TNT provides businesses and consumers worldwide with an extensive range of services for their mail and express delivery needs. Headquartered in the Netherlands, TNT offers efficient network infrastructures in over 200 countries and employs more than 163,00 0 people. Over 2008, TNT reported €11.1 billion in revenues. TNT recognizes its social responsibility and has formed partnerships with the United Nations World Food Programme and the United Nations Environment Programme to fight hunger and pollution in the world.

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

Yes, an uniform operation will avoid mistakes, but manufacturers should have the freedom to improve the equipment and develop solutions.

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?

Yes, legislation should foresee the integration of the digital tachograph into an open in - vehicle platform. Such ITS applications must be standardised, harmonised and interoperable in order to improve the effectiveness and reliability of transport as a whole. Moreover, the application of ITS must be, to the widest extent possible, on a voluntary basis. Road Transport operators must be abl e to maintain freedom of choice when selecting the ITS equipment and application.

Integration of - e-toll: would reduce the amount of toll - and maut boxes.
- recorder for accident investigation: if the driver is able to.
- e-call: no opinion
- speed control: yes, but geared to local speed limits

A real time tracking and tracing function would be interesting, provided this functionality is only for use for the transport company and are not public.

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

The remote download feature is an important tool for r educing the administrative burden of handling data generated by the digital tachograph. Moreover, as a technology, its adoption should be stimulated through increasingly cost efficient solutions provided by manufacturers. Since it is not essential for fulf illing the digital tachograph's primary

functions and the Regulation's objectives the regulator should decide upon the added - value of mandating this.

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

It takes approx. 45 minutes per vehicle, this mainly because of the age of the system.

> **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?

A speed up of the download process would make it more efficient. Remote control of moving vehicles should not be envisaged, mainly because of the many different national interpretations, which diverges enforcement practices and sanctioning policies.

> **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?

Yes, the current security level is proportional and there should be no other sources of motion.

> **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?

Yes, but by manually recording

> **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?

Option 2, format of data

> **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?

Yes, retrofit should be possible, but not mandatory for operators.

As long as the innovative capacity of the device is not hampered, a general type approval scheme for vehicles, at least guarantying interoperability and consistency should be possible.]

> **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.)?

Yes, up to the manufacturers, before market introduction.

> **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.?

Today a wide range download devices and processi ng software of greatly variable quality is available on the market. Since road transport operators depend very much on this equipment in order to comply with regulatory obligations, TNT believes that these products should be subject to EU rules for type ap proval.

> **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?

Preferred option is 3

> **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?

No improvement necessary.

> **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)?

Weekly rest, annual leave, sickness etc. It must be possible for these to be loaded onto the driver card. In short drivers and operators should be able to use electronic means for creating a ll the records that a driver is required to carry in order to demonstrate compliance with EU driving and Rest Time Rules or the AETR Agreement.

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

Yes, as longs as the data are correctly protected.

> **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?

Yes, warnings for the driver in order to enhance compliance with the legislation on driving times and rest periods should be given, other warnings should be optional. However, an important condition is that the interpretation and enforcement of the EU Driving and Rest times in all countries should be harmonized.

> **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?

No

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

No