# Motorcycle Test Review Seminar – Q&A

#### Test review

#### Q.1 I feel that the time scale for the test changes is far too long. What can be done to speed this up?

We are aware of the concerns about this and we are moving as quickly as we can. However, we need to be sure that any changes really do deliver improvements and do not want to rush into changes that turn out not to work in practice.

# Q.2 The Minister mentioned 'Push Back' from some of his staff. Where does the DSA sit regarding the proposals and are they actively trying to resolve the issues or are they dragging their feet?

DSA are fully supportive of the review and are working with colleagues in DfT and MCIA representatives to resolve the challenges presented by finding a solution to on road testing

### Q.3 Why can't the government fund the building of more MPTCs and move them to the original idea of having a 1 event test then?

The land required for an MPTC is generally expensive. That type of investment is not government policy and the focus is on reducing the costs in the delivery of public services. DSA are continuing to look for additional low cost off road areas where current provision is low and there is sufficient demand to make it worthwhile.

## Q.4 Given what the minister wants, how far does the DSA/DFT think they have moved to realising these ambitions?

We have made good progress, working with motorcycle trainers and user groups, to identify potential changes to the test. We have now reached the stage where we are starting to trial the proposed changes to verify that they work in practice and once we have done so we can move to the stages of consultation, legislation and implementation.

#### Q.5 Why is the minister frustrated with the test review process?

The Minister is frustrated with the time it has taken to deliver changes and we all share those concerns. But he recognises that we need to get this right and not rush into changes that have not been properly considered or researched, which could lead to further problems.

Q.6 Why 2015 for a single event test? This is a totally unacceptable time frame. We in Poole/Bournemouth need this to happen before summer 2012 as we are loosing our Mod1 facilities (VOSA).

The timetable presented at the seminar suggested bringing in the new manoeuvres and a single event test in winter 2012/13. The new manoeuvres would initially be provided in new on-road areas in gap areas that are not well served by the off road test centres, but those off road test centres would initially still be used. The new manoeuvres and single event testing would be introduced in all locations at this time. This would be the start of a transitional period, as the new manoeuvres were transferred from off road centres to on road locations, as suitable sites are identified, over a period which might take until 2015, as the date at which the transition to on road testing in all areas is complete. But the single event test comes into effect at the start of that transitional period, not the end.

#### Q.7 Why is it taking so long to phase the one test back in?

Any changes to the current test require consultation and legislation and we need to consider all of the options before moving back to a single event test.

Q.8 Given what appears to be the never ending delays within the review process, and the added complication of the introduction of 3DLD which still requires a satisfactory consultation, do the panel feel that a cabinet reshuffle will further damage the process, therefore the whole motorcycle industry?

The review is under way and we all recognise the issues involved and the concerns of the industry. We have identified a way forward and these are built into DfT and DSA business plans. Any changes to the Cabinet or other Ministerial; portfolios will not affect the underlying need for change and the work done so far to identify and implement solutions.

Q.9 If we move the Mod 1 to an on road location to become more realistic, so we find a quiet road, non residential safe pavement/verge, clear view, minimal street furniture, then set up and take down cones - it sounds like what we have now - off road?

One of the main aims of the test review is to improve accessibility. If research finds that all or most of the test can be carried out safely on- road and suitable roads are found, then we can fill the gap areas that are currently not served by an off road MPTC. The proposed new manoeuvres are different from those in the current module 1 and have been designed to be suitable for on road as well as off road sites.

#### Q.10 31.6mph is the minimum for the stop & avoid exercises. What speed limit will they be carried out in?

It is proposed the higher speed manoeuvres will be carried out at a speed of around 30mph, so candidates will not be required to exceed the speed limit. It is our view that this is sufficient to meet the requirements of the EU Directive.

Q.11 If DSA get dispensation for a) exceeding the speed limits and b) for closing roads, subsequently closing MPTCs, where will schools practice manoeuvres?

The MPTCs are not used exclusively for motorcycles, so will still be needed for other categories of vehicles. We are not proposing to close roads during the test, subject to the trails of the manoeuvres to verify their safety on the road.

Q.12 Is it possible for legislation to allow the DSA to close sections of road for testing? This would give a massive boost to finding suitable venues.

Closing roads is an option that is up for consideration but it is not our preferred option. The aim is to identify on road locations that are sufficiently quiet necessary. Closing roads for a few minutes and reopening them, several times a day, will require additional road signs, may require police presence, will add time to the length of the test, reducing the number of tests per day and increasing costs. Whether road closures are involved or not, changes to the test will require changes to legislation to implement whatever the final outcome may be.

#### Q.13 Which parts of 2DLD can we change if a 5% reduction in speed has been introduced can we remove the figure 8 and reduce speed for bends?

