



# AOBRD/ELD Migration Preparation

## Common tips to assist compliance with the ELD final rule

Carriers who are currently using a grandfathered Automatic On-Board Recording Device (AOBRD) may do so until December 16, 2019 after which only compliant Electronic Logging Devices (ELDs) may be used. FMCSA has indicated that this deadline will not be extended, as early adopters of AOBRD technology were given a two year window to become compliant with the ELD final rule.

**To help you meet this deadline, ATA has worked with its membership to create a list of common tips to help carriers during this migration process.**

- ✓ Discuss the transition plan with your AOBRD/ELD vendor. Establish a timeframe for when any relevant software or equipment will be updated.
- ✓ Transition plans should take into account these important factors:
  - Software vs. Equipment: Is your AOBRD able to be upgraded with a software update, or will new equipment need to be installed?
  - Back Office Support: Does the back office AOBRD software support the ELD, or will a new software program need to be installed?
- ✓ Once the transition plan with your AOBRD/ELD vendor is established, announce a *go-live* date with your fleet managers, drivers, technicians, and other relevant parties.
  - Establishing a *go-live* date well in advance of the December 16th deadline will allow time for troubleshooting of any concerns that may arise.
- ✓ Driver training is critical to the success of the AOBRD/ELD transition. Begin driver training early in the process, prior to the go-live date to ensure drivers are properly trained. This is especially critical during roadside inspections so that the data transfer of a driver's record of duty status (RODS) is efficient and successful.
  - Having *mock roadside inspections* can be helpful in training drivers how to transfer their RODS during a roadside inspection.
  - *Yard moves* should be explained to drivers so that it is used properly.
  - *Personal Conveyance* should be explained to drivers so that it is used properly.
- ✓ Don't forget administrative support training. Administrative staff will need to know how to properly manage ELD records through back office software programs.
- ✓ Check each vehicle to ensure your fleet is compatible with the ELD equipment. Because ELDs are synchronized with the engine, it's important to ensure that the device you are using works properly with each type of engine in your fleet.
- ✓ Carriers should carefully manage the use of exempt drivers, such as maintenance technicians and other non-driver vehicle moves, so that subsequent drivers are not accepting unidentified movements that do not belong to them.
  - Consider issuing a user-name and user-account to maintenance technicians and other personnel who are considered exempt drivers. This will limit the number of *unidentified movements* a routine driver must accept or deny when logging into the ELD system.
  - Remember that unidentified driver segments have to be reconciled to a driver or other category of movement since they are subject to internal DOT audits and roadside inspections.



**Need more assistance? FMCSA has numerous resources available to assist carriers in complying with the ELD final rule. Visit <https://eld.fmcsa.dot.gov> for further information. Contact ATA's safety policy department for further assistance at (703) 838-1700.**

# Major Differences between AOB RD and ELD

Category	AOBRD	ELD
Important Technical Specifications	<b>Driving time:</b> Engine data is used to determine when the driver is driving.	<b>Driving time:</b> Driving time: Device must consider the driver as driving once the vehicle reaches 5 m.p.h.; and must default to on-duty, not driving when the vehicle is stopped
	<b>Locations:</b> Device allows locations to be automatically generated or entered by the driver.	<b>Locations:</b> Device must automatically generate location information (change of duty, 60-minute intervals while driving, engine on and off, and at beginning and end of personal conveyance or yard moves).
	<b>RODS Graph/Grid:</b> Not required with an AOB RD.	<b>RODS Graph/Grid:</b> Required on a display or printout. New header requirements.
	<b>User Information:</b> Not defined.	<b>User Information:</b> Driver must have a user name and account in the ELD system which identifies license information.
	<b>Required Data:</b> Date and time and location recorded during duty changes.	<b>Required Data:</b> <ul style="list-style-type: none"> <li>• Date and time</li> <li>• location accurate to within one mile and 10 miles during personal conveyance use</li> <li>• vehicle miles</li> <li>• engine hours</li> <li>• vehicle information</li> <li>• carrier information</li> </ul>
Roadside Inspection Transfer Options	A printout or display of the drivers daily RODS and previous 7 (or 14) days may be used. AOB RD is not required to transfer to roadside enforcement.	<b>Telematics method</b> (via wireless web services <u>and</u> email) <u>OR</u> <b>Local transfer method</b> (via USB2.0 <u>and</u> Bluetooth).
Driver Requirements during operation	<ul style="list-style-type: none"> <li>• <b>RODS</b> for the current day and previous 7 (or 14 if traveling to Canada) days may be used and;</li> <li>• <b>Instruction Sheet</b> and;</li> <li>• <b>Supply of blank logs</b> to complete the current trip.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>RODS</b> for the current day and previous 7 (or 14 if traveling to Canada) days may be used and;</li> <li>• <b>User Manual</b> for ELD and;</li> <li>• <b>Instruction Sheet</b> and;</li> <li>• <b>Supply of blank logs</b>, at least 8 days' worth, to be used in the event of a device malfunction.</li> </ul>
Special driving categories	None	<ol style="list-style-type: none"> <li>1. <b>Personal Conveyance</b> (recorded as off-duty)</li> <li>2. <b>Yard time</b> (recorded as on-duty).</li> </ol>
Editing	Edits allowed. Per 395.15 Interpretation question #2, a driver must be allowed to review his or her AOB RD record, annotate and correct inaccurate records, enter any missing information, and certify the accuracy of the information.	Edits allowed. Edits made by a manager must be approved by driver. ELD must display the original record and the updated record with details.