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AOBRDs to ELDs:
The Definitive Deadline
Transition Guide

Best practice for migrating to ELDs

Start helping drivers and fleets make the move

THE TIME IS NOW

Most carriers and drivers will be aware that December 2019 is the full ELD compliance deadline – the end of phase three of the FMCSA's implementation timeline. After December 16, 2019, all carriers and drivers who come under the rule must use self-certified ELDs that are registered with the FMCSA. While the current Phase Two period enjoyed a 'soft' launch, it is widely accepted that there will be no similar 'soft' approach to this final deadline.

Non-compliant carriers face penalties, fines and/or out-of-service conditions. Failure to record a driver's duty status using an ELD is a critical violation of CSA scores.[1]

To ensure a smooth transition, we've spoken with fleets who have already migrated from AOBRDs to ELDs to get their first-hand experience of the transition.

This guide outlines the challenges they faced and what fleets can do for a seamless changeover. The aim of this guide is to help carriers who want to swap from their existing ELD or are utilizing grandfathered AOBRDs ahead of the switchover deadline.

This guide will outline the differences between AOBRDs and ELDs as well as deliver best practice advice to smooth your transition regardless of your telematics provider. We will outline some of the most important steps for you to follow in the switchover, including planning, training, deployment and how best to use data measured.

Why you should switch from AOBRDs to ELDs sooner rather than later

> Give time for driver training & communications.

> Allow time for new policies and procedures to be in place.

> Give time for working out any issues along the way.

> Fleets can start to reap the rewards of ELD data sooner.

> Your vendor has more time to support your transition.

> Some changes are significant and need time to settle in.

> Confidence that your fleet will be compliant on deadline day.

[1] https://blog.orbcomm.com/eld-mandate-update-fmcsa-announces-eld-violation-severity-weights/

KEY DIFFERENCES BETWEEN AOBRDS AND ELDS

It's important for drivers and carriers to be aware of the differences between AOBRDs and ELDs.
To manage expectations, carriers can outline specifically what will be different, so drivers will know what to expect.

	For Drivers	For Fleet Managers
Driving Threshold	ELDs must automatically record drive time once the vehicle is in excess of 5 mph.	Fleets were previously able to set the threshold for driving status. ELD automatically sets it 5 mph except in the case of Yard Moves or Personal Conveyance.
Log Edits	Drivers will be able to edit their duty status records. All edits must include an annotation. Drivers can accept or reject the carrier's edits. Drivers cannot edit their own drive time.	Carriers can edit logs, but they must be annotated and accepted by drivers. Carriers cannot edit or change drive time to non-driving time.
Unassigned Driving Time	Drivers will be presented with unassigned driving time at login. They must review, accept or reject. For Team Drivers, they can reassign drive time to their codrivers (and vice versa) subject to acceptance of both drivers. Logs may need to be re-certified.	ELDs will automatically record time when the vehicle is in motion and no driver logged in. Carriers can suggest this as an edit for drivers. If rejected, fleet managers must reconcile and reassign. The carrier is responsible for assigning any unidentified driving time or annotations on why it is unassigned.
Personal Conveyance (PC)	If authorized by the carrier, drivers can manually select PC as off-duty/PC status.	Carriers define their fleet's PC status. If authorized, the carrier must explicitly assign PC to individual drivers in their profile. Location accuracy must be reduced to a 10-mile radius when a vehicle is used for authorized personal use.
Yard Moves	Drivers authorized for yard moves must be able to manually select this as on-duty/yard move status.	Carriers must explicitly assign yard moves to individual drivers via their profiles.
Roadside Inspections	Drivers must be able to display their screens on request to an official. Drivers must be able to transfer ELD data in one of the following ways: web services/email, USB or Bluetooth.	Carriers can prepare drivers for roadside inspections by ensuring ELDs are equipped to deliver data by telematics or local options.
In-Cab Documentation	Drivers must always carry an ELD information packet in the cab. It should include the ELD user guide, malfunction instructions, roadside inspection sheets and at least eight days' supply of blank drivers' RODS graph-grids.	Carriers need to decide how to deploy documentation in either printed online format or both; and ensure they have adequate copies of the relevant documentation.
Malfunctions	Drivers must notify carriers of any malfunction within 24 hours. Drivers need to revert to paper logs during a malfunction period and recreate RODS as graph grids for the period.	Carriers are responsible for resolving malfunctions within eight days of notice.

