



**Community  
Transport  
Association**

Response to the Vehicle Operating Services Agency

**Consultation on  
Changes to test content for Class IV minibuses  
and Class V and VA non-PSV buses**

Closing Date: 12 January 2007

The Community Transport Association

The CTA is a rapidly growing national charity giving voice and providing learning and enterprise support to member organisations, which are delivering innovative transport solutions to achieve social change. CTA UK promotes excellence through providing training, publications, advice and information on voluntary, accessible and community transport.

Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

The CTA is the representative body for non-profit passenger transport operators in the UK. CTA Member organisations are involved in the provision of transport, especially accessible services.

The CTA is the UK's largest provider of training, advice and information on accessible, voluntary and community transport provision. The CTA is funded by the Department for Transport, the Scottish Executive, the Welsh Assembly Government and the Department for Regional Development (Northern Ireland).

### **CTA's Response to Consultation**

The CTA welcomes the opportunity to contribute to the VOSA's consultation process. After reading through the consultation we have decided to respond on the proposals contained in Annex E (Add the inspection of VIN and registration plates to MOT tests for Class V & Va) and Annex F (Include the inspection of speed limiting devices on private minibuses with 9-12 passenger seats).

### **Contact Details**

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## **Annex E**

With regard to Annex E and the adding the inspection of the VIN and registration plates to MOT tests for Class V and VA The CTA endorse Option 2, to introduce changes as proposed.

## **Annex F**

With regard to Annex F and the inclusion of inspecting road speed limiting (RSL) devices on private minibuses with 9-12 passenger seats, Class IV, the CTA has a number of concerns.

1. Those minibuses, both Class IV and Class V, first used between 1 October 2001 and 30 December 2005, and fitted with Euro 3 type diesel engines should either have an add on RSL fitted, or the engine control unit's (ECU) speed limiter function enabled from 1 January 2007. It is clear from the many advice calls that we have received that there is a great deal of confusion for minibus operators as to whether or not an RSL needs to be fitted to their vehicles, what type is needed and who is qualified/certified to fit them. This situation is compounded by the base vehicle manufacturers' apparent ignorance on this topic, or being unable to source and provide an appropriate ECU. We have heard of several instances where an in scope minibus has gone to have the RSL function enabled only to find out that the ECU does not support this and that a new ECU or RSL at £600-1000 is needed.
2. A particular problem is those in scope Class IV minibuses (9-12 seats) based on vans that have a GVW up to 3500kg. As van manufacturers are aware that vans up to this GVW are not required to be fitted with an RSL (set at the van speed limit of 90 kph), and are unaware that the van is subsequently going to be converted in to a minibus, the ECU often does not support this function. This has started to come to light only recently as the 1 January 2007 deadline was approached and minibus operators started to contact their vehicle manufacturers/suppliers.
3. The CTA understands that an RSL needs to be fitted by a supplier approved and certified by VOSA. Are all the vehicle manufacturers with RSL equipped ECUs approved by VOSA? Are all the companies currently retro fitting 'add-on' RSL to minibuses also approved? What will happen to a minibus at MOT if it is found that a non-approved supplier fitted the RSL?
4. The CTA feel that due to the uncertainty outlined above, that the MOT should check that an RSL is actually fitted and working, is set at the correct speed and has been fitted by an approved supplier. The CTA do not feel that checking a 'calibration plate' is inadequate to ensure an RSL is fitted correctly. If 'calibration plates' are to be used, they should be of a prescribed design, and contain information on who fitted the RSL, the speed it is set at, and when it was fitted. The CTA would suggest that the 'calibration plates' are issued by VOSA to approved vehicle manufacturers and RSL manufacturers/suppliers/ installers.

The CTA continues to support the fitting and use of RSL speed limiters to minibuses.

The CTA believes that all in scope minibuses Class IV, V, VI should have a compliance check at MOT.

The CTA feel that the MOT compliance check will need to be more rigorous than checking a 'calibration plate', certainly in the short term, to ensure that an RSL is

actually fitted and working, particularly for those in scope minibuses first used between 1 January 2001 and 1 January 2008. In the longer term, after 1 January 2008 when all new minibuses will need to be RSL equipped from the date of their first use, compliance should be simpler to ensure.

The CTA recommend that the calibration plate design is specified and should allow for the installer to be identified so that in the event of an RSL not being correctly set, VOSA can take appropriate action against the approved installer.

The CTA urge that VOSA produces a list and maintains a database of approved RSL installers and that only an RSL installed by an approved supplier will pass an MOT compliance test.

The CTA supports the option to introduce changes in compliance testing from January 2008 as this will allow time to develop adequate procedures and information systems to address the above concerns.

The CTA is concerned about RSL enforcement on those minibuses required to be fitted with an RSL from 1 January 2007, before the compliance checks are introduced on 1 January 2008 as proposed. With the current confusion over which minibuses should be fitted with an RSL, whether or not the RSL supplier is VOSA approved, the lack of availability of some vehicle manufacturers' RSL equipped ECUs, etc., the CTA would support a 'light touch' in enforcement for in scope minibuses operated solely in the UK and under 7500 kg, until January 2008, to allow for the resolution of these issue, for which the minibus operators are not to blame.