

RVS Consultation Submission 16

RVSA review, issues arising from meeting:

I have put the below in plain English as per what was spoken about at the Sydney meeting:

Issues that need clarification on the Information Sheets and a further submission:

-SEV's, Calendar or Vehicle build date based? At the meeting it was put forward that it was to be calendar/time based, and later it was put forward that it will be the same as it is now, vehicle build date based. It does not mention either in the Information sheets at present.

-It was put forward that under the new SEV's system, once a new model vehicle becomes available to the public anywhere in the world (for this scenario lets say the USA), three months after that a SEV's application can be applied for, once granted and

approved then that SEV's approval remains in place for two years, even if another company comes along and gains Full Volume type approval on that same SEV's approved vehicle, giving the smaller companies a guaranteed two years (maximum) of doing that vehicle under SEV's, in parallel with the Full Volume approved company. It does not mention either in the Information sheets at present.

-With Model Reports under the new RAWs, once an author/owner of the MR sells the rights to use that MR to another company,

as time progresses and the vehicle will require new evidence, example would be Emissions, lights etc, to be updated, the AVV will not be able to sign off the checklist due to those items not being updated,

hence the owner/author/seller of the MR will be asked by the purchaser sometime after purchasing the MR (which could be months or longer later), if the owner/author/seller refuses to update the MR to accommodate the later evidence required

to be updated in the MR, how will the government force the owner/author/seller of the MR to do so and update it? What was brought up at the meeting was the possibility of a fine to the owner/author/seller of the MR,

or even that MR taken off the approved MR list, which would then put the purchaser in a worse position. Also it was mentioned the purchaser could go and buy another complete MR from elsewhere, hopefully, which means double the amount spent on MR's for one Make/Model of vehicle. Another thing mentioned was that the original 'scope' of the MR should include Year Models, whether that be just one or two years, or from a certain year (beginning of the Make/Model Year Model range) to 'current' and this Year range would be enforceable upon the owner/author/seller of the MR. This should be clarified also.

-It was not spoken about at the meeting, nor does it clarify it in the Information sheets, once a Model report (MR) is sold to another company, does this company go through a Sample Vehicle inspection and gain a CPA number? If the purchaser/user of the MR does not need a sample vehicle inspection, this could be a safety issue, as it is thought that many current companies importing RHD vehicles from Japan and elsewhere will be pushed out under the new SEV's arrangements and will be looking for an alternative solution, that being RHD conversions on American vehicles, bringing in some numbers of people with zero RHD conversion experience, and an easy entry to market with the MR side, but no experience in this field. A Sample vehicle inspection would go some way to allaying the safety aspect of their RHD conversion as well as safety audits afterwards. Perhaps this could be clarified.

-Will the current RAWs Determinations manual be updated, or completely re-written?

-Will current RAWs CPA holders have their CPA's transferred to their new RAWs approved schedule list once they are operating under the new RAWs scheme?

-If a SEV's vehicle 'drops off' the list after two years and not re-approved, does anyone/everyone holding RAWs CPA for that make/Model have that CPA removed from their approved schedule list automatically?

-It was also put forward at the meeting that any company with Full Volume type approval must now, once the RVSA comes into effect, have access to the original vehicle (OEM) production line etc, and therefore have approval from the OEM (if for this scenario, USA, then GM USA, Ford USA and Chrysler USA). At present, there are multiple private companies who hold Full Volume type approval who may have access to certain information from each of those OEM USA companies, but do not have permission

to do them in Australia nor would have access to the USA OEM production line (Ateco [Chrysler] & Walkinshaw [GM] would be the only private companies that would this author would surmise). What will be done to stop this unapproved-from-the OEM Full Volume type approvals continuing? It does not mention either in the Information sheets at present.

-Should not the new SEV's have the ability to allow vehicles to be approved under SEV's that are first produced in LHD (Left Hand Drive) format and not available anywhere else in the world as genuine factory OEM RHD vehicles,

put on the list regardless of any other companies gaining Full Volume type approval? The reasoning behind this is, small business could compete with the likes of Ateco and Walkinshaw whom are both major players moving into this RHD conversion market,

and as the new SEV's stands now, small companies will be forced out due to this SEV's ruling, where if it included non factory RHD vehicles then small business's (& jobs) would be saved as they could

still compete against the larger new players with Full Volume type approval. This is not a clarification of the Information sheets as they stand, but a proposal to have the new RVSA written to include the above, as it is not currently including this. This is a big deal for small business's currently in the RHD conversion industry, and the biggest threat they currently have to their ongoing business and employee jobs.

Thank you.

Regards

Allan Reed

US AUTOS Compliance Pty Ltd

