

This correspondence from:
The Secretary
New Zealand Federation of Motoring Clubs Inc.
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9 April 2009

Tyres & Wheels Amendment
Rules Team
NZ Transport Agency
PO Box 5084 Lambton Quay
WELLINGTON 6145
Email: info@nzta.govt.nz

Dear Sir/Madam,

Thank you for the opportunity to comment on the Work Time and Logbooks Rule 62001/2.

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 traction engines, and vintage machinery, covering heritage and collectors vehicles spanning all years of production.

Proposal 1

In the overview you refer to 4 fatal crashes due to a misuse of snow tyres, it is possible and most likely that far more lives have been saved by the correct use of snow tyres but of course there won't be statistics to verify this. Why anyone would use snow tyres in the upper North Island is a mystery, they should only be used in winter when snow and ice are likely, places like ski fields, the Southern Alps, Dunedin etc. They provide better traction in snow and ice but poor traction on wet sealed roads. Drivers using these tyres need to be aware of this.

We agree with your proposal.

Proposal 2

If you trust a tyre fleet service person and obviously you do or you wouldn't be making this proposal, why not request the inspector to take into account a written statement, after all a tyre specialist will know more about tyres than a vehicle inspector. The wording of 2.3(5B) will result in different standards at testing stations with some inspectors taking account of written evidence and others ignoring such evidence (due to the wording *may* take into account).

We suggest 2.3(5B) In accessing whether a tyre in 2.3(5A) is in a safe condition, a vehicle inspector or inspecting organisation *should* take into account written evidence from a person who...

- (a) etc
- (b) etc

Proposals 3 and 4 has the FOMC's full support.

Yours sincerely,

Andrew McClintock
Submission Secretary
NZ Federation of Motoring Clubs

Representing the responsible special interest and heritage motoring enthusiast