

Understanding Electronic Logging Devices A Report by The DOT Doctor

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Table of Contents

Enforcement Date.....	4
Getting A Head Start	4
The Evolution of the ELD.....	4
What's in a Name?.....	4
AOBRD.....	4
EOBR.....	5
FMCSA Compliance	5
What You Need to Know.....	6
What is an ELD?	6
I Have an App. Why do I Need an ELD?.....	6
System Options	6
Proclaimed Benefits of an ELD.....	7
Who Must Have an ELD and Who is Exempt	8
What is Required in Addition to an ELD?.....	8
Onboard the Vehicle	8
Handling System Failure.....	8
Simplified Auditing or Not?!?.....	9
Harassment of Drivers	9
Supporting Documents	9
Being Audit Ready.....	10
Electronic Data as Support Documents	11
Auditing an Electronic Log	11
The Audit Trail.....	11
Auditing the Edits.....	12
Can ELDs be Wrong?	12
Highway Safety.....	13
HOS Rules: DOT v. Trucking Industry	13
Now What: Why Become a Dinosaur to the Inevitable?	13
Options.....	14
Proactive Dispatch and Increased Productivity	14

Driver are an Asset and Their Hours are a Commodity	14
Trucking in the 21 st Century: A New Age Dawns in Trucking	14
What's Coming at Us Down the Road?	15
DOT Physical Questionnaire Changes	15
Drug and Alcohol Clearinghouse.....	15
Claritin Clear.....	16
Safety v. Compliance.....	16
ELD Implementation	16
Choosing a System for Your Operation.....	16
Implementation	17
Installation and Set-up.....	17
Training	17
Monitoring and Tech Support.....	17
Auditing and Fixing Mistakes	17
Planning and Management.....	17
This is All So Confusing. Where Can I Find Help?	18
Resources	19
Publications by Dr. Sitler	20
BOOKS by Dr. Sitler	20
Pu: Energy Source or Death Source	20
Industry Publications	20
Various Presentation.....	21
Additional Document Locations.....	21

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Electronic Logging Devices (ELDs)

Enforcement Date

Electronic Logging Devices, referred to as ELDs, are a subject of high controversy with drivers and carriers. It is a love or hate relationship. Regardless of your feelings, ELDs are the new law of the highway. On December 11, 2015, this rule became a part of the Federal Register. It will be enforceable by December 18, 2017.

Getting A Head Start

Many companies jumped ahead of the curve and proactively installed devices that created electronic logs. The government commended some of these advanced thinkers. A few fleets were used as pilot or test fleets for the new technology. Smaller carriers took the plunge in an attempt to avoid fines and show that they were going *Beyond Compliance*, a new category that the FMCSA is considering adding to the scoreboard. While these efforts are commendable, we learned on Friday, December 11, 2015; the day the rule was posted to the Federal Register, that these steps may not be enough.

The Evolution of the ELD

FMCSA wrote the first rules addressing automatic recording devices in 2010. We have witnessed the evolution of this rule over the next 5-years. The original rule was rescinded and the birth of today's ELD began. Automatic recording devices originally referred to as an AOBDR (Automatic On Board Recording Device) began appearing in 2011. Finding that term offensive to many in the industry, we moved forward to the EOBR (Electronic On Board Recording). Drivers still felt trapped and stalked, hence the birth of the ELD (Electronic Logging Device).

What's in a Name?

What's the difference between AOBDR, EOBR and ELD? Currently, the www.fmcsa.dot.gov website lists 25 references to AOBDR, 153 references to ELD, 74 references to EOBR and 254 references to "Electronic On Board Recording". While the industry uses these names interchangeably; each device type is very different. FMCSA is making that clear in the published version of the rule.

AOBDR

An AOBDR is an electric, electronic, electromechanical or mechanical device capable of recording a driver's duty status information automatically as required by 49 CFR §395.15. AOBDRs were the only regulated devices for automatically capturing a driver's hours of service. The device was required to be integrally synchronized with specific operations of the commercial motor vehicle in which it was

installed. At a minimum, the device has to record engine use, road speed, miles driven, the date and time of day. Most AOBRDs recorded or captured much more data on the vehicle and the driver.

