

## Revision of Community Legislation on the Recording Equipment in Road Transport (Tachographs)

### Question 1

I believe it is important that all equipment of different manufacturers function in exactly the same way as;

1. It promotes confidence with the vehicle operator / driver knowing the equipment therefore helping to reduce errors.
2. It reduces the burden on operators by reducing the need to supply training on various units to the driver.
3. It simplifies the task for enforcement agencies when preparing their procedures.
4. It simplifies the task for the calibration centre in understanding the equipment.

### Question 2

No comment

### Question 3

Remote downloading should be encouraged, as mentioned in the document; it would encourage more frequent downloading therefore helping reduce the chance of lost data, make data more readily available for Enforcement at vehicle operating centre. Data frequently downloaded, therefore reduces the time required for next download. I do not agree there should be a regulatory approach in order to facilitate widespread introduction as this may increase the financial burden on the vehicle operator.

### Question 4

Until recently I worked for an Enforcement Agency in the UK, I was in regular contact with technicians in approved workshops and examiners on the roadside, I have had instances where it has been reported to me that a technician trying to download a VU taking over 4 hours, there appeared to be now fault other than the speed of communication between the VU and the download tool being used. There should be no obstacles for speedy download of data if more co-operation between all parties were encouraged.

### Question 5

Here in the UK we have the WIMMs working if a similar format could be designed where a moving vehicle transmits the information as suggested i.e. driver card inserted, or registering speed and motion, this would of great assistance to the enforcement agencies as a sift tool as to what vehicles to stop, would help reduce tampering, especially if monitored by mobile checks.

### Question 6

No the current security level is not acceptable.

There should be some source of other motion, any system incorporating a signal from another system of the vehicle is open to manipulation, if the VU is manufactured with a GPS chip inside this would give a secondary speed signal that could be used as the comparison, with present technology this should be possible at minimal cost, no system will ever be perfect but this should give added security.

### Question 7

Any vehicle that is ever required to be used in scope of Regulation (EC) No 561/2006, even if only occasional should be required to operate under the regulations at all times.

### Question 8

Option 3

### Question 9

Yes legislation should specify how new equipment has to be introduced in the field. Should improved equipment be available, then the new equipments should be fitted in case of replacement of defective equipment.

If the new equipment is introduced to heighten the security of the system then introduction measures need to be drafted with a minimal time implementation date. No I do not think, type approval for tachographs should not fall under the general type approval scheme for vehicles.

### Question 10

Field testing of equipment should be possible before type approval is requested, it could be carried out geographically, with the manufacturer informing the required Enforcement Agencies of the number of units required to be tested, the duration of the testing and the identification of the vehicles being used.

### Question 11

Option 3, Community legislation

All seals should be approved and the same used by all member states.

All downloading equipment and calibration equipment used by calibration centres should be approved to one standard, set and used throughout. The quality of the standard would need to be high and agreed by all members.

### Question 12

Option 1

### Question 13

The operation of workshops needs to be monitored and policed by the Member States Enforcement Agencies to monitor and ensure the workshops operate to the correct standards and meet the requirements of the regulations.

Each Member State who authorises workshops need to produce a manual detailing the requirements for the set up, operation and procedures to be met by authorised workshops, there needs to be a system in place to monitor the conduct of the workshop with a discipline system available for those that do not meet the requirements, technicians need to attend refresher training on a regular basis.

### Question 14

A start and end location entered automatically via GPS would allow closer monitoring of vehicle and driver activities.

### Question 15

There should be regulations covering the use of electronic data exchange on cards that are issued between card issuing authorities. All issuing authorities should be required to sign up to it.

### Question 16

The management of the driving time and rest periods should be the responsibility of the driver / operator; it should be the manufacturers' choice if warnings are offered as an optional tool.

### Question 17

1. There should be a standardised requirement for training and the content of the training course throughout all Member States.
2. There should be a set standard throughout all Member States for all calibration equipment.
3. There should be a standard for the seals etc used during sealing of the system.

### Question 18

There should be standardization throughout all Member States with reference the policy for replacement of one manufacturers unit with another. Information regarding compatibility of a unit to a vehicle should be more widely and freely available.