

This correspondence from:
The Secretary
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Vehicle Certification Fees Co-ordinator
NZ Transport Agency
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Vehicle certification and road user charges (RUC) administration fees consultation

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 proposed fee changes.

Exemptions from vehicle-related land transport rules

Heritage vehicle owners are concerned that the proposal to charge a standard fee of \$160 per hour for granting exemptions could become an attempt to use the inadequacies of the rule making process to extract unreasonable and inflated profits from motoring enthusiasts. If the rule changes relating to vehicle safety standards were drafted more creatively and efficiently in the first place provision for exempting all vehicles which complied with manufacturers specifications and previously accepted safety standards would be automatically included. The proposal does suggest that "waiver provisions would be made available for instances where exemption applications are driven by anomalies in the vehicle compliance rule." We suggest that waiver should be mandatory where vehicles needing exemptions are factory specification but not accommodated by the compliance rule.

We submit that NZTA should give careful reconsideration as whether these proposed changes may result in significant unfair costs being imposed on fringe groups of motorists which would be contrary to the declared Government policy objective to reduce the fees and costs charged to all motorists.

Vehicle Certification Fees

We are puzzled as to why a WoF label currently costs 72c while a CoF label costs \$2.13. The proposed new cost for a WoF label will be \$1.55, an increase of 115% while CoF labels will cost \$6.50, an increase of 205%. Why are the costs charged for labels so very similar in design and size so vastly different?

While we appreciate the need to raise some fees to better reflect the increase in true costs incurred, we suggest any reviews should be done on a more regular basis, than to be left for almost 14 years. A review every 3 years would be much better. With the current intermittent frequency of the review of such charges, the much larger increases result in customer dissatisfaction. More frequent but smaller increases are easier for people absorb, especially when many personal budgets are set at least 15 - 18 months ahead.

Yours faithfully

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

Roy Hughes
Secretary
NZ Federation of Motoring Clubs,

Representing the responsible special interest and heritage motoring enthusiast