Logs created on laptops, tablets or smartphones are not AOBRDs unless they are directly or indirectly connected to the engine to **automatically** collect the required movement and speed data. Such non-integrated devices are currently allowed for logging but the driver must be able to produce a compliant paper log on demand. These will not be acceptable after the 2017 deadline.

The FMCSA regulation for Hours-of-Service compliance as stated in FMCSA 395.15, uses the language “Automatic On-Board Recording Device for Hours of Service Compliance”. The FMCSA published a proposal in March 2014 to require ELDs for all drivers currently required to log. Many considered it technically accurate that an “AOBRD” was the term for the legally compliant technology. With the posting of the ELD Mandate, carriers with AOBRDs will have 4-years to come into compliance with proper ELD installation. Hence, AOBRD technology is clearly not fully compliant.

EOBR

EOBR was the term used in the FMCSA rule 395.16 that was vacated. The legislation MAP21 that was passed in 2012 requires that FMCSA issue a new rule mandating HOS recording devices that come to will be termed, ELDs. The reasoning given by the FMCSA is that an EOBR, which records varying amounts of data on the driver’s habits and the equipment plus tracks a driver (GPS) is too invasive. An ELD is designed to automatically record the movements of the vehicle along with time, date and location only; hence less invasive. While a carrier is free to use an EOBR for fleet monitoring purposes, it is not mandated. Many of today’s EOBRs have electronic logging capabilities. With some minor software updates, most hope to have a compliant system.

FMCSA Compliance

While the FMCSA’s use of different terminology may create confusion, the bottom line is that it’s not the name of the Electronic Logging Device that matters – it’s whether or not it’s in compliance with FMCSA regulations. Legislation continues to evolve and it’s up to the Owner Operator or Company Owner/CEO to ensure that the systems they use are in compliance with the most current regulations. That’s why it’s important to make certain the system you choose is able to accept updates, in order to stay in compliance when new regulations are introduced.

Rustin Keller, VP & COO of J.J. Keller, released a press release on December 10, 2015 stating that, “We believe we can adjust to the rule with software updates alone and our current ELD will not need any hardware changes. This will allow our customers to use the equipment they have, with no costly swap outs.”

Keller has been working with the DOT since the first thoughts of such a device. They were confident that their device was fully compliant and it was as of the way the rule was written in 2014. I know this because I worked with Keller during this time. Having been associated with other telemetric providers such as PeopleNet and Omnitrac, during the development stage of the last 5-years; they too, were confident of their compliance.

NOTE: No electronic device on the market as of the publication of this report are compliant. Until the FMCSA creates the parameters of compliance and a system is certified; it is **not** a compliant ELD. TDD will be following this closely and keeping our subscribers and clients up to date as changes and manufactures are announced. Estimated date: mid-February 2016.

What You Need to Know

Will my job and life be harder or easier with ELDs? Many drivers and carriers have come to enjoy having ELDs. While there was a fight at the inception; after implementation and a few months of usage, drivers have reported they enjoy the freedom from paperwork. Carriers report fuel cost savings and greater productivity. *It is a learning curve but once you are around the bend; it is pretty smooth sailing!*

What is an ELD?

An ELD is a device that is connected to the ECM on your vehicle. It automatically activates when the vehicle's engine is turned on. The devices must sync with its corresponding vehicle's engine to record engine on and off time. Mileage, date, time and location are automatically recorded along with engine hours and the ID information of the driver using the device. Even if the driver fails to log into the device, this information is still being gained. The output from this device is what is referred to as an e-log or electronic log.

I Have an App. Why do I Need an ELD?

The connection part is key. Standalone phone or tablet apps are not compliant with this new rule.

The ELD is required to be able to transfer data during roadside inspections "on-demand," via either a wireless Web-based services, email, USB 2.0 or Bluetooth. A graph representation of the driver's daily duty status changes must be visible on the unit's display and/or in the printouts.

