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SUBMISSION ON

LAND TRANSPORT RULE VEHICLE LIGHTING AMENDMENT (2011)

ON BEHALF OF THE FEDERATION OF MOTORING CLUBS (FOMC)

The Federation of Motoring Clubs (FOMC) represent over 125 member clubs ranging from cars to motorcycles, commercial and military vehicles, motor caravans, traction engines, tractors and farm machinery covering heritage, collectors and recreational vehicles spanning all years of production.

Dear Rules Team,

Proposal 1- LED RUC labels (electronic RUC status indicators). The use of modern technology is fine provided it is the owner's or operator's choice. The existing hubometers work satisfactorily.

The FOMC strongly objects if this a forerunner to making electronic meters compulsory as we have heard it suggested that in the future they will be made compulsory and there may be an ulterior motive for introducing them.

The FOMC have no comment on proposals 2 and 3

Proposal 4 – To allow higher mounted permanently dipped lights on vehicles where the normal height is impractical. Our comment is – has the use of beam setters been considered? Can they be adapted for such use and will it be necessary for higher mounted lights to be dipped at a greater angle to avoid distraction of drivers of on-coming vehicles?

Proposal 5 – We have no objection to the fitting of stop lights and indicators to bicycles and we are delighted that they won't be compulsory and that hand signals will still be legal (hand signals are recognised universally)

Proposals 6, 7 and 8 have our approval.

Proposal 9 – To allow side marker lights for vehicles 6 metres or more in length regardless of weight has our approval as long as it's not compulsory. Collectors of historic trucks and trailer units and military vehicles would not be happy if they were required to install non-original lighting. They want their vehicles in new showroom condition or as the military used them.

Proposal 10 – For end outline marker lamps to be vehicle width related and not weight and length related makes sense and we are delighted that existing vehicles will be allowed to comply with the existing requirements. We note the new requirements will be mandatory for new vehicles. Would a second-hand imported collectors vehicle be considered new, or a restored vehicle being re-registered, especially if there is no paper trail proving previous registration?

We recommend the wording be changed to – these lights being mandatory for vehicles manufactured on or after 1st April 2011 (or whatever date is considered appropriate). This would overcome the perceived problems people may have when re-registering or importing a restored vehicle.

Alternatively adopting a more restrictive definition of “new” may be simpler. Surely a second-hand vehicle being registered or re registered should not be deemed to be “new”. Under the Fair Trading Act traders would be in trouble if they described such vehicles as “new”.

Proposal 11 – No comment.

Proposal 12 – To approve new standards is common sense, but again in 2.9(2) and 4.3(7) you refer to vehicles first registered in New Zealand on or before or on or after certain dates. Would it not be better to quote manufactured before (date) or after (date) as in 2.11(1) 7.6(1A) and 7.6(1B). We suggest manufactured as opposed to first registered for the reason given in our comments on proposal 10.

To summarise –

- 1 – All proposals with no comment make good sense but are not of interest to the FOMC.
- 2 – Don't make electronic distance meters compulsory.
- 3 – Make sure you don't inadvertently make retrospective rules forcing collectors to fit non original lighting.
- 4 – If possible use date of manufacture as opposed to date first registered in New Zealand.

Thank you for considering our submission.

Yours sincerely,
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Representing the responsible special interest and heritage motoring enthusiast