



Department for Transport

MOTORING SERVICES STRATEGY CONSULTATION Summary of responses – Transport and Logistics

Annex A Responses to Question 5: We plan to move to greater delivery of services online or by other digital means. Will these changes help you in your dealings with us?

1. any digital interaction with the consumer is a plus and makes all agencies more approachable
2. Don't Know
3. In general 'yes'.
4. My dealings and on the whole with VCA and via their FMS service I find that the electronic data interchange is quite good.
5. no booking mots is a nightmare now I used to take a list of dates I need for the year to local testing station and the office would book the dates and faxed a list to me.
What would take me 1 hr now takes several. Also it costs more to go to another mot station and have no chance of a Monday am test so vehicles off road longer then needed. at the moment my local station is 8 mile away next one is 28 mile away
6. No, the VOSA online services we use are always crashing
7. NOT AT ALL
8. Not sure as Vosa are difficult to deal with under existing procedure I have experienced documents sent to Vosa being lost and me having to duplicate them the Vosa staff seem very un friendly and as if they are from another planet when we the haulier are important to the country and we are just trying to earn a living and create jobs I have never known an agency that does all it can to make life hard for us a friend of mine does work in the bank of England and its easier to get authorised to work there than to get any change to an existing O license
9. Of course. Digital services should help to speed up processes which currently take longer.
10. Online services will empower customers to choose their own time of addressing services.
11. Only if you make them simple and easy to use. Many of your e enabled services are far to complicated
12. probably
13. These changes would assist TfL in its dealings with the agencies, so long as the proactive approach referred to above supports the receipt and management of the data.
14. To some degree. Tax on line is good but being able to transfer motors on line would be useful.
15. Truck (UK) Limited provides advice, information and services to goods vehicle operators on a daily basis. We rely heavily on the availability of online services, therefore we support wholeheartedly the existing level of online activity available when dealing with the government agencies.
16. Very much so
17. Yes (x8)
18. Yes - RPC's need to be recorded digitally so that VED can be applied for online for applicable vehicles.
19. Yes - so long as there are no glitches as in other government schemes i.e. NHS patient computer records, Wessex Water disaster
20. yes I suspect so



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21. Yes if questions are responded to quickly.
22. Yes providing web pages are easily viewed and written in every simple terms
23. Yes this move should improve dealings with the motoring services agencies, provided that there remains staff available to speak to during office hours to resolve the inevitable queries arising from atypical cases. This must not just be a service to receive feedback
24. Yes, a more accessible system to allow the checking of licences is a cost prohibitive exercise for charities who operate large fleets of vehicles yet need to ensure volunteers have the relevant licences. Whilst checking of the paper licence is completed, this allows significant abuse by those willing to deceive.
25. Yes, this could speed up the communication with customers and also improve the quality and consistency of Agency responses.
26. Yes, this should help speed up dealing with the appropriate agency, and, provided the web site/portal is thoughtfully designed, reduce the chance of error
27. Yes. Above all – more coordination would assist
28. Yes. We have lots of problems with drivers not getting their licences, and digital tachograph cards renewed/exchanged promptly. Why do we need so many cards?



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Annex B Responses to Question 7: Do you have any suggestions for the future structure of VCA or the range of services it offers?

