

Carte per diagrammi
in rotoli, dischi, fogli
Sistemi di scrittura
per registratori



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Directorate-General for Energy & Transport
Unit E1 "Land Transport Policy"

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Mortara, 10th February 2010

Re: Consultation Paper for the Revision of the Community Legislation on the Recording Equipment in Road Transport (Tachographs)

Point 7. Other Questions - Question 17: Thermal Paper for Digital Tachograph Printers

Dear Sirs,

We are writing as producers of Tachograph Charts for nearly 40 years (Circular Charts and, recently, Digital Tally Rolls).

Within the frame of the Consultation Paper for the Revision of the Legislation for Tachographs, we would like to draw your attention on our previous letter to your Office - dated 20th March 2007 that we attach for you convenience - concerning the Thermal Paper used for the production of the digital tally rolls - and to your answer dated 17th April 2007 also attached.

In our letter we asked for the Regulation to focus also on the issue of the features of thermal paper used in the digital tachographs by setting much more specific standards.

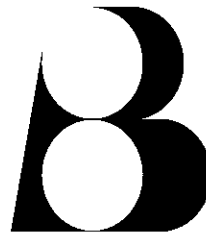
In particular, to include LBME's specifications into the Legislation and use them as benchmarks and as mandatory requirements for Type-Approval Authorities.

As already explained, current legislation only contains very basic provisions on paper. Any paper manufacturer would confirm that Requirements 135/136 of Annex 1B to Regulation (EEC) n. 3821/85 are:

1. definitely **too generic to guarantee data preservation on print-outs** (even for the minimum time of one year required by the Regulations - while fiscal and social legislations usually require much longer preservability);
2. **not sufficient to ensure a uniformity of products**: technical features (quality differences) - and therefore prices - among thermal papers are huge, ranging from POS paper to the most sophisticated label/printer papers.

In facts, products presently on the market show great diversity one another, making print-outs not as trustworthy as the sophisticated technology of the system itself would require.

In other terms, there is a discrepancy between what it would be necessary for data preservation and what is in fact type-approved.



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Moreover, it has also to be considered that:

1. those Countries with less resources devoted to Safety in Road Transport often have no other means to make road-checks than “reading” the print-outs themselves: it becomes than crucial that these prove to be as much reliable as possible by means of a paper remaining legible even under adverse and severe conditions (i.e. contact with chemicals, oil, detergents, heat, etc.) and not just under normal conditions.
2. It must ensure an indisputable record of the work done by drivers in order to avoid possible “flouting” by road haulage companies (Social Legislation and Road Safety). For this reason drivers often make print-out copies of their activity as to be able also to check their salaries. Paper quality becomes of essence to guarantee data preservation.

We have not been updated on the steps taken in the last couple of years and we trust this topic has already been properly addressed and, for this reason, not included in the Consultation Paper. Should not this be the case, we sincerely invite you to reconsider this issue.

We take this opportunity also to give our preference to a number of other questions asked in the Consultation Paper:

- Question 8 (Compatibility and Interoperability): **Paper should be kept interchangeable.**
- Question 12 (Adaption to Thechnical Progress): **Option 2 is preferable.**

Thanking you in advance for your concern on this matter, we kindly ask you to keep us updated on the works in progress while we remain at your disposal for any further information.

Sincerely yours,

BARBE' SpA

Dott. Ing. Paolo Barbé