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## **ACEA-Position on Future of PTI**

### **Resume**

The PTI Test Inspection level currently defined, in most countries is considered, sufficient or even overloaded today. However, any rationalisation must ensure all national PTIs are brought up to a medium rigorous approach to help ensure and maintain road safety.

A reduction of administrative burden and increase in fair competition for citizens, tool providers, and transportation companies, could be achieved by ensuring standardized PTI giving comparable quality levels of PTI throughout Europe. At the same time the overall road worthiness level of vehicles in Europe could be improved.

### **Roles of Vehicle Manufacturers**

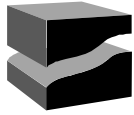
Vehicle manufacturers (VM) are concerned by PTI in more than one role. Besides providing the vehicle for their customers, additionally most of the VMs also develop vehicle testers for workshops, be it authorized or independent. Furthermore, educational and training activities related to vehicle production and servicing is part of the day to day business of the VMs as well as research and development for vehicle relevant technologies.

The VM represented by the ACEA cover vehicles from motorcycles, passenger cars, buses and commercial vehicles of all categories as well as vehicles for special use, such as agricultural tractors, caravans, ambulances, fire-engines. Some of the VM also develop and produce trailers of all weight categories.

VM in Europe sell their products world wide and are thereby under obligation to comply with the inhomogeneous legislation with regard to PTI in the global context.

### **Efficiency and Quality of PTI with regards to road safety**

Currently the defined level of PTI in most European countries is good, and an optimized standard based on a medium rigorousness level of the current procedures would be welcomed. National "specialities" should be reduced or even avoided, similarly to the procedure in Digital Tachograph and Speed Limiter legislation. Additional requests on national level lead to misalignment of test quality to the disadvantage of the vehicle owners, who need to register their vehicles in that country, and do not overall help increase vehicle safety on European roads. For countries with a considerably different (i.e. lower) PTI level a step-by-step approach to reach the defined standard could be defined in the legislation.



A C E A

A quality standard, which would need to be audited on a regular basis by a neutral body, should go side by side with standardization. Overall the PTI with respect to efficiency, value for money for citizens and organization involved in the process varies. Mostly it is of a good level, but due to lack of quality assurance, the money requested does not always give the required positive result for traffic safety intended with the PTI. There are countries where the quality, testing contents and methods of PTI could be improved.

Due to the improvement of the type approved self-testing systems in vehicles, VM consider it possible to keep PTI duration – and with that the costs – on a stable level in spite of the increase in complexity of the vehicles.

### **Provision of Technical Information**

Providing technical information to the testing personnel is already being done in some of the European countries in different ways. The procedure could be defined identically for all European countries – VM would provide sufficient information to allow for vehicle identification and suitable system testing based on VM PTI instructions. Due to the nature of the differences between technical solutions for vehicles, each VM would have to provide a full set of VM specific data, as the method of technical inspection will always depend on the technical solution implemented.

### **Administrative Burden for Vehicle Manufacturers**

Currently significant time and effort have to be spent by the VMs due to the inhomogeneous PTI procedures in the European countries. A reduction of this administrative burden would be very welcome to the VM. Examples for expenses are:

- Costs and resource needs arising out of the need to comply with different procedures. These can arise already for VMs development area, when changes in PTI are implemented for already type approved vehicles (introduction of legislation for PTI usually is defined for registration dates of vehicles, technical concepts are fixed since the type approval). Furthermore, preparation of data only required for PTI needs – different for national PTIs in Europe. For example: testing procedures for vehicles will differ from repair and maintenance instructions due to the different aim of the operation.
- Administrative costs and resources spent for discussions with governmental and non-governmental institutions on national and European level.



A C E A

## **Standardization of PTI in Europe**

Current PTI requirements and frequencies over Europe vary widely and the ACEA-Members would welcome a standardization, to increase the comparability of PTIs in Europe and reduce the administrative burden resulting of the current inhomogeneous situation.

Standardization would support the objectives above in the following fields:

- Categories of vehicles to be tested should be the same all over Europe.
- PTI intervals for each category should be identical in all European countries.
- If there is an agreement that additional PTIs should be required, the causes leading to it should also be identical all over Europe.

ACEA members understand that it could be useful to define additional PTIs for modifications with safety relevance on the vehicle which has been done without approval by VM or Body-Builder or after major accidents, critical for the vehicles structural integrity, when the repair has not been proven to be realized in accordance to VM specification.

- Testing contents and procedures would have to be identical and a standard for the relating measuring and testing equipment defined.
- Authorization for Testing Personnel should follow identical rules (required qualification, regular training for technology update, requirements for equipment, organizations allowed to realize PTI (workshops, testing organizations)).
- Quality Management Systems should be put in place ensuring a comparable standard of PTI performance in Europe and also ensure the standard of measuring and testing equipment.
- The information whether the vehicle has a valid PTI has to be provided in a way available also on roadside tests in a way it is easily accessible to the officials, and it should be standardized and in the medium to long term provided real-time and online, taking into consideration current data protection laws.
- Prices for PTI should be kept low and on a similar level.
- Roadside Test contents should be based on the standardized testing contents and procedures for PTI and be adapted to need of these tests.

For additional safety inspection for heavy goods vehicles, trailers and buses the relevant topics described above could also be standardized to improve road safety further.

As a standardization process will take a longer period of time to achieve the aims listed below, in a first step a suitable minimum standard should be defined to allow a European wide mutual recognition of PTIs performed, to make transition for vehicles easier.



A C E A

## **Roadside Inspection**

Roadside inspections are considered by the VM to be unannounced additional tests which help increase the road safety. VM consider them to be useful with regard to taking out of commission heavy commercial vehicles which could be a hazard to traffic safety, as relevant safety requirements (especially the sub standard condition of tyres and brakes) are not fulfilled. Furthermore, they can also identify wrongly loaded trucks and drivers who do not comply with driving hour laws. Legal bodies performing roadside inspection can perform also some of the PTI tests (such as visual tire control, brake-disk check, digital tachograph sensor, etc.).

## **Role of PTI and Roadside Inspection for Traffic Safety Concerns**

ACEA members would like to propose to address the needs with regard to improvement of PTI and roadside inspection by impartial/multilateral studies to verify, which potentials for traffic safety improvements by PTI, roadside inspection or other means can be identified. Topics for studies could be:

- Comparison of PTI related national laws all over Europe, especially with regard to PTI contents, methods as well as requirements for authorization to perform a PTI and how quality of PTIs realized is assured.
- The impact of the servicing level of vehicles on the results of the PTI, safety and roadside inspection and which are the failures in which systems which lead to failing PTI. Currently when the information of failed vehicle quotes is provided in the statistics it is not differentiate if the vehicle was serviced and if suitable service could have avoided failing PTI or which failures led in which system led to the failing. E.g. for continuous improvement of vehicle safety and servicing, the information that “airbag” or “brake” led to failure does not really support – which airbag failure or what was wrong with the brakes would give an indication thought.
- As far as VM are aware, there is no European wide study which shows which influence technical faults have on accident occurrence and severity and the effect a suitably performed PTI/safety inspection could have had on the outcome.

On national level, there are studies which show that a percentage (e.g. DEKRA 2009: 10%) of accidents is due to a combination of environment, technical faults and driving errors. The major technical faults related to those accidents are brakes and tires, which are classical wear and tear systems with standard inspection in PTI, safety and roadside inspection.