

This correspondence from:
The Secretary
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August 12 2016

SUBMISSION LAND TRANSPORT RULE: OMNIBUS AMENDMENT 2016 RULE 10012

The NZFOMC represents approximately 130 member clubs catering for motor caravans and heritage and collectors vehicles including cars, trucks, military vehicles, tractors and motorcycles covering all years of manufacture. Our member clubs represent more than 75,000 individuals

Section 2 Door Retention Systems: Requirement that all doors on a vehicle can be opened from outside the vehicle.

While the FOMC acknowledges the safety benefits of this proposed change what is not clear from the wording is whether all vehicles will be required to have external door handles on all doors. There are a number of vehicles such as Corvettes, MG Midgets, various hot rods, and military trucks which lack external door handles but can still be quickly accessed from outside in the event of an emergency situation.

The Rule amendment does not specify how the door "must be operable from outside the vehicle"; if it is accepted that heritage/collector vehicles should not be required to be retrofitted with external door handles on all passenger doors, we suggest the amendment needs to be clarified and re-worded before it can proceed. Otherwise we would oppose this proposed change.

Section 7 Seatbelts and Seatbelt Anchorages 2002.

The FOMC endorses the proposed amendment which will clarify that, despite the requirements in Table 2.4, seatbelts in the rear of a motorhome may be either lap seatbelts or lap-and-diagonal seatbelts in rear-outer and middle rear seating positions.

Section 15 Vehicle Lighting: Allow deactivation of optional lighting equipment rather than requiring removal if the equipment does not meet the applicable safety requirements.

The FOMC supports this amendment as a common-sense provision which will reduce costs for heritage motorists whilst allowing retention of the design integrity of the vehicle.

Remove an unnecessary requirement to fit high-mounted stop lamps to vehicles registered before 1/1/1990.

The FOMC supports this change, and suggests the amendment should apply to all vehicles both manufactured or registered anywhere in the world before this date, and not just those first registered in New Zealand. Otherwise owners of newly-imported classic collectible vehicles, or similar older vehicles, could still be required to fit a high stop light where there is no evidence of prior registration in NZ or elsewhere, thereby partially defeating the full intent of the amendment. With regard to some earlier vehicles/recent imports there could be safety benefits as requiring the fitting of standard high-mounted stop lights in their rear screens would restrict the view behind.

The FOMC concurs with the NZAA that clause 5.3(2) of the Vehicle Lighting Rule should be revised as follows: *A motor vehicle of Class MA, first manufactured on or after 1 January 1990, must be fitted with one or two high-mounted stop lamps.*

Yours faithfully

A handwritten signature in black ink, appearing to read "Roy Hughes".

Roy Hughes, Secretary
NZ Federation of Motoring Clubs
Tel 03 332 7500

Representing the responsible special interest and heritage motoring enthusiast