



Response from
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1 INTRODUCTION

- 1.1 The Motor Schools Association of Great Britain (MSA) makes the following response to the DSA Discussion Document, European Community Changes to the Driving Test
- 1.2 The MSA is the national trade association for driving instructors and schools founded in 1935. Members of the association are in the main Driving Standards Agency Approved Driving Instructors (ADI). We also have a partnership with the Institute of Large Goods Vehicle Driving Instructors (ILGVDI), and represent their interests together with those of prospective driving instructors (PDIs) and a number of bus/coach instructors and motorcycle instructors.

2 GENERAL COMMENTS

- 2.1 Members of the MSA are concerned that the DSA in making proposals to deal with new requirements from Europe are seeking to spend huge sums of money on vocational and motorcycle testing that will be reflected in massive across the board fee increases for all customers. At the same time, the proposals seek to impose a massive diminution of service to their main body of clients - car driving test candidates.
- 2.2 We have commented on most of the specific questions raised in the discussion document by quoting the question *in Italics* followed by our comment.

3 THEORY TEST CONTENT

- 3.1 *not including map reading and route planning as a theory test topic.* We disagree we feel this an important aspect of driving and that a proper understanding of these topics together with the safe use of electronic navigation aids would contribute to road safety.
- 3.2 *guidance relating to vehicle documentation and maintenance that is available, and any other training implications.* We agree that these items should be included relevant to the particular category of vehicle being tested.
- 3.3 *when these changes should be implemented.* As soon as possible.

4 PRACTICAL TEST CONTENT – CARS

- 4.1 *how these random checks should be undertaken.* We feel that these checks should be tested orally at the start of the test. We believe it is unnecessary for candidates to demonstrate these checks physically and that to do so would take time away

from the actual driving test. We are also concerned that advancing technology means that physical checks of this kind will quickly become redundant.

- 4.2 *any training implications.* If candidates are to be required to carry out physical checks, there will obviously be a need for extra training to prepare candidates for the test. There will also be additional costs involved in the provision of appropriate safety equipment gloves, wipes etc.

An MSA member made the following comment on this proposal:

I had a dream, it is a bitterly cold day, it is raining heavily and there is a strong north-easterly wind. The pupil I have brought for test is a young man he is 17 years old and of slight build, about 5' 4" tall and weighs about 8 stone.

After leaving the test centre waiting room the examiner gives the eyesight test and then asks the candidate to check the oil level on the car. The candidate opens the car door and pulls the bonnet release. Fingers numb with cold he attempts to release the safety catch and raise the bonnet. After several attempts he manages to open the bonnet and then struggles to fit the prop to hold the bonnet in place. With the icy rain now making it difficult for him to see he returns to the car for the dipstick wipes. Returning to the front of the car he locates the dipstick which he finds relatively easily because I have tied a large label on it that says "oil dipstick". Fumbling with the cold he withdraws the dipstick from the engine and wipes it clean. Teeth chattering and his nerves jangling under the watchful gaze of his examiner, rain dripping steadily from the end of his nose, he misses the dipstick hole and the dipstick falls from his grasp underneath the car. The candidate scrabbles about on the saturated car park worrying what his mother will say about the state of his best trousers that she made him wear.

Fortunately, it was at this point that I woke up.

- 4.3 *when these changes should be implemented.* Not until further detailed consultation has taken place.

5 PRACTICAL TEST CONTENT – CARS-PLUS TRAILER TESTS

- 5.1 *the safety implications of any of these changes to test procedures.* We are concerned that there should be no reductions in the time spend testing the driver on road.

- 5.2 *when these changes should be implemented.* As soon, as is practical.

- 5.3 *any training implications.* We estimate an increase of around 20% in the training time required.

6 PRACTICAL TEST CONTENT – MOTORCYCLE TESTS

- 6.1 *assessing manoeuvres in the practical test, or introducing a separate "manoeuvres" test.* We feel that a separate "manoeuvres" test should be introduced. However, we feel this should be conducted by properly qualified instructors on sites provided by the instructors/training bodies.

