



Garmin International, Inc
1200 East 151st Street
Olathe, Kansas 66062
P: 913-397-8200 F: 913-397-8282

Dec, 2014

Submitted via Federal eRulemaking Portal

Docket Services
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Docket Number FMCSA-2014-0377 - Electronic Logging Device Vendor Registration

Garmin International, Inc. ("Garmin") thanks FMCSA for this opportunity to provide comments in response to the Federal Motor Carrier Safety Administration notice on seeking approval of a new information collection request (ICR) entitled, Electronic Logging Device Vendor Registration.

Garmin is a leading worldwide provider of navigation, communication and information devices and applications, most of which are enabled by global positioning system ("GPS") technology. Garmin designs, develops, manufactures and markets a variety of hand-held, portable and fixed-mount GPS-enabled products and other navigation, communications and information products for the automotive/mobile, outdoor, fitness, marine, and general aviation markets. More specifically, in relation to the market impacted by this proposal, Garmin currently markets both hardware and software technology which enable Fleet Management Providers to offer AOBRD compliant solutions as specified by FMCSA in Part §395.15.

Garmin has previously submitted comments to the earlier proposed (SNPRM) entitled, "Electronic Logging Devices and Hours of Service Supporting Documents," (79 FR 17656), and is very pleased to submit the below comments to the current proposal, Docket Number FMCSA-2014-0377.

I. Guidance on Registration and Certification when ELD Functions Span Across Multiple Components and Vendors

According to the Supplemental notice of proposed rulemaking (SNPRM) entitled, "Electronic Logging Devices and Hours of Service Supporting Documents," (79 FR 17656), Garmin understands that specific information will be required to be included in the proposed Electronic Logging Device Vendor Registration ICR. Section 5.2.1 discloses a total of 10 items of information required to be specified by ELD providers in order to indicate certification of conformity with FMCSA standards and be subsequently listed as a certified ELD provider by FMCSA.

Garmin would like FMCSA to provide more guidance on the process of ELD registration and supply of all information required, most importantly identification of the party responsible for the

Dec, 2014

Page 2

registration and supplying the certification of conformity to the ELD functional requirements. The system design of an ELD as described in Section 1.4, “*APPENDIX TO SUBPART B OF PART 395, 395—FUNCTIONAL SPECIFICATIONS FOR ALL ELECTRONIC LOGGING DEVICES (ELDS)*” accurately portrays that sub-functions of the ELD may be implemented across a number of multiple software and hardware components thus allowing for 3rd party vendors to implement and offer partial solutions. For example, today Garmin provides one sub-component of the AORBD technology which enables many Fleet Management providers to provide complete end-to-end AORBD solutions. This further identifies that guidance regarding registration and statement of compliance is needed when ELD sub-functions can span across multiple system components provided by one or more vendors.

Garmin very much appreciates the opportunity that FMCSA has provided to offer comments and feedback on this proposal.

Sincerely,

Martina A. Hughes
Staff Systems Engineer
100 Regency Forest Drive, Suite 350
Cary, NC 27518