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SAFETY BULLETIN

ELD GUIDANCE



November 16, 2017

There will be no Idealease Safety Bulletin next week Friday Nov 24th during the Thanksgiving Holiday week.



Have a Safe and Enjoyable Thanksgiving Holiday with your Family and Friends!

ELD Countdown... 32 Days!

We are now exactly one month away from the implementation of phase two of the Federal Motor Carrier Safety Administration (FMCSA) Electronic Logging Device (ELD) deadline on December 18th.

As we approach the deadline many of you have questions regarding the ELD regulation and how it will affect your company.

To find out information regarding the ELD watch our most recent November 6th ELD webinar for 40 minutes:

<http://www2.idealease.com/e/36492/watch-v-f8E102nhDUQ/5f3cbq/603395127>

How Idealease will Support Your Compliance with the ELD Regulation While Operating our Rental or Lease Vehicles:

Idealease locations will present ELD solutions in the following manner:

- Rental personnel will review ELD Exceptions with the customer to determine if they are exempt from being required to utilize an ELD. Reasons for exemption include:
 - Drivers who have a rental vehicle for 8 days or less.
 - Drivers who use paper logs for not more than 8 days during any rolling 30-day period.
 - Drivers who conduct driveaway-towaway operations, where the vehicle is the product being delivered.
 - Drivers of vehicles manufactured before model year 2000 (due to vehicle connectivity concerns; this is a change from the proposed rule).
 - Drivers who operate using the logbook exception 22 days out of a rolling 30 day period.
- Idealease locations will allow customers to bring their own portable ELD kits to install on our rental units.
- Idealease customers will be allowed to bring their own smart devices and connect to existing telematic/ELD units already in the rental truck or Idealease locations will have portable ELD kits available for installation in the rental unit should the customer be subject to the ELD regulation.
- Idealease has Preferred ELD Suppliers that can keep customers in compliance with the ELD regulation requirements for leased and owned equipment.



Throughout all phases of the ELD regulation, Idealease locations will be available to discuss your specific needs to keep you in compliance.



Breaking ELD News!

ELD violations will NOT hit carriers' CSA scores until April 2st, 2018.

The FMCSA announced today that between December 18th and March 31st drivers

ELD violations will not impact the motor carriers CSA scoring. As previously announced drivers can and will be cited for ELD violations beginning December 18th, 2017 but will NOT be placed out of service. This grace period will allow carriers and drivers to better understand the ELD regulations without disruption to service and impact to their CSA scoring until April 1st.

ELD Exemptions

To determine if your driver meets ELD exemption #1 in the list below, ask yourself this series of questions:

1. Does my driver fill out paper log books today?
 - o If NO, NO ELD is required for this driver.
 - o If YES, does the driver fill out more than 8 days of paper log books in a rolling 30-day period?
 - o If NO, then NO ELD is required for this driver.
 - o If YES, then an ELD is required for this driver.

Say goodbye
to paper logs



Exemptions

1. Drivers who have a rental vehicle for 8 days or less (FMCSA letter of exemption must be available to an officer upon request).
2. Drivers who use paper logs for not more than 8 days during any rolling 30-day period.
3. Drivers who conduct driveaway-towaway operations, where the vehicle is the product being delivered.
4. Drivers of vehicles manufactured before model year 2000 (due to vehicle connectivity concerns; this is a change from the proposed rule).
5. Drivers who operate using the logbook exception (i.e. short-haul 100 air mile CDL and 150 air miles Non-CDL drivers) and can comply to the exception 22 days out of a rolling 30 day period.
6. INTRASTATE operations (Depending on your states timeline for adopting the ELD regulation).

ELD Questions of the Week:

Can a driver use a portable Electronic Logging Device (ELD)?

Yes. A driver may use a portable ELD. A portable ELD must be mounted in a fixed position during commercial motor vehicle (CMV) operation (CMV) and visible to the driver from a normal seated driving position. This information can be found in the ELD Rule section 395.22 (g).

What information may be requested to support the exemption for drivers not required

to use records of duty status (RODS) more than 8 days in any 30-day period?

Authorized safety officials may inspect and copy motor carrier records and request any records needed to perform their duties.



DOT Adds Drugs to Transportation Worker Drug Testing Requirements

The U.S Department of Transportation has issued a final rule amending its drug testing program regulation to add hydrocodone, hydromorphone, oxycodone, and oxycodone to its drug-testing panel; add methylenedioxyamphetamine as an initial test analyte; and remove methylenedioxyethylamphetamine as a confirmatory test analyte. [82 Fed. Reg. 52229](#) (November 13, 2017).

According to DOT, the revision of the drug-testing panel harmonizes DOT regulations with the revised HHS Mandatory Guidelines established by the U.S Department of Health and Human Services for federal drug-testing programs for urine testing. This final rule clarifies certain existing drug testing program provisions and definitions, makes technical amendments, and removed the requirement for employers and Consortium/Third Party Administrators to submit blind specimens.

The changes to the drug-testing rule go into effect on January 1, 2018. Companies should make sure that their testing protocols, or those of their third-party providers, meet these new standards by the first of the year.

Have You Prepared Your Terminal Facility for the Long Thanksgiving Holiday Weekend?

It is not uncommon for thieves to target truck terminals over the holidays as they

know it is a good opportunity are there is no one there. Make sure that you take extra precaution to secure the trucks and items of value at your terminal. If your units do not have anti-siphon devices or locking caps instruct the drivers not to fill the units at the end of the day. Make sure that all security alarms and security lighting is in working order. Walk the perimeter of the lot to make sure that security fencing is in good condition. Move units and all other material such as pallets, tires, etc far enough away from the fence so they cannot be used to climb on to get over the fence. Consider blocking the entrance and exits to the lot so units cannot be stolen. Throughout the four day weekend assign management personnel to check the terminal randomly. Using a little prevention and common sense can deter a thief from striking your facility.

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