



Texas Department of Public Safety

Commercial Vehicle Enforcement

Electronic Logging Device (ELD) Mandate



Sgt. Dana C. Moore-Texas Highway Patrol



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Will the ELD Mandate Affect You?



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Federal Motor Carrier Safety Regulations Applicability

Interstate Operations

GVWR or GVW 10,001 lbs. or more

Compliance Date December 18, **2017**

Intrastate Operations

GVWR, GVW, or Registered
weight of 26,001 lbs. or more

Compliance Date December 16, **2019**



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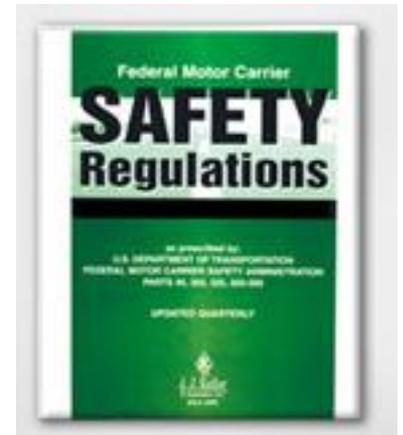
ELD Rule

Requires new technical specifications for ELD's

Mandates ELD's for drivers currently using RODS
(there are exceptions)

Clarifies supporting document requirements

Provides protection for drivers from being
harassed by carriers





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Applicability

- If a driver is currently required to prepare a paper record of duty status, the driver is required to use an ELD.
- UNLESS, the driver or commercial motor vehicle meets one of the limited exemptions...



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ELD Exemptions

- 100 air-mile radius drivers 150 air-mile radius non-CDL freight drivers
- Required to prepare paper RODS for not more than 8 days during any 30-day period
- Conducting “driveaway-towaway” operations – when the vehicle is the commodity including towing or driving recreational vehicles
- Driving vehicles manufactured before model year 2000 (as listed on the vehicle registration)





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ELD Exemptions

Engine

- Truck manufactured 2000 or later with a pre-2000 engine is exempt from ELD rule
- Truck manufactured pre-2000 with a 2000 or later engine is subject to ELD rule
- Glider kits are very popular and becoming more numerous
- No requirement to carry engine documentation in vehicle
- FMCSR Part 379 Appendix A requires motor carrier to retain motor & engine records (FMCSA Investigators only)





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ELD Exemptions

Rental Vehicle

- Rental vehicles are exempted from the ELD rule for up to 8 days
- Must be a rental and not a lease
- Driver must carry a copy of the rental agreement and the exemption from FMCSA





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Definitions

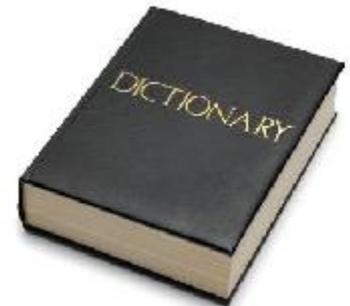
Paper RODS – Log Book

Logging Software – a computer software program or application on a phone or tablet that does not comply with 395.15. Not connected to the engine data. An electronic version of a paper log.

AOBRD – Automatic On-board Recording Device, complies with 395.15. Connected to the engine data. Automatically records the drivers duty status

ELD – Electronic Logging Device – a device that automatically records a driver's driving time and meets the requirements in the new subpart B of Part 395.

Connected to the engine data





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Is the Device Registered with FMCSA?

<https://3pdp.fmcsa.dot.gov/ELD/ELDList.aspx>



Federal Motor Carrier Safety Administration

LOGIN |



Registered ELDs

Here you may view a list of Electronic Logging Devices registered with this site. These devices are self-certified by the manufacturer and not by the Federal Motor Carrier Safety Administration. Click [here](#) to return to the homepage.

