2020 TRUCKING SAFETY & COMPLIANCE CONFERENCE NW

BROUGHT TO YOU BY ORANGE COMMERCIAL CREDIT

"PREPARING FOR" A SUCCESSFUL AND COMPLIANT TRUCKING FLEET

Preparing for ELDs in a Full Compliance World

EROAD

Soona Lee
Director, Regulatory Compliance

January 2020

2020 Trucking Safety and Compliance Conference

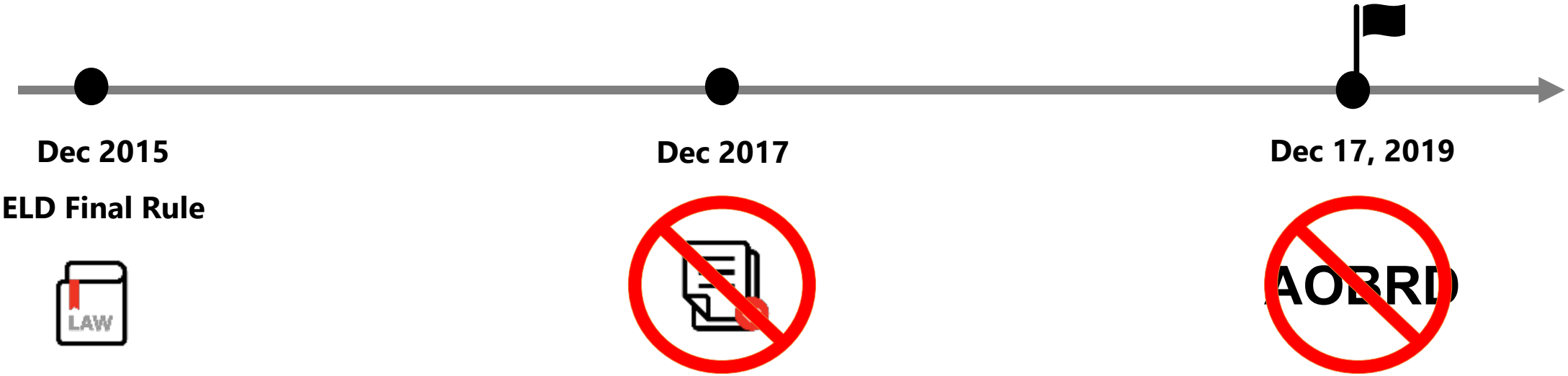
Today's topics

EROAD

- What happened on December 17, 2019?
- What's changed?
- What's stayed the same?
- Tips for the road ahead
- Discussion

What happened?

EROAD



ELD Full compliance from December 17, 2019 means:

- Must use an FMCSA registered ELDs (Penalty = out of service for 10hrs)
- Reaching a milestone of trucking industry adopting electronic records.
- Changes the ‘how’ but not ‘why’ on HOS compliance…

Spotlight on HOS rules

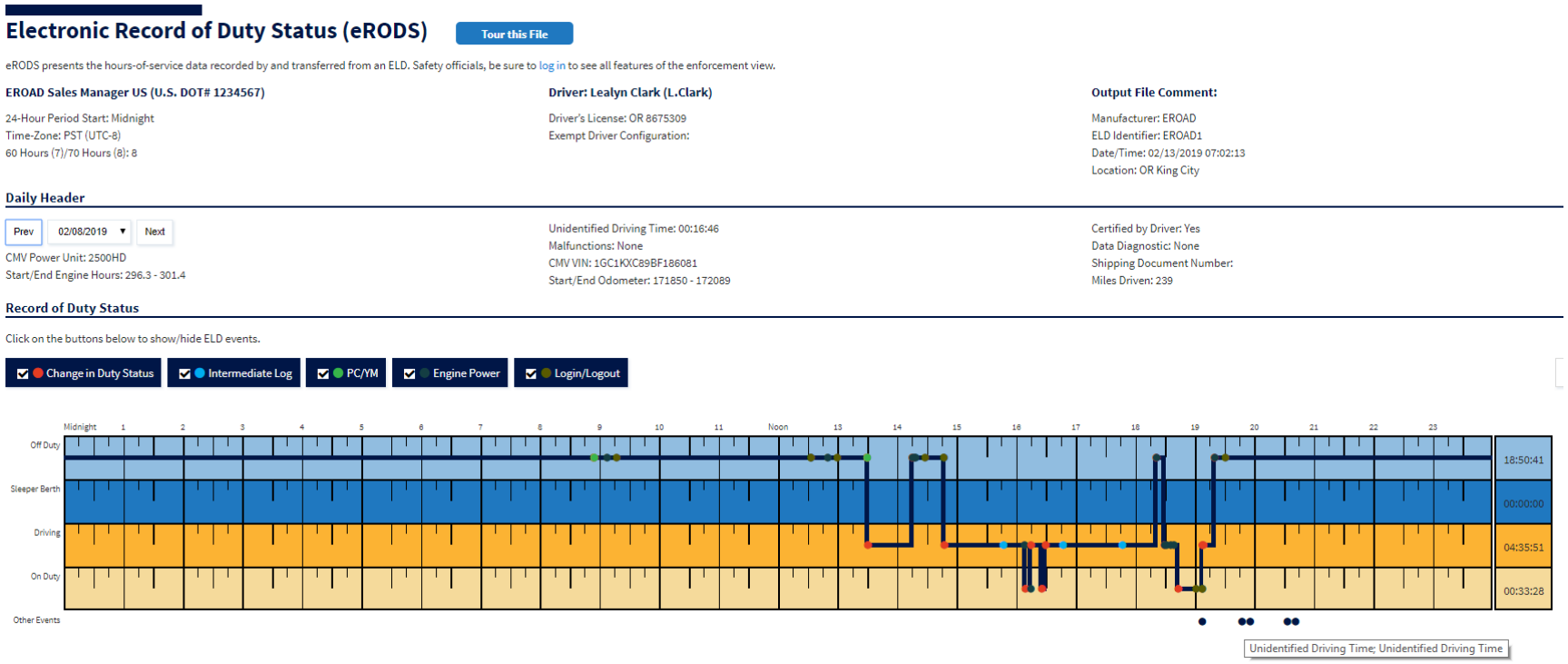
- ELD more precise in recording driver's driving and duty times
- Provide more flexibility for drivers
- FMCSA proposed HOS in key areas
- Expecting Final Rule on changes

