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ELECTRONIC LOGGING DEVICE (ELD)

Approved by: Greg Workun – VP, Compliance & Specialty Services 21-Jun-2021

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1. Purpose

- 1.1 This procedure provides detailed guidance on the use of Electronic Logging Devices (ELD) to meet regulatory Hours of Service (HOS) and Daily Trip Inspection requirements.
- 1.2 Regulatory and CEDA specific requirements regarding HOS and Trip Inspections are detailed in the CEDA Transportation Safety Practice.

2. Scope

- 2.1 This procedure applies to all Regions and Service Lines within CEDA that operate:
 - a. A Canadian federally regulated commercial fleet.
 - b. An Alberta provincially regulated commercial fleet.
 - c. A US DOT regulated commercial fleet
- 2.2 ELD use for the CEDA federal fleets listed below becomes mandatory on June 12, 2021.
 - a. BC federal fleet
 - b. Alberta federal fleet
 - c. Saskatchewan federal fleet
 - d. Ontario federal fleet
- 2.3 A date for mandatory use of ELD on Alberta provincial fleets has not yet been determined. The Fort McMurray and East regions within CEDA operate provincial fleets and will individually determine ELD implementation dates for their locations.

3. Accountabilities

- 3.1 The Manager, Asset & Fleet Services is accountable for:
 - a. Selecting and managing the ELD service provider contract
 - b. Ensuring the ELD system and all produced reports are compliant with federal regulations.
 - c. Completing assessment reviews of ELD records as required.
 - d. Supporting operational groups as an SME.
- 3.2 The VP, Human Resources is accountable for:
 - a. Ensuring that ELD requirements for commercial drivers are included within recruitment and onboarding processes.
 - b. Ensuring that commercial driver compensation includes a monthly smart phone allowance.
 - c. Supporting operations in the consequence management process.
- 3.3 The Manager, Learning & Development is accountable for:
 - a. Ensuring Hours of Service, ELD and Pre-trip Inspection training programs are available for all CEDA commercial drivers.
 - b. Managing training records for commercial drivers and providing compliance reports to Regional and Service Line leaders.
- 3.4 Regional and Service Line Vice Presidents are accountable for:
 - a. Ensuring all commercial vehicles for which they are accountable are equipped with a functioning Bluetooth compatible GPS system.
 - b. Ensuring all CEDA commercial drivers have completed the required training relevant to ELD implementation including; Hours of Service, ELD and Pre-trip Inspection.

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- c. Ensuring operational compliance with this procedure.
- d. Ensuring that drivers comply with Site requirements for the use of mobile phones when using WorkPlan.
- e. Ensuring completion of daily administrative reviews of ELD records to verify compliance.
- f. Implementing a consequence management process for noncompliant drivers.

3.4.2 Commercial Drivers are responsible for:

- a. Having a personal smart phone available and functioning during all periods for which they are on-duty.
- b. Installing and maintaining the current version of the WorkPlan ELD app on their personal mobile phones.
- c. Ensuring they comply with this procedure.
- d. Immediately reporting functional issues with the vehicle GPS system or the ELD app to their supervisor.

4. Definitions and Acronyms

4.1 The following definitions and acronyms are applicable within this document:

AFS: Asset & Fleet Services (CEDAfleet@cedagroup.com)

Commercial Driver: A person who drives a commercial vehicle and is required to document Hours of Service and Trip Inspection compliance records.

Commercial Vehicle: is a truck, tractor, trailer or any combination of them that has a registered gross vehicle weight in excess of 4 500 kg or a bus that is designed and constructed to have a designated seating capacity of more than 10 persons, including the driver.

ELD: Electronic Logging Device, means a device or technology that automatically records a driver's driving time and facilitates the recording of the driver's record of duty status.

GPS: Global Positioning System, hardware that provides tracking of a piece of equipment.

HOS: Hours of Service, is the term used to encapsulate regulatory requirements for commercial drivers to manage and record driving and on-duty hours.

Inspector: A peace officer or commercial vehicle inspector.

5. Procedure

5.1 System

5.1.1 To enable ELD implementation, CEDA has selected the Verizon Connect WorkPlan application that runs on the Verizon Connect enterprise platform. WorkPlan is a smartphone application (app) that connects to the vehicle's GPS system through Bluetooth. While connected to the vehicle GPS system, WorkPlan automatically records all drive time from the driver-selected vehicle.

