Will You Be Ready?
Tales of ELD Mandate Prep

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# ELD Rule

The ELD Rule applies to most motor carriers and drivers who are currently required to maintain records of duty status (RODS). The rule applies to commercial buses as well as trucks. Canada- and Mexico-domiciled drivers are included, unless they qualify for one of the exceptions to the ELD rule.

## Deadlines

- **December 18, 2017:** All motor carrier and drivers subject to the ELD rule must use either an ELD (electronic logging device) or an AOBRD (automatic onboard recording device).
- **December 16, 2019:** All carriers and drivers subject to the rule must use only ELDs.

## ELD Rule Exceptions

- Drivers who use paper logs no more than 8 days during any 30-day period.
- Driveaway-towaway drivers (transporting an empty vehicle for sale, lease, or repair).
- Drivers of vehicles manufactured before model year 2000.


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## FTCT & ELDs

- Small fleet: 35 solo OTR drivers currently
- All equipment is company owned
- Average age of our drivers = 60
- Implemented 4 ½ years ago (October 2011)

Why?

- Safety & Compliance
- Improved efficiency
- Get ahead of the curve

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## Paper vs. Electronic

**Paper**

- Less accurate / human error (both intentional and non)
- Easy to manipulate, safety ramifications
- Lost time and efficiency
- Logging in 15-minute increments

**Electronic**

- No miscalculations
- HOS compliance alerts
- Improved efficiency for drivers & dispatchers
- Logging to the second
- Reduce out-of-route miles
Survey:
What will you do when an electronic mandate comes?

AVOID: 68% | EMBRACE: 24%

Driver Retention
How do you avoid this? And achieve this?

Our Experience:
Multiple drivers threatened to quit. Once implemented, ONE driver left. He returned two weeks later.

Preparation Is Key

1. Do your homework when selecting an ELD
   - Ask every potential vendor for their customer list, AND then contact carriers similar in size
   - Manufacturers that have already registered their ELDs can be found at:
     https://3pdp.fmcsa.dot.gov/ELD/ELDList.aspx (still early, only 2 as of currently)

2. Training
   - Start with your staff – every employee should have a basic understanding.
   - Shop staff will be trained in installation and repair but train them on basic functions too. It helps when they have to work with tech support or log a driver out before a test drive.
   - Send the driver in as before you start training them.
   - Start training before installation even starts if possible.
   - Set up a training unit in your office for drivers, staff and mechanics to try out.
   - Set up a dummy account that can be used by anyone when they just want to test out the system without danger of changing logs.
   - Go sit in the truck with the driver once it is installed – sit in the jump seat and have them walk through their day (or test mode).
   - Give them an easy to read checklist for basic tasks such as logging a pre/post trip inspection or what to do during and after a roadside inspection.
Step-by-Step Instructions

Pre-Trip Inspection
- Duty Status: On Duty
- Inspection (Hat Guy)
- Type "Start" & Press Done
- Complete Inspection of Tractor & Trailer
- Create Form
- DVIR, Complete & Send

Post-Trip Inspection
- Duty Status: On Duty
- Inspection (Hat Guy)
- Type "Start/End" & Press Done
- Then you can manually change your duty status to off-duty or driving

Reports & Monitoring

- Monitoring
  - Use automatically generated reports and alerts
- Monthly review of violations
  - Make sure you have a progressive discipline plan in place, and follow it
- Monthly per diem reports
  - Help your drivers out during tax season
- In-depth random log audits
  - Match up fuel reports, scale tickets, tolls
  - Check if trailer and trip numbers are accurate
RTI Implements E-logs in 2010

- RTI entered into the CSA 2010 program in 2009 in a test state.
- RTI had been tying in the GPS data to paper logs for a year prior to entering the program.
- As a result of a focused on-site review, RTI discovered our communication device was capable of e Logging.
Reasons to Be E-log Compliant Early

- Hours of Service (HOS) compliance
  - It's not just about keeping a good record with the DOT; it's about keeping your drivers safe. Maintaining good HOS minimizes driver fatigue and reduces the accident count.
- Hard braking
  - Electronic logging of driver behavior alerts you to incidents of unsafe and wasteful driving.
- Speeding
  - Fleets have reduced speeding by 90% by using in-cab alerts and management reporting.

Reasons to Be E-log Compliant Early (cont.)

- Idle time
  - Are you measuring unproductive idling? How much fuel is being wasted with idling?
- Out of route miles
  - Do you know how efficiently your drivers are getting from A to B, and everywhere in between?
- Fuel
  - Fuel savings can be found not just in reducing speeding, unproductive idling or wasteful driving, but also in making sure that every cent spent on a fuel card is authorized.

Implementation of E-logs

- The system we were using was first generation of PeopleNet (green screen).
- We started by training our dispatch team on how the system e-logs (at the driver level).
Who Do We Train Next?

- Since we are primarily an LP/OO fleet, we started training our company drivers first.
  - Did not touch any dedicated fleets
  - Turned on about 10 to 15 drivers a month to the e-log system.

Training

- We had drivers on a two-week training schedule
  - The driver received classroom training and e-log set up for one day prior to going on e-logs.
  - Once in the truck, we went out to the truck with the driver, helped them log in, and ensured that the system was operational.

