



2850 Coral Court, Suite #100
Coralville, IA 52241
Phone: 319.545.3400
Fax: 319.545.3425
www.isefleetservices.com

To Whom It May Concern:

ISE Fleet Services is proud to offer our *eFleetSuite* solution, especially designed to help motor carriers to comply with United States Department of Transportation (USDOT) Federal Motor Carrier Safety Administration (FMCSA) regulations. The end-to-end solution (hereafter referred to as “the System”) comprises the A317 computer, *eFleetSuite* software and *eFleetSuite* web platform.

The System has been extensively tested to meet the requirements of [49 CFR §395.15](#) as described below when used as a standalone solution. It is the responsibility of the customer to ensure that any customer or third-party hardware and software used in conjunction with The System does not interfere with its normal operation.

Sincerely,

Hass Machlab

Hass Machlab
President and CEO
ISE Fleet Services
www.isefleetservices.com

§ 395.15 Automatic on-board recording devices.

- (a) **Applicability and authority to use.** This section applies to automatic on-board recording devices (AOBRDs) used to record drivers' hours of service as specified by part 395.

(a)(1) A motor carrier may require a driver to use an AOBRD to record the driver's hours of service in lieu of complying with the requirements of §395.8 of this part. For commercial motor vehicles manufactured prior to June 4, 2012, manufacturers or motor carriers may install an electronic device to record hours of service if the device meets the requirements of either this section or §395.16.

Response: The A317, when installed and used as directed, meets the requirements of an AOBRD per section §395.15 and therefore may be used to record the driver's hours of service.

(a)(2) Every driver required by a motor carrier to use an automatic on-board recording device shall use such device to record the driver's hours of service.

Response: The System can support any number of drivers per motor carrier, with a limit of six (6) concurrent drivers per device. The motor carrier is responsible for ensuring that all drivers whom it has required to use the System do in fact use it to record their hours of service.

- (b) **Information requirements.**

(b)(1) Automatic on-board recording devices shall produce, upon demand, a driver's hours of service chart, electronic display, or printout showing the time and sequence of duty status changes including the drivers' starting time at the beginning of each day.

Response: The System provides an electronic display that can be used to view, on demand, a driver's graph grid, sequential list of duty statuses including start time and location, and other hours of service information.

(b)(2) The device shall provide a means whereby authorized Federal, State, or local officials can immediately check the status of a driver's hours of service. This information may be used in conjunction with handwritten or printed records of duty status, for the previous 7 days.

Response: The System is capable of displaying the hours and minutes that a driver may continue to drive without exceeding the maximum driving time allowed by each applicable rule. This information is shown on the main screen for each driver. A value of N/A for any rule indicates that the electronic record of duty status currently stored on the device is incomplete, and that handwritten and/or printed records should be used in conjunction with the electronic record to ascertain the status of the driver's hours of service.

(b)(3) Support systems used in conjunction with on-board recorders at a driver's home terminal or the motor carrier's principal place of business must be capable of providing authorized Federal, State or local officials with summaries of an individual driver's hours of service records, including the information specified in [§395.8\(d\)](#) of this part. The support systems must also provide information concerning on-board system sensor failures and identification of edited data. Such support systems should meet the information interchange requirements of the American National Standard Code for Information Interchange (ANSII) (EIARS-232/CCITT V.24 port (National Bureau of Standards "Code for Information Interchange," FIPS PUB 1-1)).

Response: The System provides summaries of an individual's hours of service records via the eFleetSuite web application. When viewed or printed from the web application, individual records of duty status include the information specified in 395.8(d), identify edited data and include any failure information noted as per the requirements of paragraph (f). In addition, the web application provides reports concerning device failures and edits to records of duty status.

(b)(4) The driver shall have in his/her possession records of duty status for the previous 7 consecutive days available for inspection while on duty. These records shall consist of information stored in and retrievable from the automatic on-board recording device, handwritten records, computer generated records, or any combination thereof.

Response: The System is capable of storing and displaying electronic records of duty status for the current day and previous 7 consecutive days for multiple drivers. In the event that a driver signs in to a different device, the System will attempt to download the current and previous 7 consecutive days of electronic duty status records via a wireless connection to the eFleetSuite web server. If wireless communication is unavailable, the System supports a mechanism for the current and previous 7 consecutive days of electronic duty status records to be transferred to the device via a USB key. In all cases, the driver is responsible to ensure that any records needed to meet the requirements of subparagraph (b)(4) are in his/her possession and available for inspection while on duty.

(b)(5) All hard copies of the driver's record of duty status must be signed by the driver. The driver's signature certifies that the information contained thereon is true and correct.

Response: The System permits hard copies of records of duty status to be printed only from the eFleetSuite web application. The motor carrier and its drivers are responsible to ensure that the driver's signature appears on every hard copy that is printed.