5.1.2 Note that although Drivers will be using their personal devices to access the WorkPlan app, the app connection will not allow CEDA to access any personal information on their device. CEDA's access is limited to the Hours of Service and Trip Inspection data only via the Verizon link.

5.2 Driver Set-up and Use

5.2.1 Prior to executing the WorkPlan app, drivers are required to:

- a. Complete ELD training as it applies to HOS and Trip Inspections.
- b. Download the WorkPlan by Verizon Connect application to their personal smart phones from either Apple App Store or Android Google App Store.

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- c. Obtain a user ID from Asset & Fleet Services. Their supervisor can contact AFS at CEDAfleet@cedagroup.com. Drivers will need to provide an e-mail address where they can receive a link to set up a password. If the driver does not have an e-mail address AFS can assist in password setup.

5.2.2 With the WorkPlan app installed, follow these steps before starting to drive:

- a. Get into your vehicle.
- b. Turn on the vehicle's engine.
- c. Turn on your mobile device.
- d. Start Workplan app and sign in.
- e. Select your vehicle from the vehicles list in Workplan (You might need to refresh the vehicles list if your vehicle is not displayed). If not driving select "No Vehicle", then select "HOS", select "ON" to start day.
- f. Verify that you have a Bluetooth connection with your vehicle.
- g. Complete the pre-trip inspection per app notification.
- h. Click on On-duty not driving to start your day.
- i. Start driving; confirm WorkPlan app has switched driving status.
- j. Change duty status and make annotations as the driver's day progresses.

5.2.3 Follow these steps at once the drivers work duties for the day have ended:

- a. Stop your vehicle.
- b. Turn off the vehicle's engine.
- c. Leave or drop vehicle in the app.
- d. Change your HOS status to Off-duty.
- e. Sign out of the WorkPlan.
- f. After you have signed out of WorkPlan, you should see the Sign-In screen.

5.3 Driver Requirements

5.3.1 Understanding that complying with HOS and Trip Inspection requirements is a regulatory mandate and ELD is the mechanism by which CEDA will demonstrate compliance, the following mandatory guidance is applicable to all CEDA drivers.

- a. Training & Competency
Drivers are required to understand how to use the ELD app, including how to: log in and out, change duty status, update information, make annotations, determine available driving and on-duty time, determine malfunctions and transfer data to a roadside inspector.
- b. Accurate ELD Records
Drivers must ensure all ELD records are accurate and finalized each 24-hour period by editing any unintentional mistakes, and certifying the accuracy of the record at the end of each workday. CEDA staff with ELD record management rights are prohibited from editing ELD records to conceal violations or to falsify them in any way.
- c. Authorized Personal Use
Drivers are allowed to use a company truck for personal use consistent with federal "personal conveyance" guidance within the hours of service regulation. Drivers using the personal conveyance status must properly select the personal conveyance status on the Workplan app at the beginning of such status and must de-select the status at the end of such status. Personal conveyance does not record the driver status as 'driving time'. It is recorded as 'off-duty' while capturing the mileage driven in the personal conveyance status.

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d. Yard Move Status

For Federal carriers, the duty status of drivers performing yard moves of a commercial vehicle within a **terminal or depot** that is **not on a public road** is to be recorded as 'yard move' in the Workplan app. 'Yard move' status is recording the time as on duty not driving and is not considered to be 'driving time'. CEDA considers a Client site to be a private terminal as long as there is controlled access and there are no public roads within the entirety of the site. Should a driver working at a client site need to leave the site and/or cross a public road while on the site, regardless of distance, the driver shall change his status to 'driving time'. A private yard means that there is absolutely no public access to the yard.

