

## Questions Answered During Webinar

### Question

Time delay in saving ADR information documents which can result in approx. 30-40% of a VTA application preparation time being a direct result of waiting for ROVER to respond. Preparation time for a VTA application exceeds the system that it replaces. Can these processing times be accelerated?

When lodging a Variation, what is the time frame for notifying if payment is required? And does this time count in the legislated timeframe?

We have had some trouble getting vehicles registered in NSW. NSW advise "Technical Enquiries are yet to receive any information regarding the changes to RVDs from 1-7-2022 (after the transition period). What is your plan for working with STRAs on information feeds from the RAV and ROVER (RVD) data?

With the department quoting lack of resources for longer processing times, why has the C&E department started conducting desktop audits? Particularly given that industry was told by Drew Ward that activities wouldn't be conducted until guidance material was published!

### Votes Response

11 The department has taken a number of steps to increase the performance of ROVER. For example, when previously attempting to access the component type approval publish list, ROVER would often time out - it now loads consistently in less than two seconds. We are using enhanced analytics so that specific areas of low performance can be identified and targeted. The implementation of Google Analytics and Fiddler Web Debugging will provide us with information on which pages are slow to load and why, which will enable us to make the required technical changes to increase performance in those areas.

11 There are no legislated timeframes for processing applications to vary approvals, however, the department aims to assess within the legislated timeframe for the original application type. Email notifications are sent to the applicant and approval holder. Users with relevant authorities to act are always able to view what payments are outstanding in the ROVER portal. Where payment is required to commence a varied approval, the approval will commence once the payment has been processed.

10 The department has engaged with all jurisdictions on a regular basis. We have also been working very closely with NSW in particular on RVDs and are not aware of any ongoing concerns regarding RVDs or registration processes under the RVS legislation more broadly. The department will raise this issue with jurisdictions at its next scheduled meeting to confirm there are no outstanding issues.

10 The department has not commenced desktop audits, virtual audits or site audits. It is important to note that the RVS legislation does not include audits as a regulatory function, however, inspections may be undertaken. To date no RVS legislation inspections have occurred. Requests for information under the RVS legislation have recently commenced. An 'Inspection, monitoring and investigation' public guidance document has been published on the department's website. The document provides general information on what to expect when the department conducts future inspections, monitoring and investigation activities.

Where within the RVS Act and Rules does it prohibit the identification of the assessor as previously advised? The level of detail in an RFI is sometimes vague and a direct conversation would save the dept and applicant time. Under RVCS, it was known who was the assessor - reason for change?

9

The RVS legislation does not expressly prohibit the identification of assessors, this is an administrative decision taken by the department to minimise the potential for any (real or perceived) conflict of interest issues arising. The department has taken steps to ensure that RFIs are as clear as possible, including developing RFI templates that have links to relevant guidance materials.

Is the VTA 'Queue' based on vehicle categories? Processing time on Light Vehicles currently appears quicker than Heavy Vehicles.

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No, applications are generally assessed in date order. There are a wide range of factors that can impact on processing times, including the completeness of applications, the complexity of assessment, whether RFIs are required, etc.

ROVERinfo continues to provide generic and unhelpful replies, simply quoting legislated timeframes rather than addressing the direct question. Can you please ensure that responses actually address the questions asked?

9

The department encourages applicants not to seek updates on the status of applications before the legislated timeframe has passed - this redirects resources away from other tasks and will likely result in advice about the legislated timeframe for deciding applications. The department endeavours to address specific questions as far as possible and staff have been reminded about the importance of reading emails carefully to ensure these are appropriately addressed.

Fault in ADR 13/00 evidence template Selection of the No of brake lamps does not allow for more than 2. The mandatory No for a Passenger Car is 3 and a greater No allowed if fitted in accordance with ADR 13/00, Clause 8.1.4 Can this please be corrected to reflect ADR requirement

8

This issue has been identified and prioritised for remediation. Until this has been resolved, applicants can continue to provide explanations and additional information in the relevant comments boxes in ROVER.

Why is ISO9001:2015 certification not an acceptable evidence of quality system for a test facility approval application? If the Department is so busy at the moment, and if risk based methods is being used, why are you querying known Test Facilities who have previously passed TFI audit with this?

When will guidance be provided on Compliance and Enforcement? Information requested by "I am an appointed inspector under section 49 of the RVSA" for an opt in approval would suggest that the Departmental staff have some guidelines which they are working to. When will they be shared with industry?

UN ECE Approval Nos Within the ADR evidence templates the UN ECE Approval No input primarily reflects the old numbering method of UN ECE Approvals therefore when entering a current format UN ECE Approval No it is necessary to use "input approval details manually" which has functional problems

To ensure the conditions in a testing facility approval (TFA) will be met by the approval holder, the department must be satisfied that the approval holder has:

- appropriate internal record keeping systems
- equipment calibration and maintenance processes
- skilled (certified and experienced) staff to conduct the tests, and
- effective communication practices.

