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CONNECTING THE WORLD'S ASSETS

What You Need to Know About ELD Roadside Inspections

As the dust settles on the ELD mandate, roadside inspections are becoming a key point for drivers and carriers. What do you do if stopped? How do you ensure drivers are ready for an inspection? What if you haul into Canada? Prepare your drivers for new scrutiny during roadside inspections with our full ELD guide.

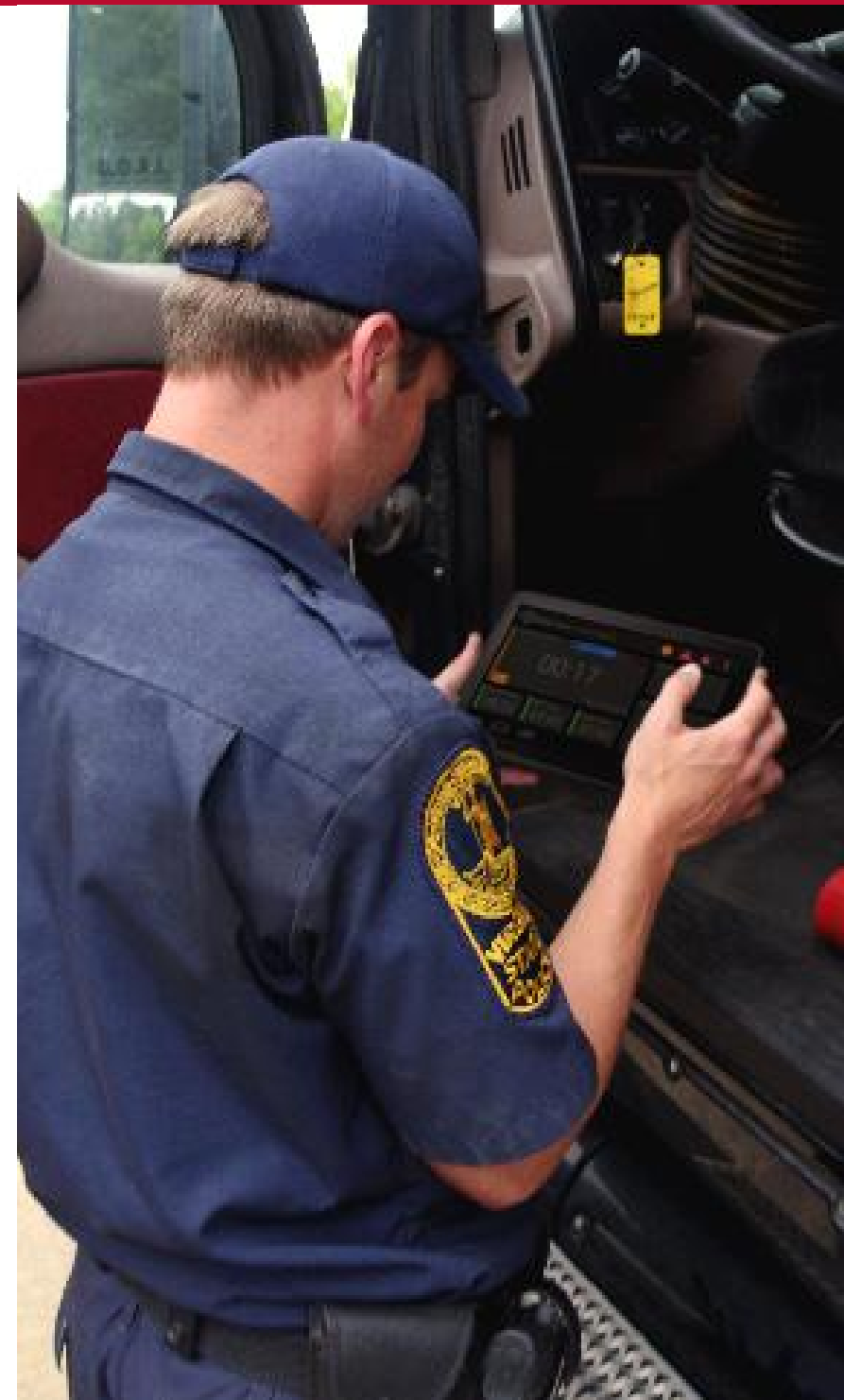


“HOW CAN I MAKE ROADSIDE INSPECTIONS EASIER?”

