



ELD MALFUNCTIONS AND OPERATOR ERRORS

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ELD MALFUNCTIONS VEHICLE BASED

- ▶ REQUIRED DATA TO BE MONITORED
- ▶ ECM COMPLIANCE
- ▶ POSITIONING COMPLIANCE
- ▶ POWER COMPLIANCE
- ▶ TIMING COMPLIANCE
- ▶ DATA RECORDING
- ▶ UNIDENTIFIED DRIVING RECORDS

ECM COMPLIANCE

- ▶ ELD DEVICE MUST BE CONNECTED TO THE ENGINE CONTROL MODULE TO RECEIVE ENGINE SPEED, HOURS AND MILES AT A MINIMUM
- ▶ AFTER 30 MINUTES IN A 24 HOUR PERIOD OF NOT RECEIVING DATA A DIAGNOSTIC BECOMES A MALFUNCTION

POSITIONING COMPLIANCE

- ▶ MUST HAVE GPS CONNECTIVITY
- ▶ MUST DETECT GPS SIGNAL WITHIN 5 MILES OF VEHICLE MOTION
- ▶ RECORDS DIAGNOSTICS OVER 24 HOUR PERIOD

POWER COMPLIANCE

- ▶ A CERTAIN DISTANCE TRAVELED WITHIN 5 MINUTES WILL TRIGGER IF THE UNIT IS POWERED UP
- ▶ IF YOU HAVE SEPARATE UNITS CHECK WITH YOUR PROVIDER TO SEE IF THEY RECORD IF EACH UNIT IS POWERED UP AND COMPLIANT
- ▶ ONE MAJOR COMPONENT OF THE POWER COMPLIANCE IS TO DETERMINE IF A DRIVER MAY AVE DISABLED YOUR ELD

TIMING COMPLIANCE

- ▶ ONCE A VEHICLE IS POWERED UP IS HAS A CERTAIN AMOUNT OF TIME TO START RECORDING AND DISPLAYING DATA.
- ▶ ALSO A MALFUNCTION MAY SHOW IF THE CELL TIME AND GPS TIME DIFFER BY MORE THAN 10 MINUTES
- ▶ THIS AGAIN IS A CUMULATIVE TIME OVER A 24 HOUR PERIOD

DATA RECORDING FOR TRANSFER

- ▶ ALL ELEMENTS MUST BE PRESENT
- ▶ ADDITIONAL PARAMETERS OTHER THAN JUST REQUIRED FOR VIEWING LOGS
- ▶ VEHICLE DATA AS WELL AS DRIVER DATA

UNIDENTIFIED DRIVING COMPLIANCE

- ▶ MUST BE ABLE TO RECORD TO AN ACCOUNT IF A DRIVER DOES NOT IDENTIFY THEMSELVES WHEN LOGGING IN

ONBOARD DOCUMENTATION

- ▶ THREE DOCUMENTS
- ▶ DRIVER INSTRUCTIONS
- ▶ MALFUNCTIONS AND DIAGNOSTICS
- ▶ DATA TRANSFER PROCEDURE

ELD MALFUNCTION POLICY

- ▶ **ELD Malfunction**
- ▶ Policy should include specific instructions for reporting malfunctions
- ▶ Address time frame and method for reporting malfunction
- ▶ 24 hour notice required
- ▶ Motor carrier may be more stringent
- ▶ Written notification required
- ▶ Identify who will receive notifications and facilitate the repairs
- ▶ May include an electronic message, such as an email, text and/or a Fleet Management
- ▶ Systems (FMS) message.
- ▶ Procedures for Reconstructing the previous 7 days
- ▶ May email driver .pdf version on personal device (Telematics system)
- ▶ Assist driver with accurate reconstruction

ELD POLICY COMPANY RESPONSIBILITY

- ▶ **ELD Malfunction (Motor Carrier)**
- ▶ Retain any paper RODS generated during the malfunction
- ▶ Ensure policy and procedures address an action plan to repair or replace malfunctioning device.
- ▶ Driver trouble shoot instructions
- ▶ Maintenance item for quarterly/semi
- ▶ annual inspection process.
- ▶ Monitor malfunctions for tampering indications
- ▶ Rule requires repair/replacement within 8 days
- ▶ Can request an extension

