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Dear Members of the Commission,

UPTR is the Professional Union of Belgian Transport Companies and represents 1.800 transport companies in Belgium.

We would like to add following comments to the consultation paper :

#### Question 1

Yes it is important that equipment of different manufacturers function in exactly the same way.

Giving manufacturers more freedom to develop solutions and improve the equipment is NOT a good idea; it would create interpretation problems in case of controls.

It is important to harmonize these controls and sanctions.

For example : for some inspectors periods of "other work" is not valid as interruption of the driving time while for others it is. When the vehicle is stationary, the tachograph should ALWAYS automatically register periods of "availability".

#### Question 2

No.

The digital tachograph should only register driving and rest time.

All other equipment should be optional. Optional equipment developed by service providers are much more flexible and evolutionary than a mandatory legal system.

No speed control should be integrated, since trucks are already equipped with a speed limiter.

#### Question 4

Yes. There is a speed problem. Many companies complain about very long delays to download data.

#### Question 5

All controllers should be equipped with a control card and it should be forbidden to allow printing performance when the machine is working well.

The mobile controls along the road should be limited to controlling the current transport activity and the respect of driving and rest time, elementary for safety on the roads.

Enforced controls could always be organised, if necessary, at the company and aim at the respect of social regulations.

Question 6

GPS is better than the current system (to avoid problem of the "lost minute").

Question 7

Yes. Attestation of activities should be lifted.

In the future GALILEO will have to replace the current system.

Question 8

Option 2

The GPS system should only be used to control driving and rest time. The tachograph is a control instrument, not a gadget.

We thank you in advance for your attention.

Yours Sincerely,

Michaël Reul  
Managing director