



December-23-14

Verigo Inc.
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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

Verigo Incorporated is a provider of commercial vehicle compliance software including driver logs and driver vehicle inspection reports. Since 2005 Verigo has participated in public comments and MCSAC committee meetings regarding matters pertinent to commercial vehicle hours of service and electronic logging device regulations. Verigo submits the following comments with regard to the New Information Collection Request: Electronic Logging Device (ELD) Vendor Registration.

Verigo supports certification of ELD platforms and the registration process outlined in the ICR. The requirements proposed in the ICR to register compliant platforms do not impose undue labour burden however, we note there is no estimation of the time required to actually complete the software certification nor what is expected to be submitted to substantiate certification. While the registration process may not impose a significant burden, the certification process itself is a significant undertaking that requires complete regressive software and platform testing. No estimation of this burden has been included in the ICR. Based on our ongoing certification program Verigo is willing to provide such estimation to the FMCSA.

To enhance the quality, usefulness and clarity of the information collect Verigo suggests the FMCSA provide more detail about supporting documentation that may be required to complete the software certification. More detail is also required about the way in which the unique registration number will be used. Clarification is required about the criteria that will be used to grant or deny a vendor registration and whether or not there will be an appeal process if a provider is denied an identification number. The purpose of the vendor registration is to maintain a list of Certified ELD devices so that fleets and drivers can meet FMCSA regulations. ELD certification is also critical for CVSA authorities. Given the certification rigours requirement there should be an equally rigours penalty for manufactures who provide misleading promotional information about ELD products that are not certified.

Respectfully,

A handwritten signature in black ink that reads "Robin Doherty".

Robin Doherty
President
Verigo Inc.