

BPA Policy 720-2

Telematics

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1. Purpose & Background

Telematics will enable Bonneville Power Administration (BPA) fleet lifecycle asset management activities. Data such as mileage, idling, fuel usage, tire pressure, engine health, etc. will assist with cost savings and safety improvement measures. BPA is taking a phased approach to implementing telematics – Phase 1: GSA-leased vehicle implementation; Phase 2: BPA-owned vehicle implementation. The purpose of this policy is to establish roles, responsibilities, and governance over the use of telematics on GSA-leased vehicles and equipment at BPA. The Chief Administrative Office Program Management Office (CAO PMO) is the information owner of the telematics data and distributes information to organizations based on approved business needs and in accordance with provisions in this policy. Telematics does not include the collection, storing, or sharing of Personally Identifiable Information (PII).

2. Policy Owner

The Chief Administrative Officer (CAO) has overall responsibility for this policy. The CAO PMO is responsible for working with relevant stakeholders to implement, review, and revise this policy.

3. Applicability

This policy applies to all processes and data collected through telematics devices installed in GSA-leased or BPA-owned vehicles and equipment. This includes light-, medium-, and heavy-duty vehicles, as well as equipment such as trailers, generators, and forklifts.

4. Terms & Definitions

- A. Telematics:** Technology-based hardware tools that collect and record vehicle operational data. Devices that enable telematics data collection may be installed by manufacturers in vehicles as standard equipment or be added as an aftermarket product.
- B.** Data types are tied to the following risk profiles: high and low.
 - 1. **High-risk data** – may identify an individual driver and is only accessible by the Information Owner, such as live GPS data.
 - 2. **Low-risk data** – does not have the potential to identify individual drivers.
- C. Information Owner (IO):** An official with operational authority for specific BPA information (including responsibility for establishing controls for its generation,

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collection, processing, dissemination, storage, and disposal); generally, a business unit manager or designee. In the context of this policy, the IO is within the CAO PMO.

5. Policy

Telematics is a way to collect data on the use of a vehicle. The CAO PMO is the Information Owner (IO) of telematics data under this policy. BPA has GSA-leased vehicles with telematics installed. Any time a GSA-leased vehicle is used, various types of information are recorded, with the exception of PII. This recorded data is collected and securely stored off-site by a third-party entity.

- A. Governance and use of telematics data:** The IO will manage the data as an information asset. BPA will govern the use of telematics data through this policy and associated procedures. Once this data is made available by the third party and data requests are submitted to the IO, the IO reviews, analyzes, and shares information with relevant BPA programs in accordance with this policy and Deputy CAO approval.
- B. Security and Privacy:** High-risk data (such as live GPS location data) will be carefully managed with the controls listed in subsection C (Data access).
- C. Data access:** Only the IO will have direct access to raw telematics data. The IO may also provide BPA organizations access to low-risk raw data upon approval from the Deputy CAO. Data sharing is specific to the business needs of the organization.

1. Data Distribution Process and Procedures

- a) See **Appendix B** for approved data uses.
- b) The IO is responsible for downloading and reviewing the applicable data to ensure policy compliance prior to distribution.
- c) For recurring data requests, direct data access may be approved by the Deputy CAO for low-risk data in alignment with business needs.
- d) For high-risk data, direct access to the data will not be provided. The Deputy CAO may approve sharing on a case-by-case basis.
- e) Any data requested for investigative or disciplinary purposes must be reviewed by the Deputy CAO and approved for release by the Office of General Counsel. Requests for data will be limited to situations in which the data is necessary to investigate an initiating incident, and will not be used in an effort to discover misconduct on its own.

2. Data Distribution Limitations

- a) Data will only be distributed internally to the BPA organizations listed in **Appendix B**.

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- i) Organizations not listed in **Appendix B** will need to submit a data request to the IO for approval by the DCAO. A business justification supporting the data request must be provided.
- ii) The Deputy CAO must review all BPA telematics data requests not listed in **Appendix B** and determine if release will be approved.
- b) All data reporting is limited to summary data unless explicit approval is received from the Deputy CAO to access raw data.
- c) Any release of telematics data outside of BPA must be preapproved by the Deputy CAO.

D. Storage and Archiving

- 1. Data will be stored in the GSA MyGeotab Portal and a secured BPA CAO PMO folder. Data reports and analysis will be retained in the folder according to the CAO PMO (N) information asset plan.

6. Policy Exceptions

None.

7. Responsibilities

A. BPA Program Offices

- 1. May have limited access to the approved aggregate data detailed in **Appendix A**.
- 2. Submits data requests to the IO through telematics@bpa.gov.
- 3. Are not authorized to distribute data beyond what is detailed in the initial request.
 - a) If telematics data is integrated with other data sets, the IO is no longer responsible for the new data set.

B. Information Owner (IO)

- 1. Serves to represent BPA in the approved use of all telematics data.
- 2. Reviews telematics data requests for compliance with this policy.
- 3. Documents data request determinations and provides telematics data to authorized users upon receiving the necessary approval.

C. Deputy Chief Administrative Officer

- 1. The Deputy CAO is the approver of all data requests not approved by this policy.
- 2. Reviews revisions to this policy.

