

RVS Consultation Submission 26

Dear MVSA Review Team,

1. NC trucks, according to David Stevens we can import a factory RHD truck (that meets eligibility) under RAWS, but not a factory LHD to be converted. He had mentioned that the conversion compromises the vehicle. Our long company history disputes this point aggressively.

He also said that a truck was a commercial vehicle and not intended for RAWs, yet a factory RHD vehicle can be imported? It could be argued that truck drivers are one of the remaining true enthusiast groups on the road. Many trucks have \$10's of thousands spent on add ons and dress ups.

2. With the understanding that the closure of full volume, and that the department is handing the market to one company who do Ram and GM trucks for LH to RH. Being that they are performing a second stage manufacture to the original vehicle build, should they be classified as a RAW also and not as a Full Volume Type Approval?
3. I believe there is a new version of VSB4 that is more thorough being done. I would suggest that this is a set document/checklist for the AVV to complete with every vehicle? Not necessarily linked with the Model Report.
4. I understand that there may be scope for Manufacturers to obtain Type Approval on vehicles while still overseas, this unfairly locks out low volume importers from models. Particularly in the case where a Type Approval is issued on a vehicle that could still be left hand drive. Is there a plan for a minimum number of vehicles to be made ready for sale and actually available in the market place to lock off Low Volume?

Further to this, will there be a requirement for Manufacturers to have a "retail ready" example of the Make/Model/Variant on the ground in Australia to obtain Type Approval?

5. Is there a clear guideline on what constitutes a "variant" available? Will there be a requirement for a Type Approval holder to make a certain number available to Australian market to close off a "Variant" also?
6. What allowance do we have for the importation of Stretched limo's ex USA that need to be converted?
7. Timelines, understanding the department has been going for 4 years already and that there is a lot of work to go. Our industry was crushed with the delays imposed by the Departments lack of readiness last time when RAWS came in. Understanding that the new management is significantly different than years gone by, however the impact to industry was huge. We request that the parliament to start date be extended to 18 months to allow the

Department to Beta test in real life situations prior to start date. Then the transition period be extended to 18 months, thus allowing for any unforeseen issues to be resolved. **This is a BIG issue**

Thanks and Best Regards,

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