Most ELDs work with a connected interface device such as a cell phone, tablet or keyboard. These can be connected via Bluetooth or hard-wired. The driver will sign-in and out via this device as well as add any comments, PTI information and duty status changes. ELDs will automatically move a driver between driving and on-duty statuses based upon the parameters set by that system and/or the carrier.

ELDs are not presently required to track a vehicle or a driver in real-time. They also will not be required to include driver-carrier communication capabilities.

Most ELDs can capture pre and post trip information thereby providing an electronic DVIR (e-DVIR).

System Options

The simplicity or complexity of the system is up to the carrier. You can opt for a full "bells and whistles" system like QUALCOMM's Omnitrac that provides a wide variety of data feedback on the vehicle's and driver's performance plus a weight station bypass system with their new partnership with Drivewyze or a simpler system like PeopleNet that offers an option that performs the bare minimum of functions

required. Many manufacturers offer levels of service that allow you to customize your experience and track just what is of interest to you.

Here are some service provider options:

- [Omnitracs](#)
- [Pedigree Technologies](#)
- [XRS](#)
- [PeopleNet](#)
- [Rand McNally](#)
- [Continental Corp.](#)
- [J.J.Keller & Associates](#)

List of the leading so termed “ELDs” currently on the market:

Leading ELDs on the Market <http://www.overdriveonline.com/2015eldchart>

NOTE: FMCSA is hoping to release a list of compliant manufactures and models by mid-February 2016.

Proclaimed Benefits of an ELD

There are numerous benefits to using electronic logs according to various manufacturers, carriers and drivers who have been using these devices.

- First and foremost, electronic logs can greatly simplify compliance by eliminating the need for paper logs. Drivers and carriers see significant time savings from going paperless.
- Some of the most common logging violations can be eliminated. Virtually all “form and manner” log violations go away, drivers always know where they stand on compliance and drivers always have a current log. Alerts will tell driver when they are approaching an hours-of-service limit.
- Besides making compliance easier, electronic logs make auditing easier and faster. The systems typically come with automated auditing built in. (More on this later in this report.)
- Roadside inspections can be easier and quicker. Most ELDs have a lock-down mode for inspections that allow the officer to only view what is legally required. This also can save on fines from a promiscuous officer would have “dug” back through a paper log book.
- Scheduling and dispatch become easier because office personnel know the location of the vehicles and how much time drivers have available.
- Location, engine use, speed and other data captured by the devices (if so equipped) can prove valuable during litigation or other legal proceedings, potentially protecting both the driver and company. It helps reduce fuel costs and provides for proactive re-training and counseling based upon the information provided by the system.

Who Must Have an ELD and Who is Exempt

Anyone who is currently required to create a record of duty status will need an ELD.

Exemptions:

- Drivers who log less than 8 days out of every 30
- Drivers with vehicles older than a 2000 model (no compatible ECM port)
 - We will also see this issue in some fleets that run smaller than medium duty trucks in a CMV capacity
- Drivers in drive-away and tow-away operations

This is an interstate regulation. TDD is looking into how this will affect intrastate carriers. Watch for a follow-up article. We have contacted TXDPS on this issue and are awaiting a response.

What is Required in Addition to an ELD?

ELDs are great devices but they need support.

Onboard the Vehicle

A driver using an electronic recording device must also carry:

- An instruction sheet describing how data can be stored and retrieved from the device.
- A supply of blank logs (records of duty status) sufficient to record the driver's duty status and other related information for the duration of the current trip.

You must be prepared to create a paper log in case of system failure. Failure may be due to software or hardware issues. Synchronization failure between recording and interface device is also possible. Software updates and patches can also cause system "upsets" or failure. The driver must be prepared to avert these failures. Carriers can assist by having someone available to fax or email over past day logs if total system shut down occurs during a Roadside Inspection.

Handling System Failure

If an electronic recording device fails, the driver must:

- Note the failure of the device.
- Reconstruct his/her logs for the current day and the previous 7 days, less any days for which the driver has records.

- Continue to prepare a handwritten log until the device is working again.

