

*This correspondence from:*  
The Secretary  
New Zealand Federation of Motoring Clubs Inc.  
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27 June 2011

SUBMISSION ON – LAND TRANSPORT RULE: OMNIBUS AMENDMENT 2011 RULE 10007  
ON BEHALF OF THE FEDERATION OF MOTORING CLUBS (FOMC)

The NZ Federation of Motoring Clubs is an incorporated society representing over 125 clubs with individual membership of around 60,000 enthusiasts who collectively own special interest heritage and hobby vehicles comprising cars, motorcycles, trucks and military vehicles, motorhomes, tractors and traction engines, and vintage machinery spanning all years of production. We welcome the opportunity of submitting on this bill.

Dear Rules Team,

When we state “no comment” we are neither in favour nor against the proposal. It simply means we have not asked our member clubs their views but do not expect the proposed change will directly or indirectly affect them.

Proposals 1 to 6 inclusive – No comment.

Proposal 7 – Has our approval.

Proposals 8 to 12 inclusive – No comment.

Proposal 13 – We are fully in favour of this. We are aware some drivers have more than one licence and spread demerit points to avoid having their right to drive suspended. If they break the law they should be required to face the consequences.

Proposals 14 to 17 inclusive – Have our support.

Proposal 18 – We agree with this change. The FOMC concurs with the opinion that make, model and sub-model manufactured in annual volumes of twenty thousand or less should be one of the criteria to be met to qualify as a S.I.V.

Proposals 19 and 20 – No comment.

Proposal 21 – We are very pleased to see this proposal as the request for this change was raised by the FOMC in conjunction with the Motor Caravan Association. If both breakaway brakes and a safety chain are used in conjunction, a broken connection could adversely affect control of the tow vehicle and create a serious safety hazard. Thank you for considering our submissions and taking this action.

Proposal 22 – Our concern is that in the absence of sufficient quoted evidence and statistics this may be more of a perceived risk rather than a genuine significant safety hazard. While some of the targeted braking systems could be “inappropriate” others may actually provide safety benefits. If some systems work safely why ban them all? Could it be that their operation and application is not clearly understood? Without the previously mentioned statistics or results of road or track testing we cannot say if we agree or disagree with this proposal.

Proposals 23 and 24 – No comment.

Proposals 25, 26 and 27 – Have our approval.

Proposal 28 – No comment.

Proposal 29 – We have no issue with this proposal.

Proposal 30 – No comment.

Proposals 31, 32 and 33 – Have our approval.

Thank you for considering our submission.

Yours sincerely,  
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Or write to –  
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***Representing the responsible special interest and heritage motoring enthusiast***