Internet consultation relating on Periodic Technical Inspections (PTI) for motor vehicles and their trailers

GENERAL REMARKS

Please fill in the electronic form *) **by 24 September 2010 at the latest**.

*) enter: **http://ec.europa.eu/yourvoice/ipm/forms/dispatch?form=roadworthiness**

Please use the prepared questionaire-paper:

Internet Consultation relating on PTI_Prepared consultation-paper_2010-08-20.doc

→ Fill in the multiple choice and numeric blocks with the help of this paper

→ There are specifications and descriptions sometimes requested.

- You will find prepared Comment-texts
- If you agree, not agree or you want to edit the text or create your own text – use this document:

  Internet Consultation relating on PTI_Aditional document for upload_2010-MM-DD.doc

- In the particular description field, please **copy an paste each time**

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→ At the end of the session you must **upload the saved document** and

don't forget to define the correct date in the name of the document:

…**_2010-0M-DD**.doc

Please note: The session time is limited to 1 hour 30 minutes which means that You should submit your reply within this time. If you exceed this time-frame, your replies will unfortunately be lost.

CONSULTATION

RESPONDENT INFORMATION

I am responding on behalf of (compulsory)

- ○ myself (as citizen)
- ◉ an organisation or a public authority

Please indicate the sectors in which you are engaged:

- ☐ Vehicle manufacturer
- ☐ Vehicle tester in garage
- ☑ Testing organization
- ☐ Roadside vehicle tester
- ☐ Traffic police
- ☐ Government
- ☐ Entities responsible for health
- ☐ Insurance company
- ☐ Road breakdown service [e.g. in UK, RAC]
- ☑ Educational / training / research organisation
- ☐ Others

How familiar are you with the system of PTI? (compulsory)

- ◉ Very familiar
- ○ Fairly familiar
- ○ Not very familiar
- ○ Never heard of it before

EXPERIENCE OF PTI

Please reply to the following questions with reference to the PTI system in the Member State with which you are most familiar.

Which vehicle category was involved or most usually involved? (compulsory)

- ☑ Private cars
- ☑ Goods vehicles (< 3.500 kg)
- ☑ Goods vehicles (> 3.500 kg)
- ☑ Passenger vehicles (< 8 pass.)
- ☑ Passenger vehicles (> 8 pass.)
- ☑ Trailers (< 3.500 kg)
- ☑ Trailers (> 3.500 kg)
- ☑ Agricultural tractors
- ☑ Motorcycles
- ☑ Caravans
- ☑ Other

Please describe

Other

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Recommended text :

- *Regarding **trailers**:* Germany: including O1 to O4
- *Regarding **motorcycles**:* Germany: including L3 to L5 and L7

To which type of test do you refer? (compulsory)

- (●) Periodic in garage or testing centre
- ( ) Roadside inspection

In which country did the test take place? (compulsory)

( ) Belgium	( ) France	( ) Austria
( ) Bulgaria	( ) Italy	( ) Poland
( ) Czech Republic	( ) Cyprus	( ) Portugal
( ) Denmark	( ) Latvia	( ) Romania
(●) Germany	( ) Lithuania	( ) Slovenia
( ) Estonia	( ) Luxembourg	( ) Slovakia
( ) Ireland	( ) Hungary	( ) Finland
( ) Greece	( ) Malta	( ) Sweden
( ) Spain	( ) Netherlands	( ) United Kingdom

What was the cost of the test to the vehicle owner per vehicle tested (excluding any consequent cost of e.g. repairs to the vehicle)? Indicate currency ...optional)

(●) EUR (euro area - euro)	( ) EEK (Estonia - kroon)	( ) LVL (Latvia - lats)
( ) BGN (Bulgaria - lev)	( ) GBP (United Kingdom - pound sterling)	( ) PLN (Poland - zloty)
( ) CZK (Czech Republic - koruna)	( ) HUF (Hungary - forint)	( ) RON (Romania - leu)
( ) DKK (Denmark - krone)	( ) LTL (Lithuania - litas)	( ) SEK (Sweden - krona)

Indicate type of vehicle ... optional)