Driver needs to notify dispatch or a designated company official immediately of the failure.

Simplified Auditing or Not?!?

When ELDs were first discussed about 5-years ago, the idea was that log auditing was going to happen with a push of a button. Paperwork would be a thing of the past. The government had full confidence in the computerized systems against falsification and no support documents would be needed. These devices would be another addition to the paperwork reduction act family.

Apparently, the pilot programs changed their mind. Carriers and drivers have found how to “edit” their time in the system to some degree. While this leaves a trail, it is basically legal so long as the driver signed off on the edit. Some unscrupulous carriers would manipulate hours to lengthen a driver’s day. As such, the [Driver Coercion Rule](#), effective January 29, 2016, was implemented last week. In addition, harassment of drivers as well as the requirement for supporting documents have been added to the original wording of this bill.

For information on Driver Coercion please see our Holiday Newsletter -

http://thedotdoctor.com/the_dot_doctor_speaks/view/1602/the_monthly_scoop_holiday_2015_newsletter_csa_highway_bill_2016_elds_driver_cohesion

Harassment of Drivers

Quoting from CCJ

A similar ELD-mandate set for implementation in 2012 was tossed in court over its lack of protection against driver harassment. In accordance with that, FMCSA’s new rule makes it illegal for carriers to use the devices to harass drivers, puts in place fines for doing so and puts in place a system for drivers to report such instances. The rule defines harassment of drivers via an ELD as any action by a carrier toward a driver that the carrier “knew or should have known” would have interrupted a driver’s off-duty time. **“Harassment must involve information available to the motor carrier through an ELD or other technology used in combination with and not separable from an ELD,”** the rule states.

Supporting Documents

Drivers must maintain up to eight (8) supporting documents for each day. These may be maintained in paper or electronic format. Just like logs must now be submitted within 13 days, so must these documents. The carriers must continue to retain these support documents for no less than 6-months just like they must currently do for paper logs.

Supporting documents include: (1) bills of lading, itineraries, schedules or other documents that show trip origin and destination, (2) dispatch records, trip records or similar documents (3) expense receipts, (4) electronic mobile communication records sent through fleet management systems or (5) payroll records, settlement sheets or similar documents that show what and how a driver was paid. The carrier must keep the first and last document for the day and six others. If fewer than eight are submitted, carriers must retain all of them.

Being Audit Ready

ELDs do not mean that a carrier no longer has a responsibility or requirement to audit the driver's day. A proactive and prepared carrier will have a way to present these items in a uniformed fashion. The most commonly used and best accepted forms of documentation are as listed.

- **Dispatch Log** – The carrier will maintain a current and well-kept Dispatch Log that clearly shows dispatch time, start and end time of each load along with pickup and delivery location(s).
- **BOL** – Each driver will have paperwork showing his day's work or each load for OTR drivers. Time and date should be added to any BOL, schedule, work order or similar document that did not previously display this information.
- **Payroll** – This has long been used by the DOT. In days past, an auditor would look first at the highest paid and lowest paid drivers of your fleet. With CSA, other criteria are now used. Remember all time that is compensated must be reflected in a driver's HOS. Payroll is checked to ensure that work hours, such as time in the shop, is reflected on the ELD's time status; on duty not driving.
- **Receipts** – Fuel receipts, toll receipts and all other expenses should have a time and date on them. If they do not come that way; drivers should be encouraged to add these details. This was something many avoided in the past but it is a necessity today. Fuel reports can be added to this list as a means of providing fleet wide support documents. Fuel reports from EFS and other vendors come with date, time and location information. This should have already been a part of your log auditing routine.
- **Messages** – Messages can be via truck system devices like Qualcomm or Road Ranger. They can be via cell phone. Any of these methods are legally available to be checked by authorities. Be sure your messages, which usually have a location encoded in them, match your driver's HOS records.
- **Roadside Inspections** – Roadside inspections and other interactions with authority still matter. All roadside inspections must be retained by the carrier. Good or bad, drivers must turn these into their carrier. Carriers need to match the time and date on these inspections with the driver's logs. Monitor the CSA site and ensure your driver turns in his inspections then match them to the log (electronic or paper) to ensure they are a match.

