



Briefwisselingsadres  
Kantoor: Brussel  
Havenlaan, 104/106  
B-1000 Brussel  
Tel: 02/420.54.56 - Fax: 02/420.67.79  
E-mail: [brussel@uptr.be](mailto:brussel@uptr.be)  
BTW: BE 407.748.408  
Banknr.: 340-097600-79

Brussels, September 23th 2010

Dear Commissioner Kallas,

**Subject : Public consultation on Periodic Technical Inspections**

As most representative road haulage association in Belgium, UPTR wants to inform you about our point of view concerning the Periodic Technical Inspections.

For UPTR, following points should be taken into consideration:

1. Waiting times at control stations:

We are often informed by our members that waiting times in Belgian PTI stations exceed 2 hours and more. A maximum waiting time should be imposed to the testing stations.

2. Value for money:

Sometimes we are confronted with cases of trucks that are pulled over by the police or other control services and are fined because the validity of their tachograph or speed limiter has recently expired. If you take into consideration that these vehicles have passed a periodical inspection a month earlier, the PTI station should have drawn the attention on to the fact that the validity of the tachograph/speed limiter was about to expire.

3. Vehicles:

For some years now, the road haulage business suffers from an unlawful competition from agricultural vehicles. It is UPTR's definite conviction that these vehicles should also be subject to a PTI in order to make them less attractive for unlawful road transport.

4. First inspection date:

There is no need to inspect brand new vehicles such as some member states like Belgium impose.

5. Roadside inspections:

These roadside inspections have been put in place in order to invite vehicle operators to ensure that their vehicles be in a good state at all times, not just at the Periodical Technical Inspection. Given this approach, the roadside inspection

should consequently be extended to all motor vehicles. The vast majority of vehicles today that circulate on EU roads, cannot be the subject of a road side inspection.

The items currently verified in roadside inspections should not be extended to the ones foreseen by PTI. Roadside inspections would cause too much loss of time and hence inefficiency. Heavy goods vehicles operate very often in a just-in-time schedule. Time consuming roadside inspections that would take too much time, will lead to claims for delay.

6. Standardisation:

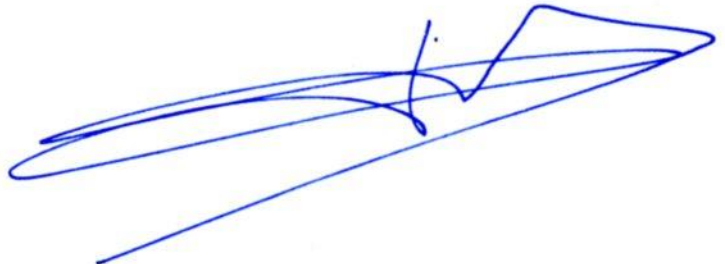
UPTR is in favour of a standardized system that is uniform in all European countries. We are also in favour of a liberalisation of the PTI market. In Belgium for example it is compulsory to have your PTI done in a GOCA PTI station.

Thanking you for the attention you will give to our point of view,

Yours sincerely,

Michaël REUL  
Secretary-General

L.O.

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.