### **Electronic Logging Devices**

October 19th, 2017 10 AM CST



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### Webcast Logistics

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- HANDOUTS: Download today's handout in the "Webcast Handouts" box found on the bottom of your screen.

Thank you for participating in today's webinar!









### J. J. Keller & NPTC Webcast Electronic Logging Devices

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# Electronic Logging Devices This webcast will cover ... • A regulatory overview • How industry best practices are raising the bar on compliance • A case study in implementation • Question & Answer Attention Attendees: + Thank you for attending! + You will be muted during the event. + Please use the Q&A feature to send in questions to us. We'll try to answer them during the Q&A period if they are not covered in the presentation. + The slides and recording will be posted within 7 days at: www.jjkeller.com/nptcinfo





### **Electronic Logging Devices**

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### **Basic Premises**

- Drivers that must log must be using an electronic logging device (ELD) or an automatic onboard recording device (AÓBRD) by December 18, 2017, unless an exemption applies
- Requirement is driver-specific
  - If driver is required to log, and none of the ELD-specific exemptions apply, driver must be using an ELD
  - If the driver must be using an ELD, the vehicle must be equipped with one







### **Common Questions**

- Does this apply to me?
  - Basic question: Is your driver <u>required to log?</u>
    - Yes: Covered, unless an ELD-specific exemption applies
    - · No: Not covered
- Are there exceptions?
  - Yes. HOS exemption or ELD exemption may apply



Tom Bray





### Decision Matrix

- Is the driver operating a commercial vehicle and covered by the safety regulations?
   If yes, continue. If no, not required to use an ELD
- Is the driver covered by the hours-of-service regulations? . If yes, continue. If no, not required to use an ELD
- Is the driver covered by the "record of duty status" (logging) requirements?
  - If yes, continue. If no, not required to use an ELD
- Is one of the ELD-specific exemptions applicable to the
  - If yes, not required to use an ELD. If no, must use an ELD





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### **Decision Matrix**

- ELD-specific exceptions:
  - Drivers that are using an AOBRD that was installed before 12/18/17
  - Drivers that only occasionally have to complete a log
  - Drivers driving a vehicle that is part of a driveaway/towaway shipment
  - Drivers driving or towing an RV that is part of a driveaway/towaway shipment
  - Drivers driving a vehicle older than model year 2000 (based on VIN or engine serial number in case of engine change)







### **Bottom Line**

• If your driver is operating a commercial vehicle and subject to the safety regulations, covered by the HOS regulations, required to log, and none of the ELDspecific exemptions apply, the driver must be using an ELD or AOBRD by 12/18/17!



Tom Bray





### Not Alphabet Soup

- Two different devices will be in use from 12/18/17 to 12/16/19
  - AOBRD:
    - Most present devices are AOBRDs

    - Regulated under §395.15
      Can be installed up until 12/18/17
    - If installed before 12/18/17 can be used until 12/16/19
  - - Replacing AOBRDs
    - Regulated under Subpart B to Part 395
      A lot more technical requirements

    - · Most apply to the manufacturer







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### **AOBRD**

- Fairly simple technical standards written in the mid-1980's (see §395.15)
- Must be "integrally synchronized" with the vehicle to automatically determine when the driver is driving
- · Automatic location not required
  - Driver can manually enter location
- · Scheduled "pings" not required
- Display must show text list of duty changes and hours
- Driver or back office can make independent edits



Tom Bray
Industry Consultant – Transportation
J. J. Keller & Associates, Inc.





### **AOBRD**

- Manufacturer provides letter stating compliance with §395.15
- Most are updateable to the ELD technical requirements
- Roadside inspections
  - Officer is just shown the display during roadside inspection
  - No printing or data exchange required at roadside
  - If officer wants a copy of the records, driver/carrier have 48 hours to provide



Tom Bray Industry Consultant – Transportation J. J. Keller & Associates, Inc.





