



ELD Implementation for the Tower

By Brian J Riker

By now I am sure you have heard about electronic logging devices (ELDs) and hours of service (HOS) regulations that are affecting the towing industry. I am sure you also are aware that

TRA has been working to mitigate the effect these regulations have on our industry. Unfortunately, the Federal Motor Carrier Safety Administration recently denied the Association's petition for exemption. Our efforts are not over, although in the meantime towers will need to comply with the current regulations.

Fortunately for the bulk of the industry electronic logging devices are not a big issue. Most light-duty towers can benefit from the short-haul exception to logging requirements, as can some heavy towers. The companies most likely to be affected are the multi-location companies, ones that cover large areas, or those that also offer more traditional trucking services such as equipment transport.

In its simplest form, ELDs are only required if you are currently required to complete paper log books more than 8 times in any 30-day period. This is per driver, not per company or truck. There are other exceptions based on commodity hauled or the age of your equipment. See my previous article on [Hours of Service Compliance: Best Practices for Towing Companies](#) for more detailed information about the exceptions. Contrary to popular belief, the towing industry is not exempt from hours of service compliance, even when operating locally. Yes, there is a police ordered tow exception, however, it is very limited in scope and does not provide relief beyond the "emergency" which makes it practically useless.

So, how does a tower implement ELDs once they have determined they must use them? The goal is to come into compliance swiftly with a minimal disruption to normal operation. In reality that is harder than it sounds, but with a good ELD vendor it is manageable. Before simply choosing the lowest cost or most readily available device you should evaluate your overall digital communication system. Now may be the time to upgrade devices or increase integration between your truck location services, in-truck dispatch system, and the ELD system. Of course, you also want a vendor that understands your unique business needs and is responsive to your questions. Towing is not "one size fits all" and neither should your ELD be.

Another important consideration is the ability to service and expand the system. The regulations only provide 8 days to repair a malfunctioning ELD before the vehicle it is installed in must be placed out of service. Also, it is not cost effective to purchase a system that can't grow with your business. Determine if the system is something you can self-install or does it require a visit from their technician every time you have a problem or want to move it to a new truck?

Once you have chosen your system, install the devices in the entire fleet before you cancel any other systems you have been using. There will be some hiccups during the installation and are expected when you first start using any new technology. You don't want to find yourself with no means to track or communicate with your trucks. Make sure your vendor will assist with training both your drivers and operations crew. Many providers have excellent training for the office staff but not the drivers. It is usually the drivers that struggle the most with these systems.

Do not bring all your trucks online at the same time. Again, install the system on all trucks but bring your trucks online gradually to limit the problems. I suggest starting with the least critical trucks and working towards the most critical or busiest trucks.

Assure your drivers that the new system is not to punish or babysit them, it is simply to comply with new Federal regulations. This will ease their apprehension, and there will be resistance – drivers do not like these systems, especially older or less tech savvy drivers.

After installation - but prior to the first use, have a refresher course on hours of service compliance. Some of the biggest issues with ELDs in daily use revolve around incorrect understanding of the hours of service regulations. This training is needed for both your drivers and dispatch staff. Often dispatchers simply do not understand how a driver may manage their available time, or they don't understand how the break and rest periods actually work.

Expect mistakes and log violations in the beginning. Unless your drivers are already familiar with using ELDs they will forget to document things or input them wrong. This will even result in a few out of service situations, possibly even DOT citations. Be prepared with contingency plans to cover loads and shifts due to technical errors that can't be edited or erased. This is perhaps the biggest downfall of the ELD system. In an effort to minimize cheating they have removed the ability to correct honest mistakes.

Make use of all the features, it will give you the best return on investment. Many companies resist ELDs because they think it will just be another expense, and if you don't take full advantage of all the features that is right. The better ELD systems have maintenance alerts, fuel mileage, state mileage, even driver behavior monitoring built-in. If your fleet needs to file mileage reports for the International Fuel Tax Agreement (IFTA) or International Registration Plan (IRP) the time savings using automated reports can be amazing. Some insurance companies will take driver behavior monitoring into consideration when deciding what your premiums will be. Even without discounts, the savings from fewer accidents and truck repairs will offset a significant portion of the system's cost.

If you don't already have a digital dispatch platform most ELD systems have at least a basic one that includes two-way messaging, vehicle location and other basic tools to increase fleet utilization. Now may also be the time to revisit your policies on take home trucks and unnecessary movement. With every minute of driving time being tracked, it

may make business sense to keep the trucks staged where they are most often used. Not only does this reduce response times, it also reduces exposure to risk by eliminating, or at least minimizing, the time on the highway which in turn reduces your chances of being in a crash.

In summary, cheap is not always the best way to go; even with a system you don't want to use but are being forced into using. There are many business benefits to using ELD systems when the proper system is chosen - if you take advantage of its features. Successful integration of electronic logging devices will require a change in how you plan for call volume and even how you dispatch your drivers. There will be times that your preferred driver simply does not have the available hours to complete an assignment and you will need a backup plan. Prior to implementation of an ELD system, be sure you have evaluated your call volumes, available resources, and have made any corrections needed, otherwise you will find yourself unable to service your customers on-time.

About the Author – Brian J. Riker is President of Fleet Compliance Solutions, LLC and Director of Transportation Compliance for eComply.com®. He is a third-generation tower with more than 25 years of experience in the ditch. Brian specializes in helping towers and other non-traditional fleets navigate the complex world of regulatory compliance. He works with several state associations as well as TRAA. You can read his bi-weekly column in Tow Industry Week or find him presenting educational seminars at towing industry shows throughout the year.