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

Comments on Electronic Logging Device (ELD) Vendor Registration

Docket No: FMCSA–2014–0377

Webtech Wireless Inc. is a major supplier of compliant ELDs on both consumer tablets and rugged industrial devices. We applaud the Federal Motor Carrier Safety Administration (FMCSA) in their efforts to require the use of Electric Logging Devices to improve the safety of commercial motor vehicles.

Webtech Wireless Inc. submits the following comments in regards to the Electronic Logging Device (ELD) Vendor Registration process.

The ELD registration process

In section 5.2.1 “Online Certification” the specification states...

The online process will only allow a provider to complete certification if the provider successfully discloses all of the following required information:

“Model number of the product.”

“Software version of the product.”

“An ELD identifier, uniquely identifying the certified model and version of the ELD, assigned by the ELD provider in accordance with 7.1.15.”

If we assume “model number” refers to hardware and consider ELDs that are based on mobile computing technologies a number of issues arise.

The number of different mobile devices that ELD vendors are deploying will increase dramatically over time with new models arriving ever month. It is not inconceivable that an ELD based on mobile technology could be deployed on 10 different phone models on its initial release and within 2 years support over 100 different models.

Couple that with software version number changes from rapid release cycles of only a few months and the combinations of hardware model numbers and software versions can quickly scale into the 1000's.

This will be a logistical nightmare if ELD manufacturers have to re-register each combination of supported mobile hardware against each new software version released.

The requirements surrounding ELD registration suffer from a limited perspective that ELDs will be dedicated hardware devices, fixed mounted in vehicles and will change infrequently. This is completely opposite of the direction mobile computing and emerging technologies is heading today.

Webtech recommends that the ELD identification and registration system be revisited to account for emerging technologies and platforms. A system of registration that is not dependant on hardware is necessary to support mobile computing based ELDs.

ELD De-Registration

The ELD de-registration process has been completely omitted from the requirements and de-registration has potentially an even greater impact on an ELD manufacturer than all the other issues combined.

Without any information one can only guess at what de-registration might look like, the following is a possible scenario that can threaten an ELD provider's existence.

Consider an ELD provider who has deployed thousands of ELD devices to their customers and somewhere in the USA an inspector has an issue with that ELD indicating that it is not compliant. The ELD is subsequently removed (de-registered) from the approved list and instantly the ELD provider's entire customer base is impacted.

Webtech requests that the ELD de-registration process be clearly defined, who can de-register an ELD, what the policy is around de-registration, is there notification prior to de-registration with time to react before de-registration occurs, what recourse an ELD provider has to dispute a de-registration and how can a de-registration be reversed.

Conclusion

We appreciate the opportunity to comment on the ELD Vendor Registration process. Though we welcome the overall idea of the registration process we believe that there are issues that need to be addressed before it can be implemented successfully by ELD vendors.

Sincerely,
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