The Directive requires that at least two manoeuvres are carried out at slow speed, including a slalom, so any further requirements are a matter for GB decision. One of the options is to use selective testing, as for car drivers, where riders may be tested on the slalom and then either the u-turn or the figure of 8. The directive specifies a manoeuvre at 30km/h, but does not specify the manoeuvre itself, so it need not be a bend. It may be possible to apply the same degree of flexibility to the interpretation of the 30km/h speed requirement as to the 50km/h specified for the hazard avoidance and emergency stop manoeuvres.

### Q.14 An examiner is a good judge of speed, so should be capable of doing this for high speed manoeuvres on the road?

Using the examiners judgement of speed for the hazard avoidance manoeuvre is one of the options being considered.

### Q.15 Why bother with an avoidance exercise? Why not train a rider to ride defensively and to read the road and traffic conditions ahead?

The avoidance exercise is a mandatory requirement of the Directive. We do think that it is desirable for riders to have these skills as well as riding in a defensive manner.

#### Q.16 When training for proposed on road slalom, how much consideration has been given to the corporate homicide or corporate manslaughter acts?

The safety of candidates is paramount. The aim of the research is to determine the requirements for the safe conduct of the test on-road so that candidates are not put at unnecessary risk.

# Q.17 With regard to the road slalom, has the issue of obstructing the public highway been addressed?

See Question 21.

# Q.18 With regard to placing cones on the road, insurance prohibits road trials of any kind. Has consultation been undertaken with insurance companies if this is applicable?

We needed to finalise what the proposed new manoeuvres would look like and have not consulted the Insurance Industry. We may need do so as part of the public consultation.

#### Q.19 Why Kilometres an Hour?

The EU Directive specifies km/h but the existing GB implementing legislation specifies mph. We can use either unit of measurement.

# Q.20 Have the DSA considered the possibility of doing the new slalom and avoidance in the DTC car park once car tests have left the premises, where there is room to allow this?

Carrying out the slower speed exercises in test centre car parks may be feasible at some quieter locations if it can be done safely however it will be important not to disrupt other DSA operations such as car testing.

Q.21 We are all concerned with safety, so how can a swerve test and slalom (as shown in video) be carried out safely on a public road? I see nothing fundamentally wrong with the current Mod 1 test. But then we are lucky to have a MPTC within 15 minutes.

A research contract has been let to hold wider trials with test level candidates to verify standards, suitability and safety of the new manoeuvres. This will include a number of onroad sites to establish the criteria for safe on-road testing, before we decide whether to introduce this part of the test on-road.

Q.22 Statistics show incidents occur under breaking on Mod 1 test systems. Why introduce an on road test in a publicly accessible environment?

See Question 21.

Q.23 Who will be liable for prosecution when the trainee loses control due to stopping without cause?

See Question 16.

#### Q.24 What if the designated road is busy?

The trials will identify the criteria for suitable on road sites where the manoeuvres can be carried out safely. This is unlikely to include busy roads.

Q.25 What is the likelihood of the module 2 being more localised? If we lost our local facility for motorcycle tests in Hereford with the introduction of MPTCs, can we be considered for the module 2 or single event test again?

We have a 20 mile/45 minute service criteria and believe that module 2 candidates from the Hereford area are generally on the cusp of those criteria if attending the nearest centre at Worcester. We will consider extending the module 2 service to Hereford subject to there being sufficient local demand.

#### Q.26 We have to travel 70 miles to a test centre, can we have one in mid Wales please?

We are currently searching for a cost-effective, casual module 1 site in the Builth Wells area to improve the service in mid-Wales.

Q.27 How many new Mod 1 facilities will be made available in North Oxfordshire / Warwickshire in 2012/13 leading up to new test intro?

We currently deliver module 1 tests from Oxford Kassam and Silverstone (Northamptonshire). There are no plans to introduce additional sites in this area but we are open to the possibility of a cost-effective casual site serving this area if one could be identified.

#### Q.28 Why are there no motorcycle test centres in surrey?

DSA look to provide motorcycle testing facilities within a 20 mile 45 minute service criteria with consideration given to demand within the local area. This approach does not need to reflect county boundaries and there are centres servicing candidates from Surrey at Tolworth, Croydon, Farnborough and we aim to open a new testing facility at Mitcham in the near future. We are not aware of any service provision gaps in this area but would be happy to consider any representations.

# Q.29 Mod 2 test availability - None according to DSA website, I pre-book a full programme then 1st & last tests are removed for training time - related to Kendal and Heysham test centres.

Motorcycle examiners are detached from our centre to Kendal and Heysham which means the first and last module 2 tests each day are not available to enable them to travel. Even allowing for the 5 test day we believe demand is being met and there are significant gaps in the programmes during September. If the trainer is not able to purchase the number of tests required they should raise a request for more slots via the 'call back' process. There is no record of call backs being raised for either of these centres.