- 6.2 *a suitable speed for the "slow speed" manoeuvres.* We believe that practical trials should take place to ascertain a reasonable "slow speed".

- 6.3 *whether the special manoeuvres should be conducted off-road or on-road.* Off road see 5.1 above
- 6.4 *an acceptable distance for riders to travel to take a test.* As short a distance as possible. The DSA should provide a local service for local people.
- 6.5 *when these changes should be implemented.* It should be possible to implement these changes by September 2005
- 6.6 *any training implications.* Yes extra training would be required.
- 6.7 *the implications for practical moped riding tests.* The same requirements for mopeds should be in place taking into account the differing power to weight ratios.

7 PRACTICAL TEST CONTENT – LGV AND PCV TESTS

- 7.1 *the safety implications of any of these changes to test procedures - reversing and loading/unloading exercises - the facilities needed to assess the loading bay manoeuvre.* We suggest that DSA should investigate these requirements further and then publish guidelines on the requirements they think necessary in order for these tests to be carried out by instructors/training bodies.
- 7.2 *possible impact on the number of tests conducted per day.* There could be an increase in the number of tests, even on laden vehicles, if the manoeuvres were tested separately by instructors/training bodies. LGV centres could be closed down and LGV/PCV tests could be conducted from most ordinary DTCs.
- 7.3 *when these changes should be implemented.* As soon, as is practical.
- 7.4 *the training implications.* Extra training would be required and trainers would have to increase fees to cover extra fuel used wear and tear etc.

8 MTV REQUIREMENTS ETC.

- 8.1 *whether DSA should adopt multi-purpose test centres.* Absolutely not responsibility for off road manoeuvre testing should be passed to the private sector. This testing would need to be properly supervised by the DSA to ensure that standards and consistency are maintained
- 8.2 *acceptable distance for candidates to travel to take a test.* The DSA should provide a local service for local people. If LGV and PCV “manoeuvre” tests were moved to the private sector it could mean that the on road tests could be conducted from any DTC thereby improving service delivery rather than restricting it as the discussion document suggests to some 50 super centres.
- 8.3 *whether further specifications for the closed box body trailers for B+E and C1+E tests would be helpful.* We believe that this would be helpful.
- 8.4 *the kind of load acceptable for training and testing.* We believe it should be a fixed load. Training for other types of loads liquid etc. should be the responsibility of employers.

- 8.5 *the arrangements for verifying the security of load, and RTM of vehicle/trailer.* We suggest that a method of placing seals on the load should be developed in order to prevent tampering.
- 8.6 *whether a RTM should be imposed for a C1 lorry or a trailer in a C+E test conducted with a drawbar-trailer combination.* We believe this would be helpful.
- 8.7 *whether maximum RTMs should be imposed.* We believe it would be advisable to specify RTMs.
- 8.8 *when these changes should be implemented.* As soon, as is practicable.
- 8.9 *any training implications.* The proposals will require candidates to receive an increased amount of training.

9 DRAFT REGULATORY IMPACT ASSESSMENT (RIA)

- 9.1 *DSA would welcome comments on the relative advantages to different parties of between: an integrated network of centres with safe off-road testing facilities. - greater travel-to-test distance to centres. - increased test fees.* We see no advantages to candidates, instructors or most importantly road safety in any of the above. We believe that separating the testing of manoeuvres from general driving/riding and having these assessed by properly trained, qualified and supervised trainers would produce a more cost-effective efficient and convenient service.

10 PUBLICATION OF MSA COMMENTS

- 10.1 We are content for our reply to be included in a summary of responses, which the Agency may divulge on request.

11 CONCLUSION

- 11.1 Use DSA expertise to provide supervision of appropriate standards and private sector expertise to offer cost effective testing.