



Attn: Department of Transportation
Federal Motor Carrier Safety Administration

From: Saucon Technologies
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Bethlehem, PA 18020
Submitted by: Jacqueline Fortsch, Product Director
on behalf of Saucon Technologies

Re: Docket No. FMCSA-2014-0377, Electronic Logging Device (ELD) Vendor
Registration

Saucon Technologies submits the following comments for consideration, in response to the above-mentioned docket concerning Electronic Logging Device (ELD) Vendor Registration. Saucon Technologies provides comprehensive hardware and software solutions to the Motorcoach industry, including fleet monitoring, customized mobile apps, and AOB RD-compliant HOS recording devices to its customers. Our driver log product consists of a device, which is installed in a tamper-proof location on the bus, and connected to the engine; and a driver display, which is wired to the device and allows the driver to enter sign-on and duty status information as required by AOB RD regulations. Saucon Technologies considers docket FMCSA-2014-0377 an important component of its intention to provide its customers with future offerings of ELD-compliant products, and therefore requests the Federal Motor Carrier Safety Administration to consider the following comments.

Supplementary information: *Background*

“The ELD providers will be asked to self-certify and register their devices with FMCSA online via an application form MCSA-5893.”

Saucon comment: Saucon Technologies requests FMCSA to carefully consider the content of this form, and its detail level. We were not able to locate a copy of or example of this form, so we assume it has not yet been drafted. Is it simply a form that states “vendor certifies itself compliant” which is signed by the vendor and submitted? Is it a checklist that the vendor must complete to show compliance? Will it require the vendor to list information on *how* their device is compliant with the technical specifications that will be laid out in the upcoming ELD regulations? We request FMCSA to keep in mind that the content of this form, and the information required in it, will greatly affect – either positively or negatively – the annual time estimates related to device registration and certification listed in the document. Perhaps a simple checklist of key technical points that must be met by the vendor to be considered ‘certified’ would suffice on this form.



Additionally, Saucon would like clarification that certification is required at the *product offering level only*, and NOT the device level, as Saucon understands the term “device” to mean the installation of a product offering within a single bus. For example, Saucon currently has a product offering named “Prox,” which is hardware that can run Saucon’s driver log software on it. Saucon has Prox *devices* installed on hundreds of buses around the country. We understand that certification would need to be done for the Prox *product*, and not for each Prox *device* installed.

“Once completed, FMCSA will issue a unique identification number that the provider will embed in their device.”

Saucon comment: As a manufacturer of AOBRD-compliant devices, Saucon Technologies requests that FMCSA consider and address how devices already installed in a bus and being used in the field (which require only a software update, done remotely on the device, to move to ELD-compliance) should have this unique identification number embedded on them. While the embedding of an identification number could be a fairly simple addition for newly manufactured products, it will be more difficult to do the same to devices already installed, and not easily accessible to either the manufacturer or motor carrier.

Saucon Technologies requests an example of the unique identification number so that it can prepare for formatting and proper coding purposes.

We also request that FMCSA consider and clarify the purpose of this unique identification number. Will this identification number need to be shown at roadside inspection (since the device itself is not easily accessible to either the driver or the inspector during inspection, but the driver display that connects to the device is available)? It should be clarified when, where and how this identification number will need to be provided and displayed, so as to give flexibility to product manufacturers.

“Estimated Time per Response: 15 minutes first year and 7.5 minutes in subsequent years.”

Saucon comment: Saucon Technologies finds it difficult to concur with this estimation in time required to complete the registration process, as there are a number of factors that will influence time needed. According to the estimated time presented in docket FMCSA-2014-0377, Saucon Technologies would spend approximately 30 minutes to register one of its products the first year, and 15 minutes to do the same in subsequent years. Unfortunately this time estimate is highly dependent on several things that remain undefined, including but not limited to: the level of detail included in the above-mentioned registration Form MCSA-5893; the certification process itself once the form is completed and submitted to FMCSA, as well as the time lapse between submission and issuance of the unique identification number; and the purpose of the unique identification number as defined by FMCSA.



Of equal importance, Saucon Technologies requests that FMCSA clarify if the unique identification number issued by FMCSA can then be used as “evidence” to enforcement agencies, during both roadside inspections and audits at manufacturer or customer sites, that Saucon Technologies’ devices are ELD-certified. Once the identification number is issued, will Saucon receive a “certificate” from FMCSA which can be presented at these events? When Saucon Technologies receives the unique identification number, does this then mean that our product is fully certified? Saucon Technologies feels this is an important component of the registration and certification process, so that it truly is an annual process, and not a process that needs to be repeated after each roadside inspection or audit. Saucon Technologies requests that these issues be addressed in the final ruling.

Suggestions for information to be included “to enhance the quality, usefulness, and clarity of the collected information.”

Saucon comment: Saucon Technologies suggests that any website storing information on ELD-certified vendors contain the following information:

- Vendor company name
- Company contact information
- URL to link users to the vendor’s website
- Descriptor noting in which industry the ELD vendor mainly works (Motorcoach, Trucking, Multiple, etc are some suggestions)
- Section for comments on what the company can provide (i.e. is the ELD product a stand-alone product, or part of a Fleet Management System, etc)
- We suggest that each ELD-certified vendor be given a username/password to the website where this information is stored, so that the vendor can access and edit the information when needed.

Overall, Saucon Technologies agrees that the process of certification as an ELD vendor is an important part of the product’s practical and efficient use in the Motorcoach industry. Once defined, certification will eliminate much of the confusion and open interpretation which exists today among regulating authorities, ELD manufacturers, and enforcement agencies, regarding electronic logging devices and their technical requirements. Therefore, Saucon Technologies respectfully asks that you consider the comments included in this submission.