#### Q.30 Plans to bring tests closer to candidates, opening of Girvan & Dumbarton for car tests why no module 2 tests?

The taking testing to the customer initiative is focused on providing only additional car test locations but we are also searching for module 1 locations in specific search areas where we recognise there are gaps in service provision. Girvan and Dumbarton are served respectively by Ayr MPTC and Glasgow MPTC in line with the 20 miles/45 minutes distance criteria.

## Q.31 Cumbria has 1 MMA, 3 Module 2 Centres, but only 2 examiners to run either part of the testing procedure, why?

DSA is currently training additional motorcycle examiners to improve our ability to respond to customer requirements.

#### Q.32 Would you be willing to move back to cities you have left due to the opening of MM Test Centres If Perth closed because of Dundee?

We currently base our motorcycle service on 20 miles / 45 minutes travel criteria which means customers in the Perth area are serviced from Dundee.

#### Q.33 Are there still plans for a Mod 1 test centre in York, as of yet we do not have one?

We are committed to searching for a cost-effective, casual module 1 location in the York area as we recognise there is a gap in service provision. We offer module 1 tests at weekends from the VOSA site at Wetherby and we are working with VOSA to see if and when, subject to their operational requirements, we could extend our use to weekdays.



# Q.34 When the test changes back to single event test can we have new centres that were not previously bike test centres IE nearer Motherwell? Provided they are car test centres.

Once any changes to the format and content of the test are decided we will consider the implications for our points of service delivery.

# Q.35 Why can't the two tests be combined as is? It takes 10 minutes to do the Mod 1 test. We travel 45 mins to the test centre for a 10 minute test. The two tests can be combined with ??? Rider Faults.

Under current legislation the module 1 must be passed before module 2 can be taken however we are considering trialling taking the two modules back to back to see if riders and trainers prefer it. In the future when legislation is amended it would be possible to have a single event test. Under a single event test the maximum number of rider faults allowed would be 15 for a pass to be awarded.

# Q.36 How much interaction has there been between the team researching the new proposed on road exercises and the operational examiners who will have to conduct them? Has their feedback been at all negative regarding having to put cones out on public roads?

Operational examiners have been involved in the review from the outset, DSAs Trades Union play an important part in ensuring the views of front line motorcycle examiners are included.

#### Q.37 Why can't the ATB do the slow part of the Mod 1?

Using ATBs as delegated examiners for the slow manoeuvres is an option that we will consider. However, there are various issues that will have to be taken into account e.g. a trainer cannot be an examiner simultaneously and there would need to be a system in place to check the delegated examiners, who would have to be trained and quality assured.

# Q.38 Other than destination issues, the new M1 format seems to be working fine with the practice run. Why can't you leave it as it is but simply lower the speed requirements for A1 class?

Initial feedback on the recent changes to module 1 is very positive. The minimum speed that the higher speed exercises have to be carried out at is in EU legislation and whilst we have introduced a tolerance in the way the speed is assessed we cannot alter the minimum requirement for A1 machines. Part of the research trials will be to ensure any changes take the performance of smaller machines in to account.

#### Q.39 As an Interim step, why can't local test centres be re opened for Mod 2 Tests? This would save me 13'000 Miles/Annum.

The locations of test centres have been chosen against the criteria of candidates being within 20 miles or 45 minutes to travel to their nearest test centre. This is not always possible for module 1 testing but the Agency would be prepared to consider a request for additional module 2 coverage where there is sufficient demand.

Q.40 Why can't instructors examine the slow speed manoeuvres at the ATB. When in effect we already do, and we issue a legal document at the end of it (CBT) DL196 (I appreciate this could be open to abuse though). To carry out slow speed Manoeuvres on the road is totally nonsensical (Traffic, Pedestrians, Cyclists Etc...) It would need police intervention.

(Please see answer 37 above re: instructors examining slow manoeuvres at the ATB.)

The trials of the new manoeuvres will also consider whether it is possible to carry out some slow manoeuvres on the road, in case the ATB approach proves not to be viable.

# Q.41 With regard to 'mobile examiners', the DSA cannot currently supply enough examiners to cover the test centres. How do they propose to cover mobile assessments?

We are exploring and where practical implementing all possible measures to increase our motorcycle examiner resource. Mobile examining is being trialled to assess impact including how this affects examiner utilisation.

#### Q.42 What is going to be done interim re - the closure of rural VOSA sites?

DSA use 8 VOSA sites for module 1 testing at weekends in areas where there would otherwise be a gap in service provision. VOSA are transforming their service delivery model so that they are less reliant on their estate. None of the 8 sites used for motorcycle testing have been announced as closing and DSA are working closely with VOSA to understand and influence their programme.

#### Q.43 MPTCs are not weather prepared, tests cancelled for wind and rain, drainage is poor and no scope for rearranging tests.

