics

- Entering data properly
 - *USDOT #, DL/State, Time-zone, Exempt Driver*
- Creating and dealing with unidentified trips
- Reviewing, editing and annotating drivers' logs
 - *Suggesting edits vs. making edits*
- Managing HOS violations
 - *Enable proper rulesets, exemptions/exceptions*
- Filing a proper DATAQ
 - <https://dataqs.fmcsa.dot.gov/HelpCenter/HelpCenter.aspx>

Real World Scenarios



Develop procedures for *what ifs*

WHAT IF....

- Driver cannot transfer logs to a roadside enforcement official?
- Driver gets placed OOS for not using the ELD correctly?
- Driver is creating numerous Unidentified Trips?
- ELD has technical issues and driver does not let you know for 3 days?
- Driver has an accident and enforcement wants the data off the ELD?
- Driver keeps using Personal Conveyance incorrectly?
- Driver routinely asks certain dispatcher to suggest edits and falsify logs?
- Dispatchers use location and activity to harass drivers?
- Enforcement writes driver up for something you know is incorrect?



Questions and Answers



THANK YOU



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