

*Len Dunman's*

# 10-POINT CARRIER CHECKLIST

*for ELD Deployment*



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Inside, Len Dunman, Safety Director at Mercer, offers his insight on the value of ELogs and their role in maintaining a successful carrier operation. In addition to serving as the chief safety officer of Mercer Transportation, Len is responsible for all environmental compliance and initiatives. He supervises a safety department of some 30 salaried and hourly employees, and is the designated corporate representative for all accident or other injury litigation.

### 1. Educate and obtain buy-in from ownership and senior management

The successful transition from paper logs to electronic logging devices is impossible without the total and unwavering backing of ownership and senior management. The process demands a significant number of in-house process changes and is often unpopular with drivers and even some operations personnel and managers.

**THE OPPOSITION MUST CLEARLY UNDERSTAND THAT THE IMPLEMENTATION IS GOING FORWARD ... WITH OR WITHOUT THEM.**

The ownership must be fully educated on the benefits of moving forward with the change from both a compliance and accident litigation standpoint. For most carriers, avoiding the risk of potential paper log problems in accident litigation is far more important than the FMCSA Hours of Service compliance issues. In many cases, the carrier's insurance broker, underwriter and loss control representative are of great help in the ownership educational process.

### 2. Establish timetable for implementation

The ultimate date for fleet implementation is the FMCSA mandate of December 2017.

**IT IS PRUDENT FOR TRAINING, LITIGATION DEFENSE AND LOGISTICAL REASONS TO SET A FLEET DEADLINE WELL IN ADVANCE OF THE MANDATE CALENDAR.**

The learning curve at all levels of the carrier organization is challenging and culture-changing. For example, initially a fleet might consider an implementation schedule of 100 trucks per month. But in reality, only 50-60 units will probably be able to be completed, including drivers trained, within each 30-day period during the first 5-6 months of the process. A project manager must be dedicated to keeping the project on schedule with adequate empowerment to handle any contingency. No push back from drivers or carrier personnel can be tolerated during the implementation process. Ideally, the project manager will belong to the carrier's safety department and serve as the line supervisor of log audit personnel.

### 3. Educate and obtain buy-in from all managers and supervisors

All managers and supervisors must be educated about the ELD and implementation timetable. Managerial support from all areas of the organization is critical and must be demanded by the ownership and senior management. Drivers opposed to the change will attempt to go from manager to manager in hopes of finding a sympathetic ear for remaining on paper logs. It must be made clear to all managers that the Hours of Service regulations have not changed. If the driver had no problems with paper logs, there will be no problem with an ELD. If the driver was not logging legally on paper, he or she will absolutely have a problem with the ELD and it will be apparent in very short order. No sympathy or "understanding" can be extended to deliberately non-compliant drivers.

**IF A DRIVER THREATENS TO LEAVE OVER HAVING TO INSTALL AN ELD, EVERY MANAGER MUST BE EQUALLY WILLING TO SHOW HIM OR HER TO THE DOOR**

Managers unwilling to buy into the implementation should also be subject to dismissal.

#### 4. Educate recruiting, safety, operations, and field office personnel

Many carriers find it wise to implement an ELD changeover with new recruits first. Driver recruiters are key players in this process. The entire recruiting staff must be thoroughly trained in the ELD program and be well-versed on specific cost and installation details. An initial loss of potential new drivers should be expected due to the ELD implementation. The recruiting manager and his staff should not be penalized for a temporary reduction of qualified applicants. Most applicants are now facing the ELD requirement at nearly any medium to large motor carrier to which they apply. The entire recruiting message must be uniform. Buy-in from the recruiting manager is essential at this point in the process.

Likewise, the company safety director is responsible for ELD training and buy-in by all members of the safety department, not only the log auditors. All members must be fully versed in the transition process and the message must be uniform. As with any portion of a company's safety policy, no negative comments from a member of the safety department to a driver can ever be tolerated. Suggestions on improvement of the ELD transition process are always welcome and should be encouraged.

Much time should be spent with the carrier's operating department. The truck operations manager, all assistants, and line supervisors should be thoroughly educated.