49 CFR 395
Hours of Service

1. Standardized enforcement process

EROAD

- ELDs must transfer HOS data to safety officials for roadside inspections and audits.
- They can access and view data using eRODS

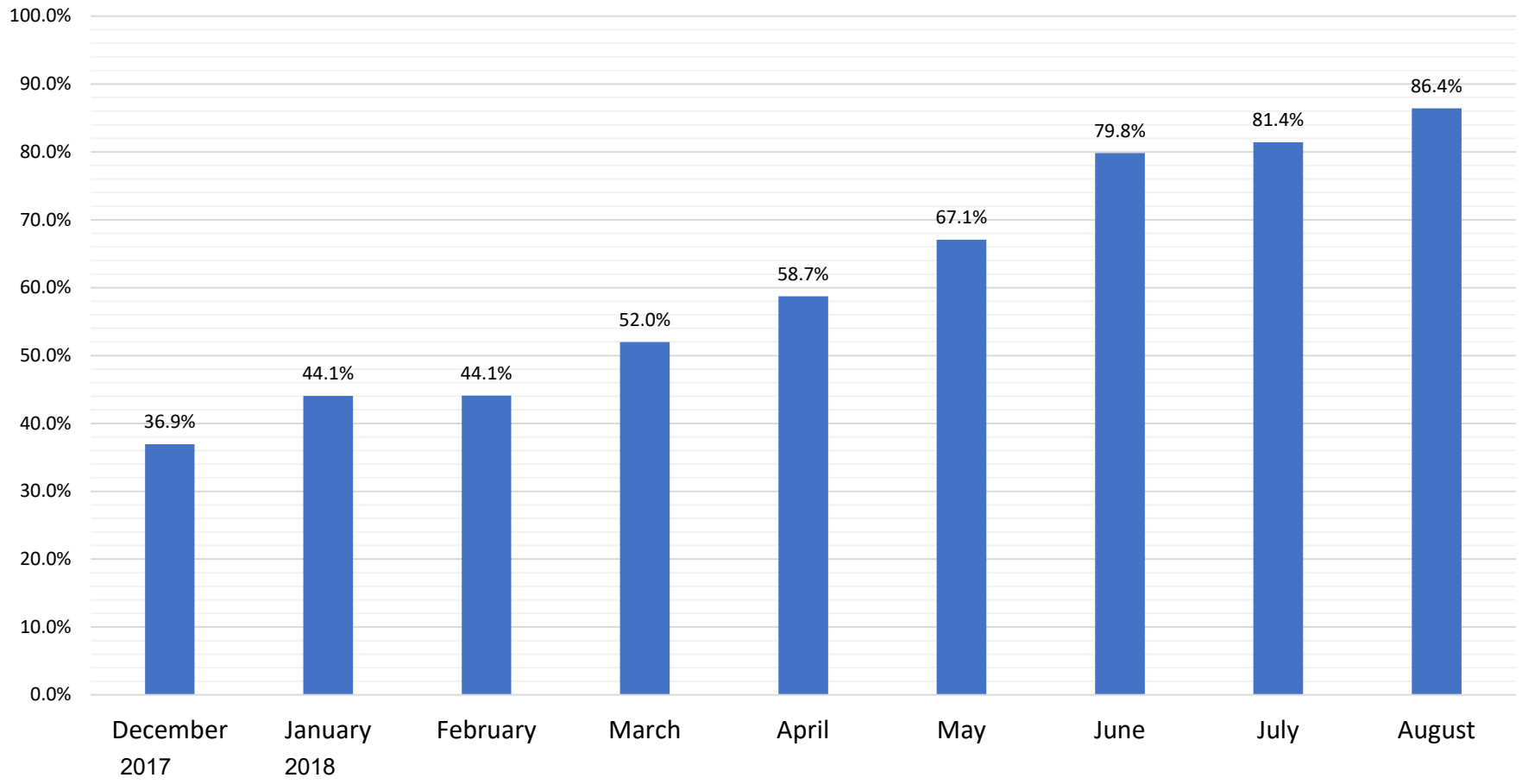


Enforcement

Four different statuses from an eRODS transfer:

Valid	• No issues with the output file