NOTE: Owner Operators with your own authority. You are not excluded. You are a carrier. These rules apply to you. In fact, 90% of all registered carriers have under 10 trucks. If you are the carrier and the driver, then you play a dual role and both sets of rules apply to you and your operation.

Electronic Data as Support Documents

Records from Global Positioning Systems (GPS) may be subject to audit by the FMCSA (whether those systems are a part of an electronic logging system or not). Such records are considered "supporting documents" for hours-of-service compliance and must be maintained by the motor carrier for six months. The FMCSA may use GPS records to verify the information contained on drivers' logs, even if the company does not do so.

Cell phone records also serve as location providers. They can be subpoenaed by the court. These records can prove if the driver was using a phone for call or text during a particular period of time, like prior to a crash, as well as providing time duration and location information.

Cameras are everywhere. Street cameras, cell phone cameras, dash cameras, ATM cameras, red light cameras, speed cameras and Google glasses; just to name a few, can all provide location information as well. Do not risk improperly altering your logs; paper or electronic, as you are risking your freedom. Jail time is granted to those who falsify record of duty status.

Auditing an Electronic Log

When auditing an e-log, be sure to document an exact reason. Carriers should limit this access to only highly trusted personal such as the head dispatcher and/or the Safety Director. General dispatch should not be allowed to edit logs.

Drivers must accept log edits. Just because you assign time (unassigned events) or edit a log; it is not completed and accepted by the system until the driver accepts the audit. Be sure your drivers are aware of this and looking for any proposed changes when they log onto their devices. If they reject the change, you cannot force it upon them. Unassigned events will go back into that category if a driver rejects the change. Unassigned events must be monitored daily. Failure to properly assign these events can and will result in a driver running over hours. You are still liable and can face fines as well as other penalties. ELDs must be managed. They are not a fully self-management system.

The Audit Trail

A trail is created in the system that documents the change. Most graphs and/or entries are shown in a contrasting color to make the change highly visible. The auditor that performed the edit is recorded. These are attention grabbing entries that raise many questions to DOT auditors.

Auditing the Edits

An outside firm or a senior manager should audit all edits for compliance. Editing an e-log is equivalent to creating a false log unless you can document a valid reason for the edit. Drivers forgetting to log out, equipment failure or adding hours to a driver such as shop time (on-duty not driving) are examples of the few edits that are legal. These events should be rare and done with extreme care. Anyone performing daily edits on a driver should be retrained (both the manager and the driver).

Can ELDs be Wrong?

Another audit that should be performed on e-logs is a manual audit. Computers make mistakes when their programs do not function properly. This is common after software upgrades or new installations. Spot audits should occur to ensure the system is always functioning properly. **The fines, even for computer malfunction, will still be on the carrier and the driver!**

An example of this in action:

ELD app has a bug with the new app update. (9 Dec 15, Keller system)

A driver checked his display and it said he had 5 hours available. He called dispatch. He knew he had only 3 hours left but the clocks on the app, after the new update, said he had 5. We pulled up his log on the system to review. What we can find is that the app is no longer counting any time you take off during the day against the 15 hours. This is incorrect!

Parameters

- The ELDs are set to TX Oilfield. Oilfield specific vehicle - NO
- This company is allowed to log TX intrastate HOS rules (15/8) with oilfield 24 hour reset.
- 30 min break.
- No line 5 or wait time is allowed.

The app does not seem to be calculating this last item properly.

When we self-audited the log; any time OFF DUTY was “added” back to the driver in his available hours for both yesterday and today. This is a potential fineable situation for both the driver and the carrier. Drivers have been advised by management to ignore the clocks for now and take count of their own hours until this bug is fixed.

What appears to be happening is that the update classified all user of this category as “drivers of oilfield specific vehicles” which allows for the “wait time” to not count against the 15 allowable hours.

