FOR COMMENT PERIOD ENDING JUNE 30, 2023



IFTA BALLOT PROPOSAL 1-2023

Sponsor

IFTA Audit Committee

Date Submitted

May 12, 2023

Proposed Effective Date

January 1, 2024

<u>Manual Sections to be Amended</u> (January 1996 Version, Effective July 1, 1998, as revised)

Procedures Manual Section P540 Distance Records

Subject

Standardization of Electronic Audit Records

History/Digest

The Board of Trustees approved a GPS Standardization Working Group in October 2019. The charges for this working group were outlined as follows:

- (1) Survey membership on level of experience with various GPS or other electronic auditing and how they engage in such audits, including any issues encountered conducting GPS audits, types of GPS systems audited, and the mileage software used to conduct the audit;
- (2) Survey the IAC to gain a better understanding of the obstacles faced to comply with the Plan and difficulties found in the audit process;
- (3) Review the format for the electronic data and provide recommendations for a standard format;
- (4) Analyze the electronic recordkeeping requirements in both the Plan and the Agreement with the results from the survey and make recommendations; and
- (5) Provide progress updates at upcoming Board meetings and a report to both Boards with a final recommendation by the Fourth Quarter 2020.

The Board of Trustees issued a new charge on December 1, 2020, as follows:

The IFTA AC should work together with the IRP AC to develop a ballot that works for both organizations. Your ballot proposal should take into consideration the research that was completed and presented to the Board in October 2020 from the GPS Standardization Working Group.

(6) A ballot, FTPBP#4 2021, was submitted on March 23, 2021, and distributed for comment. The Audit Committee provided multiple opportunities for discussion at the 2021 Audit Workshop. The committee also reviewed the online comments. After much deliberation, the Audit Committee withdrew the ballot.

Intent

To define what data elements would be adequate and what formats would be acceptable (i.e., XLS, CSV, etc.) for audit from the licensee. The individual jurisdiction has the discretion to accept static images but is not required to. The intent is not to exclude future or current technologies that would sufficiently capture distance accrued and that would allow for the verification of distance. An example of such a technology would include geofencing. Licensee records which do not contain all the elements set out in P540 may still, depending on the sufficiency and appropriateness of the records and of the licensee's operations, be adequate for an audit as outlined in P530.

Commentary:

Geofencing technology creates geographic boundaries, such as jurisdiction, enabling software to respond when a vehicle leaves and enters a particular boundary. If certain data was provided from geofencing technology, it could allow for the verification of distance. This does not remove the requirements of total distance traveled by the vehicle or distance traveled in each jurisdiction for VTS (vehicle tracking systems), this is a requirement of section P560 Summaries.

Interlining Indicates Deletion; Underlining Indicates Addition

1 2 3 4 5 6 7 8	P500 *P540	EDURES MANUAL Recordkeeping Distance Records Distance records produced by a means other than a vehicle-tracking system, as set out in 00, that substantially document the fleet's operation and contain the following elements shall be
		ed by the base jurisdiction as adequate under this article:
9 10	[SECTI	ON P540.100.005 – P540.100.035 and P540.300 REMAIN UNCHANGED]
11 12 13 14 15 16 17 18 19 20	.200	Distance records produced wholly or partly by a vehicle-tracking system, including a system based on a global positioning system (GPS): Distance records produced by a vehicle tracking system that utilizes latitudes and longitudes, a record must be created and maintained at a minimum every 10 minutes when the vehicle's engine is on and contain the following data elements:
		.005 the original GPS or other location data for the vehicle to which the records pertain .010 .005 the date and time of each-GPS or other-system reading, at intervals sufficient to validate the total distance traveled in each jurisdiction
20 21 22 23		.015 .010 the location of each GPS or other system reading the latitude and longitude to include a minimum of 4 decimal places (0.0001) of each system reading
24 25 26 27 28		.020 .015 the beginning and ending reading from the odometer, hubodometer, engine control module (ECM), or any similar device for the period to which the records pertain the odometer reading from the engine control module (ECM) of each system reading. If no ECM odometer is available a beginning and ending dashboard odometer or hubodometer for the trip will be acceptable.
29 30		.025 the calculated distance between each GPS or other system reading
31 32 33		.030 the route of the vehicle's travel
34 35		.035 the total distance traveled by the vehicle
36 37		.040 the distance traveled in each jurisdiction
38 39		.045 .020 the vehicle identification number or vehicle unit number
40 41 42 43	text file	ta must be accessible in an electronic spreadsheet format such as XLS, XLSX, CSV or delimited . Formats from a vehicle tracking system that provides a static image such as PDF, JPEG, PNG, d are not acceptable.