



VOSA Tachograph Calibration Fees Consultation
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Dear Chris,

Tachograph Calibration Fees

Thank you for inviting us to comment on the proposals for tachograph calibration fees. We note that there are three options being considered and that the preferred approach is to de-regulate the fees charged by the approved tachograph centres.

Whilst we understand that a regulated fee is an administrative and legislative burden we are concerned with the impact of de-regulation on smaller operators and those in rural areas.

De-regulation of the fees could see tachograph centre operators charging a premium where there is little competition which would result in operators in rural areas having to pay more. In addition, our view is that larger operators who are considering converting their premises to authorised testing facilities (ATF) for their own fleet may well consider becoming tachograph centres as well which would mean a further reduction in costs longer term for larger operators.

Smaller operators would not be able to afford this level of investment and therefore will be penalised by having to pay higher fees at an independent operating centre or having to travel further to a tachograph centre due to the loss of business from the larger operator.

Our recommendation would be that **option 3** is given further consideration as it provides the necessary safeguards for smaller operators and recognises the change in timing from analogue to digital tachograph calibration therefore protecting the tachograph centre. The additional benefit of option 3 is that this encourages operators to use newer vehicles as the costs for digital tachograph calibration are slightly less expensive.

We are aware that some operators have questioned the timing exercise and we would recommend that VOSA provide further clarification to operators on the timing exercise that has been carried out.

We hope our comments add value to VOSA's decision making process and are happy to provide further clarification if needed.

British Vehicle Rental and Leasing Association

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A company limited by guarantee Registered Office as above

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Registered in England No. 924401

VOSA

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Yours sincerely

A handwritten signature in black ink, appearing to read "Jay Parmar". The signature is written in a cursive, flowing style.

Jay Parmar
Head of Legal Services

Bona-fides BVRLA, the industry and its members

- The BVRLA is the trade body for companies engaged in the leasing and rental of cars and commercial vehicles. Its members provide rental, leasing and fleet management services to corporate users and consumers. They operate a combined fleet of 2.5 million cars, vans and trucks, buying nearly half of all new vehicles sold in the UK.
- Through its members and their customers, the BVRLA represents the interests of more than two million business car drivers and the millions of people who use a rental vehicle each year. As well as lobbying the Government on key issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct. www.bvrla.co.uk