### **ELD**

- Must connect to vehicle ECM to get vehicle data
- Over 100 pages of technical requirements
  - Examples of the requirements:
    - Automatic data captures required at start up, shut down, log in, log out, at each duty change, and once per hour during operation and must include date, time, location (accurate to 1 mile), vehicle miles, engine hours, driver, and vehicle and company information
    - Starting and stopping driving are the only two "automatic" duty changes and changes are based on "hard" numbers; all other duty changes must be made by the driver
- · New editing processes required
  - Driver must accept changes made by others



Tom Bray
Industry Consultant – Transportation





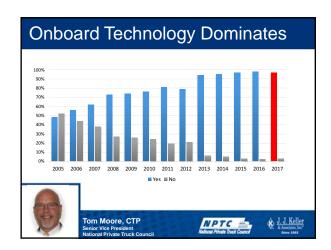
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### Display or printout must include header, grid-graph, and detailed list of all data captures All unassigned driving time in system must be assigned or explained if it cannot be assigned Two "special driving categories" to reduce unassigned miles/driving Devices placed into initial service must be on ELD registry as of 12/18/17 Roadside inspections: Driver must be able to print or show display outside of vehicle AND send records directly to officers Telematic (email or web service) Local transfer (Bluetooth or USB)

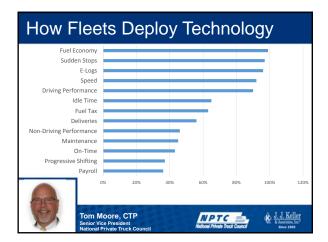
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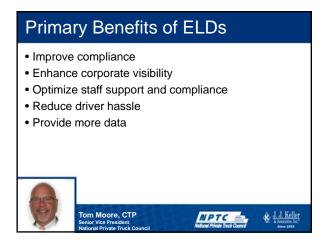




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### **Electronic Logging Devices**

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### Anticipate a flood of new products Train all staff Look for integration opportunities Develop data management aptitude Establish clear expectations

NPTC





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### My Background • 10 year CDL holder

- Over 7 years in industry
  - 5 in school bus/motorcoach
  - 3 different companies, WI/TN/WA
  - Dispatcher to General Manager to Safety & Risk Manger to Driver Operations Director to Operations Manger
- Hired at Wilbur-Ellis Company in June 2016
  - DOT Compliance



Megan Rollo
DOT Compliance Coordinator





### Wilbur-Ellis Company LLC

- Nearly 100 years old
- Top 50 largest privately held in the US
- 3 Divisions CBC, Feed, Agribusiness
- Agribusiness: Mainly Mississippi west, but also in MI, WI, OH
- Connell Brothers: Mainly in Asia Paint, Pharma, Plastics, etc.
- · Feed: littered throughout US/Canada



Megan Rollo DOT Compliance Coordinate Wilbur-Ellis Company





### Wilbur-Ellis Company LLC

- Approx. 1200 commercial vehicles
- Approx. 2000 commercial trailers
- Drivers flex seasonally 750-1000
- 12M miles annually
- Approximately 170 branches in US
  - One DOT contact person at each location
- Hazmat Carrier
- Entrepreneurial culture at the branch level



Megan Rollo DOT Compliance Coordinator



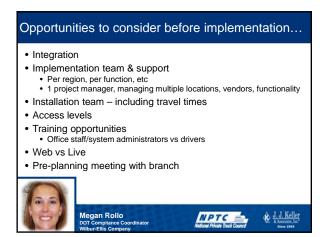


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# • Multiple projects at the same time • ELD • IFTA • Standard Fuel Card Solution • Driver Safety • Asset Tracking • Vehicle Maintenance • Dispatch Megan Rollo Dolt Compilance Coordinator Dolt Compilance Coordinator





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### Opportunities During Implementation

- Timing of implementation (in-season vs off-season)
- · Length of implementation
- Other non-related topics
- Truck paperwork audits
- Domino effect of issues
- Who is the go-to for support?
  - In-house vs 3rd-party installer



Megan Rollo
DOT Compliance Coordinator
Wilbur-Ellis Company





### Opportunities for Post-Implementation

- · Individual branch follow up
- · Training, training, training
- System Administrator
- Understanding the difference between AOBRD & ELD
- Understanding the timing of vendor self-certification
- Implement & begin to tighten driver safety data 
   Safety incentives
- Efficiencies with understanding where branches travel
- · Leased vehicles
- Controls
- Culture Change



Megan Rollo DOT Compliance Coordinate Wilbur-Ellis Company







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