The MMA does not contain drainage grids or channels within its area as these would present a potential danger to candidates. It is effectively a piece of very flat road within perimeter fencing. Rather than a camber, the MMA has a slight but consistent incline to aid in the removal of surface water. The cancellation of tests due to bad weather is the decision of the relevant Driving Examiner whose responsibility it is to assess the hazards presented at the time and to act in the interests of safety.

#### Q.44 We were always told one test for everyone so is it this rule that is being changed?

Any proposed changes will be implemented at the same time, so that testing will remain the same fro everyone. We are considering new manoeuvres that can be performed in an equivalent way on road or off road and there may be a mixed approach, with some performing the manoeuvre on road and others off road, at least for a transitional period. But the content of the test and required standards will be the same for all candidates, wherever it is taken.

#### Q.45 Is one accident in every 1st candidate acceptable? How does this compare to cars?

Accident rates for the current off road module 1 candidates are comparatively higher than for car candidates (average of 3.9 per 1,000 for module 1 compared to 0.6 per 1,000 for car candidates), while module 2 candidate accident rates (0.9 per 1,000) are more

comparable. In the first 4 months of 2011/12 there is a clear reduction in the number of accidents for module 1 candidates (average of 2.1 per 1,000).

Q.46 We ride new riders 110 miles to complete Mod 1 tests. Students who travel long distances in poor weather are at a disadvantage when taking there tests compared to students who have better access.

We recognise there are service gaps in module 1 test provision and as a priority we are seeking to fill those gaps. Any support or suggestions from trainers would be welcomed. Candidates in those areas are disadvantaged in terms of having further to travel however it is very rare that a candidate's journey would involve this type of distance. We do not want learners to have to travel unreasonable distances for their module 1 tests and have used casual sites and shared VOSA sites to try and minimise any service gaps.

Q.47 Why has it taken such a long time for the DSA to acknowledge there is a problem with the test and why do they find it acceptable for learners to have to ride excessive distances to a MOD 1 test?

DSA introduced some minor changes to the module 1 test in May. Other changes are being considered as part of the wider review announced by the Minister. We do not want learners to have to travel unreasonable distances for their module 1 tests and have used casual sites and shared VOSA sites to try and minimise any service gaps. We are continuing to look at introducing casual site arrangements in the areas most affected and any support from trainers would be welcomed.

#### Q.48 How can 'dumbing down' the high speed manoeuvres improve rider skills and standards?

One of the key aspects in developing the new test is to ensure that the same standards of competency are required of candidates taking the test. The aim is to address safety and accessibility concerns, without undermining rider standards.

#### CBT / Highway Code / Theory Test

#### Q.49 Are you going to require a theory test for a CBT? (Please do!)

The Learning to Ride project is considering various changes to the CBT syllabus. Whilst we do not currently plan to require new riders to pass their full theory and hazard perception test before completing CBT, one proposal is to introduce a basic theory test to CBT, this should ensure new riders have proved to their trainers that they understand the rules of the road before they venture out on to the public road for the first time.

Q.50 Suggestion - Prior to applying for a provisional licence a member of public has to sit their general theory & hazard perception test. This certificate is included in the application pack they send in. Further theory tests are taken which are vehicle relevant before tests.

See Question 49.

Q.51 Learner car drivers are always accompanied by a qualified driver until the test is passed - not so for learner motorcyclists. If car learner has no knowledge of

Highway Code, there is always someone there to advise them in any situation. The bike learner has no such luxury and for 2 years and could be a hazard to himself and others. Good argument for making theory test compulsory before starting practical training for both car and bike.

See Question 49.

Q.52 Was consideration to surfaces taken when VOSA/Part Time sites are used for module 1 testing? There has been a lot of emphasis put on how MPTCs surfaces have been specially treated.

The surfaces at VOSA and other casual sites have been checked to ensure it provides a suitable level of grip. Where necessary this involved re-surfacing and hydro-stripping to ensure a safe surface for testing.

Q.53 Is it possible to introduce basic knowledge of the Highway Code & Road Craft at school level 15&half years upwards, possibly including theory test before the young people gain access to a license.

The DfT has produced road safety educational resources for schools, called Think Education, which aim to teach safe road use to all age groups, from Pre School to age 16. DSA has also produced a safe road user award for ages 14-16. These are available to all schools, but it is up to schools whether they choose to use these resources.

Q.54 What Plans, if any, are there to ensure that a candidate takes and passes a theory test before taking a CBT?

See Question 49.

#### Q.55 Why can't the car/motorcycle theory tests be combined?

The content of the car and motorcycle theory tests are different. The motorcycle theory test contains specific motorcycle related questions that do not form part of the car theory test.