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8. Standards & Procedures

- A. The telematics data request and review process is described below and in the process map in **Appendix C**. Internal detailed procedures are developed and maintained by the CAO PMO.
1. BPA organizations submit their telematics data requests to the telematics@bpa.gov mailbox for review. Data requests should include a summary of the business need for the data, how the data will be stored and used, and if there is the intention to integrate the data with other data systems.
 2. The IO reviews data requests compared to the approved uses of data in **Appendix B**. If the data request complies with **Appendix B**, the IO distributes only relevant summary data to the authorized user that requested the information.
 3. If data requests do not comply with **Appendix B**, the IO submits the request to the Deputy CAO for review and distribution decision.
 4. If the data request is not approved by the Deputy CAO, the IO notifies the organization that the requested information was denied.

9. Performance & Monitoring

The CAO PMO monitors compliance with this policy and reports to the Deputy CAO on compliance findings, including the collection, storage, and distribution of all BPA telematics data.

The CAO PMO maintains a log of all approved and denied data requests, including originator, type of data requested, and status of data requests.

10. Authorities & References

- A. BPA Policy 236-300, *Enterprise Data Governance Policy* (2022)
- B. BPA Policy 473-2, *Information Technology Systems and Services Policies* (2021)
- C. BPA Policy 230-400, *Asset Management Policy* (2023)
- D. [GeoTab](#): Serves as the GSA Fleet telematics software company.

11. Review

A. The CAO PMO annually reviews the continuing effectiveness of this policy and associated procedures in meeting the policy's objectives.

B. The CAO PMO coordinates revisions to this policy with necessary stakeholders, the Chief Administrative Officer, and the Deputy CAO.

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12. Revision History

| Version Number | Issue Date | Brief Description of Change or Review |
|----------------|------------|--|
| 1.0 | 12/12/2024 | Initial publication of policy. |
| 2.0 | 2/10/2025 | Revisions for compliance with new EOs. |
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Appendix A: List of Data Collected

The following data is collected on GSA-leased vehicles that include telematics:

| <u>Data Type</u> | <u>Data Description</u> |
|--|---|
| Vehicle Identification Number (VIN) | VIN as assigned by the Original Equipment Manufacturer |
| Vehicle Details Identification | Vehicle make, model, and year |
| Device ID/serial number | Unique asset number of telematics device |
| Odometer reading | Derived from vehicle's engine |
| Miles traveled | Miles traveled during any user-defined calendar period, using engine-based odometer recordings |
| Number of days used | Number of days the vehicle is used over a user-defined calendar period |
| Number of trips | Number of trips taken over a user-defined calendar period, where a "trip" can be user-defined in terms of distance traveled and/or other criteria |
| Vehicle speed | Miles per hour (MPH) based on vehicle's engine/speedometer |
| Fuel type | Type of fuel used by vehicle |
| Fuel consumption by type in natural units (e.g., miles per gallon, etc.) | Quantity of fuel consumed (including electricity) during a given period |
| MPG or kWh (lifecycle measure) | Miles per gallon or kilowatt hour calculation over the life of the vehicle |
| MPG or kWh (calculations between fueling/charging events) | Miles per gallon or kilowatt hour calculation for current tank/charge of vehicle |
| Auxiliary runtime | Auxiliary system runtime |
| Total engine hours | Total time engine is on (running lifetime total) |

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| Idle time | The total amount of time a vehicle's engine is operating while the vehicle is not in motion. An idle event and its associated duration must be determined when a user defined acceptable idle threshold is exceeded. Idling time per event and lifetime totals must be able to be derived |
| Oil Life Sensor | See when a vehicle is due for service based on oil life sensor |
| Trouble codes | Track and transmit vehicle diagnostic data and/or other alerts when vehicle is functioning outside of acceptable parameters. Both the code itself as well as a corresponding translation must be provided |
| Diagnostic alerts | On board diagnostic (OBD) based alerts |
| Crash events | Determine if a vehicle has been in an accident/incident and provide collision information to system users with additional accident data elements (e.g. restraint controls, brakes, steering, velocity, airbag deployments, etc.) |
| Accelerometer data | Determine if the vehicle is being operated in a harsh manner (e.g., hard braking, rapid acceleration, etc.) |
| Hardware removal alert | Detection and alert when telematics hardware is removed from OBD port (or similar), which must be captured electronically in real-time |
| Data transmission date/time | Transaction date and timestamp for key transactions or events, including, at minimum: activations, deactivations, accidents/incidents, hardware removals and transfers |
| Global Positioning System (GPS) tracking | Near real-time tracking of a vehicle's location using GPS coordinates. Must have the ability to turn GPS tracking on/off per data plan basis (when GPS is enabled, full geofencing, breadcrumbing, and customizable trip reporting functionality must also be available) |
| Tire pressure | Current tire pressure levels (if available) |
| Fluid levels (oil, transmission coolant, and washer fluids) | Ability to view current fluid levels (if available) |
| Seat belt detection | Indicates usage of seatbelts (if available) |