Device Name	Model Number	Software Version	ELD Identifier	Image	User Manual	Company	Contact Company (Phone)	Contact Company (Email)	Company Website
Load Logistics TMS	LOGI-APPS	1.35 or higher	LLSAPP	LOGI-LAUNCH-20150923-500.png	LOGI-APPS-REFERENCE-MANUAL-Ver35-ELDONLY.pdf	Support Resources, Inc.	770-702-0701	contactus@load-logistics.com	www.load-logistics.com
Gorilla Safety ELD	GS0001	1.0.9.2500	GS0001	Gorilla Safety ELD Image.jpeg.jpg	Driver Manual-2.pdf	Gorilla Fleet Safety, LLC	844-636-1360	info@gorillasafety.com	www.gorillasafety.com
FleetUP	3GL	1.0	TLT3GL	FleetUP ELD.jpg	FleetUP ELD Driver User Manual V2.0.pdf	FleetUp	855-274-2886	info@fleetuptrace.com	www.fleetuptrace.com
DriverLog	BlueLink	210	WL1001	Bluelink-standalone1-black-arrows(1).png	Compliance DriverLog Manual.pdf	Wireless Links	201-531 5906	support@wlius.com	www.wlius.com
Hutch ELD	Mercury	V 1.2.3 or higher	HELD16	Image for FMCSA Registration.jpg	ELD Manual Version 1.0.pdf	Hutch Business Group Inc	360-353-4093	sales@hutchsystems.com	www.hutchsystems.com
TSO INCABIN PLUS	TSO100	2.0 or higher	TSO100	TSO100.JPG	Manual_3.0.pdf	TSO MOBILE by Tracking Solutions Corp	18774772922	sales@tsomobile.com	www.InCabinPlus.com
e-Track Certified	ATS001	1.1.0.0 or above	ATS001	e-Track Certified Screenshot.png	e-Track Certified Driver Guide.pdf	ATS Fleet Management Solutions	570-309-0060	joeb@abw.com	http://www.atsfleettracking.com/
KeepTruckin ELD	LBB-1 and higher	8.0 and higher	KTIELD	KeepTruckin - The most powerful and reliable ELD.jpg	KeepTruckin - ELD User Manual.pdf	KeepTruckin, Inc.	855-434-3564	sales@keeptruckin.com	keeptruckin.com
Geowiz Truck Tracker Edition	HG100	v 2.0 and higher	FF44EE	Geowiz_Pictures.png	Driver Instruction Guide for ELD.pdf	GeoSpace Labs	877.4.GEOWIZ	david@geowiz.biz	www.geowiz.biz
at eDash	Apollo	1.0.28 or higher	APOLLO	ApolloELD.jpg	HOSAppUserGuideSWV109.pdf	Assured Tracking Inc	305-971-6777	support@assuredtracking.com	www.assuredtracking.com

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Federal Motor Carrier Safety Administration

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Comparing the 3 Devices

	AOBRDs	Devices Installed with Software	ELDs
Integrally Synchronized	Yes	No	Yes
Automatic Recording of HOS	Yes	No	Yes
Technical Specifications	Limited	No	Yes
Registered with FMCSA	No	No	Yes*



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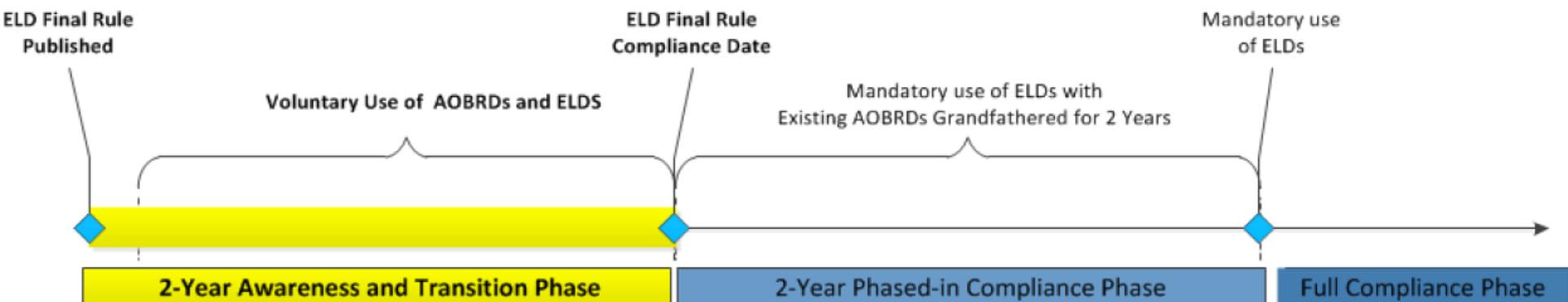
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ELD Transition

