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Final Preparations for Electronic Logging Device (ELD) Implementation

AOBRD to ELD: Final Preparations by December 16th

We are now within 30 days of full implementation of the Electronic Log Device (ELD) Mandate on December 16, 2019 that went final rule back in December of 2015.

What this means, that if you were grandfathered from the December 2017 ELD implementation date because you were previously using an Automatic On

Board Recorder (AOBRD) for your hours of service compliance, by December 16 you have to be in compliance with the ELD mandate.

Hopefully, you already have a plan in place to train drivers, develop or update company policies, and implement the ELDs or update the software from AOBRD to ELD requirements. If you do not, it is time to get moving ASAP!

Follow the checklist provided here to make your transition a smooth one.

Set policies and procedures:

- Update policies and procedures to reflect the differences between ELDs and AOBRDs
- Update responsibilities of affected personnel
- Verify that the hours of service
 (HOS) is a condition of employment and falsification or tampering with
 ELDs will not be tolerated

Establish a training program:

- Create or update training policies for affected personnel on how to operate ELDs
- Select a training team to facilitate ELD implementation
- Train drivers and supervisors to operate ELDs at a high level
- Train your supervisors and the audit teams on how to detect falsification methods

Assign responsibilities:

- Develop security safety settings for system reporting
- Establish an implementation timeline
- Determine who will install the ELDs
- Define the communication process for issue resolution

 If switching providers, obtain (and test) the devices to ensure everything works properly

The necessary move from AOBRDs to ELDs is the final step in a transition that has been a long process spread over multiple year for some carriers. Establishing an implementation plan well in advance will help make the last step into the ELD world smoother for all parties. While many carriers are holding out until later this year, those that wait much longer could find themselves in dire straits as they scramble to get technology, policies, and people in line in short order.



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:

- 1. Rental personnel will review ELD Exceptions with the customer to determine if they are exempt from being required to have 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 (i.e. short-haul 100 air mile CDL and 150 air mile Non-CDL drivers) and can comply to the

exception 22 days out of a rolling 30-day period

- 2. Idealease locations will allow customers to bring their own portable ELD kits to install on our rental units.
- 3. 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.
- 4. 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.

What if I need to rent a truck for a driver that is subject to the ELD regulations?

If the rental period is less than 8 days, they can use the 8 day rental exemption that was granted by the FMCSA as follows:

- They can paper log for up to 8 days and must carry a copy of the <u>letter of exemption</u> with them during that 8 or less day period to present to an officer if stopped.
- Idealease locations will allow customers to bring their own portable ELD kits to install on our rental units.
- If the rental period exceeds 8 days they can rent an ELD from our location.



Critical Violations Sideline 13.5% of CMVs During Brake Safety Week

Brake-related violations sent 13.5% of inspected commercial motor vehicles (CMVs) out-of-service during the Commercial Vehicle Safety Alliance (CVSA) Brake Safety Week in September.

Inspectors conducted 34,320 inspections of CMVs the week of September 15 to 21, 2019, placing 4,626 vehicles out-of-service after critical brake-related conditions were identified during roadside inspections.

When a vehicle is placed out-of-service due to a critical violation, motor carriers must correct the violation before the vehicle can proceed.

Other data collected during **Brake Safety Week** included:

 2,567 vehicles had chafed rubber hose violations;



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- 1,347 vehicles had chafed thermoplastic hose violations;
- 2,704 violations of §393.45 of the Federal Motor Carrier Safety Regulations (FMCSRs) and Canadian equivalent included chafed rubber hoses; and
- 1,683 violations of §393.45 of the FMCSRs and Canadian equivalent violations included kinked thermoplastic hoses.

ELEVATE: QUESTION/TIP OF THE WEEK SIGNUP

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