Sample Certificate

_of on-going e-log training_

Driver___________________________

Has completed 4 hours of classroom training on ___________________
e-logs.
The driver has been logged into his e-log system in his truck on ________________ and will be running paper logs in tandem with his e-log while he/she is learning the system. E-logs will be his official log during the transition until the system is proven.

Training period will be from ________________ to ________________.

Signature(safety director)
Driver Training Station

- The training station allows us one-on-one time with a driver to help them and their dispatcher in the operation of e-logs.
- It also allows for remedial training for dispatcher and drivers.
- A tutorial in the e-log device is included.

Dispatch and Driver Training

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- It also allows for remedial training for dispatcher and drivers.
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What’s the ELD Ruling?

- The FMCSA has outlined the requirements for the new Electronic Logging Device mandate. Devices used will need to:
  - Link to engine
  - Have a direct connection to the vehicle’s engine for trucks manufactured after 2000
  - Be a certified device
  - A self-certification from the ELD manufacturer that the device meets the FMCSA’s new, more stringent certification requirements.
  - Electronically send HOS
  - Transfer Hours of Service data to law enforcement officers using wireless services of various types (e.g., Bluetooth, wireless).
- Fleets using 395.15 compliant devices will have an additional two years after the enforcement date to make any required updates.
Picking a Device

- In picking a device, remember an ELD must:
  - Be integrally synchronized with the engine of the CMV.
  - Be powered and become fully functional within one minute of the vehicle's engine receiving power and must remain powered for as long as the vehicle's engine stays powered.

Motion Status

- An ELD must automatically determine whether a CMV is in motion or stopped by comparing the vehicle speed information with respect to a set speed threshold as follows:
  - Once the vehicle speed exceeds the set speed threshold, it must be considered in motion.
  - Once in motion, the vehicle must be considered in motion until its speed falls to 0 miles per hour and stays at 0 miles per hour for 3 consecutive seconds. Then, the vehicle will be considered stopped.

Date and Time

- The ELD must obtain and record the date and time information automatically without allowing any external input or interference from a motor carrier, driver, or any other person.
- The ELD time must be synchronized to Coordinated Universal Time (UTC) and the absolute deviation from UTC must not exceed 10 minutes at any point in time.
CMV Position

- An ELD must determine automatically the position of the CMV in standard latitude/longitude coordinates with the accuracy and availability requirements of this section.
- The ELD must obtain and record this information without allowing any external input or interference from a motor carrier, driver, or any other person.
- CMV position measurement must be accurate to \( \pm 0.5 \) mile of absolute position of the CMV when an ELD measures a valid latitude/longitude coordinate value.

CMV Position (cont.)

- Position information must be obtained in or converted to standard signed latitude and longitude values and must be expressed as decimal degrees to hundreds of a degree precision (i.e., a decimal point and two decimal places).
- Measurement accuracy combined with the reporting precision requirement implies that position reporting accuracy will be on the order of \( \pm 1 \) mile of absolute position of the CMV during the course of a CMV's commercial operation.
- During periods of a driver's indication of personal use of the CMV, the measurement reporting precision requirement is reduced to tenths of a degree

Personal Conveyance

- What is PC?
- Monitoring and setting limits on PC
Drivers Manual Entries

- An ELD must prompt the driver to input information into the ELD only when the CMV is stationary and driver’s duty status is not on-duty driving.
- If the driver's duty status is driving, an ELD must only allow the driver who is operating the CMV to change the driver’s duty status to another duty status.
- A stopped vehicle must maintain zero miles per hour speed to be considered stationary for purposes of information entry into an ELD.

MWH (Miles Without Hours)/Assigned Driving Miles

- Allows you to monitor a driver’s HOS and reassign them if a driver logs off the system.

Changing a Driver’s Logs

- 24/7 E-log line
- Who can change a driver’s logs?
  - Safety/dispatch?
- Log change request form
Thank you!

Gary Falldin

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Transport America, Inc.

Getting Ready for ELDs

- Make sure drivers are running legal before you go to ELDs
- Match GPS position movement to paper logs
- Automate audits
- Get buy-in
  - Driver counsel
  - Informal leaders
  - Drivers who already have experience w/ELDs
Getting Ready for ELDs (cont.)

- Ensure communication from the top
- Set up a team for implementation
  - Safety, Operations/Dispatch, IT, Maintenance
- Have consistent stance on HOS violations
- Focus on operationally-driven practices

Choosing the Right E-logs

- Ease of use for the driver
- Communication options
  - Text to voice
  - Driver text, but not while moving
  - Video options for training
  - Critical event reporting
  - Dispatching of drivers

Choosing the Right E-logs (cont.)

- Must not allow drivers to by-pass system
  - Engine cut off
- Navigation
- Real-time notification to fleet leaders of HOS violations
Technology

- Look for proven technology that makes a driver's job safer or easier
  - Collision mitigation
  - Automatic transmissions
  - Electronic roll stability
- Roll out idea to Driver Council/informal leaders
- Test with positive drivers, use driver testimonials

Technology (cont.)

- Use facts to support your initiative
- Get ahead of rumors with a lot of communication
- Understand the technology ops/safety/shop must be consistent

Q & A