Effective Date
February 16, 2016

Compliance Date
December 18, 2017

Full Compliance Date
December 16, 2019





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Implementation Phase 1

ELD	AOBRD	Logging Software	Paper
Yes	Yes	Yes	Yes



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Implementation Phase 2

ELD	AOBRD	Logging Software	Paper
Yes	Yes *	**	**

*If AOBRD was installed prior to December 18,2017

** Vehicles & carriers that are exempt for ELD rule can continue to use paper RODS or logging software



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Implementation Phase 3

ELD	AOBRD	Logging Software	Paper
Yes	No	*	*

* Vehicles & carriers that are exempt from ELD rule can continue to use paper RODS or logging software



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ELD Technical Specifications



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ELD Automatic Duty Status Changes

Driving time is automatically recorded

Records driving time when vehicle reaches 5 MPH

Device requires an alert if the vehicle stops moving for 5 minutes

Defaults to "On-Duty" if no driver entry occurs within 1 minute

Other automatic duty status settings are prohibited





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ELD - Special Driving Categories

The motor carrier can enable access for the driver to use two other types of driving

Authorized personal use of CMV (PC) – Off duty



Yard moves – On Duty, Not Driving



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ELD Special Driving Categories

Authorized personal use of CMV (PC) – Off duty

Yard moves – On Duty, Not Driving

GPS location increased from 1 mile to 10 miles

Operating on company premises

Omits recording vehicle miles and engine hours (except for vehicle power-up & shut down)

*13. Beginning December 18, 2017, if a driver indicates use of a special driving category as defined by 395.28(a) when not involved in that activity, the driver's log is considered to be false.



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ELD Technical Requirements 395.26

When elements are recorded

Date

Time

Location information

Engine hours

Vehicle miles

Driver or authenticated user

Vehicle

Motor Carrier

When data is captured

Change of duty status

Intermediate recording (1 per hour)

Special driving (personal or yard)

Certification of log

Log in

Log out

Engine power up

Malfunction & data diagnostic event



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ELD User Accounts

All drivers and support personnel must have a unique user name and password

Multiple persons cannot share one account

Driver account must include DL information to provide unique ID and not have administrative rights

If driver is also the administrator, must have a separate administrative account

Exempt driver account





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Unidentified Driving

- ELDs must record all movement of the CMV in which it is installed.
 - If a driver does not log into the ELD the ELD must
 - Provide a visual or visual and audible warning to stop and log in to the ELD
 - Record driving and on duty not driving per 4.4.1 under the unidentified driver profile
 - Not allow entry of any other information other than a response to the login prompt





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Unidentified Driving

- **Driver** must review any unassigned driving time
 - Assume any records that belong to the driver or;
 - Indicate the records do not belong to the driver
- **Motor carrier** must review the records and;
 - Annotate the record, explaining why it is unassigned
 - Assign the record to the appropriate driver
 - Maintain records for 6 months
 - Provide records to safety official



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Edits

- Drivers can make edits to their ELD record
 - Must re-certify ELD record after edit is made
- Carrier can request edits after ELD records have been submitted
- Driver has the right to decline edits
- Assigned miles must be addressed prior to operating the commercial motor vehicle
 - Accepted or declined





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Electronic Data Transfer Methods

Option 1 – Telematics Transfer Methods

- Web Services
- Email



Option 2 – Local Transfer Methods

- Bluetooth
- USB 2.0



ELD provider will determine the option, and the enforcement officer will determine which method within that option



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Electronic Data Transfer Methods

Option1 – Telematics Transfer Methods

Web Services method will transmit the ELD file directly to FMCSA servers with the inspectors routing code

