



The Truth about ELDs

On December 16, 2015, the Federal Motor Carrier Safety Administration (FMCSA) published a Final Rule to establish minimum performance and design standards for electronic logging devices (ELDs); requirements for the mandatory use of ELDs by drivers who are required to prepare HOS records of duty status; requirements concerning HOS supporting documents; and address concerns about harassment resulting from the mandatory use of ELDs.¹ The premise behind the Final Rule is that ELD’s will increase compliance with the HOS regulations and thereby will reduce the risk of fatigue-related crashes. FMCSA’s own study however, *Evaluating the Potential Safety Benefits of Electronic Hours-of-Service Recorders Final Report*, found a different conclusion. The study separated eleven motor carriers into two different cohorts, one that equipped their trucks with electronic hours-of-service recorders (EHSRs), or in other words ELDs, and one that did not. According to the study, “No differences were found between the EHSR cohort and the non-EHSR cohort for USDOT-recordable and fatigue related crash rates.”²

While fatigue is often haphazardly linked to HOS compliance, the Agency’s database demonstrates that between 1.4 and 1.8 percent of large truck fatal crashes were related to fatigue between 2011 and 2014, which is the most recent data. These data suggest that relatively few, if any, crashes will actually be reduced due to the mandatory utilization of ELDs. Regardless, FMCSA continues to seek to mandate a rule which brings no positive safety benefits and which will cost approximately \$3.5 to \$10.7 billion³ dollars by industry estimates for the first year depending on which type of device carriers choose, either an ELD that is compatible with a phone or an actual ELD device that plugs into dash.

Table 1: Cost Estimate of an ELD Device for the first year of operation

| | Purchase | Installation | Monthly Subscription | Monthly Data plan | Monthly Maintenance | Total Monthly Cost | Total Annual Cost |
|---------------------|----------------|--------------|----------------------|-------------------|---------------------|--------------------|------------------------|
| ELD with smartphone | \$600-\$800 | \$20‡ | \$33-35† | \$15-80† | 0-\$21† | \$48-136 | \$1,244-\$2,588 |
| ELD with device | \$1,000-2,000† | \$84‡ | \$33-35† | \$15-80† | 0-\$21† | \$48-136 | \$1,708-\$3,832 |

†Source: ATRI’s *Electronic On-Board Recorder Adopting in the Trucking Industry: Issues and Opportunities*

‡Source: FMCSA’s *Regulatory Evaluation of Electronic Logging Devices and Hours of Service Supporting Documents Final Rule*

¹ *Electronic Logging Devices and Hours of Service Supporting Documents (MAP-21)*, FMCSA (2015).

² Jeffrey S. Hickman et al., *Evaluating the Potential Safety Benefits of Electronic Hours-of-Service Recorders Final Report*, FMCSA (April 2014), pg. 39.

³ FMCSA estimated that 2.8 million drivers would be subject to the rule

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