



## Commercial Vehicle Safety Alliance

promoting commercial motor vehicle safety and security

December 23, 2014

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

Re: Docket Number: FMCSA-2014-0377  
*New Information Collection Request: Electronic Logging Device (ELD) Vendor Registration*

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments regarding the Federal Motor Carrier Safety Administration's (FMCSA) Notice and request for comments on the agency's Information Collection Request (ICR) regarding establishing a registration system for electronic logging device (ELD) vendors, Docket No. FMCSA-2014-0377. Specifically, in the ICR, FMCSA requested input on 'ways for FMCSA to enhance the quality, usefulness, and clarity of the collected information.'

Established in 1981, CVSA works to improve commercial vehicle safety and security on the highways by bringing Federal, State, Provincial and local truck and bus safety enforcement agencies together with industry representatives in the United States (U.S.), Canada, and Mexico. Every State and Territory in the U.S., all Canadian Provinces and Territories, and the country of Mexico are CVSA Members. In addition, CVSA has several hundred Associate Members committed to helping the Alliance achieve its goals: uniformity, compatibility, and reciprocity of commercial vehicle inspections and enforcement activities throughout North America by individuals dedicated to highway safety and security.

As noted in our previous comments on ELDs, CVSA supports the creation of a rigorous certification program for ELD vendors, which should be administered by a third party. Vendors should not be permitted to self-certify. Further, CVSA supports the creation of an advisory board that would serve to create and maintain a list of approved ELD vendors. The advisory group would be similar to those groups that currently are involved in similar activities for speed measuring instruments and breath alcohol testing devices. Additionally, the certification process must include resistance against tempering with the system/device. Finally, as the agency considers what documentation needs to be maintained regarding evidence of certification, it will be critical to ensure that inspectors conducting roadside inspections and those investigators conducting Safety Audits and Compliance Reviews are able to accurately and quickly verify compliance.

CVSA works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We

appreciate the opportunity to comment on this proposal and the Agency's commitment to safety and stakeholder involvement.

If you have further questions or comments, please do not hesitate to contact me by phone at 301-830-6145 or via email at [stevek@cvsa.org](mailto:stevek@cvsa.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen A. Keppler".

Stephen A. Keppler  
Executive Director