

European Commission  
Directorate-General for Energy and Transport  
Unit E1 "Land Transport Policy"  
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Reference: Tachographs

## COMMENT TO THE PUBLIC CONSULTATION ON TACHOGRAPHS

**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?

**Legislation should ensure that downloading equipment is compatible with tachographs for a reasonable time period.**

**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?

**Accident investigation would benefit from recorders and if tachographs could be integrated in the system. However integration procedures should not hinder the development of digital tachographs.**

**Question 3** - 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?

**Efficient control of driving times would benefit traffic safety in general. Therefore mobile control would probably increase traffic safety and fluent transport. However, current manipulation issues should be solved before mobile control can be implemented.**

**Question 4** - 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?

**Current security level is not high enough. Manipulation of data is too easy and widely in use. Any other source to ensure security of data is welcomed.**

**Question 5** - 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?

**In general tachographs should be used if the use of the vehicle falls within regulations requiring the use of tachograph. Exceptions would make controlling unnecessary difficult. Different means of recording would create secondary systems which in turn would increase administrative burden.**

**Question 6** - 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?

**Equipment should be compatible at least through appropriate transition periods. Control cards should be compatible like driver cards.**

**Question 7** - 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?

**Defective equipment should be replaced. Any equipment that replaces previous one should comply with regulations at the time of retrofit.**

**Question 8** - Which option do you prefer and if you prefer option 2 or 3, for which parts: seals, downloading equipment, control equipment, calibration tools, etc.?

**Detailed requirements are needed especially for calibration tools and procedure. This could be done through technical bodies.**

**Question 9** - 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?

**Technical requirements could be updated by technical bodies.**

**Question 10** - 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?

**Workshops specializing in security issues of tachographs should be separated from workshops providing other services.**

**Standards for calibration should be developed.**

**Better security would make it more difficult to manipulate the data.**

**Question 11** - Should the Regulation explicitly foresee the use of electronic data exchange on cards that are issued between card issuing authorities?

**Card issuing authorities should have the information of already issued cards for example by electronic data exchange.**

**Currently there is a possibility to have multiple driver cards from different issuing authorities (different countries). This makes it difficult to control driving times and rest periods.**

**Question 12** - 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?

**Monitoring of daily rest periods is important. However regulating of all required warnings would be difficult. Responsibility for following driving time and rest period regulations should be with the driver, not with the equipment.**

**Question 13** - 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?

**Requirements for recording frequency should be checked. For accident investigation current 1hz frequency is a downgrade from analogue tachographs, where collision point could be identified.**

**Collision events should be identified automatically and the data preceding the collision should be saved automatically.**

The Finnish Motor Insurers' Centre FMIC is the joint organization for the motor insurance companies in Finland. Finnish insurers' joint traffic safety efforts are coordinated and supervised by the **Traffic Safety Committee of Insurance Companies (VALT)**, a body appointed by the Board of the Finnish Motor Insurers' Centre. According to **Act on the investigation of road and cross-country traffic accidents 24/2001** Finnish Motor Insurers' Centre is in charge of the maintenance, general organization and planning of the road accident investigation scheme.