- (c) The duty status and additional information shall be recorded as follows:
- (c)(1) "Off duty" or "OFF", or by an identifiable code or character;
 - (c)(2) "Sleeper berth" or "SB" or by an identifiable code or character (only if the sleeper berth is used);
 - (c)(3) "Driving" or "D", or by an identifiable code or character; and
 - (c)(4) "On-duty not driving" or "ON", or by an identifiable code or character.
- (c)(5) Date;
- (c)(6) Total miles driving today;
- (c)(7) Truck or tractor and trailer number;
- (c)(8) Name of carrier;
- (c)(9) Main office address;
- (c)(10) 24-hour period starting time (e.g., midnight, 9:00 a.m., noon, 3:00 p.m.)
- (c)(11) Name of co-driver;
- (c)(12) Total hours; and
- (c)(13) Shipping document number(s), or name of shipper and commodity.

Response: The System records and displays all information described in paragraph (c). The System uses the abbreviations "OFF", "SB", "D" and "ON" for duty statuses and a starting time of midnight for all 24-hour periods.

- (d) **Location of duty status change.**
- (d)(1) For each change of duty status (e.g., the place and time of reporting for work, starting to drive, on-duty not driving and where released from work), the name of the city, town, or village, with State abbreviation, shall be recorded.

Response: If latitude and longitude are available from GPS at the time of a duty status change, the System stores the current coordinates and uses them to determine direction and distance from the nearest city and state. If GPS coordinates are unavailable at the time of a duty status change, the driver will be prompted to enter the name of the city (and optionally the highway, milepost, and/or service plaza) and select the state abbreviation.

(d)(2) Motor carriers are permitted to use location codes in lieu of the requirements of paragraph (d)(1) of this section. A list of such codes showing all possible location identifiers shall be carried in the cab of the commercial motor vehicle and available at the motor carrier's principal place of business. Such lists shall be made available to an enforcement official on request.

Response: The System provides a means for motor carriers to define location codes to be used in addition to, rather than in lieu of, the requirements of subparagraph (d)(1). Such codes are defined using the eFleetSuite web application and must be associated with a valid latitude and longitude. The motor carrier is responsible for ensuring that a list of all location codes that it has defined is kept and made available to law enforcement as per the requirements of subparagraph (d)(2).

- (e) **Entries made by driver only.** If a driver is required to make written entries relating to the driver's duty status, such entries must be legible and in the driver's own handwriting.

Response: The System does not require written entries; rather, drivers must identify themselves when signing in using a unique Driver ID. No driver is permitted to use the System without signing in, and the System will reject entries made by a driver if the System subsequently determines that the driver's sign in information could not be authenticated.

- (f) **Reconstruction of records of duty status.** Drivers are required to note any failure of automatic on-board recording devices, and to reconstruct the driver's record of duty status for the current day, and the past 7 days, less any days for which the drivers have records, and to continue to prepare a handwritten record of all subsequent duty status until the device is again operational.

Response: The System will note the date, time, and type of failure and also the date and time of recovery from failure, if such information is available. The System will note this information in the record of duty status for any driver who is signed at the time a failure or recovery is detected, to aid drivers in reconstructing their complete records of duty status. The System will warn the driver whenever the device is not operational per paragraph (i)(4); however, the driver is responsible to prepare a handwritten record and to continue to do so until the device is again operational.

- (g) **On-board information.** Each commercial motor vehicle must have on-board the commercial motor vehicle an information packet containing the following items:

(g)(1) An instruction sheet describing in detail how data may be stored and retrieved from an automatic on-board recording system; and

Response: With each license of the System, ISE Fleet Services shall provide a Driver Reference Guide in electronic format; this document describes how data may be recorded and retrieved. The motor carrier is responsible for ensuring that a hard copy of the Driver Reference Guide is kept in each commercial motor vehicle.

(g)(2) A supply of blank driver's records of duty status graph-grids sufficient to record the driver's duty status and other related information for the duration of the current trip.

Response: The motor carrier is responsible for meeting the requirements of subparagraph (g)(2).

- (h) **Submission of driver's record of duty status.**

(h)(1) The driver shall submit, electronically or by mail, to the employing motor carrier, each record of the driver's duty status within 13 days following the completion of each record;

(h)(2) The driver shall review and verify that all entries are accurate prior to submission to the employing motor carrier; and

(h)(3) The submission of the record of duty status certifies that all entries made by the driver are true and correct.

Response: When a driver signs out, the System will attempt to submit the driver's electronic duty status records via a wireless connection to the eFleetSuite web server. If wireless communication is unavailable, the System supports a mechanism for electronic duty status records to be transferred from the device to a USB key for submission to the motor carrier. In all cases, the driver is responsible to ensure that each record of duty status is reviewed, verified and submitted per the requirements of subparagraph (h)(2) and (h)(1).

