



U.S. Department  
of Transportation

1200 New Jersey Ave., S.E.  
Washington, D.C. 20590

**Federal Motor Carrier  
Safety Administration**

**FEB 9 2018**

Thomas A. Ditzler  
Director of Product Management-Technology Solutions  
J.J. Keller & Associates, Inc.  
Technology Solutions Office  
5 Innovation Ct, Appleton, WI 54914

Dear Mr. Ditzler:

The Federal Motor Carrier Safety Administration (FMCSA) has granted an extension of time as authorized under 49 CFR 395.34 for any carrier using the Electronic Logging Devices (ELD) models below registered by J.J. Keller & Associates, allowing the carrier's drivers to continue to use paper records of duty status in lieu of the ELD device until the deficiencies identified in your corrective action plan are remedied or until February 28, 2017, whichever occurs first. The devices covered under this extension are as follows:

Geotab GO7- J.J. Keller Android BYOD  
Geotab GO7- J.J. Keller Android Tablet  
J.J. Keller ELD- Android BYOD 2.0  
J.J. Keller ELD- Android Tablet 2.0  
J.J. Keller ELD- iOS 2.0  
J.J. Keller ELD- iOS 2.5  
J.J. Keller ELD- Android BYOD 2.5  
J.J. Keller ELD- Android Compliance Tablet 2.5

Drivers using the identified ELDs may continue to record their hours of service on a paper graph grid, in accordance with § 395.8, in accordance with the terms and conditions of this extension. As a condition of this extension, a carrier must maintain a copy of the enclosed document at the carrier's principal place of business and keep a copy in each vehicle with a malfunctioning ELD. A driver must make the copy of the document available to a safety enforcement official upon request. J.J. Keller shall notify FMCSA when the deficiencies identified in your corrective active plan have been remedied. Further, it is the responsibility of J.J. Keller to distribute the attached document to all affected carriers.

Please note that if the deficiencies identified in your corrective action plan are not rectified by February 28, 2018, FMCSA will initiate the process for the removal of devices registered by J.J. Keller from the registration list in accordance with 49 CFR part 395, Appendix A, Section 5.4.

If you have any questions, please contact Mr. Bill Mahorney, Chief, Enforcement Division at 202-493-0001 or [bill.mahorney@dot.gov](mailto:bill.mahorney@dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph P. DeLuca". The signature is written in a cursive style with a large, stylized initial "J".

Director  
Office of Enforcement and Compliance

cc: Rustin Keller  
enclosure



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### **Extension for the Use of Paper Records of Duty Status for Users of Electronic Logging Devices Registered by J.J. Keller and Associates**

The Federal Motor Carrier Safety Administration (FMCSA) grants an extension of time as authorized under 49 CFR 395.34 for any carrier using the Electronic Logging Devices (ELD) models below registered by J.J. Keller & Associates, Inc. (J.J. Keller), allowing the carrier's drivers to continue to use paper records of duty status in lieu of the ELD device until the deficiencies identified in J.J. Keller's corrective action plan are remedied. The devices covered under this extension are as follows:

- 1.) Geotab GO7- J.J. Keller Android BYOD
- 2.) Geotab GO7- J.J. Keller Android Tablet
- 3.) J.J. Keller ELD- Android BYOD 2.0
- 4.) J.J. Keller ELD- Android Tablet 2.0
- 5.) J.J. Keller ELD- iOS 2.0
- 6.) J.J. Keller ELD- iOS 2.5
- 7.) J.J. Keller ELD- Android BYOD 2.5
- 8.) J.J. Keller ELD- Android Compliance Tablet 2.5

Drivers using the identified ELDs may continue to record their hours of service on a paper graph grid, in accordance with § 395.8, until J.J. Keller notifies FMCSA that the deficiencies have been remedied or February 28, 2018, whichever occurs first. As a condition of this extension, a carrier must maintain this letter at the carrier's principle place of business and keep a copy in each vehicle with a malfunctioning ELD. A driver must make the copy of this document available to a safety enforcement official upon request.

Director, Office of Enforcement  
and Compliance