Hours of Service and Electronic Logging Devices Webinar

January 12, 2018, 2:00-3:00 PM ET

National RTAP
Rural Transit Assistance Program

U.S. Department of Transportation
Federal Transit Administration
Presenter and Facilitator

**Presenter: Mike McDonal**

Product Director, Regulatory Compliance, Saucon Technologies; chair of ABA Bus Maintenance & Repair Council (BusMARC); and past chair and current board member for ABA Bus Industry Safety Council (BISC)

**Facilitator: Brandon Buchanan**

Director of Regulatory Affairs, American Bus Association (ABA).
Hours of Service: Fact, Fiction, Reality and Your Role Within

Mike McDonal
Director, Regulatory Compliance
Saucon Technologies
Topics to discuss

- The Hours of Service Rules
- The ELD Regulation
- ELD compliance
- Data Management
- Technologies available
- Implementing Technologies into your fleets
Passenger carriers have been following the same Hours of Service Rules since the beginning of driver time recordkeeping. Drive no more than 10 hours. Be on duty no more than 15 (non consecutive hours). Work no more than 60 hours in 7 days or 70 hours in 8 days (depends if you are a 5, 6 or 7 day operation). Driver must have 8 consecutive hours off to reset the 10 and 15 hour clocks. Exceptions - many are based on industries to include oilfields, utilities and agriculture. The most common exemption for passenger carriers is the short haul or 100 air mile radius exemption. This is a very specific exemption with several requirements to qualify. Time cards can be used under this exemption.
The ELD Regulation

- Became law and enforceable December 18, 2017
- Any driver having to create a record of duty status prior to that date would need to convert to electronic recording
- None of the hours of service rules changed just the way they needed to be recorded
- Drivers time is now recorded to the second and not 15 minute intervals
- There are a very few exceptions that will allow drivers to stay on paper logs
Hours of Service

Interstate Commerce (Intent)
- Do you do feeder service to Greyhound or other for-hire carriers?
- Do you provide service to an airport, train station or ferry/boat port?

States looking at Intrastate requirements
States with special requirements
Determined by vehicle not by license (CMV)
All drivers must be using an AOBRD (Automatic On-board Recording Device) or ELD that is self certified by the manufacturers of the device.

The must be connected to the engine of the vehicle to minimally record speed, hours and miles from the ECM of the vehicle.

All of this equipment must installed and operational and drivers comfortable with the use of them by December 18, 2017.
There is a large amount of data that collected from your vehicle without any additional technology added to it.

You may or may not have access to that data.

When you add technology this will only increase the data to manage.

When you add items that include speed and driver behaviors need to be monitored and acted upon.

Company policies and expectations need to be reviewed and updated to cover all the bases.
Available Technologies

- AOBRD / ELD
- Camera systems
- Speed monitors
- Adaptive cruise control
- Automatic braking devices
- Lane departure technology
- Height warning and clearance warnings
- Tire pressure monitoring
- Engine and maintenance diagnosis
- Predictive versus preventive maintenance
How to Implement Technology

- Do your Homework !!
- Ask for live demos
- Select a company that knows and understands your business
- Build a partnership for the long haul
- Try and limit the number of vendors you have per bus
- Have a point person in your organization to lead the project
Involve your entire organization
Technology will impact your entire organization
Train Train Train!
Verify data and implement change
Registered ELDs

The listed devices are self-certified by the manufacturers. The Federal Motor Carrier Safety Administration does not endorse any electronic logging devices.

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https://csa.fmcsa.dot.gov/ELD/List
A daily review of logs should be done to address issues immediately.

• Did the driver go Off Duty from the night before or during his break times?
• Did the driver reflect adequate amount of time spent on pre- or post-trip?
• Did the driver claim Adverse Conditions – and go into violation?
• Did the driver use Personal Conveyance and if so was it used properly?
• Does the driver have a signature on each 24 hour period?
• Has the driver approved and recertified any edits made to his/her log by an administrator?
• Were there any HOS violations and were they addressed with the driver?
Logs will eventually take less time to review, but should be looked at from the point of view of an external audit.

**Effects on Safety Managers**

- Have I assigned all ‘unassigned driving’ to a driver – or explained why an unassigned driving event is not attributable to a driver?
- Can I explain this action to a regulating authority?
- Can I justify the edit made to a driver’s log as a plausible, legal one?
- Can the edit I proposed be interpreted as ‘log falsification?’
- Can I prove that I took corrective action when I found a problem?
- Can I show that I am using the data I receive from ELDs or Fleet Management System to take meaningful action?
- Did I take immediate action when I was advised of an ELD malfunction?
The BISC is comprised of security, mechanical, safety, operational and maintenance professionals as well as consultants from all segments of the industry.

Government agencies represented - DHS, TSA, FTA, FMCSA, NHTSA, DOD, DOL

The group meets regularly to discuss issues, best practices and innovations in the areas of safety, regulatory compliance, mechanics, technology and security.

Next Meeting is January 28-29, 2018 in Charlotte, NC!
Purpose – To raise the level of awareness of the importance of maintenance for intercity bus and motorcoach operations

Designed for mechanics, shop supervisors and other maintenance personnel

- Government representation by FMCSA, CVSA, State Enforcement

Meetings – In tandem with BISC, and includes some offsite visits.

- Toured operator facilities and manufacturer locations
  - Miller Transportation & Motor Coach Industries
  - Dillon’s Bus Service (Coach USA) & Cummins Power Systems

Next Meeting at Marketplace 2018 – Jan 29-30 in Charlotte, NC.
Questions?
Upcoming Webinars & Peer Calls:
• Wed, Jan 17, 2-3:30pm ET – Disaster Preparedness Peer Call Series: Getting Ready for the Worst
• Fri, Jan 19, 1-2:30pm ET – Public Transit Drug & Alcohol Fitness for Duty Policies & Procedures
• Tue, Feb 6–Tue, Mar 13, 2-3pm ET – Website Builder Workshop Series