- [x] Private cars
- [x] Passenger vehicles (> 8 pass.)
- [x] Motorcycles
- [x] Goods vehicles (<3.500 kg)
- [x] Trailers (< 3.500 kg)
- [x] Caravans
- [x] Goods vehicles (>3.500 kg)
- [x] Trailers (> 3.500 kg)
- [x] Other (Please Describe)
- [x] Passenger vehicles (< 8 pass.)
- [x] Agricultural tractors
- [ ] No charge to vehicle owner

No decimal point, no comma, no currency

Private cars - approximate cost (numeric only) optional

80

No decimal point, no comma, no currency

Goods vehicles (<3.500 kg) - approximate cost (numeric only) optional

80

No decimal point, no comma, no currency

Goods vehicles (>3.500 kg) - approximate cost (numeric only) (optional

140

No decimal point, no comma, no currency

Passenger vehicles (<8pass.) - approximate cost (numeric only) (optional)

85

No decimal point, no comma, no currency

Passenger vehicles (>8 pass.) - approximate cost (numeric only) (optional)

145

No decimal point, no comma, no currency

Trailers (<3.500 kg) - approximate cost (numeric only) optional)

35

No decimal point, no comma, no currency

Trailers (>3.500 kg) - approximate cost (numeric only) optional)

70

No decimal point, no comma, no currency

Agricultural tractors - approximate cost (numeric only) optional)

35

No decimal point, no comma, no currency

Motorcycles - approximate cost (numeric only) optional)

50

No decimal point, no comma, no currency

Caravans - approximate cost (numeric only) optional)

35

Other : please describe optional)

Other

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Recommended text :

Germany: All prices are
- without tax and
- including emission (if mandatory) and
- averaged

No decimal point, no comma, no currency

Other - approximate cost (numeric only) optional)

Other

What was your impression of the overall efficiency and value for money of the test?

From 1=insufficient to 5=excellent

	1	2	3	4	5
Efficiency and value for money (optional)	○	○	○	●	○

From your experience, are there any aspects of PTI which could be improved? (compulsory)

- ● Yes
- ○ No

Please identify aspects of PTI that you would like to see improved optional)

Yes

- ☑ Braking systems
- ☑ Steering and steering wheel
- ☑ Visibility (e.g. conditions of glass, rear view mirrors)
- ☑ Lighting equipment
- ☑ Axles, wheels, tyres, suspension
- ☑ Safety equipment
- ☑ Mileage travelled by the vehicle *
- ☑ Emissions, exhausts
- ☑ Chassis and chassis attachments
- ☑ Other equipment……
- ☑ Noisiness
- ☑ Supplementary tests for public transport vehicles
- ☑ Vehicle identification

* Collection of "mileage" could be useful in second hand car market and for policy making

Please specify optional)

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Recommended text :

1. *Braking System*: Reference values for all vehicle categories;
2. *Lighting Equipm.*: Adaption of headlamp beam setter to the technical progress
3. *Suspension*: Mandatory suspension test equipment
4. *Emissions*: Degrade threshold values; Inclusing messuring of NOx
5. *Other equipment*: Alternative engine (for example: E-cars, testing battery safety)
6. *For all*: Using of the vehicle interface for more efficient testing
   - Identification of installed systems
   - Readout of the the life results of self diagnostics
   - Assessment of the plausibility of sensor data
   - Efficient test of the function of actuators

Which specific technical information from the car manufacturer do you think would be necessary to improve PTI? (for testing centres only) optional)

- ☑ Passive safety installed components
- ☑ Active safety installed components
- ☑ Options installed on the specific vehicle
- ☑ External components (fog lights ...)
- ☑ New vehicle light power
- ☑ New vehicle noise levels
- ☑ Suspension stiffness data
- ☑ Brake capacity data
- ☑ OBD (On Board Diagnostic) connection capacities, failure codes
- ☑ Other

Please specify optional)

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Recommended text :

- Regarding to Vehicle-Identification-Number (VIN): specific information about safety relevant built-in systems
- Regarding the point "OBD connection capacities….": these are OBD-data in accordance. to regulation (EC) 715/2007, 692/2008, 515/2009
- Test methods
- Type specific defects
- Basic location information (e. g. location of VIN, OBD conector, …)
- Component location information (detailed information of specific systems)
- Additional information: Handling, dashboard, …)
- Information about standard tyres

→ all points: from European point of view (regarding to directive 2009/40/EC)

Do you think Periodic Technical Inspection should be extended to other vehicle categories? optional)