Warning	• Some missing data fields e.g. Invalid VIN, missing USDOT
Error	• Technical output file issues e.g. Incorrect check sum, Invalid values for events
Not showing?	• Incorrect safety official code • Failed connectivity e.g. no cell service or eRODS system is down

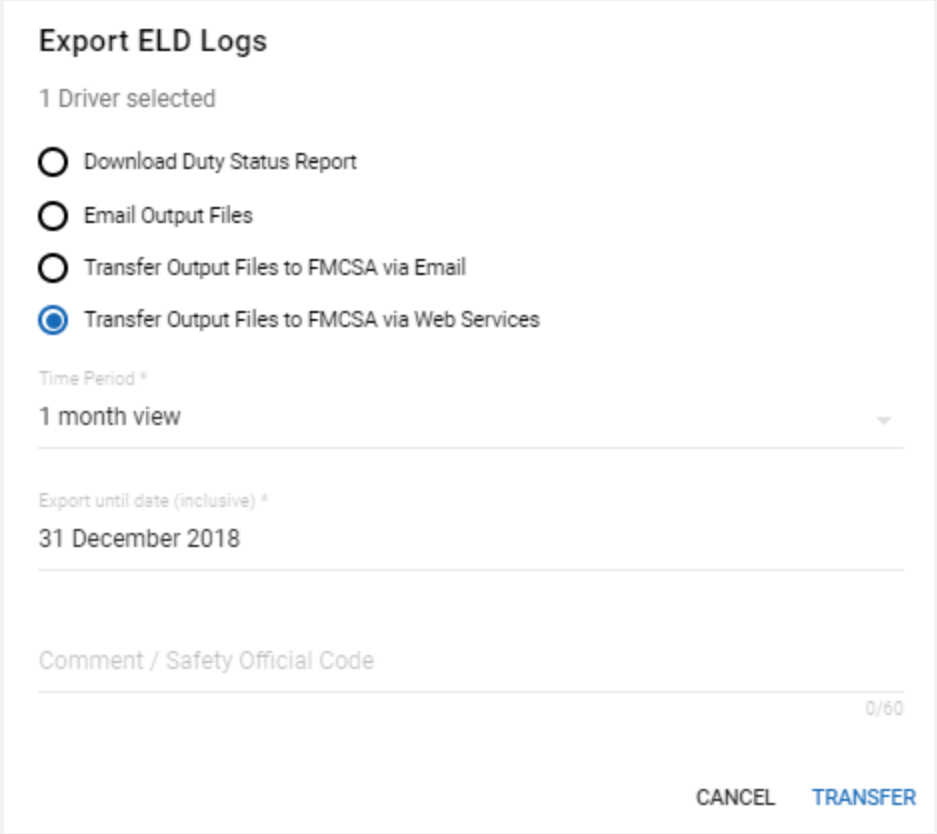
Successful Data Transfers to eRODS Web Service



What's changed?

