

Dear Constable Jackson,

Proposed Roadworthiness Testing

I am writing to you in my position as director and part owner of Trou Trading Ltd – we trade as Bikers and supply new/used motorcycles and scooters as well as undertaking repairs and maintenance for such vehicles. Our comments below are largely focussed on the proposals insofar as they impact upon motorcycles, scooters and mopeds.

Overall thoughts

We attended a useful meeting with staff from Driver and Vehicle Services ('DVS') where the background to the proposals was explained. It seemed to us that we are planning for a 'worst case' scenario and, as a part of that process, there was a need to instigate a roadworthiness testing regime. We have accepted this at face value and assume that part of your work will be to verify that we do, in fact, need to adopt a 'worst case' scenario and that there are no viable alternative options available.

Having said that, we believe some form of road worthiness testing is necessary and will enhance the overall standards of vehicles on our roads. Every day we see motorcycles or scooters in our workshop which have defects, some may be as simple as failed bulbs, others may be more serious such as bald tyres or oil leaks. All of them are potentially dangerous and, given the added vulnerability of motorcycle and scooter users, are a matter of concern.

Who should undertake testing

It is understood that, initially, testing on light motorcycles and mopeds will be undertaken by DVS with further discussion taking place about who/how/where testing will be undertaken in future as the regime is extended to more vehicles.

We confirm that we would be interested in working with DVS with a view to potentially providing facilities and undertaking testing subject to it working on a commercial basis.

We understand that the testing requirements for motorcycles and scooters will not be onerous and believe a test fee in the range of £35 to £40 (including GST) would be acceptable.

We are sure that the general public would prefer a scenario where the 'testing' and 'subsequent repair' operations were separated simply to eliminate any suspicions of unnecessary work being identified. It is clear, however, that any single testing centre (whether operated by DVS or an independent third party) would demand significant investment in infrastructure, premises and staff which simply may not be palatable.

Allowing independent garages to undertake testing would certainly simplify the process for many riders who could combine the test with an annual service, and, in the event of a test failure, it is always open to the vehicle owner to undertake the necessary repairs themselves or to take the vehicle elsewhere for rectification. If this approach was adopted, it is important that the garages appointed as test centres should be subject to an initial approval process and periodic assessments to ensure appropriate standards are in place and maintained.

Frequency of testing

Based upon what we see on a regular basis in our workshop it is clear that many owners, in particular younger riders and owners of small capacity machines, do not undertake regular basic checks of their vehicles themselves. Older riders and those owning larger capacity (typically over

125cc) machines are more aware of safety issues and it is much rarer for us to see such machines with defects. Each year, as we come into spring and the riding season starts we are often asked to carry out 'safety checks' on larger capacity bikes as they are taken out of storage or before owners take them abroad. In general no issues are found but owners appreciate the peace of mind of knowing the bike is safe and ready for the summer's riding. Given the value of many larger capacity machines owners also tend to have them serviced on a regular basis to ensure the warranty is maintained and to help protect the value of their investment in the machine.

It is noted that accident rates for mopeds and motorcycles is identified as a factor in determining testing frequency (page 15) yet mere accident rates do not show the full picture. Ages/experience of riders, third parties being at fault etc are all potential causes of accidents – it would be useful to better understand how many accidents were caused by vehicle defects before this statistic is used as a basis for testing frequency on motorcycles. As far as we are aware, no other country imposes a more onerous testing regime on two wheel vehicles compared to cars.

Perhaps a 'two stage' testing regime could be adopted where mopeds and motorcycles/scooters up to 125cc are tested on a two year cycle from three years old but larger capacity machines are tested in parallel with cars – ie every three years from five years old.

Other comments

It is appreciated that these comments relate to minor details and may, therefore, fall outside your remit.

It is puzzling that it is proposed that tractors are exempted from testing – whilst such vehicles may not be used on the road on a regular basis the consequences of one losing control due to, for example, faulty brakes, could be significant. Surely there should be some testing regime for them on a par with heavy commercial vehicles ? Bear in mind that we are no longer living in the times of tractors trundling along at a maximum speed of 15 mph.

It is noted that vehicles may be exempted from the testing regime if they are declared to DVS as having been taken off the road. It is important that the process is simple and easy for the vehicle owner to operate. Or, alternatively could we not simply follow the UK where the vehicle must have a valid test certificate to be used on the road – no certificate = no road use ? This would seem to be a simpler solution ?

I trust these comments are useful – if you or any of your fellow panel members have any queries or would like any further explanation please feel free to contact me,

Yours Sincerely,

Owen Lewis

Director