

Please consider implementing the following Best Practices to help your company operate in the electronic logging environment.

DRIVERS

- Include a notation in the post-trip inspection report as to whether the ELD is working or not working.
- Avoid sharing ELD login or password information with anyone.
- Certify logs within 24 hours.

MAINTENANCE

- Maintain an inventory of ELD hardware (just like tires, windshields, other parts) in the
 event a unit <u>malfunctions</u>. Doing so avoids the issue of the 8-day paper log recording
 limit, and keeps vehicles on the road while the manufacturer repairs or replaces the unit.
- Give login status to all mechanics and anyone, other than the driver, who may move the vehicle in order to avoid "unassigned time" issues for both drivers and vehicles.
- Provide a weekly report to your company's ELD manager regarding all ELD device issues, even if they were minor and fixed quickly.

OPERATIONS/SAFETY

- Practice running all reports available in your ELD system.
- Set up a system for the daily review of all ELD errors and/or corrections, and include the driver and management in the process.
- Identify and include company personnel with technology and/or computer-based assessment experience, other than safety and operations, in the process of identifying hours-of-service (HOS) and ELD issues.
- Regularly run an "Unassigned Miles Report" and ensure that any unassigned miles are assigned to the proper driver. This report will be requested during on on-site Compliance Review.
- Establish a method for identifying to whom miles should be assigned whenever a driver "rejects" miles from the "Unassigned Miles Report."

MANAGEMENT

- Create a "how to use the ELD equipment" manual and/or web-based training for all current, new or returning drivers.
- Develop guidelines for solving technical issues while the driver is on the road. This might
 include setting up a problem-solving manual on your company's website or giving each
 driver the link to the ELD provider website.
- Ensure that drivers, administrative personnel, and all other ELD users know who to contact if there are questions or concerns regarding your company's ELD system.
- Furnish each driver with an ELD mandate "communication card" that can be presented to an inspector during a DOT inspection. As nerves and language barriers can sometimes come into play, the card could aid in the communication process and alleviate some of the stress. The information listed on the card will be determined upon the particular situation:
 - If the vehicle is installed with an ELD, the card might include the make, model of the device installed in the vehicle and proof of its listing on the <u>Federal Motor Carrier</u> Safety Administration (FMCSA) website.
 - If the vehicle is installed with an automatic onboard recording device (AOBRD), the card might include a brief description of how it works; confirmation that it meets the requirements of a grandfathered AOBRD device per the ELD mandate (49 CFR 395.15); simple instructions for accessing the HOS information (i.e., table, email, phone, back-up paper log), and the name/phone number of your company's ELD manager. PLEASE NOTE: A motor carrier may continue to use grandfathered AOBRDs only until December 16, 2019. After that date, motor carriers and drivers subject to the ELD rule must use ELDs that are registered with FMCSA to record, certify, and present their hours-of-service data.
 - If the vehicle was manufactured before the model year 2000 (as reflected on the vehicle registration) or the engine model year is older than 2000, the card might indicate that the <u>driver is exempt from the ELD rule</u> and why, a photo of the vehicle's engine plate, and contact information for the individual responsible for motor and engine changes at your company.
- Monitor and track the processes and review all reports to make sure your ELD system
 is producing the desired results, to check that the system is working as planned, and to
 identify and correct gaps or problems that have arisen. Work closely with your
 company's ELD manager to ensure that all gaps and problems are addressed promptly.
- Conduct follow-up training with drivers and employees who are experiencing problems with the system or with compliance.
- Establish specific disciplinary policies that address ELD issues, including a policy that ELDs are not to be tampered with, disconnected or damaged; a policy for disciplining drivers who consistently "reject" miles from the "Unassigned Miles Report;" and a policy regarding the prohibition of harassment and coercion related to HOS or ELDs.
- Consult legal counsel when establishing new ELD policies.