2. Off-site safety audits

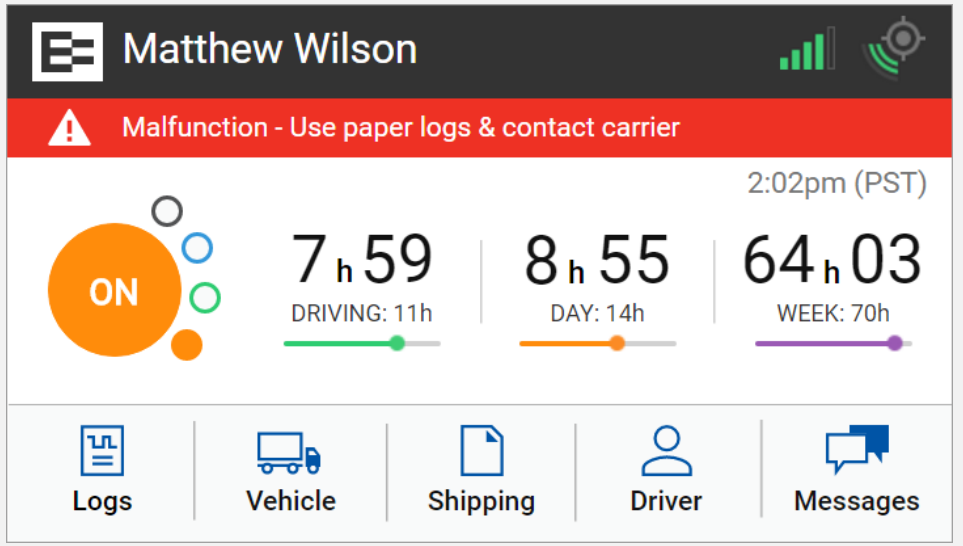
- FMCSA reported conducting nearly 1,000 off-site audits in FY 2019 and expect an increase
- Off-sites initiated when carrier has elevated scores in 1-2 CSA BASICs
- Electronic records support FMCSA to request and review various records online

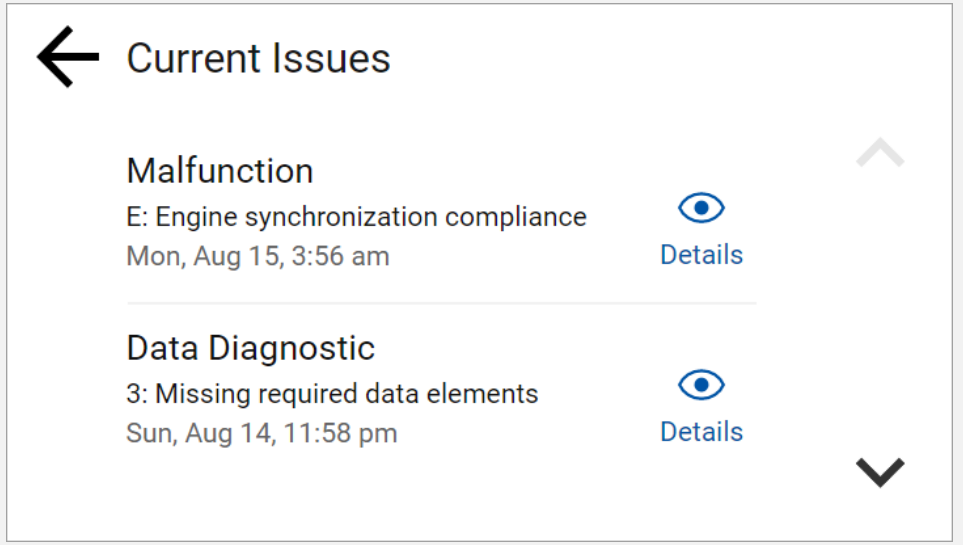


What's changed?

3. Malfunctions and data diagnostics

- Tampering or device failures are recorded on ELDs
- Drivers must carry must carry instruction cards that explain malfunctions and resolutions
- Carrier must work with the ELD provider to resolve malfunctions within 8 days