#### Q.56 Why do people who have passed a bike test a few years ago do not have to take a theory test for cars?

Riders who passed their motorcycle test prior to February 2001, and who didn't hold a full car licence, were also awarded full category B1 entitlement (trikes and small three wheeled cars). As these riders hold a full licence in the car category they are exempt from the car theory test. This no longer applies as those passing their motorcycle test are no longer awarded category B1.

Q.57 Could we have the provision to extend CBT Certificates beyond the two year period only for students under instruction not solo riding? To avoid those who are running out of time on a certificate rushing into a test.

The two year life of a CBT certificate is designed to limit perpetual learning and to encourage riders to take more training and go on to take their motorcycle test. Whilst CBT can be re-taken at any time there are no plans to extend this two year period.



# Q.58 Are there any plans to introduce CBT vehicle restrictions? IE if you take your CBT on auto, you can only ride auto. If you want to ride a manual bike you would be unable to do so without further training.

Introducing a restriction to CBT certificates for riders who complete CBT on an automatic machine are being considered as part of the Learning to Ride project.

#### Q.59 Why is there not a minimum number of hours for modules A,B,C & D when there has to be 2 hours spent on module E?

The duration of each module of CBT should be determined by the rider's ability and the rate they progress through the CBT syllabus. This also applies to Element E where some riders may need more than the two hour minimum training period to reach a safe standard.

### Q.60 Would it be possible to introduce a shorter CBT syllabus for those wishing to simply renew their certificate?

Alternative options for those repeating CBT have been considered as part of the Learning to Ride project. The proposals for those repeating CBT are based on learning outcomes and the needs of the individual trainee so it should be possible to adapt the CBT course to suit their needs.

#### Q.61 An MOT has a set price because it needs to be properly conducted why is there no guide price for CBT?

The MOT is a test, CBT is a training course, and the cost is set by the Approved Training Body. The amount of time taken to complete the course may vary depending on the needs of each individual learner to successfully complete the course

#### Q.62 Can the DSA tell us how many CBT certificates were sold in 2009/2010 and the first 6 months of 2011?

In 2009/10 DSA sold 167,250, and from 01/01/2011 to 01/06/2011, DSA sold 102,875.

#### Trainer booking/re-test

#### Q.63 Can the short notice test hand back and retest time be bought in line?

The re-sit period for candidates who fail either module 1 or module 2 is designed to encourage them to take further training before taking their test again. This is a separate issue to the booking cancellation period which is being carefully considered as part of the trainer booking review.

# Q.64 If we are to increase to 10 clear days for test cancellation to DSA, then surely some sort of compromise could be met with candidates waiting time of 10 days waiting on a mod 2 re-take. This would surely use up tests back on the market?

The re-sit period for candidates who fail either module 1 or module 2 is designed to encourage them to take further training before taking their test again. This is a separate

issue to the booking cancellation period which is being carefully considered as part of the trainer booking review.

#### Q.65 Why is the retest time 10 days? 3 is sensible.

The re-test time for candidates who fail module 2 is set at 10 days in line with category B tests as it is basic licence acquisition, only practical vocational tests have a shorter period.

#### Q.66 Why only three days wait to retake module 1 test, but 10 days for module 2?

The re-test time for candidates who fail module 1 is set at three days to encourage candidates to take further training whilst still being in contact with their trainers. The re-sit period for module 2 is set at 10 days in line with category B tests.

#### Q.67 Why does a candidate have to wait 10 days to retake a module 2 test, but only 3 days to retake a module 1?

See Question 66.

Q.68 It would seem that the trainer booking facility can be used by trainers with the funds to pay for tests in advance, therefore effectively stopping other schools from getting tests for pupils in a reasonable time. Why can't the TBF be scrapped to allow fair test access for all?

The vast majority of trainers use the facility and tell us they do not want it scrapped. The Trainer Booking Agreement is currently under review. With the introduction of the next phase of internet booking, trainer booking limits will be based on actual test slots used by individual training schools. This will prevent schools reserving excessive numbers of slots and the simply handing them back.

### Q.69 Trainer booking giving on average a 6 week waiting time yet examiners claiming slots are free within a week?

The waiting time varies from test centre to test centre. Slots do become available during the 10 week trainer booking window as trainers hand them back. Availability can be checked online at <a href="https://www.direct.gov.uk/drivingtest">www.direct.gov.uk/drivingtest</a>.

Q.70 I would not want to see the window for booking test slots reduced to any less than 10 weeks. Candidates often want to book ahead and have certainty over timescales.

This is being considered as part of the Trainer Booking Review.

#### Q.71 DO NOT increase cancellation from 3 days.

This is being considered as part of the Trainer Booking review.

Q.72 When here for the last conference about 3 years ago we were informed that internet booking facility would be available within months. Why are we still waiting when every other form of testing has this facility available to them?

The development of business internet booking was delayed by rectification activity upgrading work on the core system. The system is currently being built and is scheduled to be introduced in the Autumn of next year.