NOTE: Not all ELD systems can service all operations. If you have a specialized operation like oilfield service or oilfield support, you will find that you have limited options in an ELD system that can support your company. Proper and informed ELD selection is vital to ensure you have a system that works with your operation.

Highway Safety

Rested drivers are safer drivers. ELDs are the latest tool in fighting driver fatigue. In the United States, the National Sleep Foundation estimates that around 20% of crashes may involve fatigued drivers. During an interview, 37% of drivers in a 2003 National Highway Traffic Safety Administration admitted that they had fallen asleep while driving.

The risk of traffic accidents goes up at night due to a variety of factors, but fatigue is a major issue and this risk also increases in rural and remote areas. The National Sleep Foundation asks drivers to “*Drive Alert, Arrive Alive®*.”

A government study, recently released by the FMCSA, concludes that the implementation of ELDs will “save 26 lives and 562 injuries” a year. After full implementation, we may find this number to be even greater!

HOS Rules: DOT v. Trucking Industry

The FMCSA and other advocacy groups believe that if one follows the HOS Regulations that they are a safer and more alert driver. Government hours and driver hours have always been at odds. The government views days on an 8-hour, set scale. Driver days are anything but set and rarely only 8-hours in length. As such, these one-size-fits-all laws do not adequately represent the diversity of the transportation industry. The few exceptions to the HOS Rules add more fallacy and confusion than response. Still these are the rules that we are meant to follow if we wish to participate in highway commerce.

OOIDA is also of this opinion on the one-size-fits-all regulation. The founder of The DOT Doctor has been calling for and lobbying Congress since the 80’s for an Adequate Change to the DOT HOS. (Read more on this in *Department of Transportation Hours of Service Laws Needs Adequate Revision*, http://o.b5z.net/i/u/10035243/i/Department_of_Transportation_Hours_of_Service_Laws_Needs_Adequate_Revision.pdf).

Now What: Why Become a Dinosaur to the Inevitable?

There is no more denying that ELDs will be required. As a driver, you have a choice to accept this or find a different career. Older drivers may retire. Carriers can adapt or die. This is the harsh reality!

Times change. Technology evolves. Businesses and workers adapt or are left behind. Why become a dinosaur to the inevitable?

Required ELD implementation cannot be a surprise to anyone. We have all seen this coming for years. While many embraced the idea head-on; others perish the thought. Whatever your stand; they are here. There is no more denying that ELDs are real.

Options

An ELD mandate does not mean that you do not have options. You still must choose a system. You must decide if you want to gain other statistics on your operations like fuel usage or just meet the ELD minimum mandate. You must install the system. You must learn how the system works. You must implement the system. You must train your drivers. You must train your dispatch and load planning teams. You must monitor the system. You must audit your logs. You must deliver your freight. There is much to consider!

Proactive Dispatch and Increased Productivity

Many companies who have embraced the ELD technology move have found an increase in productivity and a savings in fuel cost. By keeping your vehicles and drivers more productive; there is less idle time. Less idle time means less fuel burning. Using a pro-active dispatch system, keeps freight moving. Driver hours can best be utilized by a system that interchanges loads for optimum asset utilization. This means embracing a new method of dispatching.

Dispatchers can no longer just be a mouth piece to a driver. They can no longer just react to a situation. They must return to what they once were; an active part of the Operations process. Moving freight effectively and efficiently means planning. Planning by the carrier and the driver. A system properly planned will keep the wheels turning and everyone making money.

Driver are an Asset and Their Hours are a Commodity

Driver hours are a commodity. This is something many have forgotten or never understood. Drivers are a carrier's most valuable asset. While the cost of equipment is high, without a professional operator, the equipment cannot produce revenue. Driver's come with a cap on their hours. As any Economics 101 class teaches; a commodity with limits results in a higher value. Commodities have an intrinsic value based upon supply and demand and are therefore most efficiently traded in free markets.

Regulated trucking ended last century. Trucking is a free market. Drivers are free to move from carrier to carrier (traded). A wise carrier will see the value in their drivers and act accordingly. They will not allow shippers and receivers to waste their asset's time. They will not waste their asset's time by having a driver sit on a load or wait to be loaded. They will efficiently schedule their driver as to avoid rush hour and other time wasting situations.

