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Submitted via Federal eRulemaking Portal

Docket Management Facility
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-2018-0287**- Notice-Agency Information Collection Activities; Proposals, Submissions, and Approvals: Electronic Logging Device Vendor Registration

Garmin International, Inc. ("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 provides multiple ELD solutions ("Garmin eLog") in compliance with the Electronic Logging Device (ELD) FMCSA regulation.

Garmin is pleased to submit the below comments to Docket Number **FMCSA-2018-0287**.

Data Transfer Methods

FMCSA maintains a list on its website of the current ELD vendors and devices that have been certified (by the vendors) to meet the functional specifications. The list currently presents the following information for each registered ELD:

- a) Device Name
- b) Model Number
- c) Software Version
- d) ELD Identifier
- e) ELD Provider Name
- f) ELD Provider Email Address

Garmin requests that the Data Transfer methods supported by the ELD at the roadside also be presented in this list for each ELD. This data is currently submitted as part of the ELD registration information provided to FMCSA. By providing this detail to the public, it will allow customers and the Department of Transportation safety officials across each jurisdiction to

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understand the data transfer methods supported and which have been certified by the ELD Provider.

List of Registered ELDs

The list of registered ELDs provided by FMCSA is useful for fleets and drivers to easily find a compliant ELD for their use in complying with the FMCSA regulations. Each ELD provider is required to keep the information current. Garmin requests that FMCSA inform the Department of Transportation inspecting officials to refer to this this list when needing to understand the data transfer methods supported by the ELD as well as the latest compliant SW version.

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

Sincerely,

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