STAGE 1 — PLANNING

If the ELD switchover was a house, then certainly planning is your foundation for a seamless, reliable and easy transition. Ensure you and your fleet have time for technical, process and practical checks of any new system that could impact operations. No matter how much you plan and prepare, things don't always go flawlessly. Fleets should allow for at least a month before the deadline to work out all the details. The fewer surprises you encounter on your road to ELD, the better.

While waiting might appear to be an easier option for some, the closer you get to transition date, the more challenging the switchover will be. There is no real reason to delay, in fact, fleets are already starting to see the benefits. Preliminary figures by the FMCSA say that Hours of Service compliance is improving with ELD. In the rollout stage between April 2018 and June 2019, the percentage of driver inspections with at least one violation has consistently dropped.[2] As a result of switching over fleets of all sizes, we have been able to develop this plan to help you cover every angle. These steps will depend on the size and makeup of your organization, but these are some considerations to note.

Plan Your Project

- **Who:** Identify the stakeholders. Many Functions within a fleet will be impacted. Identify driver champions who will help drive adoption in the fleet.
- **What:** The big areas of change will be policies, processes, training and measurement. Decide if you need to introduce a pilot program.
- **When:** Implement a written plan and timeline. Decide on a switching date and work backwards. Realistically outline the length of the implementation project, factoring in training, administration and technical issues.
- **Why:** The ability to meet some business goals will be challenged. Work out how to improve ROI from ELDs around the business.
- **Where:** Start internal discussions to plot out the migration plan. Outline all areas of the business which will be impacted: drivers, dispatch, training, safety and compliance, IT, finance and support.

Consider IT Requirements

- **Devices**
  - » Ensure all in-cab devices are delivered and updateable over-the-air so drivers have time to get accustomed to the new rules.

- **Equipment Connectivity**
  - » Depending on the age of your AOBRD, it might require upgrading for ELD capability. Check for network suitability of your ELD.

- **Integrations**
  - » Does your TMS or other software integrate with your chosen ELD provider?

Prepare Your Communications

- Communicate the business impacts to management.
- Tell your drivers what the timeline looks like so they are prepared. Now is the time to reinforce the benefits for drivers and how the ELD changes are helpful to their working day.
- Ensure **ALL** departments are aware of how ELDs will impact on them. How will dispatchers use the information and interact with drivers? What do compliance teams need to know? Will the switchover impact your shop team?

Update Your Policies

- Decide on changes to key areas as personal conveyance, yard moves and log certification.
- Update your policy documents to reflect these changes and circulate to all relevant departments and teams.

Train your drivers

- Plan for group and one-on-one training to ensure any questions that do crop up can be covered.
- Outline the plans for your driver champions, if applicable.

[2] https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/regulations/enforcement/406471/infographic-eld-june-report-2019-003.pdf

TIPS FROM THE FIELD

#1. Change driving threshold BEFORE implementation

In our experience, the change to the driving threshold to 5mph is having the biggest impact on fleets.

Fleets switching from AOBRDs to ELDs report missing the flexibility they had to change the speed/time/threshold setting for drive-line status.

Our suggestion is to move the AOBRD threshold down to 5mph in advance of the ELD conversion. This will allow fleets to review operational impacts before the forced implementation and will give your operation time to adjust accordingly and train drivers fully.

STAGE 2 — TRAINING

Trust us when we say: "take time for driver training." The most successful and seamless AOBRD to ELD transitions are those where carriers have taken a training-first approach.

Training is vital from a driver perspective, so they are comfortable with the devices and presenting to roadside officials. It's also a key part for dispatch, back-office and safety staff and a necessity for compliance and management.

From our experience, some of the biggest impacts in training include the change to the driving threshold, personal conveyance, yard moves and presenting the data properly to roadside enforcement.

These steps can help form the backbone of your training program.

Driver Training Program

A driver training program should be in place to educate drivers on what to expect from the changeover.

- Make the training available online, in the office or downloadable when out on the road, so they can access it when it suits them.
- Train your driver champions first and then roll out training to other drivers.
- Use introductory training and reinforce with regular reminders and updates.

