

Public consultation on the review on the legislation on tachographs:

<p>Question 1 - Is it important that equipment of different manufacturers functions in exactly the same way? Or should legislation focus on essential requirements and give manufacturers more freedom to develop solutions and improve the equipment?</p>	<p>All tachographs should work in conformity with regulations in force. Innovations in order to simplify the use are necessary. Tachographs should work in the same way and have the same software what would have made controls much easier and tacho system integrated. Law should make the essential requirements for tacho's leaving manufacturers free to innovative solutions.</p>
<p>Question 2 - Should the legislation on the tachograph already foresee the integration of the digital tachograph into an open in-vehicle platform? If so, what other regulatory applications should be integrated in this platform (e.g. e-toll, recorder for accident investigation, e-call, speed control) and why? Would it be interesting for fleet management or other applications related to safety or security of transport, or to law enforcement, to have a real-time "tracking and tracing" function?</p>	<p>From the enforcer's point of view the legislation on the tachograph should foresee the integration of the digital tacho's into an open in-vehicle platform. It would helped with comparing data from tachograph, „tracking and tracing” system and detect the tachograph fraud.</p>
<p>Question 3 - Should remote download of the digital tachograph be encouraged? Is a regulatory approach deemed appropriate in order to facilitate widespread introduction?</p>	<p>Yes, it would allow: 1. to keep the minimal period of downloading data form driver card in case of „route” lasting longer than 1 month; 2. to shorten the control time. Current regulation „hinder „introduction of the remote download system.</p>
<p>Question 4 - What is your practical experience? Are there any obstacles for speedy download of data?</p>	<p>The specific construction of a tacho makes impossible it to download data fast. Probably it can be caused by link RS 232 or key used to dowload the data. Dowloading a full range of data from tacho can last even two hours.</p>
<p>Question 5 - How could the equipment be changed in order to make controls more efficient? Should the mobile control of moving vehicles be envisaged in order to reduce administrative burden for industry and enforcement bodies?</p>	<p>The mobile control seems to be a very good idea. However the range of wireless system is approximately 100 m. In current technical conditions, it is not possible to control a vehicle. The mobile control is a high technology purpose which can be achieved in a future. No platform for archiving data and uniform way of archiving downloaded files can be a real obstacle to the introduction of his system.</p>
<p>Question 6 - Is the current security level proportional? Can and should there be other sources of motion? Could the authenticated time/speed/positioning data provided by the future European "GPS" system, Galileo, be used as a second and independent source of</p>	<p>Current security level of data contained in a digital tacho is not enough. Additional sources of motion seem to be necessary . It could hamper the tachograph fraud. Furthermore, the integration tachograph with GPS system would be very</p>

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motion to ensure security of data?	helpful, that is why it needs to be considered.
Question 7 - In case a vehicle is only occasionally used in the scope of Regulation (EC)No 561/2006, for example when exceeding from time to time the radius set in some exceptions, should it be possible to use different means of recording activities?	No, because it could lead to abuse and circumvention.
Question 8 - Which option do you prefer? In case you prefer option 2: What are the most important issues for compatibility between a new generation of tachographs and the current digital tachograph, and what other parts of the equipment, apart from driver cards, should be compatible in your view?	In order to maintain compatibility, the preferred option is 2 .The advantage of this option is the low cost. Besides, issuing new cards would be fraud because some cards have been confiscated.
Question 9 - Should the legislation specify how new equipment has to be introduced in the field? Should a retrofit be possible, mandatory or take place in case of replacement of defective equipment? What are the essential steps for the introduction of new equipment? Should type approval for tachographs fall under the general type approval scheme for vehicles?	Law (rules) should regulates access to the market for new devices. New equipment should not be launched too quickly. Introduction of new solution should not entail changes to the basic functions of Tacho. Type approval should fall under the general type approval scheme for vehicles. The possibility of modifying, in case of replacement of defective equipment.
Question 10 - Should it be possible to carry out field tests before type approval is requested, while maintaining the same security standards? How should field test be limited (geographically, number of equipments, duration of the field test, etc.)?	Testing should not be done without approval. It could lead to abuse.
Question 11 - Which option do you prefer and if you prefer option 2 or 3, for which parts: seals, downloading equipment, control equipment, calibration tools, etc.?	Option 3- introduction of harmonized Community procedures, which should identify ways of measuring attachment plates, seals, use of inspection and workshop equipments
Question 12 - Is the current way of updating the specifications on the tachograph satisfying? Who should be responsible for the updating of the technical requirements? What is your preferred option?	Option 2 seems to be the most convenient. Regulation should provide the necessary requirements for an equipment, normative or technical institution (CEN, CENELEC?), should be empowered to determine the technical specifications.
Question 13 - Should the trustworthiness of workshops be improved? If so, how? How can conflicts of interest be avoided for workshops that are living from delivering services to individual clients but play at the same time an important role in the security of the recording equipment?	Control bodies should intensify supervision of workshops . Bodies of Road Transport Inspection should create and update the list of unreliable workshops. Uniform standards of operation should be introduced.
Question 14 - What kind of data should be	Manual entries (enrollment) should include

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entered manually by the driver? What kind of information should be recorded automatically by the recording equipment? Is it appropriate to record more precisely the location (via GPS or GNSS for example)?	place of working, hour, date. Tacho should enter geographical location of the vehicle automatically.
Question 15 - Should the Regulation explicitly foresee the use of electronic data exchange on cards that are issued between card issuing authorities?	Yes, it should be foreseen in the Regulation.
Question 16 - Should the Regulation explicitly foresee warnings for the driver in order to enhance compliance with the legislation on driving times and rest periods? Should it be up to manufacturers' choice to offer such warnings as an optional tool, including additional warnings for other aspects than the continuous driving time?	Yes, the Regulation should foresee warnings for the driver in order to enhance compliance with the legislation on driving time and rest period.
Question 17 - Do you have any other comments or suggestions which you consider should be taken into account during the revision of the European legislation on recording equipment?	To introduce safeguards tacho transmitters to prevent the tachograph fraud.
Question 18 - Would you like to propose other measures to make the recording equipment more user-friendly and to improve the reliability of controls?	