

European Commission  
Directorate-General for Energy and Transport  
Unit E1 "Land Transport Policy"  
B-1049 Brussels  
Belgium

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Ref  
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Dear Sirs/Mm.

We hereby give you answers on your questions about the future tachograph. This document is reflecting the common meaning of the stakeholders in the Swedish road transport market represented by the following NGOs;

- The Swedish Transport Workers Union
- The Swedish Bus and Coach Federation
- The Swedish Association of Road Haulage Companies
- The Swedish Road Transport Employers Association
- The Swedish Bus and Coach Employers Association

**Question 1 - Is it important that equipment of different manufacturers function in exactly the same way? Or should legislation focus on essential requirements and give manufacturers more freedom to develop solutions and improve the equipment?**

The important interfaces, i.e. download interface, core process in manual entries, should be universal and the same for all products. The other parts shall be up the manufacturers to develop in the name of technical development.

**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?**

Open architecture is a good solution but only the interfaces are to be defined in the legislation. Integration of the commercial products shall be out of scope of the legislator. Any integration of products to the OBOU-products shall be done by interface specification. It is however very important that all data generated by the new systems is information that is exclusively for the transport companies and not the inspection departments.

**Question 3 - Should remote download of the digital tachograph be encouraged? Is a regulatory approach deemed appropriate in order to facilitate widespread introduction?**

Remote downloading is positive and of great value for the transport industry but it must be up to the market to make the decision whether to implement those possibilities or not. This should be out of scope of the legislator. We are also of the opinion, that it is the company that controls over the data downloaded.

**Question 4 - What is your practical experience? Are there any obstacles for speedy download of data?**

The need for legislative requirement of download speed is no longer an issue but it is important that there are not legal obstacles for a continued development in the same direction.

**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?**

The opinion of the Swedish stakeholders is that the commercial traffic controls fulfil a strong aim with respect to the drivers' social situation, traffic security and fair competition.

We strongly oppose that hidden remote downloading should be allowed for control purpose by the legal authorities without any, from time to time, consent by the company. However, if the control time should heavily be reduced, we could be in favour of such a system but only in combination with, at each time, consent from the company and/or the driver.

**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 motion to ensure security of data?**

A GPS based systems can be used as a second source to raise the security level, but on a voluntary basis. The interface must then be a standard interface specified in the legislation. The GPS signal is also possible to use to state place of localisation of the vehicle at start and stop of journey.

**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?**

The common opinion is that it is not necessary to use any other systems for registration of vehicles that normally do not fall in scope of the drivers' hour regulation. As long as one is covered of the exceptions one should not be forced to use a separate system or be fitted with a digital tachograph. In order to avoid undue competition is it on the other hand very important that a vehicle being in scope, even for a very short distance or moment, always should be fully considered as an in scope vehicle and then have to be fitted with a tachograph according to the European Regulations. No other way of recording drivers' data should be used.

**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?**

The new generation of tachographs must always have a backwards compability with the driver cards. This is consequently option 2. The pictograms, basic CAN protocol, mechanical interface and the download protocol should be the same. It is important that a new analysis

tool can be reading data from first generation of tachographs without any problem. We know that those equipments are not regulated and do not need to be type approved today but it is anyhow important to harmonize these tools and to force the producer to make them compatible! This will ensure that the investments made can be kept and that minimum updates are required for the drivers and the companies.

**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?**

We are of the meaning that there shall not be a retrofit requirement unless there is a significant reason for this, i.e. security reasons.

Introduction of new equipment is a long and time consuming process. There must be a pre-type approval stage where the equipment can be tested in real life without having to be type approval granted.

Type approval of the digital tachograph shall not be part of the vehicle type approval. This is not recommended as this will limit the competition in the field and leave the tachograph manufacturers approval process in the hands of the vehicle manufacturers. Type approved is on the product itself and not in conjunction to other products.

**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.)?**

The Swedish stakeholders means that field test should be possible to perform before the type approval is granted. There is a very easy way to ensure that the numbers of field tests are limited. That is to require that the digital tachograph manufacturer must redraw the test units from the field no later than 2 years from when the unit was dispatched for test. This will limit the number of tachographs in the field due to economical rather than legislative reasons.