Training — What Drivers Need to Know

Carriers should be ready to answer the most frequently asked questions by drivers when they come up during the switchover period. Ensure your fleet manager, driver trainers and safety staff can to answer all of these, before starting your training process.

These are some of the common Driver FAQs:

- **What ELD is the driver operating and what rule set are they running under?**
  - » Drivers need to be able to communicate basic data about the ELD, the carrier, license, rulesets, and exemptions if applicable.

- **What is the effect of the driving threshold?**
  - » Drivers need to understand the impact of the driving threshold and alter their driving behavior. Fleets should note, as above, the 5mph threshold is a big change for drivers.

- **How do drivers deal with log edits?**
  - » Ensure your drivers know how to access logs, add and edit events, add remarks and certify your logs.
  - » Drivers need to see where to review, accept or reject suggested edits by carrier administrators.

- **How do drivers deal with unassigned driving?**
  - » Drivers will see unidentified driving events on login. They need to be able to find them on the ELD and accept or reject them.

- **What do drivers need to be able to do at roadside inspection?**
  - » Train drivers on how to operate their ELD at roadside inspections. They need to be able to show compliance officers how to inspect their RODS records including graph grids, events and unidentified driving; and to be able to transfer RODS data by web services or email.

- **Are drivers eligible for yard moves?**
  - » Carriers should outline in advance the company policy around on-duty yard moves. You will need to let drivers know if, where and in what circumstances they are eligible to use this status.

- **What is the company policy around personal conveyance?**

  » Carriers should outline their personal conveyance policy to drivers, demonstrating examples of what is permissible as personal conveyance and what is not.

- **What in-cab documentation do drivers need?**

  » Carriers should ensure that drivers have the basic supporting documents available. See 'TIPS FROM THE FIELD #2'. If requested, a driver must provide supporting documents if requested by an authorized official.

- **What does a driver need to do in the event of a malfunction?**

  » Managers should ensure drivers know to recognize a diagnostic event, distinguish events from malfunctions, and how to report malfunctions within 24 hours to the carrier.

  » Drivers will also need to keep paper logs. If drivers are unable to retrieve logs from the previous 7 days from the ELD, they will need to recreate their RODS on paper for the current 24-hour period and the last 7 days.

TIPS FROM THE FIELD

#2. In-Cab Documentation

As a basic rule, drivers must hold supporting documents with the following elements:

> A User Manual on how to operate the ELD.

> An instruction sheet for the driver in the event of an ELD malfunction, how to report this and recordkeeping procedures.

> Roadside Inspection sheet.

> A supply of paper log sheets to cover the previous 8 days of logs.

> Spare log sheets to cover further driving in the event of a malfunction.

Training — What Back-Office Staff Need to Know

Training for back-office staff is just as important so they know how to support drivers, manage users on the system, suggest log edits, deal with malfunctions and manage unidentified driving.

Some things to consider:

User Accounts

- Are all ELD users set up in the system? Have all personnel who drive – including yard movers, maintenance technicians or safety supervisors – been included?
- Are driver profiles complete and up to date?
- Have 'exempt users' been placed into categories on your ELD platform?

Policies

- **Yard Moves**. What is the fleet's policy? Which employees have been designated for yard moves? What has the company defined as a yard? Are drivers aware of the yard move special category in the event of moving a vehicle in the yard?
- **Personal Conveyance (PC)**. What is the company policy on PC? What location parameters have been set? These should be included in written policies. Ensure drivers are up-to-speed on personal conveyancing's "reasonable time" if applicable.
- **Driver Privacy**. Ensure policies are updated to take account of driver privacy. For example, if a vehicle is in use for personal conveyance, location data should only be available in a 10-mile radius.

Processes — Daily, weekly, and beyond

- Who is reviewing log edits every day?
- When should logs be certified – should this occur more than just daily?
- How will unassigned driving be handled each day? Who is doing this?

Has this new effort been budgeted for? Have automatic, scheduled reports been set up to help this?

- What happens in the event of a malfunction? Is there a workflow in place? Decide on how your fleet will handle this with your ELD vendor.
- Data for ELD audits. How long will the data be kept for? Where will it be housed securely? How accessible is it when needed?
- Dealing with driver complaints about privacy, log edits and unidentified driving. Are there policies and procedures in place and have they been updated to reflect drivers' new rights and entitlements?