**WITHOUT BUY-IN FROM TRUCK OPERATIONS MANAGEMENT, THE ELD IMPLEMENTATION WILL NOT SUCCEED.**

Many orientation sessions are necessary for dispatchers to understand the process. The sessions consist of large groups for the presentation of general information as well as small groups, perhaps eight to ten employees, to drill down to specific questions and areas of concern. Drivers will immediately blame the ELD for loss of income, drop in on-time delivery performance and for speeding violations. Dispatchers must be prepared for such driver comments and must uniformly stay on point in their response that better planning is required on the part of the driver. They must also be reminded that, by regulation, they cannot coerce or otherwise push a driver to violate Hours of Service rules or posted speed limits. The ELD transition does not change those requirements.

Carrier field operations and sales personnel are important stakeholders in the ELD transition process. They are the primary educational link to the carrier's customers and they also must be educated to share a positive and uniform message regarding the change. They must effectively communicate the need for customer support and coordination. The ELD-equipped unit cannot be delayed at either loading or unloading. Schedules, especially delivery appointments, may need to be re-evaluated. In many cases, shippers can aid the process by establishing delivery "windows" instead of rigid times. They can also help by allowing a driver to park at their facilities and obtain a 10-hour break prior to loading. Many shippers are understanding and helpful, if they are asked, and properly educated.

#### 5. Train all log auditors, modify job descriptions

**WHILE THE NEED TO RETRAIN THE LOG AUDIT STAFF IS OBVIOUS, THE EXTENT OF THE RETRAINING PROCESS OFTEN IS NOT.**

In many instances, the best log auditor historically possesses a somewhat introverted personality and is content working alone, scanning in log sheets for eight hours a day.

In the ELD environment, a log auditor has more one-on-one involvement with drivers, especially during the first few months of the transition. Drivers will have hundreds of questions and will need immediate answers. This contact will be via email, phone and in person. There are both hardware and software problems which will need immediate attention. Some drivers just need reassurance from their log auditor. These circumstances require an auditor with a more extroverted personality. Most log auditors successfully make this transition, however, some do not and will need to be laterally reassigned to other positions within the company. It is important to note that in most cases, log audit jobs are not eliminated by ELDs; they merely change. Log auditors should be reassured at the beginning of the process that their jobs are not being eliminated, but their job descriptions will be different.

In addition, ELDs will require 24/7 assistance from log personnel and also from the ELD vendor. There must be an on-call component, with appropriate compensation, included in the job description of at least a portion of the log audit staff. It is important to note that the entire log audit process changes: Drivers are no longer allowed to submit logs every 14 days. Since drivers must certify their logs daily, and that is not done until they are submitted, auditors are looking at a driver log from the previous day instead of reviewing events that are a week old. The advantages to that for a carrier are obvious.

## **6. Announce implementation schedule to drivers**

When all internal processes are in place, contracts are signed and staff is trained, it is time to announce the ELD transition to the drivers. Drivers should not have this type of culture change sprung upon them at the last minute. Ideally, at least a 90-day notice is appropriate. Thought should be given to designating certain personnel to field the innumerable questions that will be immediately forthcoming. That may be a full-time job for one or two persons for the first thirty days after the announcement. Answers concerning the implementation schedule, the type of ELD to be utilized, and the cost should be clear.

**IT IS IMPORTANT TO BE AS TRANSPARENT WITH THE DRIVERS AS POSSIBLE DURING THIS TIME.**

## **7. Hold daily information training classes for drivers**

Simultaneously with the announcement, daily training classes should be offered by the log audit staff. It is helpful for vendor personnel to also participate. These should be at the same time each day, perhaps one in the morning and one in the afternoon so that drivers can attend either on a voluntary basis. In this way, drivers can get hands-on experience on the ELD hardware and get questions readily answered. The value of these sessions cannot be overstated.

## **8. Educate customers**

Along with carrier office personnel and drivers, it is vital to educate customers. This can be undertaken by field operations and sales staff as mentioned previously. However, members of the safety department, especially the safety director, can be expected to be called upon to meet with large customers. This may occur in small, private sessions or as an invited presenter at a customer's regional or national meeting. The safety director should expect to work closely with the sales staff, and depending upon the size of the motor carrier and the significance of the customer to that carrier, the safety director can expect to travel to a customer location at least once a month, sometimes more.

**... ELDs ARE NOT ONLY CULTURE-CHANGING FOR DRIVERS AND MOTOR CARRIERS, BUT THEY ARE CULTURE-CHANGING FOR CUSTOMERS AS WELL.**

A customer who understands how ELDs work is more likely to understand the carrier's scheduling requirements. A partnership must be forged and continually reinforced. It is helpful to schedule annual safety briefing sessions with key customers at their locations.