The Commercial Vehicle Safety Alliance (CVSA) began enforcing the ELD Mandate on December 16, 2019. With no soft enforcement period, all fleets and drivers must be compliant. A violation of the ELD rule could impact your Compliance, Safety and Accountability (CSA) scores and result in fines or penalty points.

Top 5 tips to Ensure a Smooth Roadside Inspection

- 1. Ensure your driver knows how to identify the device as an ELD.** At a roadside stop, the first question will likely be, “do you have an ELD?” Make sure drivers know the name of the ELD provider and can point to the indicator on your screen that says ‘ELD.’ It’s unlikely that inspectors will have the complete list of Federal Motor Carrier Safety Administration (FMCSA) registered ELDs, so having the information available is a good start.
- 2. Ensure you have logs available for the previous seven days.** Your ELD should provide you with the last seven full days of ELD formatted logs as well as the current 24-hour period. If the driver has had the ELD for less than 7 days, ensure they have printed logs available for inspection.
- 3. Have all the required documentation.** The mandate requires that the user manual and cab cards are readily available in either printed or electronic format, as well as seven days’ worth of blank logs, in case of a malfunction.
- 4. Know how to mount and unmount the ELD Screen.** The ELD screen needs to be accessible to the DOT inspector from outside the vehicle. Make sure drivers know how to remove the ELD screen from its mounting bracket and securely remount it for safe use after inspection.
- 5. Know the file transfer mechanism the ELD supports.** The driver may be asked to transfer ELD logs to web eRODS for further inspection with the web eRODS tool. The mandate requires ELDs to be able to transfer files by Bluetooth, USB, or a telematics transfer option that allows email or web service or both. Drivers need to know what type of file transfer the ELD device supports and how to access it when asked. If sending by email, the ELD is pre-configured to send log files to the appropriate contact as set by the FMCSA, so there is no need to manually input an email address.



“DO I NEED ANYTHING ELSE IN MY TRUCK?”

In-Cab Documentation

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.
- A roadside inspection sheet.
- A supply of paper log sheets to cover the previous eight days of logs.
- Spare log sheets to cover further driving in the event of a malfunction.

Give Personal Conveyance (PC) Examples to Drivers

Personal conveyance is when a Commercial Motor Vehicle (CMV) moves while off-duty. This must be accounted for as part of the Hours of Service (HOS) status. While driving in PC mode, it doesn't reduce any responsibility of a driver to operate safely or within driving rules. It may help drivers to give them 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 on route lodging (e.g. a motel) to a restaurant or entertainment facility.

“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.”

Randy Martin, Compliance Manager, Dutch Valley Foods

- A CMV can be used in personal conveyance even with a load, as long as the load is not being transported for the commercial benefit of the carrier.

Unassigned Driving Time

It's a good idea to plan for unassigned driving time. This includes 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 any unassigned driving time a lot easier to manage.

Let Drivers Know What to Expect

Drivers are better prepared to use ELD once they are aware of the changes:

- Driver champions: For a start, when identifying stakeholders, it can help to identify a driver champion. Driver champions are usually experienced drivers with a lot of miles on the road. They can influence other drivers and assist when issues arise. They can also share their wealth of experience and the benefit of ELDs with the wider organization.
- New Hire and Refresher Training: ELD training should be part of new hire orientation and ongoing training to ensure all drivers are comfortable with what to do in the event of an inspection.
- Driver check-ins: are your drivers aware of how to use ELDs? Remind them that if an ELD is on a mobile device, they don't have to hand it to an inspector. Instead, they can handle on their behalf as long as the display is visible. Keeping drivers informed of best practice and replying to any questions will help inspections run smoothly.
- In-cab coaching through an ELD can help alert drivers to unsafe behaviors.