#### Q.73 lack of examiners causing waiting times.

We are currently training more motorcycle examiners to increase our overall resource.

#### Q.74 Could it be possible to book the current Mod 1 & Mod 2 as a single booking & single test or separate to suit trainer needs?

The module 1 and module 2 tests are currently separate entities each with its own fee and therefore need to be booked individually. However, it is possible to book the separate tests at the same centre on the came day subject to accepting the risk that Module 2 cannot proceed (and the fee be lost) if Module 1 is failed.

#### 3DLD

Q.75 Will 3DLD be implemented in 2013 as stated or will it be delayed? This affects ATB business models and the sizes of bikes to meet requirements.

The Third Driving Licence Directive (3DLD) will take effect from January 2013.

Q.76 Is 3DLD going to happen? Are there still options through derogation to avoid ATB's having the additional expense of more larger capacity motorcycle when business is tight already - these changes have to be planned to be paid for.

3DLD will come into effect from January 2013. There is no likelihood of derogation. However, the EU Commission has indicated that a tolerance for the cylinder capacity (2% to 5%) might be permitted. The EU Committee is due to meet in September and we hope this issue will be resolved then. (A tolerance of 5cc has now been agreed).

### Q.77 Given phased amendments to 2nd directive between 2010/2015 - how will a 3rd directive be implemented during same timescale?

3DLD will be implemented in January 2013. We will have regard to that deadline when making other changes to the test arising from the current review. However, we do not want to delay any one set of changes unnecessarily.

#### Q.78 Explain how we are implementing the 3rd Directive?

We are implementing the 3rd Driving Licence Directive, as explained in the Department's response to consultation published in March 2010. Please see:

Implementation of the Third Driving Licence Directive

(http://webarchive.nationalarchives.gov.uk/+/http://www.dft.gov.uk/consultations/closed/thirddirective/response.doc)

Q.79 Is there any possibility of not implementing the Third Directive? If so why not do it, as it will make training not cost effective?

The Third EU Driving Licence Directive will take effect from January 2013. We have no option but to implement it, as all Member States must comply.

Q.80 Why do we have to be purchasing expensive new 600cc machines to comply with the 3rd Directive? What is the difference between a 500 or 600 (apart from 100cc)?

See Question 76.

Q.81 When will the criteria in 3DLD on bike capacity, testing or uplifting of categories be clarified to allow the ATB to adjust their business model and allow planning, preparation for what will be a considerable expense in the very short future?

See Question 76.

Q.82 3DLD should be a training route. Produce a book of certificates for trainers to sign off on Progressive Access. DSA get the revenue from Certificate Sales as in CBT. If you trust ATB's to sign off on total novices, why then not do the same with progressive access?

DSA support the progressive training options under 3DLD, to enable that to happen the training must be approved and supervised - this is a key part of the Learning to Ride project which aims to introduce quality assurance for all types of professional road based motorcycle training

#### Miscellanous

Q.83 If someone passes an A2 test, is then over 21 and wants to do accelerated access, they should be able to do the category A test on a Bike restricted to 33bhp. People more likely to go down A2 route or upgrade when they come of age. I would have done this if I could have done it on my restricted GS500.

There are minimum test vehicle requirements for all categories of practical test, machines used for unrestricted category A tests must meet the 35 Kw requirement.

Q.84 If someone has passed an A2 licence could the accelerated access just be the old single event test for DAS. To upgrade from A2-A as they have still met the 2DLD to pass A2?

When upgrading from one sub-category to another it is important riders can show they have the full range of skills and abilities to ride the larger machine. This involves completing all the requirements of the current test.

Q.85 Why can't I run A2 & DAS courses side by side, the syllabus and test requirements are virtually the same? I end up paying instructors to teach one to one for no reason.

There will be an announcement from DSA on this soon.



#### Q.86 Why can we not run A2 candidates alongside DAS candidates, when the training and testing is essentially the same?

There will be an announcement from DSA on this soon.

Q.87 Will the DSA move to a more pro-active stance on instructor development and improvement? Rather than the current "Big Stick". You have done that with the wrong approach. I.e. Seminars/Discussion Groups/Best Practice/Coaching Courses etc.

DSAs role is to set standards and carry out assessments of riders and trainers. Whilst we support and encourage development this should be provided by others within the training industry.

#### Q.88 Will the proposed registration have an imposed cost? We are already a documented ATB, why should we pay the DSA to remain one?

The way instructors and approved training bodies become qualified and are registered with DSA forms a key part of the Learning to Ride project. Our aim is to keep costs down but to move to a fairer "user pays" principle. Currently all motorcycle instructor activity is funded through the fees for DL 196 certificates, we plan to have fees that are relevant to each specific activity. Our aim is not to increase the overall costs to the training industry.

