This webcast will cover ...

- New HOS Regulations
- How fleets are coping
- Preparing for the ELD mandate
- Question & Answer

Moderator
Dr. Gary Petty, President & CEO, NPTC

Panelists
Tom Moore, CTP, Senior Vice President, NPTC
Mark Nave, Transportation Safety & Compliance Manager, Blac Frac Tanks

Attention Attendees:
+ Thank you for attending!
+ The presentation will start in a few minutes at 1:00 PM Central.
+ You will be muted during the event.
+ Please use the Question feature to text questions to "Q & A". 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: http://www.jjkeller.com/nptcinfo
Introduction

- Regulations – Tom Bray
- Policy and Procedure Best Practices – Tom Moore
- Blac Frac Tanks – Mark Nave
- Housekeeping issues:
  - You will be muted during the event.
  - Please use the Question feature to test questions to the Q&A Panelist. We’ll try to answer them during the Q&A period if they are not covered in the presentation.
  - If you lose sound at any point, you can dial-in by phone using the number and Pass Code listed below.
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Hours of Service/Electronic Data Devices

Thomas Bray
Editor, Transportation Management
J. J. Keller & Associates, Inc.

Applicability

- The hour-of-service regulation apply to a driver driving a commercial vehicle that...
  - Weighs or is rated for 10,001 pounds or more (single or combination)
  - Is used to transport a placardable amount of a hazardous material (regardless if weight)
  - Is designed to or seats either 8 or 15 (depending on compensation)
General principles

• The hours-of-service regulations have three key areas:
  • Limits
  • Logs (paper or electronic)
  • Exceptions

Limits

“Daily” limits
• *No driving if it has been 8 hours since the driver’s last break of 30 minutes or more
• No driving after 14 consecutive hours of duty
• No driving once 11 hours of driving is reached
• 10 hour break “resets” the 11 and 14

• No driving once driver accumulates 60 hours in last 7 days (70 hours in 8 days, if carrier operates vehicles 7 days a week)
  • A break of 34 or more hours meeting requirements can “reset” the drivers 7/8 day total
    ➢ *The period must include two 1 a.m. to 5 a.m. periods
    ➢ *Driver cannot start next restart until 168 hours have passed since the start of the last restart period

* Denotes new rule as of 7/1/2013
Logs
- Must contain 11 items as well as the “grid graph”
- Carriers can add additional components
- Must be kept current to the driver’s “last duty change” when on duty
- Driver must have today plus previous 7 days when on duty
- Carrier must retain for six months along with all supporting documents

ELDs
- Electronic logs that get information from the vehicle to automatically record driving time
- Takes the place of the paper log
- Regulated under §395.2 and §395.15 (the “AOBRD” rules)
- New rules coming in the near future

Exceptions
- Most exceptions only apply to specific regulations
  - Example: “Short-haul” drivers do not have to complete a log (“simple time record” replaces log) or take 30 minute break
  - Driver must meet all conditions attached to exception to use it
  - Example: Short-haul drivers must stay within distance and time limits established in the exception
  - Carrier has option of not allowing driver to use exception
Common HOS Exceptions

- Adverse driving conditions
  - 11 hours driving (up to 2 extra)
- Emergencies/disaster
  - All limits
- Driver-salesperson
  - 60/70
- Oilfield operations
  - 34 hour restart (24 instead)
  - Logging on duty during waiting
- Short-haul operations
- 100 air-mile radius
  - Logs/30 minute break
- 150 air-mile radius
  - Logs/30 minute break/14 hour
- 16-hour exception
  - 14 hour (up to 2 extra)
- Split sleeper berth
  - 16 hour break
- Travel time
  - Logging on duty during travel

HOS – Top Violations

On road:
- Log violation (form and manner)
- Log not current
- Operating after 14 consecutive
During audits:
- False log
- No logs for driver when required
- Logs/supporting documents not retained

Tom Moore, CTP
Senior Vice President
National Private Truck Council
National Private Truck Council (NPTC) & J. J. Keller & Associates, Inc.® presents:

