

This correspondence from:
The Secretary
New Zealand Federation of Motoring Clubs Inc.
PO Box 10-410
HAMILTON
Email: secretary@fomc.co.nz



Immobilisers Amendment
Rules Team
Land Transport New Zealand
PO Box 2840
WELLINGTON

VEHICLE EQUIPMENT (IMMOBILISERS) AMENDMENT: Rule 32017/3

Dear Sir/Madam,

Thank you for the opportunity to comment on the Vehicle Equipment (Immobilisers) draft Rule.

The NZ Federation of Motoring Clubs (FOMC) represents over 100 member clubs catering for cars, motorcycles, trucks and military vehicles, tractors and traction engines, covering heritage and collectors vehicles spanning all years of production.

Organised car thieves will simply bypass security systems or tow the vehicles they want, but if immobilisers reduce opportunistic vehicle conversion by joyriders this has to be beneficial to everyone. It's joyriders who are the more prolific vehicle thieves, and who do the most damage to the vehicles they convert, other vehicles, private property, and other road users.

While the FOMC is generally in favour of your proposal we urge you to consider the following points.

On page 16 of the overview you mention break-ins of owners homes by thieves looking for vehicle keys. While there may not be a noticeable increase of this type of crime, any increase in car jackings (rare in NZ but more prevalent overseas) would be unacceptable. Unfortunately under this proposal such occurrences may increase. What if any strategy will be put in place to limit this type of crime?

There is no mention in your yellow draft of diesel vehicles. You mention immobilisers interrupt two or more systems (fuel pump, starter motor or ignition). As diesels don't have an ignition system and usually a mechanical fuel pump that leaves the starter motor and glow plugs. In warm weather some diesels will start without glow plugs. If a fuel supply stop valve or some other device is required can this be installed within the \$300-\$400 price range of an immobiliser, or would diesel vehicles be subject to an unfair price disadvantage?

On pages 8 and 9 of the overview the proposed amendment rule does not apply to scratch-built vehicles, along with motorsport vehicles, vehicles first registered outside NZ more than 8 years entry, and vehicles re-entering service.

On page 6 of the draft rule a scratch-built vehicle is defined as:

- (a) assembled from previously unrelated components;
- (b) a modified production vehicle.

It is our understanding that the LVVTA see scratch-built as described under (a) but a 'modified production vehicle' as a vehicle that was produced by a recognised mass production vehicle manufacturer and has subsequently been modified by fitting a different engine or a new body with safety related component modifications, but we don't think the LVVTA see scratch-built and modified production as one and the same. Would this affect your definition?

More importantly, although the overview also excludes vehicles re-entering service from complying with the Rule, this is not specifically stated in section 2.10 of the Rule. Thus 2.10(1) should have an additional category (d) added, namely "vehicles re-entering service in NZ" or words to that effect.

Yours sincerely,

Andrew McClintock
Submission Secretary
NZ Federation of Motoring Clubs

Representing the responsible special interest and heritage motoring enthusiast