Email method will send ELD file to FMCSA servers along with inspectors routing code (not emailed directly to inspector)

Inspector will download ELD file from FMCSA using eRODS software

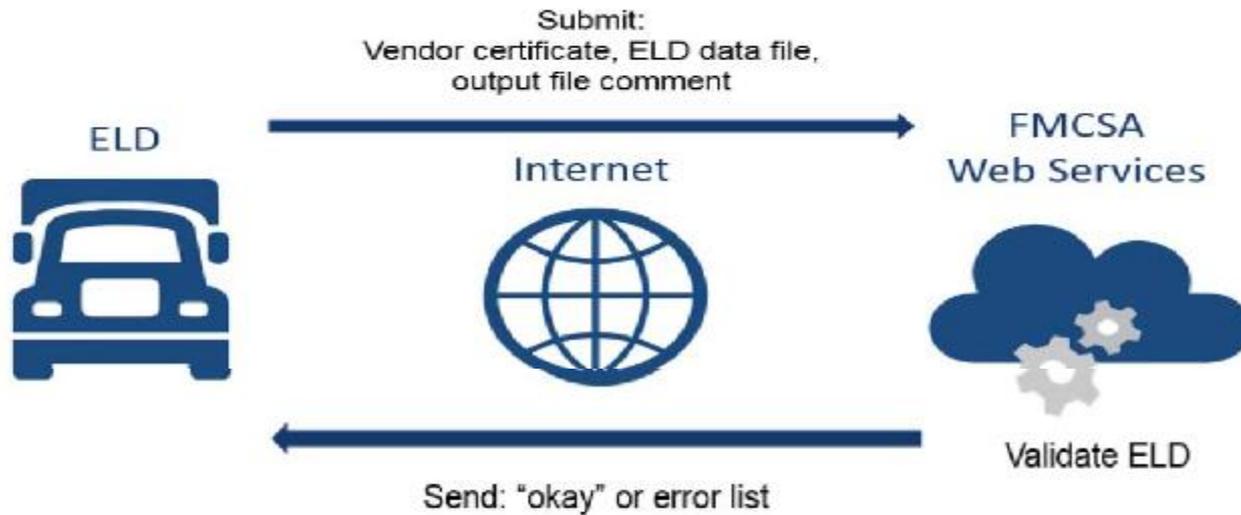




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Data Transfer: Web Services



U.S. Department of Transportation
Federal Motor Carrier Safety Administration



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Data Transfer: Email



U.S. Department of Transportation
Federal Motor Carrier Safety Administration



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Electronic Data Transfer Methods

Option 2 – Local Transfer Methods

Bluetooth method will connect the ELD and inspectors computer. The inspectors computer will transmit via the internet the ELD file to FMCSA servers. eRODS software will then download the ELD file and display on the inspectors computer

USB method will use a proprietary USB stick provided to the inspector. Driver will insert the USB device and download the ELD file. The inspector will then insert the USB device into the computer and the ELD file will be displayed on the eRODS software