Trucking in the 21st Century: A New Age Dawns in Trucking

ELDs help in this effort by showing you up to the moment stats on your driver. By knowing, not guessing, exactly what time your driver has available for today, tomorrow and the next week; you can plan more efficiency. There is new software coming on the market that further enhance and assist with this planning effort. It integrates social media for up to the minute news on traffic and weather conditions. This allows for a quick diversion when necessary. It allows the planner to know if the driver can make the delivery or not when running on a tight schedule. Why send a driver to a location on the

'hope' that he can make it? With this predictive software, the system can accurately conclude if the driver will be able to be on-time. It will improve your on-time performances while reducing idle cost due to a driver being stuck at a closed facility.

Dispatchers will monitor this interactive system and be at the ready to communicate on the fly changes to their drivers. No longer will drivers be stuck with a slow load. Drivers will not own the load they picked up but be part of an efficient highly integrated transport system. Autotronic trucking with add to the efficiency of this new system.

Folks, this is not science fiction. This is Trucking in the 21st Century! Keep your trucks rolling and your drivers productive. Optimize all your assets. Utilize all the technology available. ELDs are the first step to this new age in trucking.

What's Coming at Us Down the Road?

ELDs (516-page bill) and FAST Act (1301-page bill) are just the tip of the iceberg. Sleep apnea testing is gaining speed again. Lung tests are becoming popular. They are looking for proof of at least 1-year without tobacco usage for insurance and other purposes. There are carriers who will not hire smokers due to the increased risk factors such as vehicle damage from cigarettes, increased accident rates and higher health insurance premiums. Diabetes, limb loss and epilepsy rules are all under review as a means to qualify or disqualify a CMV/CDL driver.

DOT Physical Questionnaire Changes

December 22, 2015 begins the latest "improvement" in DOT Medical Card criteria. Drivers will now have an increased questionnaire. This is followed by doctors having to submit these forms and findings to the state daily by 2017. To read more on this subject, please check out our Holiday Newsletter Special Edition -

http://thedotdoctor.com/the_dot_doctor_speaks/view/1602/the_monthly_scoop_holiday_2015_newsletter_csa_highway_bill_2016_elds_driver_cohesion.

Drug and Alcohol Clearinghouse

The Drug and Alcohol Clearinghouse is in the works. Once established, d&a results will be submitted directly to the clearinghouse. New hires will be processed through here. The days of tracking down SPH for D&A Info will be behind us. All that information will be available at a one-stop shop. Closed carriers or carriers who refuse to respond will no longer deter the hiring process as their information regarding drug and alcohol history will be preserved and available in one location.

Drivers who job hop and "test" to see if they are clear will now have a record of these actions as all carriers will be required to submit this information. It is a fair bet that much of this information will be provided straight from the MRO like the DOT Medical information is provided directly from the attending physician. This move should help clear our roads of illegal substance users and those who operate under the influence.

Claritin Clear

Dispatch still needs to be trained and mindful that no driver is allowed on the highway unless they are “Claritin clear!” Prescription and over the counter drugs still cause issues due to side effects that the user may be unaware of or that have occurred due to the mixture of multiple medications and foods, drinks or other substances. Even sleep deprivation must be monitored. Just because your driver had time off did not mean that he gained the needed rest. Know your drivers. Monitor your drivers. It is for their safety, your carrier’s protection and the safety of all those whom which they share the highway.

Add this new addition of a D&A Clearinghouse to the PSP Scores for drivers and a driver history should be quite clear. Hidden companies and incidents will virtually disappear. Items that were only discoverable through post-accident testing or authority interaction records will be documented between these two systems.

Safety v. Compliance

While it is true that we need more drivers due to a continuous increase in capacity; it is also true that we need more professionally qualified drivers on our highways. Filling our vehicles with a “pulse” that is a steering wheel holder has resulted in too many injuries, accidents and fatalities. There is a strong push for highway safety improvements. While compliance and safety are not synonymous, they are both striving for the same goal. (More on that topic in next TDD month’s newsletter, [The Monthly Scoop](#).)