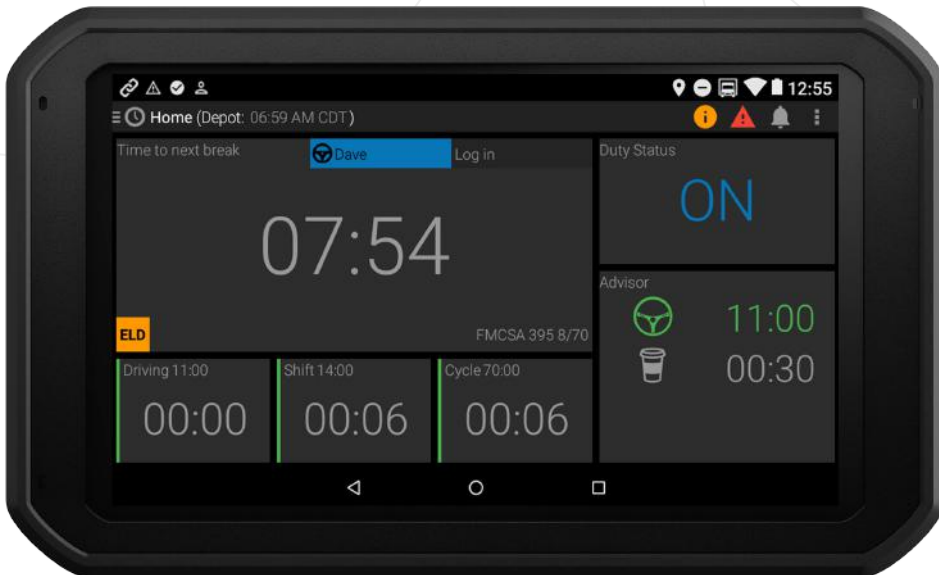
“HOW DO I TRANSFER MY LOGS?”

Transferring ELD logs should be straightforward. An ELD must have two options for electronic data transfer:

- Local transfer, either by USB or Bluetooth.
- Telematics transfer, either by email or web service.

An ELD is required to have at least one full set of a transfer type, local or telematics. State enforcement will have the ability to support at least one method from each category.

During roadside Inspections, the DOT officer will identify to the driver the method to transfer the logs.



ELD - Roadside Inspection

Instruction Guide for Drivers and Roadside Inspectors

BEGIN ROADSIDE INSPECTION



1. Select **HOS** from the main menu.

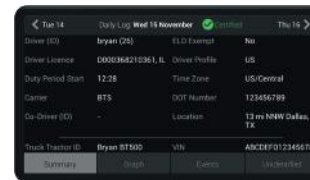


2. Slide out menu (left), and select **DOT Roadside Inspection**.

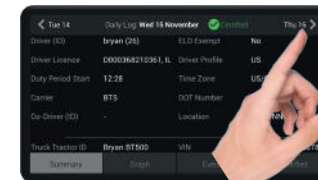


3. Choose either '**Inspect Logs**' or '**Transfer Logs**'.

INSPECT LOGS



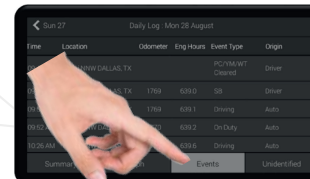
4.1 The initial view is the **HOS Daily Summary**.



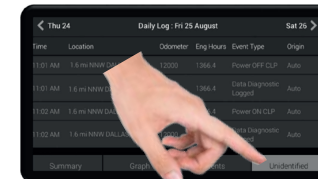
4.2 Use left / right arrows to change days.



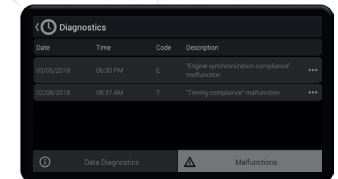
4.3 Use bottom tab to navigate to the **RODS Graph**, or to additional logs.



4.4 View **Events Log**.

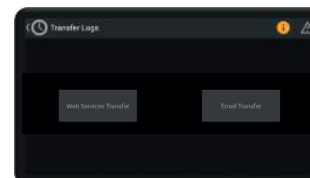


4.5 View **Unidentified Events Log**.

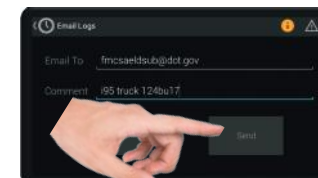


4.6 Vehicle Malfunctions can be viewed by tapping the **Warning Triangle** icon

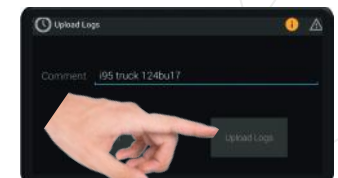
TRANSFER LOGS - EMAIL / WEB SERVICES



5. Choose to transfer logs via email or web services.



6. Add destination email, inspector's comment, and then press 'Send'.



7. Add inspector's comment, then press the 'Upload Logs' button.

“WHAT ARE THE PENALTIES IF I DON’T HAVE AN ELD?”