1. additional resource and improved/easier access to services-we already spend in excess of £300,000 on ECWVTA, plus additional costs in IVA inspections, therefore a partnership or joint venture with us would be advantageous and provide a smoother outflow of product from us to customers and end users.
2. Allowing an electronic version of the D796 Driver mandate Consent Form, that would allow not for profit organisation to access licence checks at a realistic cost, or be advised if there was a change, would assist the 'Big Society' to develop whilst ensuring that competent checks were made at a realistic price. Currently would cost about £5 per driver from a commercial company. For SJA with 25,000 drivers, it is unaffordable.
3. DfT should look at far reaching options like contracting out VCA's work on certification
4. Get rid of it. Have one body - a one stop shop - responsible for all the work of the current disparate agencies
5. Higher levels of transparency with regard to all areas of VCA would be welcome.
6. I don't have much contact with VCA but it could benefit from being able to act as a free enterprise.
7. I have some concerns regarding any restructuring VCA which must be addressed. Firstly it has to be accepted that VCA along with RDW are somewhat unique in that they fill the role of Approval Authority and Technical Service. These terms are very important and are outlined in the Framework documents. Every European Member State has an Approval Authority which is a government body the role of the Approval Authority is quite clear and it also has a role in appointing and auditing Technical services. Any move to place VCA on a different footing, (Mutual, or semi Private) MUST ensure that a separate Government Approval Authority is established to carry out these duties. Failure to do this would inevitably result in the question "Who Guards the Guards" . It would not be acceptable for VCA set up as a mutual or a semi private body to be both an Approval Authority AND a Technical service this would result in a clash of interests. It also has to be recognised that VCA has Technical services who are themselves Technical services for other bodies, for example MIRA and TUV Automotive, to allow VCA to continue to Audit them under a new footing would be unacceptable simply because they would be auditing their competitors. Also there are requirements re Internal quality control via ISO 17025 which need to be addressed (See European Frame Work Directive 2007/47 EC articles 41 and 42, and 2003/37 EC Article 21, I anticipate that other member states would have a view on these issues. I would also be concerned that the UK Motor industry receives the required support to enable it to gain certification and thus access to the EU market. I believe that there is a very real danger that a revised VCA may take a commercial approach and extend it's global reach further than at present with the result that it seeks certification business from overseas manufacturers to the detriment of UK manufacturers. Currently VCA supports manufacturers in the Far East, Mainland Europe, China, India, and the USA. As the scope of type approval has widened we have seen more and more UK manufacturers coming under the scope of "Type Approval" and strains have been placed on VCAs resources, over the past year support from some offices at times



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has suffered.

It is vital for the UK Automotive industry that support of the UK Manufacturing industry with certification services is some how recognised by any reformed VCA as their core role and identified as a priority over and above Overseas manufacturers. The services provided by VCA currently enable manufacturers to also access markets outside Europe, this is because if an approval certificate to a UNECE Regulation is issued by VCA this is recognised by contracting parties (Countries) outside the EU so for example a UNECE Regulation 13 H Braking approval and test report issued by VCA may be used by a manufacturer to gain access to markets in the Far East.

So decisions regarding VCA can have serious implications for the UK Automotive industry which may not have been considered by the proposals.

This is not to say that personally I am against them in principle just that there are a number of issues which I have outlined that I am not convinced have been fully appreciated and addressed, service levels to UK manufacturing must be addressed, and safeguards put in place as outlined.

8. I think the customers should be allowed to pay car tax by direct debit .
9. Incorporate all agencies into one Vehicle Agency
10. Is there not a case for global or EU standards rather than UK?
11. lighten up stop being hard to deal with
12. More Staff for Certification purposes and IVA testing at customer premises
13. No (x9)
14. Not applicable to our organisation.
15. RETAIN THE CURRENT ARRANGEMENTS
16. The future structure of the VCA needs to ensure that it keeps abreast with improvements in technology. The VCA needs to put itself in a position to actively engage with potential suppliers at an early stage to promote innovation and encourage competition. Continuous evaluation of the standards against which products are assessed is required to ensure that new and advanced technologies are not hindered by out-dated standards.
17. The range of services should focus on the current core VCA activities, improve the current speed of delivery of the services and in particular improve the speed of communication which has been a big problem causing unnecessary additional costs to vehicle manufacturers.
The future structure of the VCA should be more integrated with both VOSA and DVLA.
18. This is a service which could be offered through commercial businesses
19. This really depends on how it is restructured.
not opposed in principle - but need more details of the practical
20. This should assist in the achievement of the objective set out in response to question 6 if the delivery of VCA services is through a partnership with the private sector, thereby allowing the latter's considerable experience and expertise to be drawn upon by the VCA staff



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Annex C Responses to Question 9: How would our plans to bring the driving test closer to the customer affect you as a customer or a business?

