# **EROAD**

**Electronic Logging Devices - ELDs** 



PMTA's 89<sup>th</sup> Annual Management Conference

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#### What is an ELD?



§ 395.2: "ELD means a device or technology that <u>automatically</u> records a driver's <u>driving time</u> and <u>facilitates</u> the accurate recording of the driver's <u>hours of service</u>, and that meets the requirements of subpart B of this part."

#### **Key requirements:**

- Automatically captures drive time, starting at (or up to) 5 mph
- Must be connected to the CMV's engine to track vehicle movement and operation
- Date, time and location automatically captured
  - Intermediate recordings every hour on hour when in driving status
- Tamper resistant
- Allow for annotation by both driver and carrier to explain or edit/correct records
  - Edits are "suggested" and must be approved by driver

Final rule can be found here: https://www.fmcsa.dot.gov/hours-of-service/elds/electronic-logging-devices

#### ELDs must.....



- Meet all the technical and functional specs set by FMCSA (over 300)
  - ELD vs. AOBRD
- Automatically record when vehicle is in motion (cannot be edited/removed)
  - Special driving categories: Personal Conveyance (PC) and Yard Moves (YM)
- Have mute functionality while driver in sleeper berth (driver harassment)
- Make records available to enforcement
  - Display requirement
  - Ability to transfer records roadside
  - eRODS
- Be self-certified and on FMCSA ELD Registry
  - Independent certification required?

https://eld.fmcsa.dot.gov/List

# Who needs it and who is exempt?



All drivers that currently require RODS must transition to ELDs by compliance date(s).

### **Exemptions:**

- 1. Drivers currently allowed to use timecards could continue to do so under  $\S$  395.1(e) <u>unless...</u>
  - Driver falls outside of short-haul parameters more than 8 days in any 30 day period (rolling, not set)
- 2. Drivers who conduct driveaway-towaway operations, where the vehicle being driven is the commodity being delivered
- 3. Drivers of vehicles manufactured before model year 2000.
  - Taken from VIN #

# Implementation and Compliance Timeline

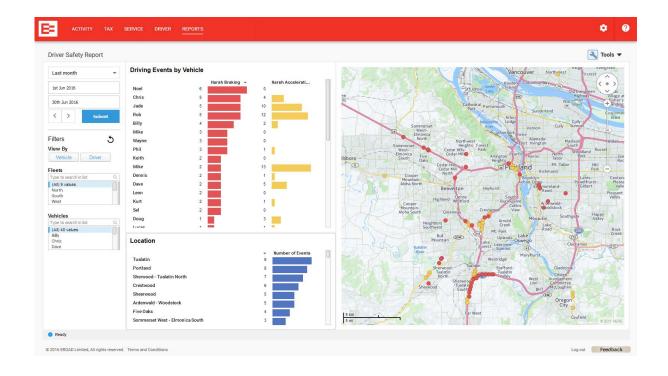
Phase 1	February 16, 2016	Effective Date	ELD providers with compliant product can apply to be on the FMCSA registry
Phase 2	<u>December 18, 2017</u>	Compliance Date	ELD becomes mandatory for qualifying- non/exempt carriers and drivers
Phase 3	December 16, 2019	End of AOBR Grandfathering / Full Compliance Date	All drivers and motor carriers must abandon AOBRs and use ELDs



### Cost and ROI



- Registered ELD Providers
  - https://gpdp.fmcsa.dot.gov/ELD/ELDList.aspx
  - http://www.overdriveonline.com/2017-eld-buyers-guide/#8
- Hardware cost plus monthly subscription cost
- Buying vs leasing equipment
- Dedicated hardware vs. BYOD
- DVIR, Vehicle Maintenance Module
- Driver Behavior , Data Analytics
- Integrations
- AOBRD vs ELD





# Installation and Training



#### Installation

- Time
- Difficulty
- Options
  - Selfinstall
  - 3<sup>rd</sup> party
  - Provider install

#### **Back Office**

- Driver set-up
- Who's doing what

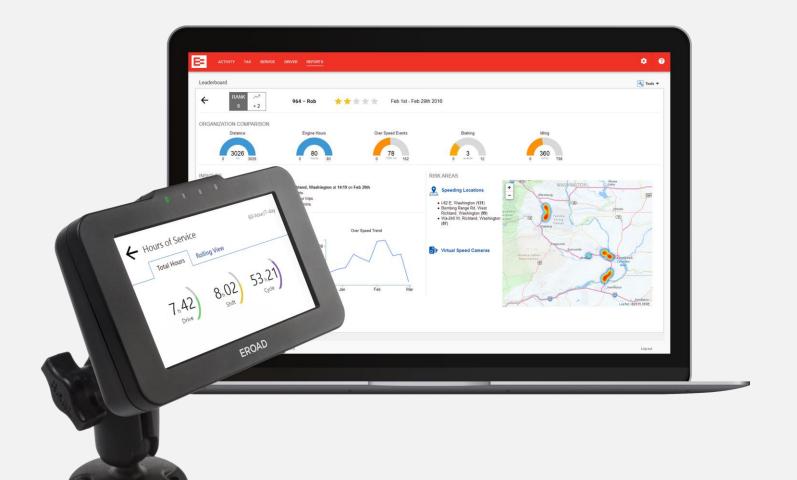
# **Training**

- Time
- Difficulty
- Drivers, Safety Supervisors, Dispatchers, Office, Shop



# Mandate from different angles





#### **Drivers**



# Challenge

# Adapting to change and technology

- Resistance/fear of technology
- Real-time recording of HOS information
  - Time management -No "wiggle room"
  - Getting stuck without hours
- Not understanding new features
  - YARD MOVES, PC, On-Duty time