The penalties for both drivers and operators can be substantial. Fines for drivers can range from \$1,000 to \$10,000. If a driver is found to violate ELD regulations, they will be placed out of service for at least 10 hours. The driver cannot continue the trip. The truck will also remain immobile. The driver can continue the trip after the penalty period, providing they can show appropriate paper logs for travel.

ELD violations also impact CSA scores. There are [22 ELD-related violations with a variety of severity ratings](#). These include critical violations, like failing to record the driver’s duty status using an ELD or failing to create a record of duty status. Drivers can also be put out of service if found to be using an unauthorized ELD or falsifying logs.

“BUT WHAT ABOUT MY AOBDR?”

Are AOBDRs still valid? No. The phased-in compliance period came to an end on December 16, 2019. Motor carriers and drivers are now subject to the ELD rule and are obliged to use self-certified, registered ELDs.

“WHAT IF I HAUL IN CANADA?”

In parallel with this new era of ELD trucking in the United States, the Canadian government has revealed its plan for ELD. The rules will broadly align to those already in place in the United States. There are some exceptions including:

- Third-party certification: Transport Canada is creating a third-party certification process, different from self-certification in the United States. All ELD models will require third-party certification.
- Mandatory rollout from June 2021: The 24-month rollout phase aims to give carriers and drivers as much time as possible to become compliant and to allow for certification of ELDs.
- No grandfather clause: Unlike in the United States, there will be no grandfather clause. Transport Canada says this phase is no longer necessary.
- ORBCOMM is fully committed to meeting the Canadian ELD deadlines, once they are made public. If you transport to or within Canada, you won’t be left in the dark for ELDs.



STAGE 2 – TRAINING

Trust us when we say: “take time for driver training.” The most successful and seamless AOB RD 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

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#1. 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

#2. 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.

TIPS FROM THE FIELD

#3. Unassigned driving time

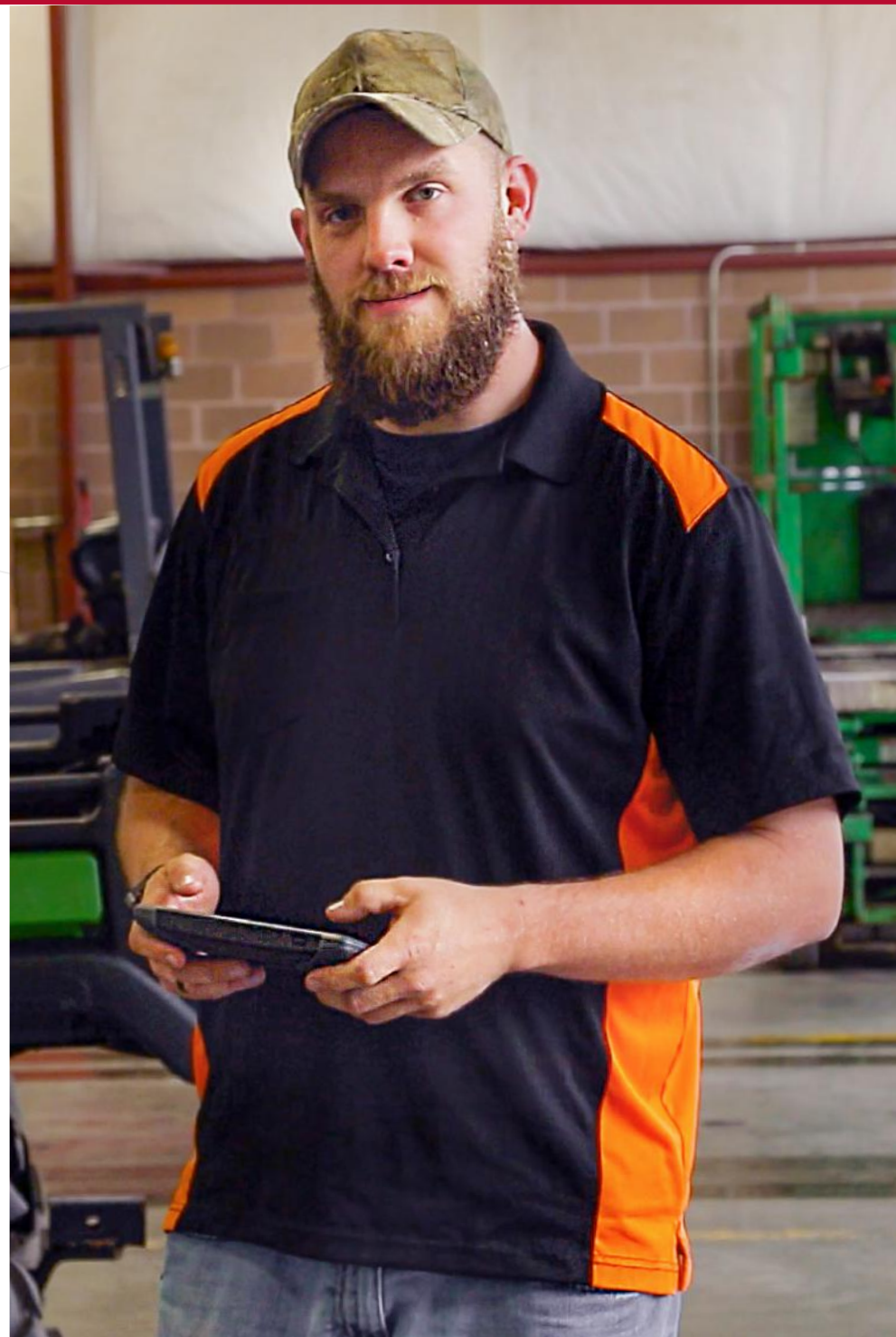
It's a good idea to plan for unassigned driving time. This could include shop personnel, truck washers, fuel attendants and other support activities for vehicles.