*Hours of Service/Electronic Data Devices*

March 5th, 2014

**Estimated Negative Impact on Productivity**

- 20%: More than 10%
- 25%: 5%-10%
- 25%: Less than 5%
- 25%: No negative impact

**Fleets Affected by the 34-Hour Weekly Reset**

- 90%: Yes
- 10%: No

**Fleets Paying for Mandatory Rest Breaks**

- 60%: Yes
- 40%: No
• House bill (H.R. 3413) would require GAO to analyze FMCSA Regulatory Impact Analysis on 34-hour restart, including once a week requirement and two periods of 1:00 a.m. to 5:00 a.m.
• One-year for GAO study; FMCSA could not enforce 34-hour changes until 6 months after GAO analysis completed
• Senate bill (S. 1891) introduced by Sens. Ayotte (NH), Johanns (NE)

Electronic Logging Proposal

• FMCSA to publish supplemental proposed rule to mandate adoption of ELDs by all carriers in interstate commerce (except short-haul drivers); phase-in within 2 years after effective date of final rule
• Supplemental NPRM now scheduled for publication in Federal Register any day now; final rule in 2014/5
• Sent to OMB on August 7, 2013; clearance this week?
• Will consider anti-harassment requirement, technical specifications, supporting documents

NPTC Policy on ELDs

• Supports mandate for EOBRs for all interstate carriers, with 3 caveats:
  • Technology must be cost effective and accurate
  • Must protect data ownership and access for carriers and drivers
  • Must eliminate all supporting document requirements
Growth in Onboard Technology

Onboard Technology Deployed

Mark Nave
Transportation Safety & Compliance Manager
Blac Frac Tanks
• Established 1994 as a service company for the Oil & Gas field
• 36 trucks, variety of trailers
• Haul a variety of tanks which include oversized loads
• Move oilfield equipment for Oil and Gas Companies

Hours of Service
Change Management

Communicating with drivers
• FMCSA gave plenty of time to notify drivers
  • 18 Months
  • 12/11 to 7/13
• Newsletters
• Safety Meeting
• One on One Meetings with drivers
• Hands on training with drivers
Newsletters

Are you ready for July 1st!!!

This coming Monday, July 1, 2013 drivers will now have a mandatory 30 minute break each day that they are driving. If you are driving all day you will need to go off duty for 30 minutes within your first 8 hours of drive time. It may be best to take your break in the second half of your 8 hours. The law states you need to have a 30 minute break every 8 hours and if you were to take your break too early in the day you may have to take 2 breaks. It is very important to manage your time and your break to stay as efficient as we can. If you have any questions regarding this new rule, please contact Mark Nave.

July 1st 2013

- Weekend prior software was updated
- Morning training meeting on July 1st with drivers
- Oil and Gas Exemption, no 34 hour resets required for our drivers. (If so we would have kept our drivers updated on the 34 hour ruling)

Violations!!!

- Many 30 minute rest violations for first two months after July 1st 2013
- Constant communications with drivers having difficulties
- One maybe two violations a month now
Hours of Service

- Paper logs
- Manually checked
- Multiple Drivers

Log Scanner

- Errors
- Perfect logs

Perfect Logs

- Straight lines
- Violations
Electronic Logs

- Took two years to implement electronic logs
- Drivers not computer literate
- Electronic Logging Devices needed updates
- Android

Electronic Logs

- No scanning
- Run reports on each driver
- Electronically fix log errors, NOT violations
- Logs are done electronically not manually by drivers

Example Compliance Report
Older Units
- Units older than 1996 the E.L.D. will not work in
- Take picture of paper log
- Compliance team updates log(s)

Roadside Inspections
- Easily accomplished with electronic logging devices
- Roadside inspector able to see last seven days logs
- Will show violations
- Drivers should be aware of their logs and what violations they may have, just like a paper log

Example Roadside Report

Mark Nave
Blac/Frac Tanks
Roadmap Towards Successful Implementation

- Build a relationship
- Educate team members
- Sell the benefits
- Make it their idea
- Target key employees
- Support integration internally
- Be patient

Clear Communications

- Know what you want and say so
- Ask questions and LISTEN
- Clarify assumptions
- Provide the right tools

Question & Answer Session

Please continue to submit your questions.
Closing Remarks

• Checkout the archive of past topics at: http://www.jjkeller.com/nptcinfo
  • PowerPoint slides and recording up in 1 week

• Remaining topics for 2014:
  • May 14th, 2014 – Managing CSA Scores
  • July 23rd, 2014 – How to Survive a DOT Audit
  • October 22nd, 2014 – Regulatory Update

Thank you for participating in today’s webcast!

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