- ☑ Motorcycles >= 125 cm3
- ☑ Motorcycles < 125 cm3
- ☑ All trailers on the basis of insurance information
- ☑ Passenger cars in business use*
- ☑ Caravans
- ☑ Heavy quadricycles
- ☑ Small electrical vehicles
- ☑ Agriculture Tractors
- ☑ Others

Please specify optional)

Other

→all points: from European point of view (regarding to directive 2009/40/EC)

Do you think that a new technical inspection should be required again after ...? optional)

- [x] Accidents
- [ ] Vehicle change of ownership
- [x] Vehicle modifications
- [ ] Certain distance travelled
- [ ] Others ...

Please describe here optional)

Other

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Recommended text :

*Regarding new technical inspection **after accidents**:*

After an accident the roadworthiness of a vehicle is, depending on the crash severely, reduced or non-existant. This creates the need for an additional irregular inspection, which deals with the roadworthiness after accidents.

Many benefits are attributed to this additional inspection:

- Increased road safety
- Reduction of Vehicle Theft
- Reduction of Illegal Work
- Consumer Protection
- Prevention of Fraud

*Regarding new technical inspection **after vehicle modifications**:*

There is a growing market for technical modifications of vehicles by their owners. Consequently there is a high number of illegal modifications with a high risk for other road users. Technical modification – this means individual modifications to the vehicle – so that the original status las it was approved in the (EC) type approval or in the national approval is changed.

For this reason risks for roadworthiness are increased because the fitting of parts without approval is not allowed or the useage is not in line with the part approval (range of application, obligations for fitting). Therefore a irregular inspection is needed.

In your opinion, which should be the first date of the inspection compared with those currently required? optional)

- ○ Earlier than actual one
- ○ Later than actual one
- ● Current first inspection date is correct
- ○ Not known
- ○ Not applicable

In your opinion, which should be the frequency of the inspections compared with those currently required? optional)

- ○ Higher frequency
- ● Higher frequency for older cars (>=8 years)
- ○ Lower frequency
- ○ Current frequency is correct
- ○ Not known
- ○ Not applicable

Do you think that the improvement of the PTI system and the simplification of the administrative procedures related to PTI of vehicles could be an advantage for you? optional)

● Yes ○ No ○ Do not know

To improve road safety and reduce emissions, how much could the PTI cost reasonably increase for you? optional)

- ○ up to 5%
- ○ up to 10%
- ● up to 20%
- ○ up to 30%

EXPERIENCE OF ROADSIDE INSPECTIONS

Do you think that Roadside inspections should be extended to other vehicle categories (unannounced technical inspections of commercial vehicles circulating)? optional)

- ☑ All commercial vehicles
- ☐ All motorcycles

Do you think that the items verified in Roadside inspections should be extended to the ones foreseen for PTI to avoid unfair treatment? optional)

- ○ Yes
- ◉ No

Which specific technical information from the Car Manufacturer do you think would be necessary to improve the Roadside inspections? optional)

- ☐ Passive safety installed components
- ☐ Active safety installed components
- ☐ Options installed on the specific vehicle
- ☐ External components (fog lights ...)
- ☐ New vehicle light power
- ☐ New vehicle noise levels
- ☐ Suspension stiffness data
- ☐ Brake capacity data
- ☐ OBD (On Board Diagnostic) connection capacities, failure codes
- ☑ Other

Please specify optional)

Other

The roadside inspection can not replace the periodic technical inspection, because there are differences in test items, test equipment and so on…. Furthermore the RSI is a random test within the traffic and not a regular test.

THE INSPECTIONS IN EUROPE

Today there are differences between the system for vehicle inspection in Europe. Do you think that the system of periodic technical inspection of your country should be changed to a system fully standardised in the EU? optional)

- ○ Yes
- ◉ No
- ○ No opinion

If a standardised EU vehicle inspection system were to be introduced should it be based on optional)

- ◉ the most rigorous standard currently in force anywhere in the EU, to maximise the levels of security achieved?

- ○ the medium standard in force?
- ○ the least rigorous standard in force?

