

COMMENTS TO THE CONSULTATION ON THE REVISION OF THE COMMUNITY LEGISLATION ON THE RECORDING EQUIPMENT IN ROAD TRANSPORT

1 March 2010

Identification number in the Commission's Register of Interest Representatives: 8402170864-02

Deutsche Post DHL is the world's leading mail and logistics services Group and provides its customers with both easy to use standardized products as well as innovative and tailored solutions ranging from dialog marketing to industrial supply chains. Over 500,000 employees in more than 220 countries and territories form a global network focused on service, quality and sustainability. 2008 Deutsche Post DHL achieved an annual turn over of over €54 billion.

With 51.000 vehicles in Europe, Deutsche Post DHL is a significant operator on the EU roads. We recognize the importance of adopting and enforcing harmonized social rules in road transport to ensure a level playing field in the sector and improve road safety. We are also a signatory of the European Road Safety Charter since 2006.

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Question 1

The equipment of different manufacturers shall work in exactly the same way. Already today, the different equipments on the market can create confusion for the user/driver leading to mistakes when changing truck. In order to avoid this situation, Deutsche Post DHL has now decided to equip its new fleet with only one type of equipment if possible.

Question 2:

Integration of the digital tachograph into an open in-vehicle platform is highly desirable. Standalone systems should be avoided since the place in the dashboards is limited. Other applications like e-toll should be incorporated as it is already the case for the media centre with radio, navigation and phone application.

Question 3:

Acknowledging the benefits of remote downloading, we prefer no to use it today because of our concerns regarding data security.

Question 6:

The security of the system and the reliability of the data are crucial for us. Knowing the potential future benefits of Galileo, it can certainly provide a second and independent source of mention for a better security and reliability of data. However, the use of Galileo should not lead to a cost increase in the price of the equipment or in the use of the system.

Question 9:

Retrofitting in case of replacement of defective equipment can be an interesting option when applicable. Older vehicles have not all digital equipment on board, so retrofitting cannot be an obligation.

Question 11:

Option 1: Do not change the current situation.

Question 12:

Option 1: The commission continues to update the technical specifications through comitology.

Question 13:

The trustworthiness of workshops is critical however there is no need to change the current situation. If new provisions should be adopted they should be efficient and proportionate.

Question 16:

The Regulation should foresee warnings for the driver in order to ensure compliance with the driving and resting time for instance.

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