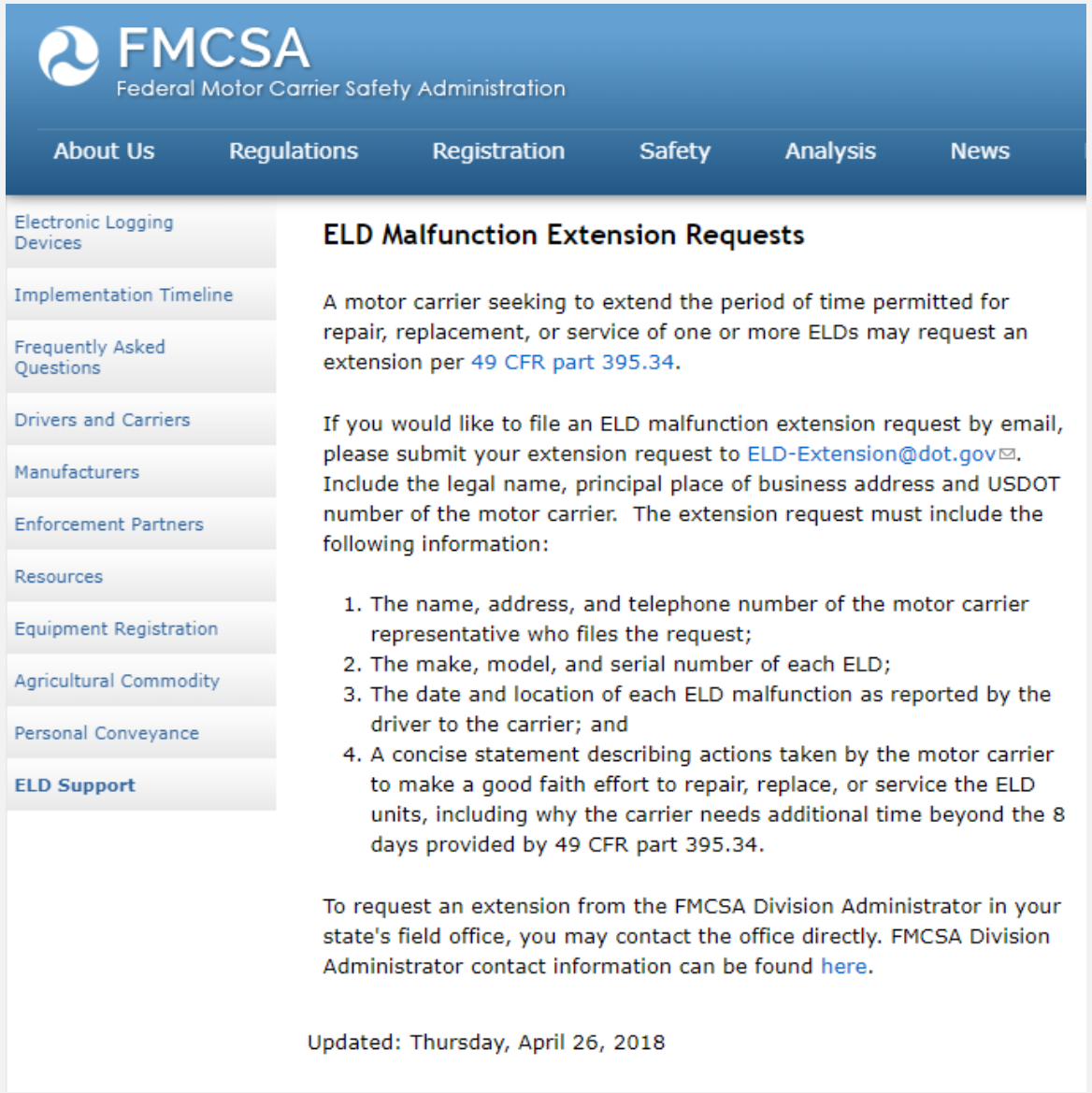




What's changed?

4. Extension request to FMCSA

- 8 days to fix or replace ELDs
- **For example:**
  A carrier wishes to change ELD providers and need longer than 8 days to replace the existing with the new devices



FMCSA
Federal Motor Carrier Safety Administration

About Us | Regulations | Registration | Safety | Analysis | News

- Electronic Logging Devices
- Implementation Timeline
- Frequently Asked Questions
- Drivers and Carriers
- Manufacturers
- Enforcement Partners
- Resources
- Equipment Registration
- Agricultural Commodity
- Personal Conveyance
- **ELD Support**

ELD Malfunction Extension Requests

A motor carrier seeking to extend the period of time permitted for repair, replacement, or service of one or more ELDs may request an extension per 49 CFR part 395.34.

If you would like to file an ELD malfunction extension request by email, please submit your extension request to ELD-Extension@dot.gov. Include the legal name, principal place of business address and USDOT number of the motor carrier. The extension request must include the following information:

1. The name, address, and telephone number of the motor carrier representative who files the request;
2. The make, model, and serial number of each ELD;
3. The date and location of each ELD malfunction as reported by the driver to the carrier; and
4. A concise statement describing actions taken by the motor carrier to make a good faith effort to repair, replace, or service the ELD units, including why the carrier needs additional time beyond the 8 days provided by 49 CFR part 395.34.

