

RESPONSE

to the Consultation Paper:

FITTING BLIND-SPOT MIRRORS ON EXISTING TRUCKS

In general, we are positively disposed towards the Consultation Paper. As far as it concerns the questions, our comments are as follow:

1. Do the benefits of retrofitting existing trucks built in or after 1998 outweigh the costs?

There is no additional data apart from what is provided by the Consultation Paper, so we are not in a position to have any doubts, as far as it concerns the benefit –cost analysis, which is presented in the Paper. What is asked for is if the cost of retrofitting blind spot mirrors on existing trucks is around 150 Euro, as it is stated.

2. Is the approach, including the discussion of alternative solutions, the correct one?

The position presented in the Paper is towards the right direction. Nevertheless, we consider that the a retrofitting installation of radar systems and camera systems is technically difficult and the relevant costs will go beyond the limits of 150 Euro, as it is stated in the Paper.

3. The Commission would be particularly interested in the manufacturers' views on the limitation of the scope of a retrofitting obligation to vehicles having European type-approval. Furthermore, it is interested in the percentage of HGV's which would be excluded from a retrofitting directive on the basis of this exclusion criterion.

There are no comments.

4. Do you have any other comments or questions?

There are no comments.