1. As a business needing D1 and C1 licences for staff, we train over 600 drivers a year across the country; we are limited to delivering the training in house but having to arrange DSA tests. Extending the devolving of testing to reputable organisations, such as SJA (Like the Police and Bus Companies) would be a huge benefit. Enabling testing on Saturdays or Sundays would also assist those who have difficulty in getting days off during the week.
2. As a business we deal with approved mandatory training for vocational drivers', but we are not in regular contact with DSA for driving tests.
3. As per question 9 TfL assumes that this proposal does not affect vocational licence acquisition testing.
4. Benefit to our organisation would be limited as our contact is infrequent, however looking at the broader picture, it should help to reduce costs and waiting times.
5. Better to keep proper test centres
6. Dealing with vocational tests I am sceptical as to whether the dsa can use customers sites and maintain an efficient service. The training providers are now expected to provide all the facilities with no reduction to the test fee
7. Greater availability of opportunities for the testing of PCV drivers would be beneficial to First's business and would make the training of new drivers a more cost effective process
8. In August 2012 Blackpool Transport Services Ltd lost our long held delegated examiner status and with this the ability to manage our driver training programme in the most cost and safety efficient way. The loss of this facility was solely due to the application of a mandatory minimum number of tests, which it was deemed by the DSA, that such examiners must complete annually to maintain their levels of competence. Delegated examiners have to complete 75 tests each year. We would argue that this figure is arbitrary and would suggest that a 25 test per year is more realistic to allow greater flexibility in these uncertain economic times.
The quality of the delegated examiner programme would not be compromised in any way by this reduction because they would, as previously, be continually assessed under the existing DSA programme. There is already a delegated examiner re-training programme to which all companies employing staff with this qualification must commit. Delegated examiner status facilitates the recruitment process and ensures continued flexibility for the business. Trainees can be tested within a timescale to suit both the trainee and the business. The absence of this facility since August 2012 has had a significant adverse impact on our driver training programme; both higher costs incurred from repeat tests and delays in the availability of tests have increased the length of time the employee is on the payroll before they are productive. Delegated examiner status allows us the flexibility to put a trainee to test when the trainer is confident that they are at a safe test standard, negating lengthy waits for tests or retests. The waiting times we are currently experiencing are an average; nine working days for



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Module one tests; ten working days for a Module 2 tests; nine working days for a Module 3 tests and thirteen days for a Module 4 tests. A further concern with the delays in obtaining test dates is that alternatives have had to be considered in regard to using test centres further afield. This has a significant impact on the business with the possibility of several hours being spent in transit to the centre and other associated costs. This is certainly contradictory to the vision to 'improve convenience to customers'.

Reducing the qualifying number of tests required before a company is allowed to retain or re-apply for Delegated Examiner status to 25 would as stated in your aims significantly 'benefit your company and meet the Consultation aims of "bringing driving tests closer to you" without compromising road safety. A factor which must be considered here is that organisations who have recently lost Delegated Examiner status have all previously met the requirements for on-site testing. This prior knowledge and understanding of the regulatory requirements would facilitate the re-introduction of the process with minimal support prior to re-implementation and therefore further supports your department's vision to bring tests 'closer to the customer... without threatening the integrity of the driving test or resulting in higher fees to the customer'.

9. In certain circumstances bus and coach operators premises could be used to deliver other driver testing on a similar basis to commercial vehicle ATF's. This would offer businesses the chance to offer additional services at more convenient locations for the public whilst at the same time enabling DfT to reduce its overall driver testing estate.
10. In its broadest sense - improving the utilisation of common assets
11. It will have no effect on me as I have no involvement in driving tests. However I'm sure it will be of benefit to driving instruction businesses.
12. It would make our business more efficient.
13. It would make planning and availability of tests and venues so much easier
14. Less travelling for staff taking LGV tests saving time and expense
15. Less wasted time and money taking pupils to distant DTC's for practice and the final test.
16. Likely to benefit large operators but not individuals or small operations.
17. Make it easier for theory tests etc. to be taken locally with easier parking than is usually provided at Government owned establishments
18. n/a (x2)
19. No
20. none
21. Not applicable to our organisation
22. NOT AT ALL
23. not personally but it would be an improvement to the currant regime
24. Possibility of reduced travelling time to attend
25. Saving time on needless journeys.
26. The driving test is a anti motorist and car agenda and should be totally re-written to serve motoring and the driver not political anti car agenda.
27. We already have our own testing centre which we will be happy to



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share it with the DSA if needed.