As the FMCSA deadline looms closer, carriers are seeing a trend by larger shippers which requires carriers to list what percentage of their units are equipped with ELDs. If the number is under 100%, a carrier will have to outline its plan for full deployment by the mandate deadline. Shippers are concerned that any fleet that is not 100% ELD deployed, or at least well on the way with a definite timetable, will potentially have service problems in December 2017 and beyond.

**9. Implement new recruits, followed by existing drivers**

With all planning, training, and hardware in place, it is time to implement the ELD transition. Many carriers have found success starting slowly, with controlled numbers. A good way to do this is by starting with new recruits as they go through their new driver orientation. The recruiters will have already sold this to the recruits. Fleets who use independent contractors may find that they incur most, or all, of the ELD costs on the new drivers and could include these costs as part of the recruiting budget. This alternative allows the carrier to test its inventory control, installation procedure, operation and log audit process in a controlled fashion.

**SOME CARRIERS BELIEVE THAT THEY WILL LOSE RECRUITS BY FORCING THEM TO DEPLOY ELDs. IN PRACTICE, MOST HAVE NOT EXPERIENCED THAT ...**

The majority of recruits now have some sort of prior ELD experience from other motor carriers. Many no longer know how to complete paper logs.

Once the carrier is confident with the new driver ELD deployment, it is time to equip the rest of the fleet with ELDs. A first date should be announced well in advance and that line should be drawn deeply in the sand. It should be clear to all drivers from the ownership, senior management, and all other managers, that refusal to comply will result in termination.

Some carriers have found it prudent to offer a voluntary installation window for existing drivers. This should run between the implementation of deployment on the new recruit equipment up until the mandatory installation date for current drivers. Volunteers may be offered financial incentives, if relevant, on the ELD and its installation cost, credit on their company safety score, or both. It is important to note that with these volunteers, as with new recruits and subsequent mandatory installations, a time frame for training must be established. Two weeks seems to be reasonable. Drivers in training should not be allowed to submit paper logs after that time. There will be voluntary drivers who will try to deploy the ELD for the incentives and attempt to "fly under the radar" while continuing to log on paper. The carrier must have an appropriate audit mechanism in place to identify such abuses.

## 10 Continually tweak program based upon experience

Once everything is in place and operational, the “project” portion of implementation ends and the day-to-day “fun” really begins. As with any segment of a motor carrier’s operation, the ELD piece must be constantly evaluated. There will be driver issues, connectivity issues, hardware problems, program updates and continual log auditor and driver training. Safety and operational policies may need revision to reflect driver behavior with the ELD. Log auditor workloads and on-call requirements can be adjusted as experience warrants. Carrier and vendor relationships are especially important moving forward as unforeseen problems, or opportunities, will present themselves. The carrier will operate differently in the ELD environment and the ramifications of such a significant culture change will resonate through all segments of the operation.

**AS THESE THINGS HAPPEN, LESSONS WILL BE LEARNED  
AND THE CARRIER WILL BE BETTER, AND SAFER, FOR IT.**

Becoming an ELD motor carrier is not an end objective but rather part of the journey. When it is viewed in that light, the transition appears far less daunting.

These steps can be scaled for any fleet size, from 5 to 5,000. The size of the fleet doesn’t matter, but unwavering dedication to bringing your organization through the transition is non-negotiable. You can count on “issues” during and after the rollout, but good communication between all parties — driver, dispatcher, safety, recruiter, auditor, and ELD vendor — is the key to ongoing success.

Always willing to help, Len is a member of several boards of directors both relating to his job and the surrounding community. He attends a number of state and national trucking organization and law enforcement safety meetings every year, and was recently named the Kentucky Trucking Association’s 2016 Safety Director of the Year. In 2014, he was appointed to the Kentucky Motor Carrier Advisory Committee by Governor Steve Beshear. He is a board member and former officer of the Kentucky Clean Fuels Coalition and a third-generation Professional Member of the American Society of Safety Engineers.

A Louisville native, Len is a graduate of Murray State University. He got his start in trucking while in college, working for the old Taylor Motor Company, an international truck dealership in Murray, KY. Len enjoys working on old cars, traveling on his motorcycle, and spending time with his family.