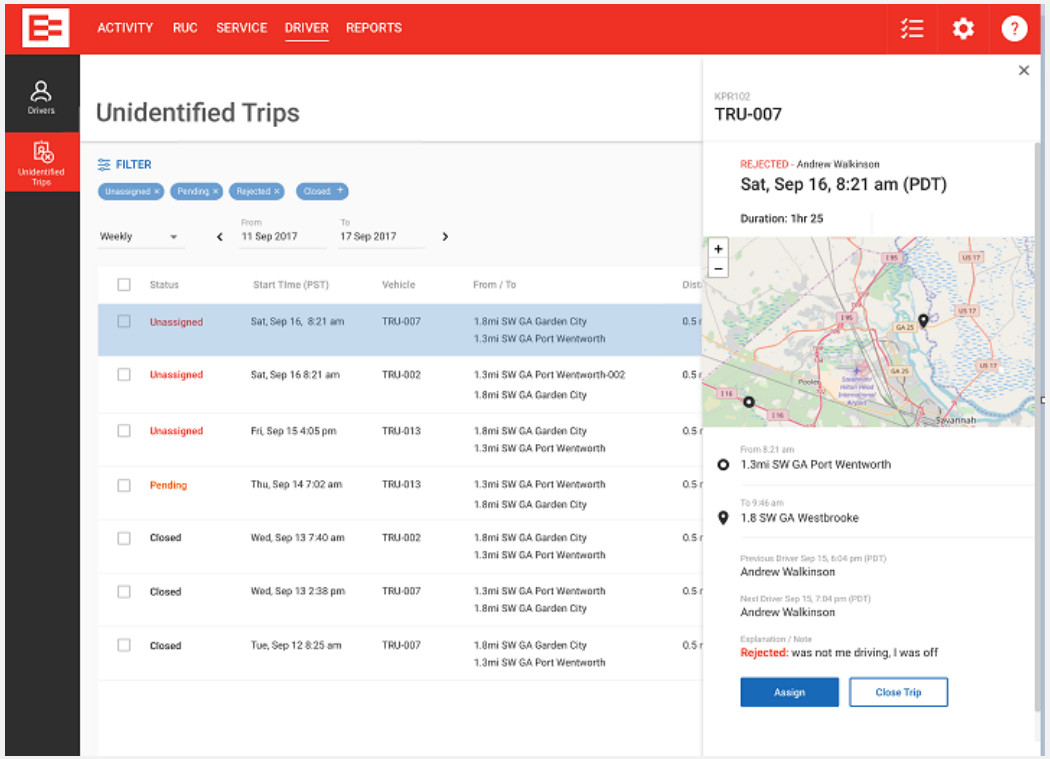
To request an extension from the FMCSA Division Administrator in your state's field office, you may contact the office directly. FMCSA Division Administrator contact information can be found here.

Updated: Thursday, April 26, 2018

What's changed?

5. Managing Unidentified Trips

- All drive time is recorded
- When drivers don't log in, unidentified trips are created
- Both carrier and drivers are responsible for reviewing, assigning and explaining these trips



What's stayed the same?

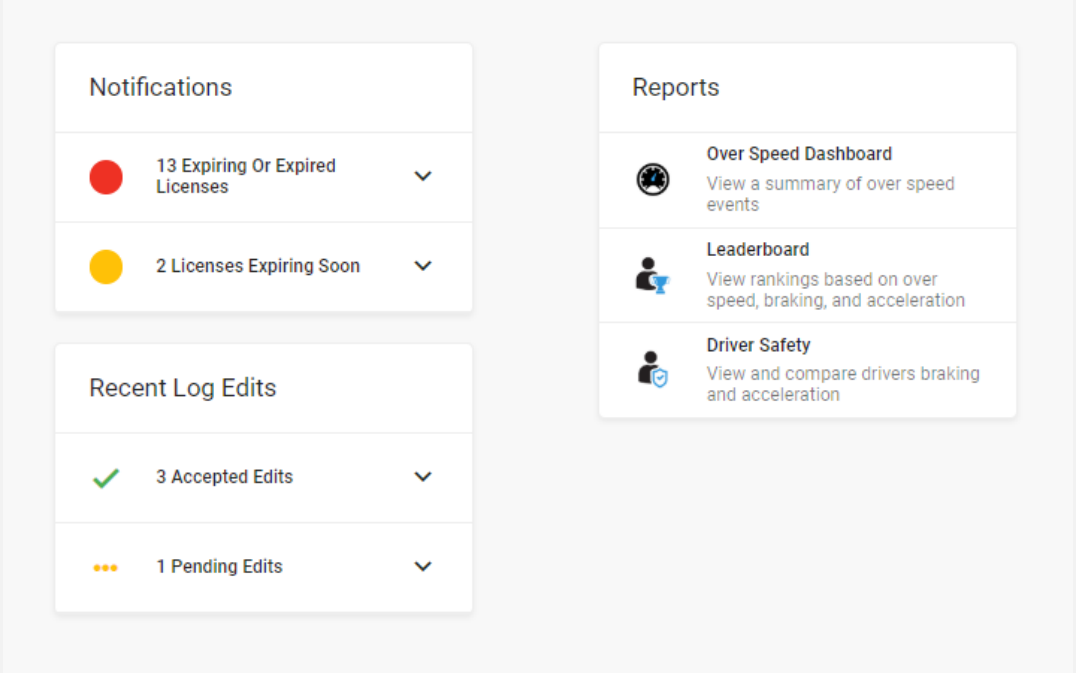
1. Drivers: input required

- ELD automatically records driving and vehicle data
- Driver still need to input:
  - ON, OFF, SB duty statuses
  - Remarks: e.g. pre / post trip inspections
  - Shipping documents
  - Trailer numbers
- Review and certify logs daily

What's stayed the same?