28. We hold delegated status for the delivery of PCV driving tests. The current model works well for us
29. We would support opportunities to improve the convenience of bringing driving tests closer to the customer, we as a PCV operator, train drivers for PCV licence acquisition. The possibility of having an examiner come to our site would certainly be beneficial. However, we would need the option for an examiner to conduct the number of tests we require for our business needs, without the barrier of a minimum number. A minimum number of tests may effect our recruitment and training plans and place additional pressure on existing resources in holding trainees back for test slots incurring additional costs and wages.
Although separately, we as an operator previously had the Delegated Examiner status, but lost this status due the number of tests needed to be completed over a year in retaining competence. Is this the opportunity for the required tests for Delegated Examiner status to be reduced, for example 25, this will benefit operators to have Delegated Examiners and test our own trainees releasing valuable DSA test slots for other customers.
Could Delegated Examiners be provided with the authority to test other than their own companies trainees in controlled situations, again, releasing valuable DSA test slots for other customers.



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Annex D Responses to Question 14: Do you have any comments on our plans to reform HGV, bus and coach testing?

1. Additional lane / pit fee adds cost to operators who need to travel the same distance or further for a test
ATF / DTP online booking would help
2. Continue to improve the online facilities and therefore reduce the overall administrative costs.
3. Due to the new Certification requirements coming very soon More HGV testing station need to be built and more HGV IVA inspectors needed. Also Inspectors are needed that are not VOSA employees, similar to nominated MOT testers for cars.
4. Ensure it covers D1 & C1 vehicles
5. Having worked in the Commercial Vehicle Engineering Industry for 35 years (25 as a Manager) , I can see how easy it would be for Commercial managers and Vehicle operators to cut corners and lower standards regarding vehicle testing. One scenario might be; A loaded two axle rigid vehicle is tested by garage "A" . Garage "A" has a commercial interest in the running of the vehicle. The vehicle fails the Test with no effort on the service brake on one wheel on the steered front axle.(this currently results in an immediate prohibition). The Manager of garage "A" decides the vehicle is needed across town within the hour and sends the vehicle out without repairing the fault. The vehicle is then involved in a fatal accident. This would not have happened if VOSA staff had tested the vehicle.
6. I believe that if VOSA are closing test stations they should subsidise the additional cost that the ATF charge
7. I see no movement on VOSA closing sites that have ceased testing - until this happens I question the benefits.
8. I think it would be a better way for everyone my only fear would be if standards drop the existing testers should be used as monitors to check that standards don't drop and the high level of testing is kept up I also would like to see more on the spot testing especially for foreign vehicles both private and commercial on ALL our roads
9. IF IT IS NOT BROKEN - LEAVE IT ALONE
10. I'm sure that if VOSA are using less government owned testing stations then the audit and certification process is bound to create more red tape
11. In our opinion the only way VOSA can deliver services that operators and owners demand is to deregulate testing to privately owned enterprises capable of providing the same 24 hour 7 day a week service currently required and provided in the normal course of business. This would provide VOSA with the opportunity of reducing vehicle testing staff headcount, by TUPE, into the private sector, leaving VOSA to continue the crucial role of enforcement and monitoring of this very busy transport sector - this will lead to safer vehicles operating within ever tighter legislation through the increased resource now available.
12. In short, Vehicle testing should remain under the control of VOSA.
13. It is a nightmare trying to get tests booked! We DO NOT want ATF sites, this is proving to be expensive and difficult to obtain tests
14. It is our firm viewpoint that whilst we have no objection to HGV, bus and coach testing being carried out at authorised testing facilities (and also to retain government owned test stations), all such testing must continue to be performed by government agency staff who are fully independent of any commercial influence, bias and pressure. There is a need to avoid a similar situation that is reported to