TIPS FROM THE FIELD

#3. Give PC examples to drivers

Give drivers some concrete examples of Personal Conveyance:

> Time spent travelling to a safe rest location after loading or unloading.

> Moving a CMV as a result of a request by a safety officer during off-duty time.

> Time spent traveling from a driver's en route lodging (e.g. a motel) to a restaurant or entertainment facility.

#4. Unassigned driving time

It's a good idea to plan for unassigned driving time. This could include shop personnel, truck washers, fuel attendants and other support activities for vehicles.

Assigning an additional driver profile for each one at the start of the process will make unassigned driving time a lot easier to manage.

Training — What Management Needs to Know

ELDs will impact on fleet management's KPIs around safety compliance resources, dispatch support for drivers in the field, delivery expectations of customers and customer satisfaction.

- Updated KPIs – Management should revise their KPIs in advance and measure against actual once ELDs go live.
- Communicating with customers: Fleets should consider educating their customers and vendors on the expected impact on business.
- Have new, additional responsibilities for drivers, safety and back-office staff been resourced and planned for?
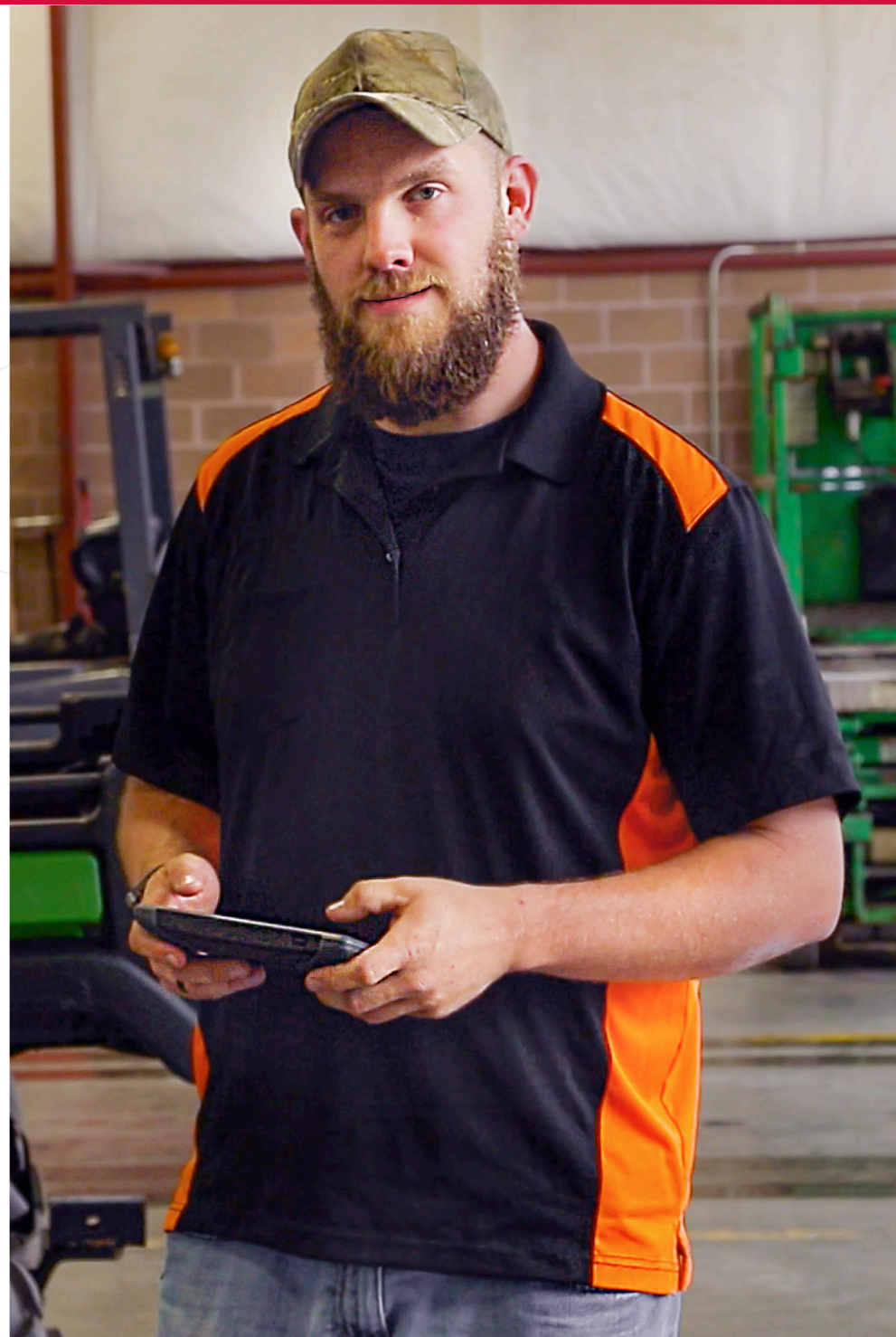
STAGE 3 — DEPLOYMENT

