

This correspondence from:
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18 August 2008

Steering Systems Rule Amendment
Rules Team
NZ Transport Agency
PO Box 2840
WELLINGTON
Email: info@nzta.govt.nz

Dear Sir/Madam,

Thank you for the opportunity to comment on the Steering Systems Amendment Rule 32003/2.

The NZ Federation of Motoring Clubs (FOMC) represents over 110 clubs with individual membership of 20,000 enthusiasts, catering for cars, motorcycles, trucks and military vehicles, tractors and vintage machinery, covering heritage and collectors vehicles spanning all years of production.

Land Transport NZ (now the NZ Transport Agency) will be aware from our comments on the Frontal Impact Amendment Rule that the FOMC is highly supportive of the new Special Interest Vehicle category. The FOMC, in conjunction with the Left Hand Drive Enthusiasts Federation (LHDEF), has long petitioned for enthusiasts to be permitted to import and register less-than 20 year-old specialist vehicles which were prohibited under the current Rules. We are pleased that our arguments in support of relaxing the rules have been recognised in the overview of the draft Rule. Therefore, we support applying the SIV criteria to the amended Steering Systems Rule, along with the consequent removal of the old '90 day' rule or the requirement to convert vehicles to right-hand-drive.

In summary, the FOMC fully supports the proposed amendments, and we only have a few general comments and suggested changes below:

Section 4, Part I

Category A: Special Interest Light Vehicles less than 20 years old:

The FOMC, and especially the LHDEF, has lobbied long and hard for permission to register less than 20-year-old enthusiast left-hand-drive (LHD) vehicles in NZ without meeting the existing restrictive criteria. Therefore we fully support the new Section 4, Category A, and the conditions as listed in the Rule, including the provision for trustee ownership, without amendment.

We also support the removal of the 'baggage' vehicle clause, and concur that if immigrants' or returning citizens' vehicles do not meet the new SIV criteria, then they cannot be registered.

However, we note the overview refers to the vehicle being imported for the "importer's own personal use" when in fact the importer may not be the intended first registered owner in NZ. Given the complexities of the importation process, it is not uncommon for buyers to engage a professional broker to assist them in this process. In the past, this wording has restricted purchasers from registering an applicable vehicle for the first time because they did not personally import it. So it should be clear in both the Rule and the instruction manual for TSD agents that this refers to the first owner, and not necessarily the importer.

Category B: Light vehicles that are 20 years old or more

The FOMC supports removing the restriction on an importer/owner only being able to import one older LHD car in a 12-month period.

We note also that the overview refers to vehicles being "imported for the importer's own personal use" and again, any reference in the Rule or TSD instructions should be clear that this in fact refers to the first NZ owner, i.e. the person registering the vehicle, which may not necessarily be the importer.

We recognise that the amendments to the Rule are designed to cater for private owners of specialist light vehicles and therefore we agree it is appropriate that there be restrictions on operating such a vehicle in a transport service.

Category E: Previously exempted vehicles

The FOMC acknowledges that the new Rules will not be retrospectively applied to LHD vehicles which have been exempted and registered under the existing Rules process, and agree that the amendment Rule should include a savings provision for owners of those vehicles (i.e. 'grandfather' rights).

Section 4, Part II

Application for Category A Left-hand-drive Vehicle Permit:

As we have outlined, the FOMC endorses the criteria under clause 2(b), but notes subclause (vi) which requires the applicant not to have been granted an LHD SIV permit in the last two years. We believe this is superfluous as subclause (iv) does not allow the owner to sell the vehicle within four years of first NZ registration, and under Section 4, Part 1, Category A (condition 3) an owner can only have one LHD SIV registered in their name in any case.

Issue of Category A Left-hand-drive Vehicle Permit:

We have no comments on clause 3, but again suggest removal of superfluous subclause (b)(iii) as per our comments above.

In clause 4, the FOMC proposes replacing some of the listed magazine titles, and including other more specific LHD-related titles.

In particular, we suggest removing *Unique Cars Magazine* (Australia) which is merely a used car trading publication. We suggest *NZV8* magazine be included instead.

In addition we urge, as with the SIV criteria in the Frontal Impact Amendment Rule, that it be made clear not only in the Rule but in associated forms and guidelines that the listed magazines are not intended to be an exhaustive list, and that applicants submitting other

enthusiast syndicated publications (from any other market), or their respective websites, should also be acceptable as evidence that the vehicle in question meets the collector's criteria.

For example, other acceptable mainstream titles may include *Auto Motor Und Sport* (Germany), *Quattroruote* (Italy), *L'Auto* (France) and *Auto Italia* (UK). These could replace *Top Gear NZ* and *MOTOR Australia* which are less applicable here.

Finally, the FOMC believes the proposed annual quota for 500 Category A LHD SIV permits is acceptable.

Yours sincerely,

Mark Stockdale
Secretary
NZ Federation of Motoring Clubs

Representing the responsible special interest and heritage motoring enthusiast