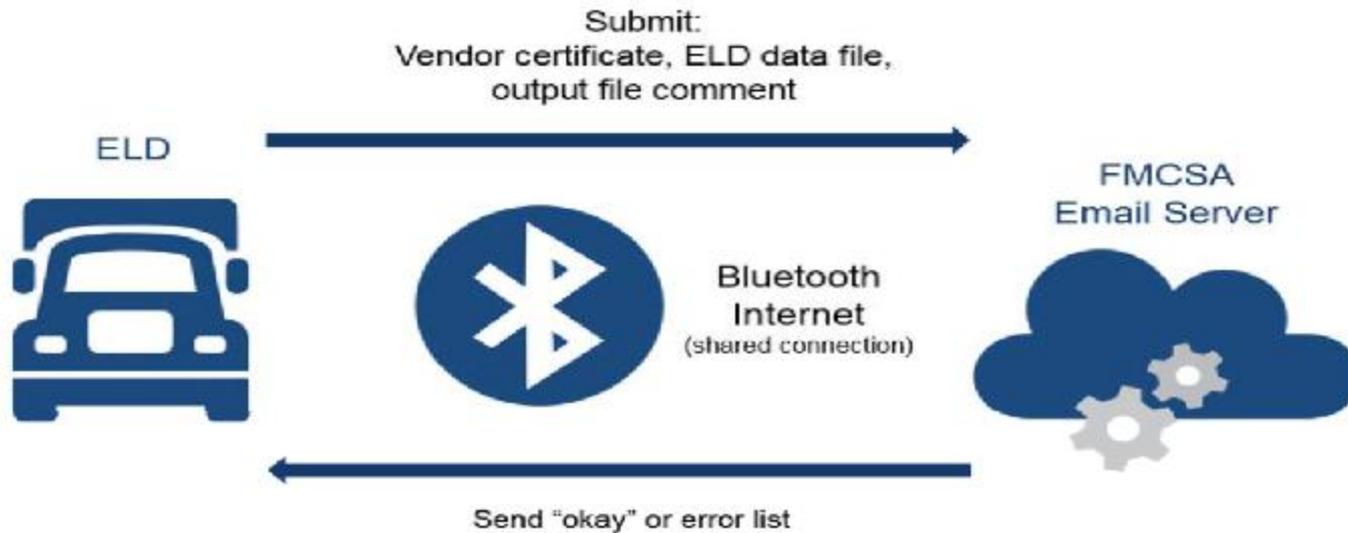




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Data Transfer: Bluetooth®



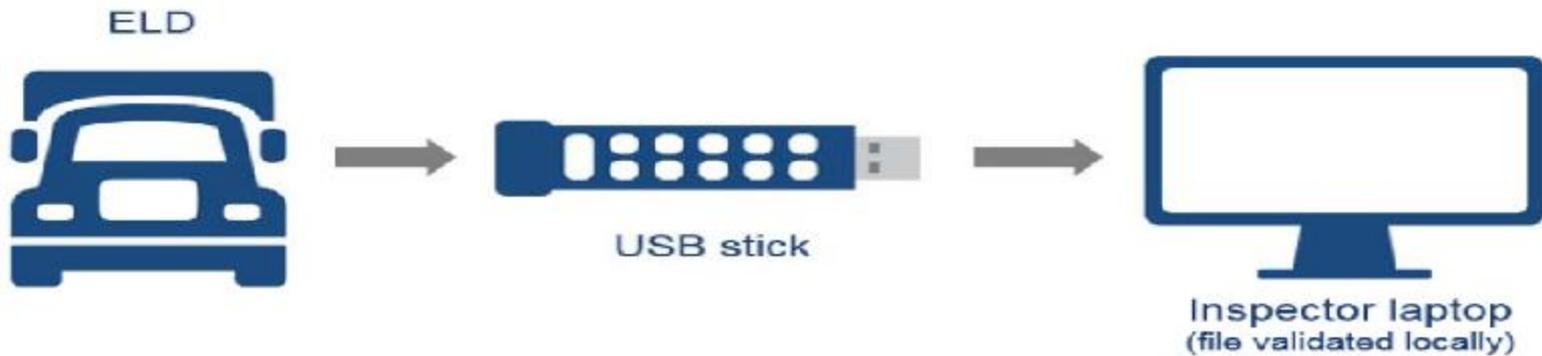
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Data Transfer: USB 2.0



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eRODS Display

Electronic Record on Duty Status - 01 - Alpha : 1505x838

File Help

Prev 1/12/2013 Next View Errors View All Violations

Driver: [smith] *primary Driver License: AL1234567 Vehicle VIN #: 1M2P267Y5AM022445 Power Unit #: 5000 USDOT: 7654321 Carrier: Acme Trucking Multi-Day Basis: 7

Period: 1/10/2013 00:00 Time Zone Offset: 4 Shipping Document Number: B 75251 Driver Exempt: False Current Latitude: 28.19 Current Longitude: -121.81 Current Location: 2.2 Miles N of Dixon CA, US