ELD Implementation

Change can be confusing. Change can also be invigorating. It can be an opportunity for improvement. Why not embrace the ELD Mandate as a time for optimization?

Upgrading to ELDs is a commitment. It is an action that requires proper project management and implementation finesse to be efficient and effective.

Choosing a System for Your Operation

ELD Implementation is a multiple part project. First you must choose the system that is right for your operation and your drivers. Not all systems are created equal. It is not just switching a flip even if you have the hardware already in a place. It is a process. You have to ready your drivers and dispatchers for the change if you want a smooth implementation. Proper training on the new system and understanding how it will be used aids in the transition. Drivers feel like they are being tracked and stalked. Dispatchers feel like they can never make their deadlines. Allay both of these fears with transitional training.

Implementation

How you present the switch from paper to electronic logs to your drivers and employees is as important as choosing the proper system for the job. An unprepared or rushed implementation is 85% more likely to result in user rejection than a properly orchestrated implementation. A smooth transition is a result of user buy-in and training accompanied with a good installation and support team. Professional Change Management / Implementation teams can offer this competitive edge. In addition to a smooth roll-out, experiencing strong buy-in to the new technology from the Carrier's Executive Team in a supportive manner is key to employee acceptance.

Installation and Set-up

System set-up is important. You have parameters to set based on your operation. You have to choose the proper rule set and set up your system for success. Drivers sometimes need to be able to switch between rule sets depending on your operation. This requires additional training and understanding. Improper preparation to the system will result in a non-functioning system. Avoid this pitfall!

Training

Drivers need to know how to sign in, change status, perform a PTI, drop and switch trailers and/or trucks, log out and add comments. Operations staff needs to know how to monitor and interpret the information the system is providing. This all takes training and time just like the introduction of any new hardware and software.

Monitoring and Tech Support

Once the systems are LIVE, you need someone who will monitor what is happening. Provide a helping hand to drivers and operation. Be prepared to answer questions and address concerns. A tech support team for glitches and non-connects. Be ready to trouble shoot issues. Always have a paper log ready as a backup, as required by law, for times when there is a true system failure.

Auditing and Fixing Mistakes

The log auditor(s) and editors need to understand their function. They need to know the liability on editing a log and how to properly document the change as well as obtain the driver's consent. Drivers will need to know who to call when they have questions or system malfunctions. What happens when a driver forgets to log out or log in? Who will handle these issues? You must be prepared to answer these questions.

Planning and Management

ELD Implementation needs planning and management. There are processes and procedures to follow that makes your ELD Implementation successful. There are many moving parts and facets. Successful implementation can mean the difference between a well-working system with happy users and a

dysfunctional system with miserable users. Carriers with the greatest success have outsourced this project to seasoned professionals.

This is All So Confusing. Where Can I Find Help?

The DOT Doctor (TDD) has Change Management / Implementation Specials. These project management experts are ready to assist. We have helped many other clients with major projects including “ELD Implementations”. TDD can aid with user buy-in and transition. We know how to have a smooth implementation and transition to electronic recording devices.

TDD is there to assist you from system choosing and planning all the way through your first year of usage and beyond. We are here to help as little or as much as you desire. Make it a smooth transition! Increase driver and employee confidence in the system.

Invest in your company’s future by hiring a team of experts! Call TDD today at: 844-DOTDOCTOR.



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BOOKS by Dr. Sitler

Pu: Energy Source or Death Source

Amazon, 2005

"PU: Energy Source or Death Source" discusses the advantages of Nuclear Energy vs. conventional energy methods. Understand this value element and its benefits to the environment. The health risks, terrorist potential and proper handling of Plutonium are discussed in detail.

The transport and handling of high level hazardous material, especially nuclear waste, is covered in this electronic book.

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Additional Document Locations

The DOT Doctor's Website <http://thedotdoctor.com/authorship>

Scribd <https://www.scribd.com/user/66181733/Andrea-Sitler-PhD>