REQUEST FOR EXTENSION

- ▶ If you would like to file an ELD malfunction extension request by email, please submit your extension request to ELD-Extension@dot.gov. Include the legal name, principal place of business address and USDOT number of the motor carrier. The extension request must include the following information:
- ▶ The name, address, and telephone number of the motor carrier representative who files the request;
- ▶ The make, model, and serial number of each ELD;
- ▶ The date and location of each ELD malfunction as reported by the driver to the carrier; and
- ▶ A concise statement describing actions taken by the motor carrier to make a good faith effort to repair, replace, or service the ELD units, including why the carrier needs additional time beyond the 8 days provided by 49 CFR part 395.34.
- ▶ To request an extension from the FMCSA Division Administrator in your state's field office, you may contact the office directly. FMCSA Division Administrator contact information can be found [here](#).
- ▶ MAKE THE REQUEST AS SOON AS POSSIBLE DO NOT WAIT UNTIL DAY 6 OR 7 TO MAKE THE REQUEST

ELD MALFUNCTIONS DURING COMPLIANCE REVIEWS

- ▶ AS A FULL ELD USER YOU WILL TRANSFER FILES DURING A COMPLIANCE REVIEW SIMILARLY TO THAT OF A ROADSIDE INSPECTION
- ▶ YOU WILL SEND AN OUTPUT FILE TO THE INVESTIGATOR VIA THE SAME METHOD AS FROM A VEHICLE
- ▶ KEY COMPONENTS
- ▶ DRIVER FIRST AND LAST NAME MINIMUM CHARACTER REQUIREMENTS
- ▶ VEHICLE VIN NUMBER
- ▶ FILES CAN BE RECEIVED, WARNINGS, REJECTED
- ▶ TEST YOUR FILES PRIOR TO COMPLIANCE REVIEWS
- ▶ <https://csa.fmcsa.dot.gov/ELD>

OPERATOR ERROR

- ▶ DRIVER TRAINING IS THE KEY TO ALL ELD SUCCESS
- ▶ INITIAL TRAINING
- ▶ MONITORING
- ▶ RETRAINING
- ▶ UPDATED TRAINING
- ▶ FIND MOST COMMON ERRORS
- ▶ ARE ERRORS SYSTEM ERRORS OR USER ERRORS
- ▶ OPERATOR ERRORS NEED TO BE REVIEWED FOR CAUSE AND CORRECTION (IF POSSIBLE)

OPERATOR ERROR

- ▶ WHAT CAN BE CHANGED
- ▶ ON DUTY TO OFF DUTY
- ▶ OFF DUTY TO ON DUTY
- ▶ DRIVING TIME CAN BE ADDED AT ANY TIME
- ▶ DRIVING TIME MAY ONLY BE REDUCED IN A VERY FEW CIRCUMSTANCES
- ▶ TEAM DRIVING
- ▶ UNASSIGNED MOVEMENT NOT APPLIED TO THE APPROPRIATE DRIVER
- ▶ DRIVING TIME THAT WAS MANUALLY ENTERED BY A DRIVER TO CORRECT A LOG OR TO SHOW WORK FROM ANOTHER CARRIER

COMPANY PROPOSED EDITS

- ▶ MONITOR LOGS DAILY
- ▶ VERIFY ALL EDITS WITH SUPPORTING DOCUMENTATION BEFORE MAKING THEM
- ▶ VERIFY THAT DRIVERS ARE REVIEWING AND EITHER ACCEPTING OR DECLINING THE EDITS
- ▶ EDITS ARE NOT FINAL UNTIL THE DRIVER APPROVES THEM

OPERATOR ERRORS

- ▶ DRIVERS HAVE ALL OF THE ELEMENTS OF THE LOG PRESENT IN THE LOG
- ▶ NAME
- ▶ VEHICLE
- ▶ MILES FOR THE DAY
- ▶ TRIP IDENTIFICATION
- ▶ PRETRIP AND POST TRIP AS REQUIRED

QUESTIONS ??????

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