Eng: 1/12/2013 Vehicle Miles: 332640 Registration ID: ZA10 Total Driving Hours: 550

Time	Type	Code	Eng Miles	Eng Hours	Location
1/12/2013 12:00:00 AM	Change in Driver Duty Status	2	600	19	3.7 Miles E of Green River WY, I
1/12/2013 10:00:15 AM	Change in Driver Duty Status	4	600	14	2.7 Miles E of Green River WY, I
1/12/2013 12:00:00 PM	Change in Driver Duty Status	3	0	0	3.7 Miles E of Green River WY, I
1/12/2013 5:00:00 PM	Change in Driver Duty Status	1	300	5	58.3 Miles E of Spring Creek NV
1/12/2013 6:00:00 PM	Change in Driver Duty Status	3	300	6	59.1 Miles E of Spring Creek NV
1/12/2013 10:00:00 PM	Change in Driver Duty Status	1	540	10	18.1 Miles SW of Winnemucca ?
1/12/2013 11:00:00 PM	Change in Driver Duty Status	4	540	11	17.8 Miles SW of Winnemucca ?

Off Duty: 02:00:00

Sleeping Berth: 10:00:15

Driving: 09:00:00

On Duty: 02:59:45

Events Violations

Show Events

- Show All
- Duty Status Changes
- Intermediate Logs
- Personal Use / Yard Move Change
- Driver Certifications
- Login / Logout
- Engine PowerUp / Shutdown
- Malfunctions / Diagnostics

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Display or Print Requirements

Electronic transfer back-up method - RODS must be shared in one of two ways

*****Determined by the provider**



Printout



Screen Display

Visible at a reasonable distance
without entering the cab



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Display or Print Requirements Daily Header

<i>Record Date</i>	<i>USDOT #</i>	<i>Driver License Number</i>	<i>Driver License State</i>	<i>ELD ID</i>	<i>Trailer ID</i>
20-Nov-14	123456789	D000368210361	IL	987654	Unit #
<i>Time Zone</i>	<i>Driver Name</i>	<i>Co-Driver Name</i>	<i>ELD Manufacturer</i>	<i>Shipping ID</i>	<i>Data Diagnostic Indicators</i>
CST	Smith, Richard		Acme ELDs	BL1234567890	No
<i>24 Period Starting Time</i>	<i>Driver ID</i>	<i>Co-Driver ID</i>	<i>Truck Tractor ID</i>	<i>Unidentified Driver Records</i>	<i>ELD Malfunction Indicators</i>
Midnight	1234567		Unit #	No	No
<i>Carrier</i>	<i>Start End Odometer</i>	<i>Miles Today</i>	<i>Truck Tractor VIN</i>	<i>Exempt Driver Status</i>	<i>Start End Engine Hours</i>
Acme Trucking	39564 - 39984	420	1M2P267Y5AM022445	No	758.2-765.7
<i>Current Location</i>		<i>File Comment</i>		<i>Print/Display Date</i>	
6 mi. NE North Auburn, CA				20-Nov-14	

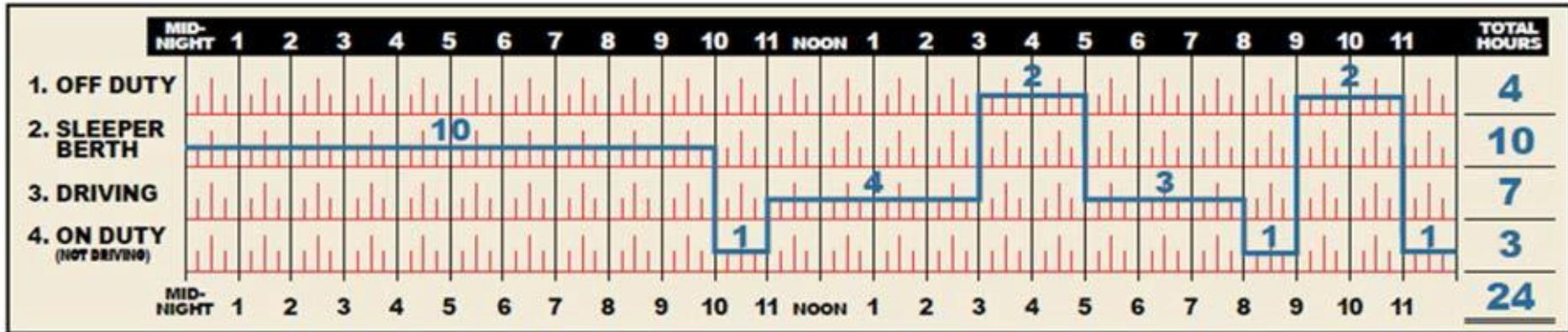
* Vehicle mileage is obtained from ECM and may not be the same as the odometer.