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

#4. 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

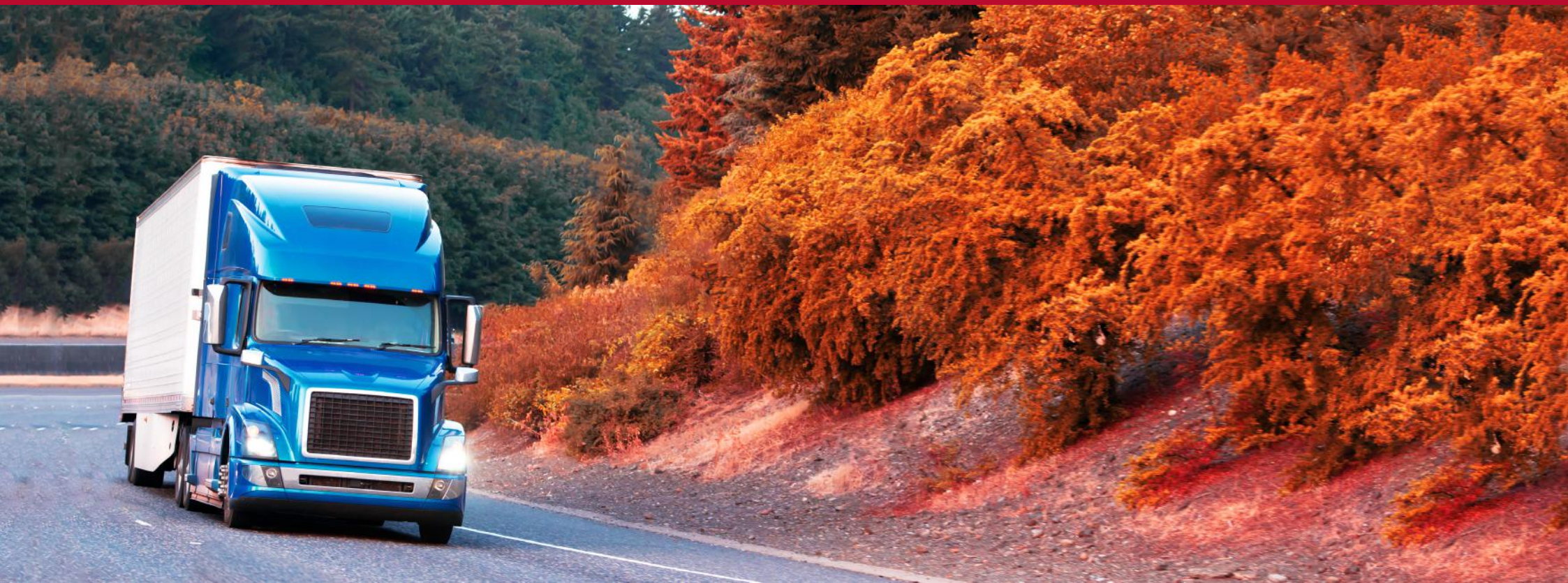
Your ELD is in!

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.





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