Sgt. William D. Collier

Implementation of ELD’s

Training for TN State Troopers
State of Tennessee
THP’s 9 Districts

Fall Branch 5th District
13 counties

Jackson 7th District
11 counties

Nashville 3rd District
12 counties

Cookeville 6th District
15 counties

Knoxville 1st District
11 counties

Memphis 4th District
10 counties

Lawrenceburg 7th District
11 counties

Chattanooga 2nd District
12 counties

Tennessee Department of Safety & Homeland Security
Tennessee State Trooper

[Map of Tennessee showing the 9 districts]
Total of 8 scale locations in TN
## Certified Troopers in TN

<table>
<thead>
<tr>
<th></th>
<th>Level I Inspectors</th>
<th>Level III Inspectors</th>
<th>All Inspectors</th>
</tr>
</thead>
<tbody>
<tr>
<td>CID</td>
<td>2</td>
<td>5</td>
<td>7</td>
</tr>
<tr>
<td>District 1</td>
<td>32</td>
<td>33</td>
<td>65</td>
</tr>
<tr>
<td>District 2</td>
<td>20</td>
<td>38</td>
<td>61</td>
</tr>
<tr>
<td>District 3</td>
<td>40</td>
<td>38</td>
<td>81</td>
</tr>
<tr>
<td>District 4</td>
<td>36</td>
<td>34</td>
<td>69</td>
</tr>
<tr>
<td>District 5</td>
<td>37</td>
<td>41</td>
<td>77</td>
</tr>
<tr>
<td>District 6</td>
<td>38</td>
<td>34</td>
<td>74</td>
</tr>
<tr>
<td>District 7</td>
<td>47</td>
<td>23</td>
<td>69</td>
</tr>
<tr>
<td>District 8</td>
<td>28</td>
<td>40</td>
<td>69</td>
</tr>
<tr>
<td>Administration</td>
<td>36</td>
<td>26</td>
<td>62</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>316</td>
<td>312</td>
<td>634</td>
</tr>
</tbody>
</table>
Training obstacles

- Overcoming the myth’s associated with electronic devices
- Uniformity in training throughout the state
- How to reach all troopers, train them, and get them to maintain that knowledge to enforce it uniformly
- Setting personal preferences aside
- Teaching troopers to be patient as the industry adjust to the changes
Our Plan

- Two trainers attended train the trainer course for ELDs, taught by FMCSA in GA
- Schedule district training where the same trainers instruct all troopers
- Schedule events at scales where as a group we focus on ELD’s and AOBRD’s
- Monitor violations that are found and share common violations found with the field personnel.
Training Course Overview

Objectives

- Discuss implementation of ELD mandate.
- Types of devices and configurations
- Current AOBRD Regulation: 395.15
- New ELD Regulation: 395.20 to 395.38
- Best practices for roadside inspections.
- Citing Violations
- OOSC
They Can’t Be Beat Right??

- https://www.youtube.com/watch?v=BGyprdsXCvk
## Comparing the 3 Devices

<table>
<thead>
<tr>
<th></th>
<th>AOBRDs</th>
<th>Devices Installed with Software</th>
<th>ELDs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrally Synchronized</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Automatic Recording of HOS</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Technical Specifications</td>
<td>Limited</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Registered with FMCSA</td>
<td>No</td>
<td>No</td>
<td>Yes*</td>
</tr>
</tbody>
</table>

*To see the list of ELDs registered with FMCSA, go to: [https://www.fmcsa.dot.gov/hours-service/elds/equipment-registration](https://www.fmcsa.dot.gov/hours-service/elds/equipment-registration)*
Exemptions

- Have not changed for the most part
- ELD specific exemptions are still being worked out
  - Trucks with model year older than 2000 are exempted
  - Up to 8 days on paper logs (infrequent use)
  - https://www.fmcsa.dot.gov/hours-service/elds/faqs
ELD Exceptions

- **Short haul drivers**
  Cannot use paper RODS for more than 8 days within any 30-day period

- **Drivers operating CMVs manufactured before model year 2000 as indicated by the VIN** may continue to use paper RODS.

- **Drivers involved in drive-away/tow-away operations** where the vehicle being driven is part of the shipment being delivered may continue to use paper RODS.
Options/ Methods

- Paper RODS – acceptable until December 18, 2017 (exceptions)
- Automatic Onboard Recording Device (AOBRD) – acceptable until December 16, 2019
- Logging Software Programs and Phone Apps - acceptable until December 18, 2017
- Electronic Logging Device (ELD) – optional on February 16, 2016, required on December 18, 2017
ELD Mandate

ELD final rule:

Phase I
From February 16, 2016 to December 18, 2017

Phase II
Compliance Date: December 18, 2017
Can use AOBRDs that were installed prior to 12/18/17 and certified, registered ELDs

Phase III
Full Compliance Date: December 16, 2019
Must be using certified and registered ELDs
In a victory for the U.S. Department of Transportation, the U.S. Supreme Court has said it will not hear a lawsuit challenging a DOT rule requiring truck operators to use electronic logging devices to track hours of service. The Supreme Court’s June 12 decision leaves in place a lower court ruling upholding the mandate and its Dec. 18 compliance deadline.

# Printing Requirements

<table>
<thead>
<tr>
<th>Device Type</th>
<th>Required to have printout during roadside inspection:</th>
<th>Guidance found in:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Logging software and application device with electronic signature capabilities</td>
<td>Yes, at the request of an enforcement official. If the driver is unable or refuses to provide the requested printout, the driver should be cited 395.8(a) or 395.8(k)(2). Driver must be given the opportunity to print current and prior seven days RODs at roadside.</td>
<td>Hours of Service for Commercial Motor Vehicle Drivers; Regulatory Guidance Concerning Records of Duty Status Generated by Logging Software Programs (79 FR 39342)</td>
</tr>
<tr>
<td>Logging software and application device without electronic signature capabilities</td>
<td>Yes. Driver must be given the opportunity to print current day RODS at roadside.</td>
<td>Hours of Service for Commercial Motor Vehicle Drivers; Regulatory Guidance Concerning Records of Duty Status Generated by Logging Software Programs (79 FR 39342)</td>
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</tbody>
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# FUN CHECK

**Violations 11, 14 or 30 MRB?**

**11 hour rule 5:30am-1pm**

**14 hour rule 6p-10p & 11p-mid**

**14 hour rule 7a-1p**

**11 hour rule 7:30p-10p & 11p-mid**

**30 MRB 5:01pm**

**30 MRB 12:01pm**

**30 MRB 5:01pm**

**30 MRB 5:01pm**

**14 hour rule 6p-10p & 11p-mid**

**30 MRB 12:01pm**

**14 hour rule 7a-1p**

**14 hour rule 7a-1p**
1. You can only violate HOS when you are driving? **True** or False
2. Enforcement personnel receive more money if they place you OOS? True or **False**
3. Only a Federal Marshall can check your log book? True or **False**
4. It is okay to drive if you are tired, ill or fatigued, as long as you have available hours? True or **False**
Questions or Comments?

Questions concerning this presentation please call Sgt. William D. Collier 615-815-6599