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- occur in Class IV testing whereby certain well known chains of tyre / exhaust centres who are also approved to carry out such tests, are also responsible for a significant and disproportionate number of test failures (decisions which are often subsequently on appeal reversed).
15. Key to improving convenience & efficiency is to allow ATFs to license own staff to carry out tests (as with cars) This would give much greater flexibility, be more economical & reduce operator down time.
 16. leave it alone have vosa run mot testing stations for hgv
 17. Licence HGV, Bus and Coach engineers in the same way as car testing stations, and keep the civil servants in an overseeing capacity, they don't need to do the MOT
 18. No (x4)
 19. No further comments
 20. Only that impartiality is preserved when the private sector is involved as we will be dealing with competitors.
 21. Our main comment with regard to VOSA and the ATF's is, should all Test Stations be closed, will we see a reduction in test fee's to compensate for the cost of attending an ATF station. At the present time we do not have to pay to have our vehicles tested at the local test station, it is part of the test fee. We do however, have to pay a lane fee if we use an ATF station.
 22. Out sourced testing is good in principal but there has to be resource available to maintain all the current testing schemes available. There are several types of test offered by VOSA and the private premises may not offer all types.
 23. Push these plans forward as soon as possible
 24. Sustaining independence of the licencing system from commercial interests is very important.
 25. Testing at private sector providers premises will allow for clearer communication between testers and repairers which should lead to greater efficiency
 26. The current model works well for us as a Delegated Centre providing tests for our own employees. My "don't knows" in the previous answers are based on the lack of detail supplied so far. in principle, it looks fine - but I need more detail
 27. The fact that we have to pay the lane fees now and the test fee remains the same has increased the cost of considerably for us. The test fees should be reduced to reflect the savings that vosa are enjoying.
 28. The location of any approved facilities should be subject to planning permission and include a transport impact assessment. This will help ensure there is no negative impact on the surrounding neighbourhood. The road network must be able to support the number and range of large vehicles the facility will attract. Approved facilities should also be subject to the operator licencing system with specific undertakings applied by Traffic Commissioners.
 29. there appears to be no extra provision for LCV numbers, IVA M2 inspection is currently costly to us due to the travel to and from the test station, including driver sub-contracting, fuel and time
 30. Unlike the MoD those testing the learner should have no association to the learner or the establishment providing the training!
 31. We are a supporter of the planned and future reforms .We operate 7 ATF's within our group and have plans to open a further 4 already in place . Our concerns cover a couple of areas .
Firstly the size of our investment and decisions we make on future investments.
At present there are no restrictions upon someone opening an ATF .
There are no financial requirements as to who partners with VOSA nor constraints on new entries into the ATF market based on customer capacity.
This realises two dangers. There will be partners within the ATF system with little



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knowledge or business experience of delivering a profitable commercial service and were the worst to happen the result would be to leave an under capacity in certain regions affecting customer satisfaction as needs for tests are not met and GVTS are no longer available to pick up the gaps.

Secondly the acceptance of ATFs in a particular area does not reflect capacity and to make the investment work we need to see some criteria in place to recognise when a geographic area is critically over supplied with ATF's and prevent new licenses being issued .

Customers need to have confidence in the ATF system . The system needs to be set up based on quality and not quantity of ATF operators as unlike many other areas in the commercial market place the lack of control could lead to a reduction in overall safety and professional standards.

We would like to therefore see a more robust criteria for entry in place as the second phase of privatization takes place.

Our second concern is over the transfer of VOSA testers to ATF operators .In the long term we see this as a natural progression .This however needs careful planning.

It will take some time to introduce test standards training into the HGV world if safety and professional standards are not to be compromised .

The success of the HGV testing system is that of its professionalism and independence.

The truck industry is a low margin industry and the opportunity to cut corners need to be restricted and monitored.

Customer service will be undoubtedly be improved as the introduction of Tester flexible contracts and review of test time are completed .

But behind any transfer of personnel needs to be a tried and tested method of governance and measurement .

Our view is a reasoned and planned transfer working with the ATF participants, bodies and vehicle manufacturers should come before any action to transfer staff is taken. High standards need to be maintained.



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Annex E Responses to Question 16: Do you have any comments on our plans to re-define organisational boundaries?