**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.?**

We prefer option number 2. It is important with harmonised control and analyses tools, calibration equipment. However we have some concerns as to being categorical in favour of type approval as the only way to choose. A standard procedure for certification could be developed and the labs accredited for that procedure is the preferred option. This will make the situation in the market easier to handle and not bureaucratic as with standards and type approvals.

**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?**

We are in favour of the option number one. This will provide stability to the product and the system. It involves also all the relevant stakeholders providing the right competence and focus. The process has a good track record and proven to be efficient. It is however important to focus a bit on the legal situation and process with the digital tachograph and the AETR-agreement.

**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?**

The competence of the workshop is very important to maintain over time. This will not only ensure that the new control procedures of calibration and inspection are up to date, the risk of fraud will also decrease. A legislative requirement should be implemented to ensure that the tachograph workshops are to have a yearly training session on the digital tachograph and the installation procedures.

**Question 14 - What kind of data should be 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)?**

As the country for the beginning and ending of the driver's working day should be recorded manually by the driver this could better be done in an automatic way. Places could be recorded by the tachograph by using a GPS. This will be quite a natural path to make it easier for the driver. The preferred choice is to have a minimum of manual declarations by the driver. For example could this requirement easily be changed to let the tachograph automatically register the name of country when a border passing has occurred? This information is of much more interest if a vehicle has been starting and ending the day of work in Sweden the last 600 days. The current procedure has shown to be a complicated process as the drivers often fails to do it.

**Question 15 - Should the Regulation explicitly foresee the use of electronic data exchange on cards that are issued between card issuing authorities?**

We are convinced that if this will not be the case, the security of the tachograph system will soon be jeopardised. This is very important and the requirement must be fulfilled in order to keep the system secure. Another important issue to be covered is the enforcement bodies' availability of the correct, accurate and up dated card information when enforcing drivers at road side checks and companies at company check.

**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?**

We prefers a development with a greater degree of built-in analysis tools and more optional warnings however this must first lead to an absolute coordinated and uniform implementation of all the legal acts in the field of drivers hour around the EU, in, and between the member states.

**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?**

The Swedish stakeholders have, in addition to what is said above, the following comments:

- The most important part is to never forget the actual purpose and scope of the digital tachograph.
- The tool for analysing data and the control tool must be harmonised in the way they read the regulation. It must be done in unanimity in the whole EU and AETR area.
- A possibility to update the software in the tachographs must be opened and by that get the same facilities as the tachograph of a newer generation.

- An exchange system, where tachographs from the older generation could be exchanged with used ones who have been modernised by the tachograph producers.
- Minimise all kind of manual input and production of paper based documents.
- The slowest speed of the vehicle, before registration of driving, must be higher up to 1,5 to 2 kilometre per hour or more. Driving in such low speed should be seen as other work. This will minimise the problem when moving a vehicle for shorter distance.
- We believe it is of great significance that the manufactures will be legally and regularly obliged to inform the Commission regarding malfunctions and technical errors originating from the digital tachograph.

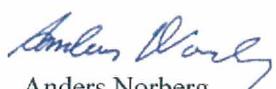
**Question 18 - Would you like to propose other measures to make the recording equipment more user-friendly and to improve the reliability of controls?**

The integration in the cab environment will improve the usefulness of the product. To regulate the method of this is not a good idea as the open interfaces are granted by the interoperability requirement set by the vehicle manufacturers which is playing an important part if used correctly.

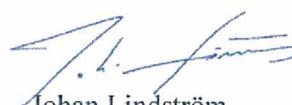
The controls can be more efficient if the enforcement officers can utilise the enforcement Tachonet. Other thoughts is to implement instant enforcement check to highlight to the driver and enforcement officer the status of driver performance compared to the actual drivers hours legislation. This will shorten the time for road side check and improve compliance.

If you have any further questions in this item please don't hesitate to call Lars E. G. Andersson at the Swedish TransportGroup who is coordinating the further answers from the stakeholders signing this letter. He can be contacted via telephone number +46 073 044 7167 or by e-mail to [lars.e.g.andersson@transportgruppen.se](mailto:lars.e.g.andersson@transportgruppen.se) .

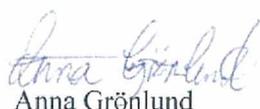
With kind regards

  
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