2. Carrier: manage & review driver logs

- Ensuring drivers certify their logs
- Check for missing form and manner information such as shipping documents, trailers, etc.
- Check for proper use of YM and PC statuses
- Correcting duty statuses for drivers forgetting to go off-duty at end of shift



What's stayed the same?

3. Importance of Training

EROAD

Regular and updated training for:

- Drivers
- Dispatchers
- Fleet or safety managers
- Mechanics

FMCSA Resources

ELD FAQs

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

- New and updated website
- Searchable FAQs by key words

FMCSA training site

https://eld.fmcsa.dot.gov/Support/NewsAndEvents

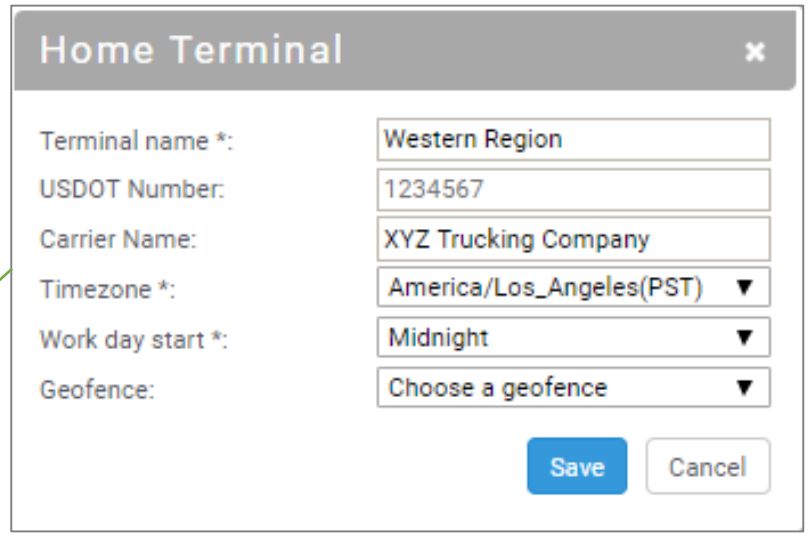
- ELD & eRODS Enforcement Training
- Carrier, Driver, Providers Interactive Training Courses

Tips for road ahead

Check your set up

Avoid Errors and issues with your ELD transfers by checking:

- USDOT number
- Vehicle Identification Number (VIN)
- Driver's license number and State
- Driver's home terminal time zone



Be proactive

Examples:

Mock DOT audit

- Test your internal processes
- Find areas for improvement
- Opportunity to correct and train on any weaknesses

Mock roadside inspection with drivers

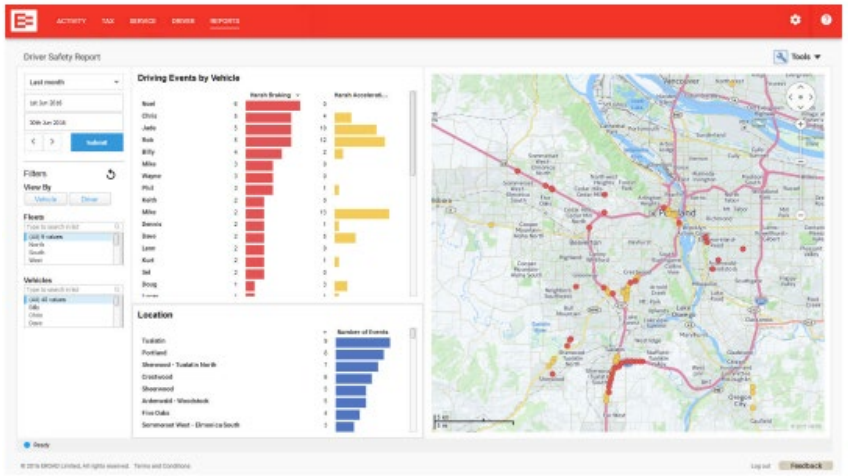
With ELDs:

- Able to explain data transfer process
- Carry user manual and instruction sheets
- Blank paper logs
- Confident about their RODS

Manage by exceptions

EROAD

- Set up notifications when an event is above a set threshold – e.g. speed, idling
- Look for trends – e.g. HOS violations
- Filter reports to isolate the 'high risk'



According to sambasafety

"One in Ten Drivers is a Serious Risk

Your drivers don't all present the same risk. Generally speaking, 50 percent of your drivers are considered "low-risk," meaning they have a clean record and valid licenses.

