

Response to the review of the Motor Vehicle Standards Act

From Ken Quinn

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Please note:

***The following is a general observation of the current MVSA and my opinions for changes and in no way applies to any specific company or individual.***

- Raws is a route to compliance for original right hand drive manufactured vehicles and original left hand drive manufactured vehicles. Clearly the same level of expertise to achieve compliance is not the same in both cases. Likewise what constitutes an original manufacturer should be clearly defined. For example: Ford, Toyota, Holden etc, not someone who has managed to “tick all the boxes” without the original manufacturers specific endorsement from the highest level. For instance would GM or Ford allow elimination of an air bag in a converted vehicle? Not likely.
- A converted vehicle is a converted vehicle. The fact that it has been converted under one scheme or the other should not be a factor in determining the acceptability of the conversion. Examples like the different requirements for seatbelts, Windscreens, Brake data and so forth between low volume new and Raws should be illuminated.

- Again whether it is deemed to be New, Used, or personal import- no distinction should be made. In my opinion it is totally absurd and flies in the face of common sense.
- Consideration must also be given to the fact that major US/Canadian manufacturers spend millions to make a safe vehicle. Made (supplied) in the USA/Canada---“tick”  
Converted to right hand drive-Scrutiny required.
- It is quite possible to have a vehicle that complies with all the relevant ADRS but is quite unsafe. Likewise a perfectly safe vehicle is rejected because of some quirk in the interpretations of the ADR or a vehicle falling on one side of an arbitrary line.
- Here in Western Australia we have a major problem with what we call the pit inspection by the local authorities. Federal regulations and procedures create some major hurdles. ADR 62 creates major problems with the differences between one scheme and the other and the fact that it does not allow USA/Canadian origin.
- American utilities are built under a platform. For example: Chevrolet produces a vehicle called a Silverado, Tahoe, Suburban, Escalade, Denali, Sierra etc. All have the same basic structure and conversion issues. They also fall under MA, MC, NA, and NB categories. Massive duplication for no discernible reason.
- Some consideration should be given to the fact that American utilities can be in one category or the other by sometimes less than 100 kgs. This creates license and import restrictions that have no benefit on safety.

- There should be an adr for road worthiness and merchantability in the sense that items in the vehicle actually can achieve the desired outcome, for example, AC actually can cool the vehicle.
- Perhaps adr 42 could be amended to include things like:
  1. Steering wheel can turn from left lock to right lock with normal effort
  2. Steering is not reduced by the application of the service brakes
  3. Air flow of the ac system is working effectively and can cool the vehicle
  4. A vehicle that has an air bag removed should have some permanent info for the consumer somewhere on the vehicle or license papers, or not be allowed at all.
- Raws determinations should be amended to include the following among others :
  1. ADR 62 to allow USA/Canadian Origin
  2. Allow cat 5 SDIL on all “pickup trucks”
  3. ADR 03/02(03) to allow USA/Canadian Origin
  4. Require a photo of critical components and systems during and after conversion with a vin number in the photo.
  5. Drop in inspections after the submission of VIC
  6. New and used to have the same evidence requirements for converted left hand drive vehicles.
  7. Since a few left to right converters have both new and used compliance i.e. low volume new and raws (to increase the number of vehicles that can be converted- increase the numbers or???)

8. The CIN should be amended to include a requirement that the customer sign the document (and we keep a copy) at the first point of sale and the CIN should be made available online to any future buyer of the vehicle. **THIS SHOULD BE ON THE REGISTRATION.** This is the computer age and it would be quite easy to do-in my opinion.

Thanks for the opportunity to respond.

Ken Quinn Chevrolet Conversion Centre