### Q.89 Under proposal, what will happen regarding down trained instructors if a single qualification is introduced because most schools operate this way?

The current proposals, which are designed to raise the standards of instructors, are to move away from down trained instructors. This will be replaced with a system where each instructor will be qualified in their own right to deliver all types of road based motorcycle training. Transitional arrangements will be put in place to ensure existing down trained instructors are not disadvantaged.

# Q.90 Why has the LTR project had no discussion or look at the commercial viability of the proposals? There has been no discussion about businesses.

The commercial viability of the changes being developed as part of the Learning to Ride project are important, there are representatives from small medium and larger trainers on the working groups who are instrumental in designing the new proposals. Any changes will have to be costed and evaluated as part of the impact assessment which has to ensure the needs of businesses are taken in to account. Training industry representatives will play a key role in compiling the impact assessment.

#### Q.91 Who would be qualified to assess the viability of a good business model as clearly the DSA have no experience in this area?

See Question 90.

# Q.92 ERS is little better than a basic test with experience. What is planned for beyond this?

Delivered effectively the Enhanced rider Scheme provides a training package designed to address the specific risks faced by each individual post test rider. It has the capacity to be much more than a basic test with experience. DSA, many local authorities and the training

industry continue to promote the scheme. We have been thinking about the future development and marketing of the ERS.

#### Q.93 The future of the ERS? In view of poor uptake?

See Question 92

Q.94 The accident statistics quoted are irrelevant unless they are broken down showing the type of accident that would have been avoidable with the ability to do a slalom, Fig.8, Hazard Avoidance, U-Turn.

The casualty factsheet includes information on manoeuvres, although the data is for 2008. See:

#### Road Accident Statistics Factsheet No. 7 – 2010

(http://webarchive.nationalarchives.gov.uk/20110503151558/http:/www.dft.gov.uk/pgr/statistics/datatablespublications/accidents/casualtiesgbar/suppletablesfactsheets/motorcycle2008.pdf)

Q.95 What per cent of accidents are caused by a young driver rather than untrained motorcyclists? Single vehicle accidents? How many were CBT Riders?

We don't have data on who accidents are caused by and don't know whether a motorcycle rider is trained or not. For both young (17-24) drivers and motorcyclists, around one in five accidents are single vehicle.

#### Q.96 KSI - why are killed or injured in the same category when they are obviously not?

Killed and seriously injured data can be provided separately. However, when looking at smaller categories, the number killed can be very small and so for convenience they are often combined with serious injuries in the KSI category to give figures with greater reliability. But they can always be separated if required.

#### Q.97 Is KSI down 11% because there is 10% less motorcycle traffic? Why is there less traffic?

Traffic could be down for a variety of reasons - the impact of the economy (also reflected in lower sales of new motorcycles) but also the weather; in 2010 both the first and the last quarter had periods of heavy snowfall.

Q.98 Can we have compulsory re-testing e.g. every five years for cars and bikes (maybe other categories)? Those passing tests would not wish to keep paying lots of money and so would continue to practise what they were taught. This would lead to safer drivers and roads.

The Government has no plans to periodically retest drivers/riders; it believes that the skills needed to drive unaccompanied should be demonstrated at the time of the practical test. Voluntary post-test training, is encouraged to continue the development of newly acquired skills but there is no evidence to justify compulsion. Most drivers have the skills they need to drive safely, therefore it is considered that action should be targeted against clearly irresponsible drivers. The Courts already have powers to require drivers to retake the driving test, in certain circumstances, and to refer offenders for retraining. The police can

also offer driver improvement courses to those who would otherwise be prosecuted for careless driving offences. We believe that this will be more effective than a blanket requirement to retest all drivers.

Q.99 Why, if someone passes a test at 17 years old are they never retested? If we are genuinely interested in improving road safety, why do we not re assess abilities every time a license is renewed?

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Q.100 Can we deal with riders who haven't ridden for a number of years and had no recent experience? Insurance companies could refer these to training schools to undertake back to biking sessions (logged) before insurance is sold.

From a road safety perspective, it makes sense for someone who has not ridden for a long time to brush up their skills with some training. However, if someone chooses not to we would not want riders to be tempted to ride uninsured because insurers would not sell them insurance.

Q.101 Would it be possible to fit video cameras to new car and bike riders and drivers, that will record constantly for 6 miles, then in the event of an incident you can just improve this and of the tests?

There are a number of controlled studies known as naturalistic driving studies that have taken place, or which are underway, where a large number of vehicles are instrumented with cameras and other sensors to provide information on driver behaviour. These studies produce vast amounts of data but are expensive to run; however, one such study specifically looking at motorcycles is the European 2BESAFE project, which is being part funded by the DfT. Details can be found on their website at: http://www.2besafe.eu/home. The insurance industry has been running trials with telematics that record the behaviour of new car drivers and can adjust insurance premiums as a reward for good driving behaviour. This has not been tried with motorcyclists and we cannot say if it is feasible with the equipment available.