Has the absence of a PTI standardised system caused you some costs? optional)

○ Yes ◉ No ○ No opinion

Do you think that inspection results of all vehicles should be available to those carrying out tests and to government authorities in Europe? (for administration and testing centres) optional)

◉ Yes ○ To authorities only ○ No ○ No opinion

Do you think that the exchange of data (including data on registration of vehicles and inspection results) is helpful to reduce the administrative burden faced by the citizens? optional)

○ Yes ○ No ◉ No opinion

Do you think that the administrative procedure for PTI is too complicated in your country? optional)

○ Yes ◉ No ○ No opinion

In the last three years, have you ever been obliged to travel from one Member State to another, in order to have your vehicle tested? (compulsory)

○ Yes ◉ No.

Has the absence of a standardised system of vehicle testing throughout the EU resulted in any other types of cost or inconvenience for you?
If so, please explain ...
optional)

POLICY OPTIONS

The EU and national Governments are at one in wishing to ensure that the EU Single Market works as efficiently as possible and that the administrative burden is reduced, in the interests of citizens. There is also a wish to see a reduction in the numbers and severity of road accidents and of emissions from road vehicles.
Against this background, a number of alternative policy options are being considered, and the purpose of this part of the questionnaire is to invite your views on the best approach.

Option 1: No policy action - maintain essentially the present arrangements on PTI and Roadside inspections.

Option 2: Encourage bilateral agreements between Member States on quality of testing, mutual recognition of PTI and exchange of information, but no new legislation.

Option 3: Mutual recognition of national PTIs to be combined with:
Information campaign on PTI for countries where the PTI quality is thought to be low
Exchange of best practices among countries

Option 4: Impose through EU legislation a standard EU-wide system for PTI
Sub-options:
a) Most rigorous
b) Medium quality
c) Least rigorous

Which of the options brefly outlined above would you support? optional)

- ○ Option 1: No action
- ◉ Option 2: Bilateral agreements
- ○ Option 3: Full mutual recognition of PTI
- ○ Option 4a: A standard EU-wide system for PTI - Most rigorous
- ○ Option 4b: A standard EU-wide system for PTI - Medium quality
- ○ Option 4c: A standard EU-wide system for PTI - Least rigorous

Please list any other information or comments that you consider may assist with PTI for motor vehicles and their trailers optional)

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Recommended text :

The European Commission published their **Guidelines for the Policy regarding Roadworthiness 2011-2020** on July 20 – under Number 3 the **Basic principles and objectives**.

The three basic principles are

- ***to achieve the most advanced standards in road safety troughout Europe,***
- ***to provide an integrated concept for road safety,***
- ***to maintain the principles of subsidiarity, proportionality, and shared responsibility***

Applied to the issues of Roadworthiness Testing that means:

To aim towards the most advanced road safety standards troughout Europe means, that the standards of periodical technical inspections of vehicles [and roadside inspections] must be enhanced continuously by best practice. As uniform advanced standards cannot be obtained in all MS at the same time, from today's perspective, a full harmonization of the PTI [+RSI] is not practicable.

In fact, single MS must still be able to continuously enhance and modernize national regulations for periodical technical inspections beyond the EU's minimum standards of Directive 2009/40/EC (former Directive 96/96/EC). The corresponding legal framework was and is the established principle of subsidiarity, which is specified in point 5 of the above-mentioned Directive.

This provides new innovative impulses for the enhancement of the whole EU-system of PTIs.
A good and current example for that is the **Introduction of Periodical Technical Inspection for Electronically Controlled Vehicle Systems**.

Germany therefore has modified PTI by implementing additional checks of the electronically controlled systems. All motor vehicles with a date of first registration before 1st of April 2006 have to be checked with regard to this issue.

The data for the inspection of the electronically controlled systems are stored in a central database established by FSD (Fahrzeugsystemdaten GmbH). The data comprises information about built-in systems, identification features and testing methods. For carrying out a PTI test, engineers have direct access to this data.

This new electronic test which goes far beyond the minimum requirements for PTI in Europe can be seen as a pilot project for future testing procedures for electronically controlled safety devices to be regulated in the 2009/40/EC. At present, FSD together with the Federal Highway Research Institute of Germany (BASt) are carrying out a research project to validate the introduction of testing of these systems. Results of this project will be presented. This includes aspects of the data collection method, detailed evaluations of inspections of single vehicles and a general assessment with regard to feasibility and practicability of the tests.

End of the Consultation – follow this guidelines now :

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