Once you have all the planning in place and training is done, you will be ready to agree on the go-ahead date with your telematics provider.

- Set the switchover date.
  - » Make sure it is well in advance of the December 16 deadline. We recommend making the switch as early as possible; if something is going to occur, it's better to know about it early to ensure you still hit compliance at the time of the deadline.
- If applicable, implement first with a soft launch with your driver champions.
  - » Assign driver champions from the organization to monitor and deliver feedback on ELDs to trainers. This will help to smooth the transition and make it easier to train the rest of the fleet.
- Plan your rollout to drivers.
  - » Training should be complete, so deliver a reminder to them that the switchover will be happening on the chosen date. Drivers will need to be aware of the changes when they show up for work on the day. Remind drivers that you've switched over and what they might expect during a conversation with a roadside official.
- Remember to include enough backup paper logs in the cab for drivers in the event of a malfunction.
- Turn your ELD on!

TIPS FROM THE FIELD

#5. Let drivers know what they can expect

Drivers are better prepared to start driving with ELD immediately, once they are aware of the changes.

Randy Martin, from Dutch Valley Foods says the switch was seamless: "I stay in touch with our drivers, so it was no surprise to them when this (ELD) happened on that Monday morning. They were given a paper saying what the changes were going to be. A week or two before, they got an hours of service user guide for ELD and, it went well."

STAGE 4 — MEASURE AND REVIEW

Your ELD is in!

Now what?

With any change like this, you can expect some teething problems. Here are a few ways you can assess and review:

- Onboarding for the first couple of weeks.
  - » Make sure additional dispatch and safety support is available to drivers.
  - » Listen to driver concerns or issues they may have. Discuss any adjustments with your telematics provider.
  - » Hold daily cross-functional meetings to iron out teething problems.

- Review your KPIs and ROI.
  - » See how your fleet's KPIs have changed as a result of introducing ELDs.
  - » Look at the further benefits as a result of ELDs. ELDs are not just a legal obligation but ELDs can turn fleet data into real, actionable insights. Increase productivity, reliability and reduce fuel and maintenance costs, while maximizing driver safety.

- Prepare your data for DOT inspections and audits.
  - » Have at least 6 months of drivers' RODS reports up-to-date and available.
  - » Focus on DVIR, diagnostics and malfunctions, and unidentified driving reports.
  - » Ensure any paper logs used during the period accessible.

NOW WHAT?

You've got all the work done, breathe a sigh of relief that you will be fully compliant by December 16, 2019.

> *"I would tell anyone that didn't start yet, to get started as soon as you can, so that the drivers accept it as it comes. Because when December comes and you have to be ELD compliant, your drivers will already be bought into it, and it's not going to be a surprise for them to do it."*
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> ....
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> **Randy Martin, Compliance Manager, Dutch Valley Foods, successfully transitioned from AOBRD to ELD**

CONCLUSION

Now is the time to make the switch from AOBRDs to ELDs – not December 2019. With just a few months to go, switching now reduces any risks to your compliance status. Not having an ELD when required can put your driver and vehicle out-of-service.

Making the switch might seem tough, but we can tell you from experience it doesn't have to be. Preparation is key. Getting your planning and training schedule up-and-running, ensuring your drivers are aware of the change and preparing your fleet will give you continuing compliance.

Visit www.orbcomm.com/eld to see how our solutions can empower your fleet today, or contact eld@orbcomm.com for more information.

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