For Provincial carriers, the duty status of drivers performing yard moves of a commercial vehicle within a terminal or depot that is not on a public road is to be recorded as 'driving time'. The provincial commercial vehicle drivers hours of service regulations do not define a terminal or depot in the same manner as Federal Regulations.

e. Regulatory Inspections

Drivers must have the ability to read, transfer, display if necessary, and explain his/her hours of service data during a roadside safety inspection. All hours of service supporting documents (e.g. bill of lading, fuel receipts, etc.) a driver has in his/her possession during an inspection must be provided to the inspector.

f. ELD Malfunctions

Malfunctions can occur with the Workplan app or the truck's GPS hardware. Drivers must notify a CEDA supervisor immediately when they become aware that the ELD in their truck has malfunctioned. As soon as they become aware of an ELD malfunction, the driver must switch to using paper logs. The driver and supervisor must make arrangements to have the malfunction corrected as soon as possible.

g. Technical Support

If you have any issues that you cannot resolve using the online help or the ELD Quick Reference Guide, contact Verizon Connect at 1-877-943-7306 and select option 2 (account #1000579244). If issue cannot be resolved discuss with your supervisor who will contact AFS.

h. No Tampering

Drivers are prohibited from tampering with, disconnecting or damaging the GPS/ELD in an attempt to create a malfunction, or make it inoperable. Any driver found to have tampered with, disconnected or damaged the GPS/ELD will be subject to company discipline, up to and including termination.

i. Username Security

Drivers are prohibited from sharing their unique ELD username and password with another driver. CEDA managers and supervisors with ELD record management rights are prohibited from sharing their username and password.

5.4 Supervisor Requirements

5.4.1 Supervisors shall:

- Be trained on ELD use and be fluent with the requirements of this procedure.
- Ensure that their drivers are trained and competent on the Workplan ELD system.
- Ensure that their drivers provide a functioning and connected smartphone during all on-duty work hours.
- Verify that drivers are complying with the requirements of this procedure.

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- e. When operating on industrial sites, determine any site specific rules for the use of mobile phones and communicate those rules to drivers as they apply to the use of the WorkPlan app. For example, drivers phones may have to remain in the truck cab while on site.
- f. Investigate driver identified ELD malfunctions or errors and take appropriate corrective actions such as:
 - i. Ensure the GPS hardware working is correctly, if not get repaired or replaced.
 - ii. Review ELD reporting errors with driver so they understand the importance of compliance.
 - iii. If a driver is a repeat offender, the driver should be re-trained and placed on an ELD auditing schedule.

5.4.2 If a driver repeatedly fails to comply with the requirements of this procedure, their supervisor is responsible to initiate appropriate consequence management activities.

5.5 Regional Leader Requirements

5.5.1 Regional Leaders shall:

- a. Establish a daily administrative review process of all ELD records that includes the following activities:
 - i. Verification that all on-duty drivers have completed both the HOS and Trip Inspection records.
 - ii. Notification to drivers of all system generated errors so that they can correct them within the allowable time frame.

Note that CEDA staff with ELD record management rights are prohibited from editing ELD records to conceal violations or to falsify them in any way.

- b. Establish and monitor a consequence management process as applicable to ELD compliance.

5.6 ELD Records

5.6.1 The Verizon Connect WorkPlan app is configured to securely retain all original ELD records for a period of 6 months.

5.6.2 During the 6 month retention period, a driver will have access to his/her ELD records

5.7 Assessments

5.7.1 A process of daily administrative reviews is the most effective mechanism to identify and correct errors. The objectives of this process are detailed in 5.5.1.a above.

5.7.2 AFS shall manage a program for monthly random assessments of ELD records to ensure accuracy and compliance with all applicable rules and exceptions. Compliance reports generated from these assessments are considered a lagging indicator and are therefore less effective than daily reviews in correcting deficiencies.

5.7.3 Matching driver logs to payroll records is an industry standard practice used to determine HOS compliance. At CEDA, payroll records are generated based on service orders therefore there may reasonably be a variance between payroll and drivers hours of service. In cases where an assessment identifies such a variance, the supervisor shall review the variance and identify it as either a systems error or non-compliant.

6. Supporting Documents

6.1

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Document Name	Document Identification	Revision
Transportation Safety Practice	2-CEDA-ALL-0097	latest
Guides	Verizon Connect User Guide	latest
Quick Reference Card	GD-AFS-CORP-001	latest

7. Interpretation and Updating

- 7.1 The Manager, Asset & Fleet Services is responsible for responding to any requests for clarification and for regular review and updating of this procedure.

8. Revision Record

Revision Date	Section Affected	Changes Made
28-JAN-21	All	New procedure for review and approval
3-FEB-21	All	Issued for Implementation
21-JUN-21	5.3.1	Update Personal Use and Yard Move Status

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