Q.102 If we had a discount on fuel tax it would enable us to do more training for the same money.

This would be for Treasury to consider.

Q.103 DFT "Think!" Films have now been removed from "Think!" Website, unavailable for download unless from YouTube. When are the films going to be made available again?

All of the current ads are available to view on the THINK! site <a href="http://think.direct.gov.uk/index.html">http://think.direct.gov.uk/index.html</a> (http://think.direct.gov.uk/index.html)

If people wish to download the ads, usage fees may apply depending on what the intention is for them. These fees are payable to the artists featured, not to DfT, and apply as it is simply not financially viable for DfT to pay upfront usage for all of the catalogue



indefinitely. However, some areas of use are covered and we ask road safety professionals to complete a simple form detailing their request: <a href="Using THINK! adverts">Using THINK! adverts</a> (http://www.dft.gov.uk/topics/road-safety/think/using-think-adverts/)

We can then either supply the advert, or let them know the cost of the usage that applies.

#### Q.104 When at an appropriate standard during DAS training, we need to give experience to the motorcyclist of riding on the motorway.

When at an appropriate standard during DAS training, we need to give experience to the motorcyclist of riding on the motorway.

#### Q.105 Why doesn't the DSA separate its motorcycle testing and associated activities from its other activities?

DSA always looks to deliver testing in the most cost efficient manner and we aim to do this by delivering a variety of different testing activity from each test centre. This enables greater flexibility of all testing resource.

#### Q.106 Why do we not get progress reports prior to this type of gathering - in particular DSA future plans?

There are several ways of making sure you are kept informed about progress reports. In addition to the information provided by MCIA, reports on the test review are published by DfT on their website. You can also sign up for email alerts via DSA Direct; there is also a DSA YouTube page.

# Q.107 When will the DSA change their obstructive attitude / stance to all of the MMAs when they are not being used for tests?

We give first priority to testing, after which MMAs are made freely available for trainers to book so that candidates can practice the off road manoeuvres. To ensure that DSA meets it's legal responsibilities we need to arrange for a Site Access Manager to be in attendance on each occasion that the MMA is let for training. This ensures that the area is used properly and that someone is responsible for making sure that those who use the sites have a point of contact for problems and queries. By making advance bookings we can ensure that both a Site Access Manager is available and MMAs are available.

### Q.108 Why does the DSA find it so difficult to QA its own staff, and how does it hope to do this with an entire industry?

DSA has comprehensive quality assurance schemes for our examiners and for monitoring CBT instructors. Over 1000 CBT sessions were supervised last year.

#### Q.109 DSA claim to be experts at Training - Why don't they do any?

DSAs role is examination, ensuring that the right standards are developed and tested. There would clearly be huge commercial as well as legal issues in DSA also offering training.

Q.110 If I want to take a degree or any other qualification I have a choice of Examination boards. Why do the DSA hold a monopoly on examiners? In any other aspect of my business I have a choice of suppliers.

The motor vehicles driving licences regulations 1999 requires that driving tests are conducted by a person in the public service of the Crown appointed by the Secretary of State; This means a driving examiner employed by the Driving Standards Agency. Slightly different rules apply to some other groups of people, for example bus drivers or MOD personnel, who can be examined by other types of driving examiner but this is not an general option open to members of the public.

# Q.111 We keep talking about the industry (protecting itself, industry confidence & manufacturing concerns etc...) why aren't we talking about customer perceptions, confidence & fears?

Customer perceptions and fears are taken into consideration, and MCI is aware that at present, the motorcycle testing regime appears overly burdensome and complicated and that uncertainty about proposed changes is adding to customer fears. Customer confidence is easily damaged by a lack of communication/ actual knowledge of future proposals. Just knowing that the test is changing but not how, is not ideal and will do nothing to reduce customer concerns.

Trainers are often the first people that potential motorcyclists come into contact with, it was with this in mind that MCI offered to host the seminar and to invite every ATB to attend - to ensure that you, as first point of contact were well placed to answer questions from your customers. Giving you the facts firsthand, dispelling some of the rumours that we know are circulating and also providing the opportunity for you to voice your opinions directly to the decision makers, and ask questions of a variety of speakers will not be a universal cure, but should go some way to address these issues.

# Q.112 Is there a view to changing the road test to include more A class road riding instead of just city roads?

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## Q.113 Can we have a single manual online or paper covering all aspects of DSA / Trainers that both parties have to keep to?

The ATB Manual which gives guidance to trainers and the DT1 which provides guidance to examiners are available to both DSA examiners and trainers. The way we publish the information to trainers is currently under review and you should see the ATB Manual becoming more accessible soon.