Answers in relation to Consulation on the recording equipment in road transport. These are my own opinions and are not necessarily the opinions of the Company for which I work for.

- 1. Having different systems may be confusing though we already have a number of different looking analogue systems and drivers get by. Provided the core integration between the driver and the tacograph is easily understandable (mode changing/ printouts etc) different front design of the system is not too important.
- 2. A GPS system in line with the wireless downloading discussed later would be advantageous both to administration, the driver and in the event of theft of the truck, possibly the Police. Speed control would be fantastic but I guess this is already controlled by the speed limiter at vehicle top speed and for a vehicle to be limited by any system in relation to the actual road limit (eg 30mph/40mph) more technology would be needed at the roadside which currently is not there.
- 3. I fully endorse remote download of the tacograph. The time saved by employees to download the VU will easily counteract any additional cost of the wireless type systems that would have to be integrated.
- 4. Downloading a vehicle takes approx 10minutes taking into account finding the vehicle, the keys, the download kit and doing the physical download. Obviously a number of vehicles can be done at the same time, however this means buying more downloaders at £150 per time which in turn get lost or broken. Running an unaccounted distance report which is very useful in finding drivers that have not correctly placed their card in the machine, or finding vehicles that have been used without authorisation has to be done for a period of time where you know all VU's have been downloaded. That is, under current legislation if a fleet is downloaded only every 3 months you have to run the unaccounted distance report for some 3 months back. By this time the information is of little use. Again the wireless system would improve this.

Downloading of driver cards for drivers based locally is painless and done daily easy. However, for operations that have drivers away from or based away from the mother depot this does cause problems. Again a costly downloader has to be sent to the outbases in order to gain the driver card information.

- 5. Any reduction in administration and therefore cost of any system would be welcome. If this cost reduction is felt within government agencies then this will in time be felt by the rest of the industry. Doubtless wireless reading of filtered information from the tacograph would work toward this.
- 6. The current level of security is adequate. We are not protecting top secret information here. In the past a driver may leave his chart/s lying around for anyone to see. Nobody was worried about security back then! Fortunately I am not interested in trying to mislead any tacograph system so I cannot comment on whether the system is sufficiently fraudproof.
- 7. I do not have any vehicle that work out of scope so am unable to give a qualified answer here.

- 8. Option 2. However, in that drivers themselves normally pay for the card the current card needs to be compatible. Having a new type of card would essentially mean a third recording system (along with the current card and analogue charts) which would bring more administration and cost of software/hardware. I cannot see anyone in the business being happy with essentially a third type of system even if it is ultimately called "digital".
- 9. No retrofit will fit all types of vehicle so this option is not overly viable.
- 10. Field tests are a must and can be carried out within a large company or number of companies using a variety of trucks which have a wide geographical range. Truck buyers would be far happier knowing the kit they have in the vehicle is properly tested and of a good standard rather than find they have to take vehicles into the garages for recalls or upgrades.
- 11. Option 1.
- 12. Option 2.
- 13. No opinion as I am not familiar with the workshop security.
- 14. The current information entered by the driver is enough. I see no need to more precisely enter the start/end of day location.
- 15. Yes, this would be advantageous to companies that work across the continent as well as the regulating bodies of those countries involved.
- 16. It is and always has been for the driver to work out his break requirement. The 4 1/2hr warning is okay if the driving period is constant. However, on most routes and especially with multidrop the driving period is broken and therefore the warning not useful. Additionally many drivers get to need a break to meet the WTD which doesn't show on the digital tacograph and which then can confuse the driver. Offering different options as to what warnings are given will be dangerous as drivers might become reliant on one type of system warning them and then swap to another type of system and be unaware the second system does not give warnings of that type.
- 17. Running an operation where-by there are two people in the cab and the second person can only record POA or break causes issues. It would be a step forward to have the second person able to record break/POA and Other Work in the same way as an analogue system does.
- 18. No further comment

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