1. Agree
2. all except VOSA I think the role that they play should be kept separate and stand alone because of the role they play in delivering safer roads for us as drivers to operate on most drivers our legal. and safe but there are those that sail close to the wind as well as some operators
3. Could cause confusion for all concerned
4. Difficult to comment further without more detail - the "devil is in the detail" from past experience
5. IF IT IS NOT BROKEN LEAVE IT ALONE
6. If you can save money it has to be done
7. Long overdue!
8. no (x9)
9. require consistency of judgements between test stations/departments
10. TfL believes, as in the answer to question 3, that there could be a licensing agency, incorporating the DVLA, the Office of the Traffic Commissioners and the Traffic Commissioners Centralised Licensing Office; and an enforcement agency which included VOSA and the DSA.
It is also the case that VOSA could benefit from close liaison/merger of some of the Highways Agency activities.
11. The clearer you can make all practice, procedures, regulatory authority the easier it will be for both business and the public to deal with the various agencies.
12. There needs to be a better tie between the various agencies and communication. It is not always clear who is responsible for what and finding out can be a bit hit or miss
13. They are archaic and of a different era and must be reformed along common sense lines which are user and customer friendly
14. Yes there is at times a blurring of the boundaries between VOSA and VCA when addressing the issue of IVA or individual Vehicle Type Approval, VCA should be clearly recognised at the Approval Authority.
15. You should consider including Highways Agency in the work. There is a clear synergy between Highways patrol officers and VOSA stopping officers work.



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Annex F Responses to Question 17: Do you have any other comments on how we can improve our service to you?

1. Less red tape
Less referrals to one of the other agencies when there is a 'difficult' question to answer posed by the customer and quicker responses. Hence the need for 'a one stop shop'
2. A uniform and better informed level of agency employee would be greatly appreciated. We would on a daily basis with VOSA, covering all areas of the country. Unfortunately, the interpretation of the regulations and the level of competence of the employees is far from uniform and far from satisfactory. It is very much a 'postcode lottery' when being dealt with, which is unacceptable when taking into account the level of regulatory authority VOSA vehicle and traffic officers can wield.
3. By ensuring that access to all services and information is readily available. Though very useful, that access should not rely on internet access alone.
4. Put more online so that we don't have to confront striking staff when road tax is due as with 30th November.
5. Increase and accelerate homogenisation of services. Large bureaucracies and duplicated administrations wasteful and unnecessary.
6. lighten up
7. See answer to Question 9 - more flexible approach to Delegated Examiner use
8. Go back to basics! Answer the phone, fix the website!!
9. Reduce the options and automated selection when calling organisations
10. The RHA welcomes opportunities to engage with the Department on a broad range of issues. We believe this is beneficial to the industry and to government. We believe that, important as agencies are in terms of delivery, responsibility for agencies' objectives and the high-level view as to how they should be achieved properly rests with the Department. Too often in the past, responsibility has been left to the agencies or there has been a lack of clarity as to whether the agency or the centre has held responsibility. However, recent indications are that the Department is taking a clearer lead and we welcome that.
11. Reduce overall costs. Especially ADI permit (4-yearly)
12. MORE TELEPHONE LINES MANNED UP BY PEOPLE WHO KNOW WHAT THEY ARE TALKING ABOUT