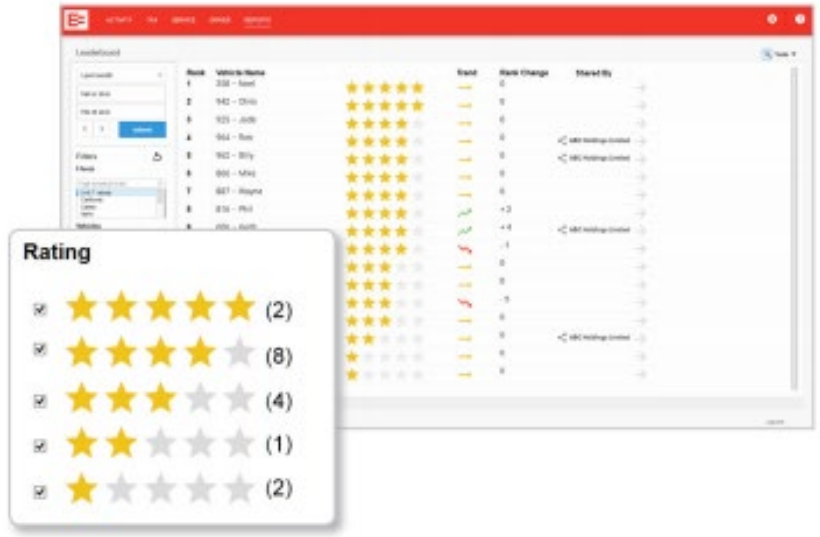
Another 40 percent of drivers are "at some risk" – they may not have squeaky clean records, but they're not a major concern either.

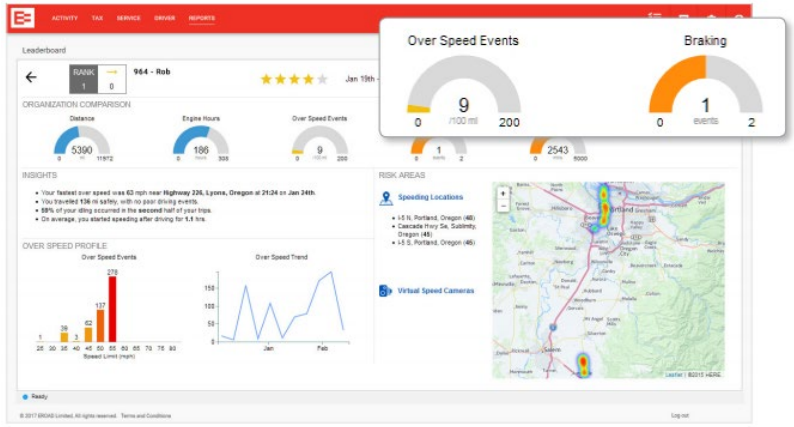
It is the final 10 percent of your drivers that are responsible for 40 percent of your accidents —four times the average risk. That translates to a loss of profit, increased downtime for equipment, and elevated hiring and training costs."

Leverage more from your ELD

EROAD

- Driver performance and benchmarking data
- Trip records for tax reporting
- Fuel efficiency
- Fleet management
- DVIR and vehicle maintenance
- and more…





Discussion Time

EROAD

What are your thoughts on what's changed or stayed the same after ELDs?

Any lessons learnt?

Soona Lee

Director, Regulatory Compliance

soona.lee@eroad.com

Thank you

EROAD Fleet Solutions
Easy. Reliable. Accurate.

EROAD solves your fleet management, safety, regulatory compliance, and fuel tax reporting needs with a single, powerful platform that delivers control, savings and efficiencies.

It's what an advanced fleet solution is meant to be: easy to use, reliable and accurate.

Contact us today to discuss your unique needs.

We're here to help.

QUESTIONS?

GEOTAB
management by measurement

ORANGE
COMMERCIAL
CREDIT
40
YEARS 1979–2019
OF GREAT SERVICE

TBS
FACTORING SERVICE

McKinney
TRAILER RENTALS

PERMIT BOOK

EROAD

Choice One Insurance, Inc
Real Protection. Honest Service. Delivered Promises.

THE CAR HAULING BUSINESS CHANNEL
AUTO
TRANSPORT
INTEL

GLOSTONE
Trucking Solutions

CF
CLEANFleet

DAT

Larry R. Davidson
Transportation Law Attorney