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November 1 2011

SUBMISSION ON

LAND TRANSPORT RULE PASSENGER SERVICE VEHICLES AMENDMENT  
(2012) RULE 31001/6

ON BEHALF OF THE NZ FEDERATION OF MOTORING CLUBS (FOMC)

The Federation of Motoring Clubs (FOMC) represents more than 125 member clubs ranging from cars to motorcycles, commercial and military vehicles, motor caravans, traction engines, tractors and farm machinery, covering heritage, collectors and recreational vehicles spanning all years of production.

Dear Rules Team,

While the FOMC has no member clubs that operate passenger service vehicles for hire or reward, some members of our constituent clubs own and restore service cars, charabanc's and buses.

There are a number of ex U.K. double decker buses around the country, a veteran (pre-1918) Renault, a veteran Austin bus, several Model TT and Model AA Fords (built on truck chassis), 1930's and 40's Cadillac, Dennis, Leyland and Bedford buses etc that we know of.

It can be very difficult to return these vehicles to the public roads after restoration because they are coach built with wood frame bodywork. They are tested for their C.O.F.'s as though they are going back into daily commercial service. All these vehicles are low geared and were designed for metal roads, were seldom driven in excess of 40mph (70kph), and restored examples will be driven accordingly. There are not many examples left on the road and if they were regulated off the road into becoming museum display vehicles only this would be a great shame.

Most of your proposals are not retrospective and won't impact on these vehicles and we thank you for that. While we realise the previous paragraph has no direct relevance to this yellow draft, it would be appreciated if you could consider creating an easier path for collectors vehicles that comply with all the safety requirements of their day but are not able to meet all the requirements in the 1999 Passenger Vehicle Service Rule.

A number of pre-war buses had linoleum on steps and aisles, others had fixed carpet. The FOMC is concerned about PROPOSAL 4. Without knowing your definition of slip resistant we ask if fixed rubber mats would be considered slip resistant. We are sure restorers would be happy to use rubber in place of linoleum. Other early buses had fixed carpet in the aisles and restorers would want to retain originality. As we have said earlier these vehicles won't be driven

fast and don't have power brakes. Would it be possible to make provision for the use of original equipment material for steps, aisles and ramps on over 40 year old vintage vehicles?

PROPOSAL 6 – We are delighted that armrests are not required in sideways facing seats in vehicles in service prior to 1<sup>st</sup> July 2000. A number of vintage (over 40 year old) vehicles have these seats and to retrofit armrests would destroy their authenticity.

We also note your reference to vehicles entering service in New Zealand before 1<sup>st</sup> July 2000. Every major city in New Zealand has at least one double decker bus, all were imported second hand but we cannot be definite on how many entered service in New Zealand after 1<sup>st</sup> July 2000 – the proposed rule change would appear to make it impossible to import a replacement double decker bus as it would not comply with the rules for entering service in New Zealand after July 2000, and will a restored vehicle being re-registered be deemed to have entered service on the date it was re-registered? We are aware of major problems caused by this wording with vehicles being required to comply with rules that don't apply to vehicles of the same age that have been in continuous use. To overcome this problem the date of manufacture should be applied or the date first registered anywhere in the world, not the date re-registered in New Zealand or entering service in New Zealand.

PROPOSAL 12 – We suggest over 40 year old (vintage) vehicles be exempt from this requirement unless guard rails were original equipment.

None of the other proposals are of concern to the FOMC and those that improve passenger and vehicle safety have our support. Thank you for considering our concerns especially our suggestion to refer to the date of manufacture and exempting over 40 year old (vintage) vehicles from complying with retrospective rules intended for the modern vehicle fleet.

Yours sincerely,

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***Representing the responsible special interest and heritage motoring enthusiast***