



11 September, 2014

Transport for London
Congestion Charge
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Worthing BN11 9PQ

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Dear Sir or Madam,

Consultation on modifying the congestion charging scheme

The BVRLA welcomes the opportunity to comment on Transport for London's (TfL) consultation to modify methods of payment in the congestion charging scheme.

The BVRLA is pleased that TfL has recognised that congestion charge payments made to unauthorised users, for example third parties that are not authorised to take congestion charge payments on driver's behalves and may keep the payments themselves. We agree such practices should be stopped to give drivers confidence to use authorised payment methods. In doing so, this will prevent the issuance of Penalty Charge Notice's (PCN's) to the drivers for not paying the congestion charge.

That short message service (SMS) via mobile phones is outdated as the mobile world has evolved with greater use of Smart phones and other Smart portable devices to manage various payment methods. Introducing a mobile application via the Android/App Store will help to enhance congestion charge compliancy and simplify the current process by reducing the number of PCN's issued to unsuspecting drivers due to their use of such unauthorised third parties.

We therefore support the proposals to:

- Allow TfL to refuse payments for the Congestion Charge other than those made by authorised users.
- Remove the SMS mobile phone payment channels.
- Introduce a mobile application which would enable users to pay the Congestion Charge, manage payments and access other information via their Smart phones and other Smart Devices.

V5 Documents & Administration of discounts

The DVLA plans to digitalise the vehicle registration document (V5C) in 2015. The DVLA will only issue hard-copies of V5C vehicle registration certificates for fleet operators as and when needed. With the upcoming digitalisation of the V5C we would recommend that TfL investigate how information that they may use from V5C documents, for example for residents discounts or CO2 emissions will be obtained in the future in a more efficient and simpler manner directly from the DVLA. To resolve any potential impact on members and their vehicles and as part of the Government's red tape challenge, we propose an alternative DVLA style look-up facility to verify any information that TfL may require from the V5C document.

British Vehicle Rental and Leasing Association

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This will help TfL with more timely and cost effective processing of discount applications and renewals. We believe if this approach was implemented there would be cost savings for TfL and therefore TfL should consider removing the £10 administration fee for registering/renewing 100% discount vehicles.

Legislative defect

We would welcome Transport for London's support on an amendment to the Road User Charging Regulations that we have been seeking since the scheme was introduced. The amendment required will allow leasing and rental companies whose agreements are longer than six months in duration to lawfully transfer fines onto the customer. The benefit to TfL is less administration, cost and time spent redirecting fines. Benefits to customers and members include a fairer structure to all involved, it reduces the number of letters sent and the time it takes to resolve the payment.

Leasing companies' inability to transfer the liability in relation to the PCN means they have to either absorb the cost or if their contracts permit they will try to recover the costs from the customer. We therefore call on TfL to lend their support to a legislative amendment to the Road User Charging Regulations to allow our members to transfer fines to the customer where the agreement is more than six months in duration.

We are keen to continue to work with TfL to ensure that our members, as well as other motorists, all benefit from schemes put in place in London.

We welcome the opportunity to comment on the TfL consultation and hope the relationship between TfL and Association will continue to add value in the continued development of London.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jay Parmar', is written over a light blue circular stamp.

Jay Parmar
Director of Policy & Membership

Bona-fides BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental and Leasing Association is the UK trade body for companies engaged in the rental and leasing of cars and commercial vehicles. Its members operate a combined fleet of 3.4 million cars, vans and trucks.
- BVRLA members buy nearly half of all new vehicles sold in the UK, supporting around 184,000 jobs and contributing more than £14bn to the economy each year.

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- By consulting with government and maintaining industry standards, the BVRLA helps its members deliver safe, sustainable and affordable road transport to millions of consumers and businesses. For more information, visit www.bvrla.co.uk.