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Display or Print Requirements 24-Hour Duty Status Grid





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Display or Print Requirements Daily Log Detail

Time	Location	Odometer	Eng Hours	Event Type/Status	Origin
20-Nov-14					
0:00	49 mi NNE Fallon, NV	39564	758.2	SB	Driver
10:00	49 mi NNE Fallon, NV	39564	758.2	Login	Driver
10:00	49 mi NNE Fallon, NV	39564	758.2	ODND	Driver
10:52	49 mi NNE Fallon, NV	39564	758.2	Power Up	Auto
11:00	49 mi NNE Fallon, NV	39564	758.2	Driving	Auto
12:00	2 mi E Fernley, NV	39624	759.3	Int Location	Auto
13:00	7 mi NNE Truckee, CA	39684	760.3	Int Location	Auto
14:00	6 mi SSE Meadow Vista, CA	39744	761.3	Int Location	Auto
15:00	3.5 mi SW Davis, CA	39804	762.3	Off Duty	Driver
17:00	3.5 mi SW Davis, CA	39804	762.3	Driving	Auto
18:00	1 mi E Emeryville, CA	39864	763.4	Int Location	Auto
19:00	4 mi SSW Univ. of California, CA	39924	764.4	Int Location	Auto
20:00	6 mi NE North Auburn, CA	39984	765.5	ODND	Driver
21:00	6 mi NE North Auburn, CA	39984	765.7	Off Duty	Driver
23:00	6 mi NE North Auburn, CA	39984	765.7	ODND	Driver
23:58	6 mi NE North Auburn, CA	39984	765.7	Cert	Driver
23:58	6 mi NE North Auburn, CA	39984	765.7	Logout	Driver



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Roadside HOS Evaluation of ELD RODS

As long as the driver is able to display the RODS on the ELD unit or printout, or transfer the ELD file, he/she is considered to have records of duty status

For example there is no internet service during the inspection, the driver only needs to display the information on the unit. (some units may have a printout instead)

If the driver cannot display the RODS on the unit, but can transfer the ELD information in any of the approved manners, they are considered to have records of duty status



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ELD Driver Interaction – Mounted

Portable (including hand-held)

ELD's must be in a fixed and mounted position during operation





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Driver's Responsibilities

- User's Manual
- Data Transfer Instruction Sheet
- ELD Malfunction Instruction Sheet
- Supply of blank record of duty status graph grids
- Any supporting documents in the driver's possession must be provided to the safety official upon request





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Manual Input

- Off duty
- Sleeper berth
- On-duty not driving
- Annotations
- Driver's location
- Commercial Motor Vehicle Power Unit number
- Trailer number
- Shipping document number



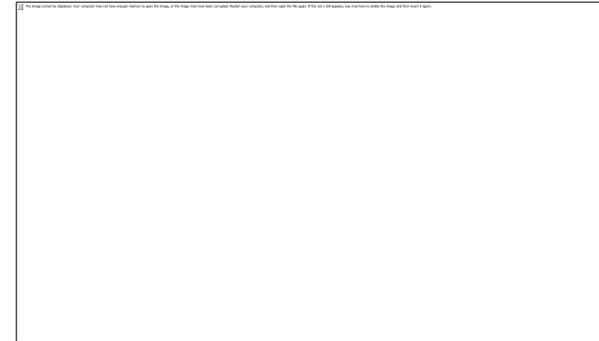


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ELD Malfunction (Driver)