# Management Strategy

# Phased roll-out and ongoing training\*

- Select a range of drivers to pilot solution
  - Gather feedback
  - Master "Driver Trainers"
  - Know different challenges for drivers in each location
- Design on-boarding and refresher training program for drivers and support users
- TRAIN ON REGULATIONS that PERTAIN TO YOUR OPERATIONS

\*The better trained your drivers are, the more successful you will be

#### **Carriers**



# Challenge

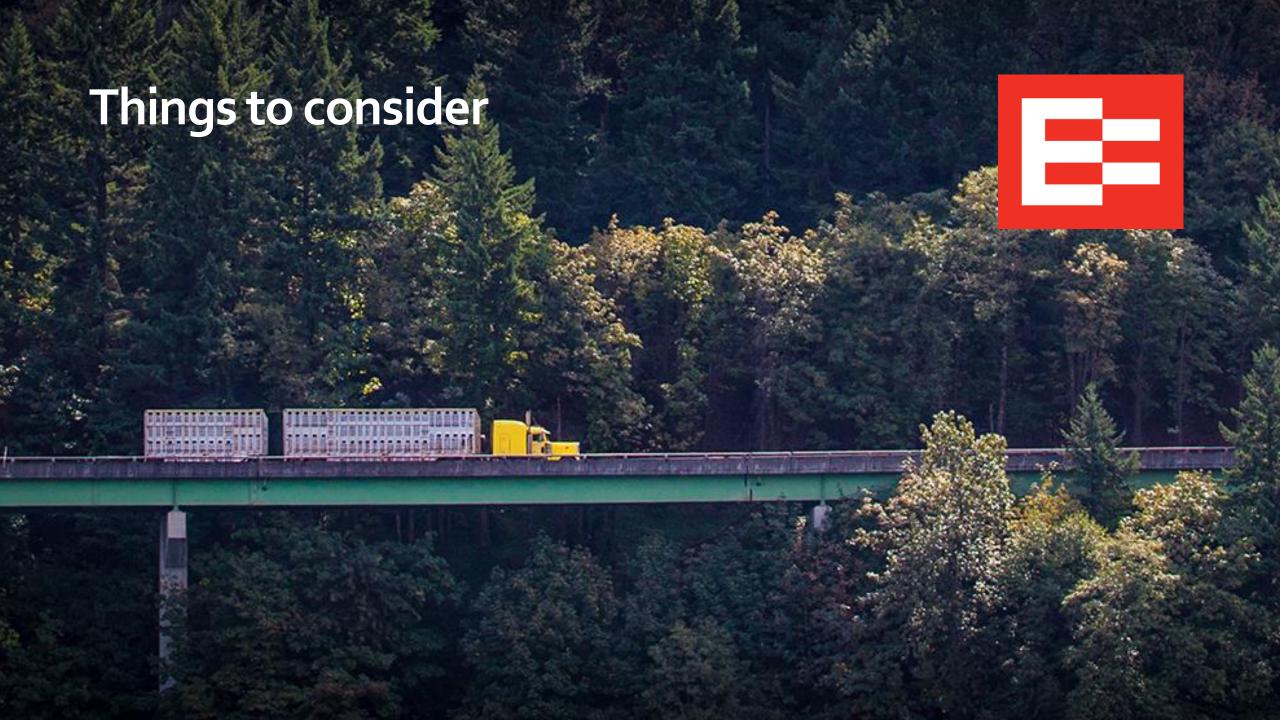
# Selecting the right technology

- <u>Significant risks</u> to business from inadvertently choosing a non-compliant ELD
  - 8 days?
  - HOS violations/penalties
- Which system best fits our needs?
  - Know operations?
  - Are we in compliance now?
- TIME
  - Up-time
  - Training
  - Reliability

# Management Strategy

#### Take time to do full research of solutions

- Evidence of independent and/or additional testing
- Review of hidden costs and contractual terms
- Audit ready system
  - Reports
  - Internal processes in place
- Continued customer support and service?
- Available training materials and assistance



#### What Else?



- User Manuals and In-Cab Requirements
- Supporting Documents
  - 12/18/2017
  - 5 categories 8/24
  - More than 8? 1<sup>st</sup> and last for 6 months
  - The Big 4 Name/#, date, location, <u>time</u>
- Driver Harassment
  - Written complaint under 49 CFR 386.12(b)
  - Within 90 days

Time to review those company policies!

https://www.fmcsa.dot.gov/hours-service/elds/eld-checklist-carriers



https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/ELD\_Rule\_Frequently\_Asked\_Questions\_0.pdf

# **Questions?**







