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?

Answer: Yes, i think it is verry important that all machines are operated the same way.

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?

Answer 2: No further open platforms. That way the all mighty 'Big Brother' gets even more chance to interfear in the life of the truckdriver. Though i would say Yes if that means all Maut and other roadtax devices could be replaced by tacho data.

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

Answer 3: Yes, this makes life a lot more easy for drivers and fleetowners.

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

No experience

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?

Answer: First i would like the machine to give the driver more info of what he is doing and how much time is left. The switches are confusing on the machines that we have now. Mobile control of moving vehicles would only make the abuse by foreign police officers bigger. Truckdrivers are since the introduction of the digital tacho more and more victims of highway robbery in the name of the law. Offences of just one minute can cause pennalty's of honderds of Euro's. That gives a lot of tachostress while these machines should protect drivers from stress. I would say more control at the base of the company and no more on the road, only when accidents happen. That way lawinforcement officers can't abuse foreign drivers anymore.

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?

Answer: That could be possible as an anti-fraude device but therefore we need other driving-resting laws. The current rules are much to strict.

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?

No meaning

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, try to mach with toll systems

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?

No answer

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.)?

No answer

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.?

No answer

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?

No answer

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 answer

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)?

Answer: Sattelite info would be usefull for the location. At het moment is is confusing, especialy in Spain where not only the country has to be adjusted, but also the region. As a truckdriver you have no idea in what region you are at any moment but when you do it wrong the Spanish Police names it FRAUD and gives a penalty.

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

No answer

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?

Answer: Make this an easy to adjust option

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?

Answer: Most important is that the time to change cards is made much shorter. Also the operation of the machines should be easyer and the same for all makes.

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

Answer: Skip the country codes and replace them by GPS signals.