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13. As referenced above, the appropriate processes and procedures need to be implemented and effectively resourced in order to ensure that the data held by the agencies is accurate at the time of provision, and remains accurate as well as remaining a good level of service which is easily accessible. LTPH require access to the DVLA licence checker to allow administrators to check for convictions, suspensions or revocations of driving licences to determine fitness of applicants. LTPH has had this facility up until the end of December however, the DVLA now require all companies using this facility to use their formal paper based mandate for all queries, with a resulting loss of efficiency. Due to practicalities of reverting to this requirement during an imminent IT systems change LTPH could no longer use this service until a reasonable solution was found. Therefore, until this is resolved, all checks are done manually by requesting each applicant provides a copy of their DVLA paper licence and photo ID as part of the application process. The service should provide a data sharing opportunity for LTPH which will speed up application processing times, and will allow LTPH to have instant access to information on an applicants driving licence which may determine the fitness of a driver.
14. Becoming more customer focussed is hard to disagree with.
15. Amalgamate all the plastic cards onto one. Why do we need a driving licence, digital tachograph, driver qualification card, and ADR card. If the ADR card ever actually materialises.
16. As previously mentioned, we as an operator previously had the Delegated Examiner status within the PCV sector, but lost this status due the number of tests needed to be completed over a year in retaining competence (75). Is this the opportunity for the required tests for Delegated Examiner status to be reduced, for example 25, this will benefit operators to have Delegated Examiners and test our own trainees releasing valuable DSA test slots for other customers.
17. Make VOSA examiners more accountable, and put them on a traffic light system of ability
18. more technology everyone has smart phones etc it would be nice to get apps to assist all drivers with motoring needs on line taxing online licence renewal etc on an app would be good facility for everyone to gain access to A FREE HIGHWAY CODE digitally on mobile phones Easier ways to contact DVLA for licensing queries without having to shunt around different departments and even more access to VOSA for driver queries and reporting problems that they should be looking into without having to give your identity



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Annex G Responses to Question 18: Do you have any other comments on our approach as outlined in the strategy?

1. Current speed limits are far too low. 50 limits in particular are totally unacceptable. Driving is a skill that why we have a practical driving test. Driving it is about reading the road and hazard perception, it is not driving by numbers. 20 limits out side of school or shopping hours is also totally uncatchable for the same reason. All speed limits need revising upwards, Limits are limits no what speed is advised.
2. I represent the views of DAF Trucks Limited who are a truck manufacturer and distributor in the UK. We are the UK Marketing and Sales division of DAF NV in the Netherlands. In the UK we are a well-established brand to the heavy vehicle industry, selling vehicles from 6 tonnes GVW upwards. Our current market share is, and has over recent years, been in excess of 25% of the total annual market of approximately 45,000 vehicle sales.
Our route to market is through a dedicated network of 136 independently owned and run dealerships, many of whom are family run and who are franchised to sell and support our product.
The transport industry continually seeks to improve its efficiency in order to maximise the quality of service to its customers (both business and consumer) and offset the considerable costs of acquiring, maintaining and operating the vehicles so vital to the economy of the UK.
Testimony to this is the fact that, at approximately 385,000, there are slightly fewer heavy vehicles (trucks) on the road today compared to fifty years ago. Of this figure DAF represents over 100,000.
Over the past three years DAF have been encouraging its network to take on Authorised Testing Facilities in order to improve the efficiency for their customers. Working with VOSA the dealers currently have around 40 live and pending locations around the UK.
The benefits to the customer are well documented in so far as the maintenance and repairs on vehicles can be carried out in the same location as the annual MOT test removing the need to travel, consume dealer travelling time and allowing the operator to maximise his vehicle availability.
As much of a success as this strategy has been, my belief is that it is now time to move to the next level and deregulate the individuals who currently remain responsible for the actual test at the dealer's ATF. This will enable additional benefits to be accrued by the transport industry.
These benefits will include the ability of the dealer to
 - Test when convenient, eg during the night, when virtually all of our dealers are open
 - Improve efficiency for the operator who can improve his vehicle utilisation
 - Reduce the number of vehicles on the road through this additional efficiency
 - Keep costs down for the operatorThe regular 6-8 weekly inspection regime on a truck is already fully undertaken by non-governmental technicians in the dealerships and fully regulated by VOSA. Deregulating the truck testers and allowing the test to be carried out by dealership personnel would seem like a simple and logical next step in the process; reaping further efficiency benefits for the industry.
I trust that you are able to consider this response as part of the consultation process.



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3. I would like to submitting my observation that there are 307,407 vehicles that are totally exempt from Vehicle Excise Duty under the pre-1973 Historic Vehicle Class. At even the basic VED Rate of £130 for any vehicle under 1549cc registered before 2001 that is a loss to H M Treasury of £ 39,962,520 in tax revenue. At the higher rate for vehicles of over 1959cc registered before 2001 of £220 that is £ 67,629,540. Obviously the exact figure lies somewhere between the two. My proposal is to use the fact that vehicles can now be taxed via the internet with no need to display a tax disc to recover this money that was lost to the country under Chancellor Kenneth Clarke who introduced the exemption at a time when the internet and the facility taxing vehicles by the internet and computer did not exist.

