

## **ACEA answers on the questionnaire of the Consultation Paper-Revision of the Community legislation on the recording equipment in road transport.**

**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?

A standard interface to other systems and equipment regarding signals and electrical interface is important. The units (from different suppliers) must be interchangeable. The HMI should be standardized in order to avoid mistakes or wrong use by drivers but should be optional.

**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?

Stick to the legal items that the tachograph should register. The tachograph should be a reliable instrument which registers and provides (to other systems) accurate speed, driving time and other data in the scope of the tachograph legislation.

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

No legal demands. Use open competition and let the consumer need decide.

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

At this moment the speed of the download process is limited because of the current functionality. A standardized interface should make it possible to download the digital tachograph data within 30 sec. Obstacles are the need for authentication when executing a remote download of the driver card.

**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?

No legal demand but on a voluntary basis. This could reduce the number of unnecessary stops (or save time during the stop) of transporters who are respecting the driving and resting times of the regulation.

**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?

GPS can also be manipulated. Cause problems when the vehicle is transported on trains, boats or trucks. Driving in tunnels is a technical problem. The legal changes that will be introduced in October 2012 should be sufficient.

**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?

The “out of scope” option should solve this problem or vehicles which are driving most of the time “out of scope” (workshop vehicles, skylift vehicles, concrete pumps etc) could/should be excluded.

**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?

First action must be that all the stakeholders must provide their requirements. After studying these requirements the conclusion can be made which option is the best solution. If it is possible to come with a significant better solution which needs a new generation of recording equipment (option 3) this solution must be chosen. If we can solve all requirements with the current generation (option 1) this should be the right solution.

**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?

If a new generation has significant better functionality than a retrofit should be possible as an option (customer wish). The essential steps for introduction of new equipment is:

- Gather all the requirements of the stakeholders
- Make clear legal requirements.
- Chose the best solution/option (technical, prise, HMI, control, manipulation, electrical interface etc).
- Validation of the units. Testing of this equipment is important including field testing in vehicles.
- Set down reasonably introduction dates.

If the tachograph would be part of the type approval scheme “end of series” provisions would make it easier to implement new legislation. On the other hand type approval for the tachograph together with the vehicle would result in extensive certification work because all vehicle solutions need to be type approved with all tachographs in their selection.

**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.)?

Field test are very important. We need geographical spreading but also al kind of transport applications (distribution, long haul, busses etc) and different types of drivers. Test drivers of the OEM are different users than the drivers who actually are not interested in the technique of the equipment.

**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.?

By choosing option 1 we know what we can expect.

**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 opinion (see 11)

**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?

Make the calibration process for OEM's as easy as possible (for new trucks). Without workshop cards (direct data input under the responsibility of the OEM, like we do with other equipment and components), no VRN (Vehicle Registration Number) needed only chassis number. OEM employee's works under ISO prove conditions and do normally not have conflict of interest. The annual inspections at the workshops can be improved by inspections and good education.

**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)?

As little as possible, only resting time and working time should be entered manually. Other data should be gathered automatically if possible. Recording of location should be an optional customer choice.

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

No opinion

**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?

It should be an option left by the manufacturer.

**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?

HMI simplification, Remote download performance and possibilities, Tamper prove systems.

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

See 17.