- (i) **Performance of recorders.** Motor carriers that use automatic on-board recording devices for recording their drivers' records of duty status in lieu of the handwritten record shall ensure that:

(i)(1) A certificate is obtained from the manufacturer certifying that the design of the automatic on-board recorder has been sufficiently tested to meet the requirements of this section and under the conditions it will be used;

Response: With each license of the System, ISE Fleet Services shall provide a Statement of Compliance; this document attests that the System has been sufficiently tested to meet the requirements of section §395.15.

(i)(2) The automatic on-board recording device permits duty status to be updated only when the commercial motor vehicle is at rest, except when registering the time a commercial motor vehicle crosses a State boundary;

Response: During normal operation, the System's on-board software permits drivers to change duty status and to enter related information only when the vehicle is at rest. If the System has insufficient data to determine whether the vehicle is moving or at rest, the System shall report an on board computer failure and will permit drivers to change duty status only to Off Duty.

(i)(3) The automatic on-board recording device and associated support systems are, to the maximum extent practicable, tamperproof and do not permit altering of the information collected concerning the driver's hours of service;

Response: The System employs a variety of methods to prevent tampering and unauthorized access to the information collected. These methods include database password protection, sign in authentication, password encryption, run date encryption and log edit tracking.

(i)(4) The automatic on-board recording device warns the driver visually and/or audibly that the device has ceased to function. Devices installed and operational as of October 31, 1988, and authorized to be used in lieu of the handwritten record of duty status by the FMCSA are exempted from this requirement.

Response: If the System is unable to record hours of service information or has insufficient data to determine whether the vehicle is moving or at rest, the System will sound an audio warning; a text warning will appear both on the sign in screen and on the main screen for each driver as long as the failure persists. Audio and text warnings apply only when the device is powered on. If the touch screen backlight is shut off and fails to turn on even when the driver taps the screen or cycles vehicle ignition, this should be considered visual evidence that the device has ceased to function.

(i)(5) Automatic on-board recording devices with electronic displays shall have the capability of displaying the following:

- (i)(5)(i) Driver's total hours of driving today;
- (i)(5)(ii) The total hours on duty today;
- (i)(5)(iii) Total miles driving today;
- (i)(5)(iv) Total hours on duty for the 7 consecutive day period, including today;
- (i)(5)(v) Total hours on duty for the prior 8 consecutive day period, including the present day; and
- (i)(5)(vi) The sequential changes in duty status and the times the changes occurred for each driver using the device.

Response: The System displays all information described in subparagraph (i)(5).

(i)(6) The on-board recorder is capable of recording separately each driver's duty status when there is a multiple-driver operation;

Response: The System maintains a separate record of duty status for each driver and permits a maximum of six (6) drivers to be signed in concurrently on a given device.

(i)(7) The on-board recording device/system identifies sensor failures and edited data when reproduced in printed form. Devices installed and operational as of October 31, 1988, and authorized to be used in lieu of the handwritten record of duty status by the FMCSA are exempted from this requirement.

Response: The System permits hard copies of records of duty status to be printed only from the eFleetSuite web application. Printed records of duty status identify edited data and will include any failure information noted as per the requirements of paragraph (f). In addition, the eFleetSuite web application provides reports concerning device failures and edits to records of duty status.

(i)(8) The on-board recording device is maintained and recalibrated in accordance with the manufacturer's specifications;

Response: The motor carrier is responsible for ensuring that the System's on-board components, especially those provided in the installation kit, are maintained in working order and that the touch screen is recalibrated if it becomes difficult to make selections.

(i)(9) The motor carrier's drivers are adequately trained regarding the proper operation of the device; and

Response: The motor carrier is responsible for ensuring that drivers are trained to use the System correctly; the Driver Reference Guide provided in accordance with paragraph (g) should not be considered an adequate substitute for individual or group instruction.

(10) The motor carrier must maintain a second copy (back-up copy) of the electronic hours-of-service files, by month, in a different physical location than where the original data is stored.

Response: The System employs industry best practices for electronic backup of all data submitted to the eFleetSuite web application, including full and incremental backups and off-site backup storage.

(i) **Rescission of authority.**

(1) The FMCSA may, after notice and opportunity to reply, order any motor carrier or driver to comply with the requirements of § 395.8 of this part.

(2) The FMCSA may issue such an order if the FMCSA has determined that—

(i)(2)(i) The motor carrier has been issued a conditional or unsatisfactory safety rating by the FMCSA;

(i)(2)(ii) The motor carrier has required or permitted a driver to establish, or the driver has established, a pattern of exceeding the hours of service limitations of this part;

(i)(2)(iii) The motor carrier has required or permitted a driver to fail, or the driver has failed, to accurately and completely record the driver's hours of service as required in this section; or

(i)(2)(iv) The motor carrier or driver has tampered with or otherwise abused the automatic on-board recording device on any commercial motor vehicle.

Response: The motor carrier and its drivers are responsible for meeting the requirements of paragraph (i).

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