- Note the malfunction
 - Provide written notice to motor carrier within 24 hours. (May include an electronic message, such as an email and/or a Fleet Management System (FMS) message.)
- Reconstruct the previous 7 days
- Continue to manually prepare records of duty status





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What to Expect Roadside



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Providing the Previous 7 Days Records of Duty Status *(December 11–17, 2017)*

- Paper Logs
- Printout from device with logging software
- Printout from an Automatic On-Board Recording Device (AOBRD), if now using an ELD

*Driver may insert missing data into the ELD



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eRODS

- Electronic data will be analyzed by FMCSA Electronic Records of Duty Status (eRODS)
- Provided to all DOT inspectors
- Potential HOS violations identified (interstate property & passenger rules)
- Falsification and tampering alerts
- Safety officials will continue exercise investigative techniques



*eRODS is a tool to help expedite the hours of service inspection process.



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Nominal Hours of Service

Roadside Violations

- Hours of service violations that are less than 15 minutes (on previous 7 days only)
- Identify patterns of hours of service non compliance
- Less impact on safety management score (SMS)
- Select the "nominal" HOS violation in the CVE-3





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Operating Without an ELD

- When an ELD is required
 - Device has been removed from the FMCSA registration site
 - There has been an ELD Malfunction
- When ELD is not required
 - Driver/vehicle meets an ELD exemption
 - Vehicle is equipped with ELD (Driver Exempt)
- Exempt driver account



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Interstate Hours of Service

- 11 hours driving
- 14 hour operating window
- 70 on-duty hours in 8 days or 60 on-duty hours in 7 days
- 34 hour restart
- 30 minute break required



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Texas Intrastate Hours of Service

- 12 hours driving
- 15 hours on-duty
- 70 hours in 7 days
- 34 hour restart
- No 30 minute break required (interstate only)



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Short Haul (Local) Driver Exemption

- Operate within 100 (interstate) or 150 (intrastate) air miles
- Shift limited to 12 hours
- Carrier maintains time records

If any condition cannot be met, driver is required to log for that day

If required to log more than 8 times in any 30 day period, ELD may be required



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Intrastate ELD Enforcement

DPS adopted the ELD rule for intrastate operations

Intrastate motor carriers that do not engage in interstate operations have until December 16, 2019 to come into compliance with the ELD rule

Until then intrastate carriers may use paper logs, logging software, AOBRD's, or ELD's to maintain compliance with the Hours of Service

Until December 16, 2019 inspectors can only verify compliance with the Texas HOS when a CMV is making an intrastate movement



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2017 CVSA OOSC/ELD

After April 1, 2018, if it is discovered that the driver and the vehicle operated by the driver is subject to the ELD rule, then the driver should be cited and placed OOS in accordance with the CVSA OOSC.

Until April 1, 2018, the driver should be cited (violation recorded), but not placed OOS. Drivers will not be placed OOS for not having an ELD until April 1, 2018, providing they have a ROD that meets the requirements of the regulations.

Drivers exempt from the ELD rule may continue to record HOS on paper RODS, AOBRDs, logging software, or an ELD. Exempt drivers are not required to log into a CMV equipped with an ELD.



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ELD Rule Summary

ELD rule is being phased in

Voluntary use of ELD's began on
February 16, 2016 (Phase I)

Phase II compliance date is December 18, 2017

AOBRD's compliant with 395.15 that were installed before the Phase II compliance date (12-18-17) can be grandfathered for 2 additional years (December 16, 2019)

AOBRD's must be upgraded or replaced with ELD's by December 16, 2019

Until December 18, 2017, drivers can meet the HOS requirements by using paper logs, logging software, an AOBRD, or an ELD





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Resources

Federal Motor Carrier Safety Administration (FMCSA) Website

<https://www.fmcsa.dot.gov/>

FMCSA Frequently Asked ELD Questions

<https://www.fmcsa.dot.gov/hours-service/elds/faqs>





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ELD Questions?