They may have made sense then, the cost versus the revenue, but with a paperless tax disc they no longer do.

Since 1998 there has been a policy that motor vehicles must be taxed at all times except where an owner makes a SORN or Statutory Off Road Notification.

A SORN can now be done by computer on the internet.

So any earlier argument about the cost of historic vehicles being declared on and off road by physical paper notification or the issue and re-issue of a Tax Disc is now no longer valid, especially as the cost of said tax disc is annually £130 for vehicles pre-1973 under 1549cc and £220 for vehicles pre-2001 over 1549cc.

As said, when the Historic Vehicle Class was first commenced it may have made sense as the cost of a licence was lower and the "cost of the paperwork" may have, like the old Dog Licence, have exceeded the revenue received from it.

This is now no longer, clearly the case!

These vehicles are not old cars owned by the less well off. They are in many case vehicles costing tens if not hundreds of thousands of pounds. For example a vintage Bentley or a 1960s Ferrari.

Are we really saying that the owners of such vehicles cannot afford an annual VED of £130 or £220 whilst the less well off owning cars of eight or nine or ten years old have to pay full VED?

This exemption should now be ended and all vehicles required to pay VED. The cost of declaring SORN is now, as it can be done on the internet negligible and if the paper licence is to be abolished again the cost of issue is again no longer relevant.

There is no exemption from the fee for a Shot Gun Certificate for an "historic class" of old shot gun nor from Council Tax for an "historic class" of old house.

Why is it that privately owned 1960s Aston Martin and 1950s Rolls-Royce motor cars should therefore uniquely pay no tax.

Are we "all in this together" or not?

4. It's high time that those ideas in the strategy were implemented.

5. No (x8)

6. Only to practise what is proposed

7. Other than to reinforce our viewpoint that all HGV, bus and coach testing must continue to be performed by government agency staff.

8. Rationalising agencies is fine in principal but it must not be at the expense of customer service.

9. Support for UK Automotive manufacturers should clearly be a cornerstone of this strategy, this should be seen as part of the Governments overall strategy to re balance our economy towards manufacturing and exporters.

As UK taxpayers we should receive priority over overseas manufactures who have access to other government bodies for automotive certification services and do not



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contribute to UK exchequer.

10. THE STRATEGY IS FOCUSED ON ECONOMIES AND NOT ON CUSTOMER SERVICE
11. There's just one thing. Removal of the paper Counterpart for the driving licence (page 17 of the consultation) has many potential benefits and there is certainly the prospect of some cost-savings for government.
However,
Two questions about the potential effects of this removal:
1/ for PCV and HGV drivers, the Counterpart is currently 1 of the 2 forms of ID required for attendance at Driver CPC periodic training - if the Counterpart goes, can we ensure that the Joint Approval Unit for Periodic Training are aware of this and amend the requirements accordingly?
2/ How will a prospective or current employer be aware of points/disqualifications etc on vocational licences - will there be a facility to check easily and quickly, whether someone has a clean licence or not?
Thank you in anticipation
12. We await positive results.
13. Yes. TfL believes the Traffic Commissioners are a valuable, respected resource for the PCV and LGV industries and that their powers could be usefully extended to the following appeals:
 - MOT, currently dealt with within VOSA, are mixing up administration with regulation;
 - Appeals against decisions of the DSA, which go directly to the Transport Tribunal
 - Medical appeals from the DVLA for vocational PCV and LGV licences, which currently, unsatisfactorily, go to lay magistrates who have much less knowledge of the work of vocational drivers and;
 - Appeals in respect of Taxi and Private Hire Vehicle drivers, where our evidence to the Law Commission, on Taxi and Private Hire Vehicle legislation says that we would prefer our appeals in London to go to Traffic Commissioners, who have a much better understanding of vocational driving standards than lay magistrates.