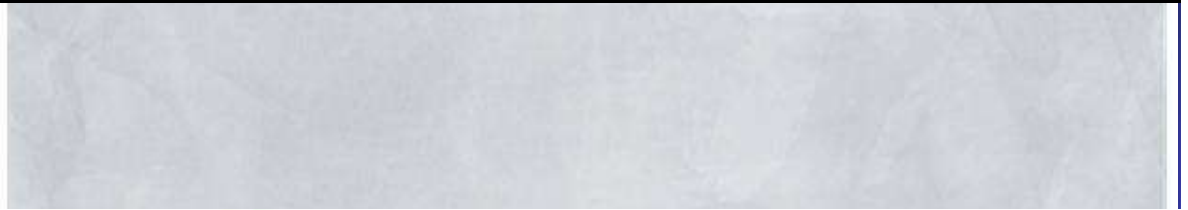




# **ELECTRONIC LOGGING DEVICES**

**October 18<sup>th</sup> , Wallace, N.S.  
Presenter: Mike Millian  
President, PMTC  
For: THRSCA/PMTC Seminar**

# ELECTRONIC LOGGING DEVICES



# US ELD REVIEW

## US final ELD rule came into effect on December 18, 2017

- ✓ **December 16, 2019 grandfathering for existing technology that does not meet new specifications**
- ✓ **Transition from AOBDR to ELD's is fast approaching, FMCSA not expected to add a soft enforcement period as they did with initial rule, significant percentage have not yet transitioned, could become a real issue.**

# US ELD COMPLIANCE

**The ELD rule applies to most motor carriers and drivers who are currently required to maintain paper logs or some Records of duty status (see exceptions). The rule applies to commercial buses as well as trucks. Canada- and Mexico-domiciled drivers are included.**

**No 3<sup>rd</sup> party certification required for manufacturers, allowed to self certify, this has caused major issues for industry.**

# ELD's IN CANADA

- ✓ **Current Canadian Federal Hours of Service Regulations allows for the use of electronic recording devices.....as long as it captures the same data manually required in a paper logbook.**
- ✓ **ELD regulation posted in Gazette 2, with a compliance date of June 12<sup>th</sup>, 2021, will apply to the same federally regulated carriers and their commercial drivers who are currently required to maintain a daily log under HOS (NSC, over 4500kg's)**
- ✓ **PMTIC and other Industry Representatives are encouraging the CCMTA and Transport Canada to work with Provincial & Territorial Jurisdictions to adopt and enforce the regulations at the same time.**

# CANADIAN ELD TIMELINES

## Canada Gazette Part I:

- ✓ Transport Canada posted its regulatory proposal in Canada Gazette part 1 on December 16<sup>th</sup> of 2017.
- ✓ The posting had a comment period of 60 days and closed on February 14<sup>th</sup> of 2018.
- ✓ The posting was closed and comments were reviewed by Transport Canada in preparation for posting in Gazette 2.
- ✓ The original posting did not require ELD's to be certified by a 3<sup>rd</sup> party. There was large push back by PMTC, and others in the industry, and 3<sup>rd</sup> party certification is now required.

# CANADIAN ELD EXPECTED TIMELINES

## Changes in Tech standard from Gazette 1 to 2

- ✓ Transport Canada & the CCMTA working group as well as stakeholders worked together to resolve issues noted in the comment period in regard to the tech standard
- ✓ Changes included roadside data transfer methods. Only email is required, USB or Bluetooth will still be available options to comply.
- ✓ View on print out has changed, CSV file as well as PDF is now required.

# CANADIAN ELD EXPECTED TIMELINES

## Changes in Tech standard from Gazette 1 to 2

- ✓ All data transfer methods to be encrypted for security
- ✓ 3<sup>rd</sup> party certification of devices was addressed in the final CG 2 posting and forms part of the regulatory requirement.



# CANADIAN ELD EXPECTED TIMELINES

## Canada Gazette Part II:

- ✓ The Gazette 2 posting occurred on June 12<sup>th</sup> of 2019
- ✓ CG 2 posting had a 2-year compliance date, which means all federally regulated carriers will have to comply by June 12<sup>th</sup> of 2021.
- ✓ The CG 1 posting also had an additional 2-year Grandfather period for existing devices installed prior to the Gazette 2 posting, this has been removed in the CG 2 posting.

# Canadian ELD COMPLIANCE

Carriers must ensure ELD's are installed and drivers and administrative staff are trained to use them by the compliance date posted in Gazette Part 2 of June 12<sup>th</sup>, 2021.

- ✓ The entire Gazette 2 posting and technical standard can be viewed at

<http://gazette.gc.ca/rp-pr/p2/2019/2019-06-12/html/sor-dors165-eng.html>

<https://www.ccmta.ca/en/national-safety-code/canadian-eld-standard>

# Exemptions in Canadian Rule

- ✓ **CMV's operated under an HOS permit or MVTA exemption**
- ✓ **Pre model year 2000 CMV's**
- ✓ **CMV's being operated under a rental agreement of no more than 30 days**

# CANADIAN ELD COMPLIANCE



- ✓ **Must notify the driver at least 30 minutes in advance of an hours of service violation, and which status they are in danger of violating.**
- ✓ **Volume control or mute option for any audio feature.**
- ✓ **If a unit breaks down, it must be repaired within 8 days. Within 5 days of the malfunction, you may request an extension from your jurisdiction director.**
- ✓ **Must generate a standard output file that can be transferred to a safety official upon request. At roadside, must be able to send by email. Bluetooth or USB will be options as well, in addition to email.**

# CANADIAN ELD COMPLIANCE



- ✓ Displays all required standardized data to authorized safety officials on demand – through a screen display or printout that includes three elements: a daily header, graph grid showing driving duty status changes, and detailed daily log data. The graph grid, if printed, must be at least 15cm's by 4 cm's. A CSV file with data will also be required.
- ✓ Requires driver certification and annotation (written explanation) for any edits to records that are made by the driver or any other ELD user
- ✓ Requires certification of driver records at the end of each 24-hour period

# CANADIAN ELD COMPLIANCE

**ELD provider must furnish a user's manual, and carrier must ensure the following is in each vehicle:**

- ✓ **A users manual**
- ✓ **An instruction sheet for the driver describing the data transfer methods supported by the device, and the steps required to generate the transfer.**
- ✓ **An instruction sheet for the driver describing the measures to take in the case of a malfunction of the ELD.**
- ✓ **Blank grids to record 15 days of drivers record of duty status.**

# CONTACT US



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