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NZ Federation of
FOMC
Motoring Clubs Inc

April 22 2014

Light vehicle Brakes Amendment 2014
Rules Team
NZ Transport Agency
Private Bag 6995
WELLINGTON 6141

Light vehicle Brakes Amendment 2014 Rule 32014/4

The NZ FOMC represents approximately 130 member clubs catering for heritage and collector vehicles including cars, trucks, military vehicles, tractors, motor homes and motorcycles covering all years of manufacture. Our member clubs represent more than 60,000 individuals. Thank you for the opportunity to provide this submission on the brakes rule amendment.

Making electronic stability control mandatory for light vehicles in general use is supported and commended by the NZFOMC, subject to special interest and motorsport vehicles continuing to be exempted as proposed in the draft rule. However we are concerned that newly built replicas of heritage vehicles such as SS100 Jaguars or Model T Fords will not be covered by the proposed exemptions, so will effectively be excluded from the road use as their "date of manufacture" is the year they are first registered.

We suggest provision should also be made in 2.1(4) for the definition of low volume vehicles to be extended to include the exemption of scratch built or bespoke vehicles which do not otherwise qualify under SIV or motorsport criteria.

Yours faithfully



Roy Hughes
Secretary
NZ Federation of Motoring Clubs,

Representing the responsible special interest and heritage motoring enthusiast