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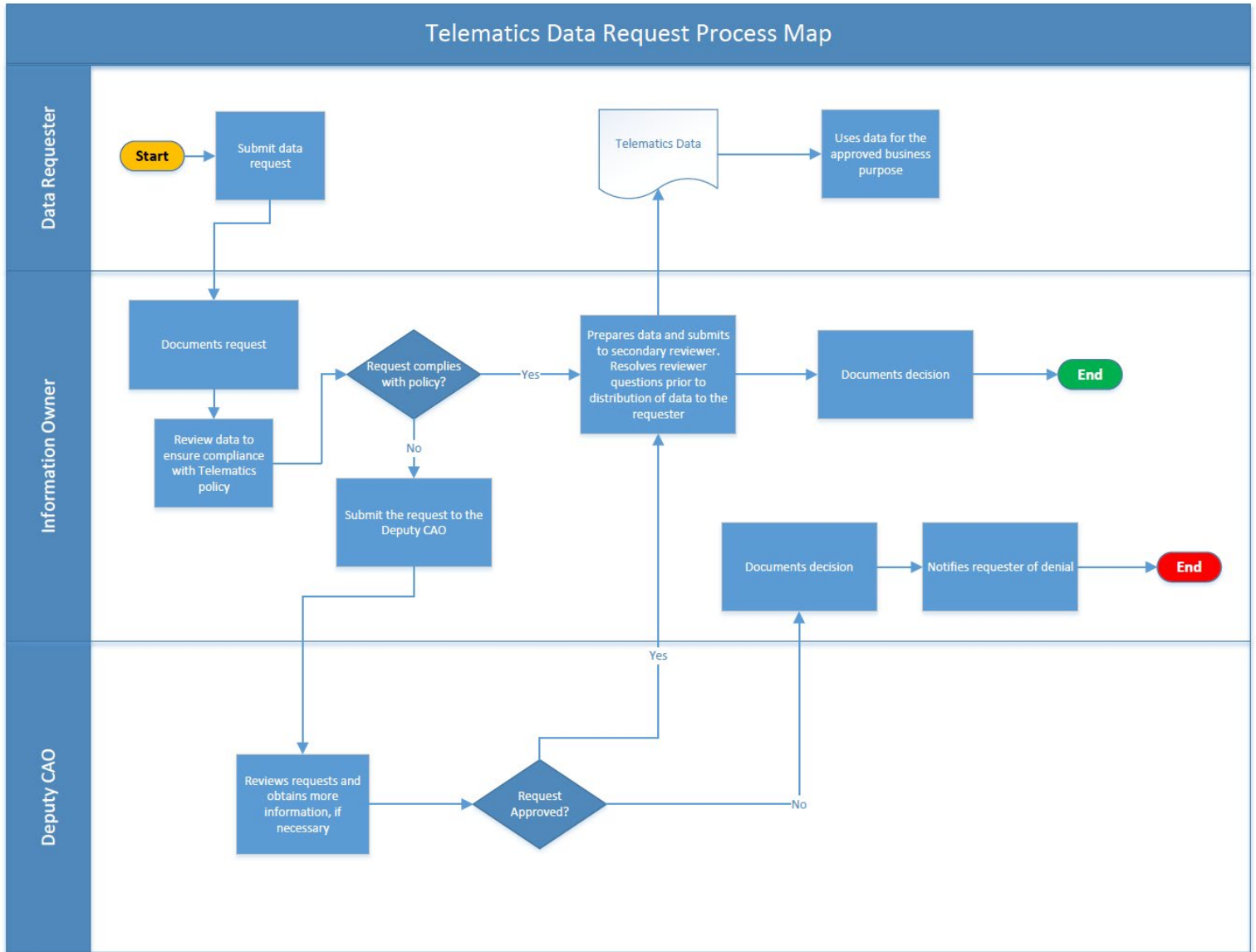
Appendix B: Approved Data Uses

The data uses listed below are considered approved for business needs. Deputy CAO approval is required for data requests not listed below. Otherwise, BPA organizations will utilize the data in the following manner:

- A. General Services Administration (GSA):** Collects telematics data (available on the MyGeotab Portal) on GSA-leased and BPA-owned vehicles.
- B. Information Owner (IO):** All data analysis and sharing is based on business need. Any data that could potentially identify an individual driver is considered high-risk data and is only accessible by the IO.
 - 1. The CAO PMO is the IO for all BPA telematics data.
 - 2. Raw data is downloaded but not shared outside of the CAO PMO unless approved by the Deputy CAO.
 - 3. Aggregate data may be shared based on business need, which must be approved by the Deputy Chief Administrative Officer.
 - 4. Reviews telematics data requests for compliance with this policy.
- C. Fleet Management:** To conduct data analysis to develop plans for general vehicle maintenance and equipment replacement cycles, Federal Automotive Statistical Tool (FAST) reporting, and other aspects of fleet management.
- D. Safety Office:** Aggregate data will be used to analyze trends to inform BPA Safety Program messaging to the BPA workforce based on common safety issues.
- E. Security and Continuity of Operations:** Data will be used to identify and recover stolen BPA vehicles.

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Appendix C: Telematics Data Request Process Map



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