7 An ISO 9001:2015 standard covers a wide range of operations that are defined in the scope of the certificate. Some TFA applications have provided ISO 9001:2015 certificates with a specific scope that covers operating testing facilities and would be considered supporting evidence for the application. The department has received several TFA applications where the scope of the ISO9001:2015 certificates did not cover operating a testing facility. In these cases the department requests further information from the applicant by RFI to establish the capabilities. Please review the TFA guidance material on the department's website at [www.infrastructure.gov.au/infrastructure-transport-vehicles/vehicles/rvs/testing-facilities](http://www.infrastructure.gov.au/infrastructure-transport-vehicles/vehicles/rvs/testing-facilities)

6 See response to question six. An 'Inspection, monitoring and investigation' public guidance document has been published on the department's website.

6 The department notes this concern and will investigate further to determine whether this functionality can be improved in a future release.

Please confirm if a Letter from the VTA holder when the SVI was destroyed is ok? We note the response to this question stated "there are no legal provisions preventing them from being replaced " however if the Department can issue guidance that a letter is acceptable it can be informed to State RTAs

What percentage of current IPAs have been opted-in to ROVER. I am just trying to gauge the potential surge of opt-ins that may be approaching prior to Christmas, so that I can inform our members that they need to opt-in sooner to avoid the rush.

Can a recall submission acknowledgement email from ROVER be created to confirm successful report submission?

For registration, do the STRA access the RAV database live or do they download the RAV data periodical to update there systems? If they download, how often does this occur?

Is it possible for VTA holders to view all VINs they have submitted to RAV on a daily basis rather than use the single VIN by VIN public search? E.g. by API or similar. This will assist VTA holders ensuring RAV submissions are successful.

Can we please get an update on the Departments lead time for processing new Authorities to Act?

6 The department has considered this issue in detail and will discuss it further with industry participants during RVSA Industry Webinar #8. A final written response to this query will be provided following that discussion.

3 The department's expectation is that a total of approximately 4,000 opt-in applications would be received. To date, we have received about 1,300 applications, with 960 approved. The department continues to encourage eligible MVSA IPA holders to opt-in as soon as possible to avoid potential delays caused by a last-minute rush, and by 1 December 2021 at the latest to allow sufficient time to resubmit applications if necessary.

3 ROVER does not currently send confirmation emails for successfully submitted recall reports. It will, however, send an update reminder message if a submission has not been received. Once a report has been successfully submitted, the due date for the next report will be automatically updated - stakeholders will only receive an update reminder if a due report has not been submitted.

3 Each jurisdiction accesses RAV data differently. We are aware that NT and QLD access the RAV database directly, whilst others rely on the public search facility hosted by the department.

5 Not at the moment, but the autoresponse email you receive after a RAV submission is validation that submitted VINs have been (or will be following payment) entered on the RAV. If any are unsuccessful, these will be listed in an exception report provided at the same time. Data that is available in ROVER is aggregated - it doesn't contain the individual VINs.

3 The department typically processes authorities to act within 10 business days. However, we recently paused processing after we identified that some missing data could cause issues further down the track. Staff have been trained to ensure all data is checked for accuracy and completeness, and processing has recommenced. This only applies to authority to acts that include setting up new organisation details in ROVER. Authority to act requests via the new self-managed capability are automatic and can be near instant (depending on how quickly the invited user accepts the request).

Supply to Market for plated vehicles from 1 July 22 is still unclear, I understand guidance is coming. Is an MVSA vehicle supplied to dealer (MVSA compliance date 02/22 as example) before July/22 considered supplied to market and dealer can continue to offer this vehicle for sale after 1 July 2022??

2 This issue is the subject of consideration and will be specifically addressed in guidance material on 'Provision for the first time', which will be published by the end of November.

Any update about the Department's guidance material for "Provide to consumer for the first time in Australia"?

1 See response above - This will be published by the end of November.

Is there a single point for all guidance material, difficult to find and notice any updates, a single link would be beneficial

1 Yes. All guidance material is available at <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/vehicles/rvs/resources>

How robust are the jurisdictional processes re validating that the RAV entry exists for VTA opt ins. IF a vehicle is registered without a RAV entry it potentially creates a problem down the track if a vehicle changes State and needs to be registered again in the future.

0 Jurisdictions have been advised that all vehicles should either have an ID plate or a RAV entry - and in limited cases may have both. If a vehicle is registered without a RAV entry, the department's expectation is that it would have an ID plate fitted.