

Steven P. Norbeck - Comments

This is a Comment on the **Federal Motor Carrier Safety Administration** (FMCSA) Notice: [Agency Information Collection Activities; Proposals, Submissions, and Approvals Driver and Carrier Surveys Related to Electronic Onboard Recorders and Potential Harassment Deriving From Use](#)

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I have been in the trucking industry for over forty years. During that time, I worked my way through driving, driver training, and now safety management. I have worked with various forms of the hours of service regulations and with both paper, and electronic logs. Electronic logs are probably one of the best advances in transportation that I have seen in my career. Our entire fleet has gone to electronic logs and our drivers love them. They were, like most, sceptical at first. However, that quickly changed once they learning curve was passed. If they were offered a choice today as to whether they could stay with the electronic logs or go back to paper, they would opt for the electronics overwhelmingly.

The fear that some drivers or organizations have that these devices can be used to harass a driver is unfounded in my opinion. Quite the opposite, these devices can be used to support a driver in determining how many hours that driver has available to work and/or drive. They make a permanant electronic record of duty status that clearly indicates how many hours the driver has left in a particular duty cycle. Any and all editing done on a duty status must be annotated with a reason and the driver cannot edit driving time.

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On the other hand, the use of paper logs can result in harassment of a driver, the driver can be coerced into manipulating his/her log to suit a carriers perceived needs resulting in a clearly unsafe practice. Drivers can be forced to run more than one log, not fill them out until the end of the day, etc., all of this is impossible with electronic logs. In order to end any harassment of drivers, electronic logs are what should be mandated throughout the transportation industry.
