

Terberg Benschop B.V. .txt

From: Vos, Wim
Sent: mardi 16 mai 2006 12:28
To: TREN E3 CONSULTATION
Subject: PS "Blind spot" A/22199

Ladies and gentlemen,

Terberg Benschop B.V. is a Dutch manufacturer of special vehicles. Our product program contains Terberg FM-trucks (Gross Vehicle weight from 33 to 50 tons) equipped with Volvo FM-cab and Volvo engines. We produce ±120 FM-trucks per year and register them on the basis of National Type Approval for Holland or every now and then by means of an individual inspection in another Member state of the EU. As you know trucks in the Netherlands have been retrofitted with an additional external blind spot mirror.

Comment on your Consultation Paper 'Fitting Blind-Spot Mirrors on Existing Trucks' :

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

Yes they do. Because the costs of mounting an additional blind spot mirror can be quite low.

Also exchanging the mirror glasses, as the paper describes, sounds affordable.

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

As there are numerous different truck cabs over the years the approach of retrofitting must contain several alternative solutions.

3. Manufacturers' view on the limitation of the scope of a retrofitting obligation to vehicles having European Typeapproval.

First: The paper is not clear about the difference between vehicles having European Typeapproval and vehicles with mirror systems having European Typeapproval.

A vehicle with a European Typeapproval has mirrors according to 71/127/EC (or 2003/97/EC).

But a vehicle with a National Typeapproval can also have a mirror system according to this EC-Directive. (Our FM-trucks for example)

Therefore the scope should not be limited to 'vehicles having European Typeapproval' but to 'vehicles with mirror systems having European Typeapproval'.

Second: Let's not limit to those vehicles only. If an extra mirror can save a life, why not do it ?

Let's not reward the vehicles that have a mirror system without European Typeapproval.

4. Do you have any other comments or questions ?

Keep up the good work !

Kind regards,

Wim Vos
Typeapproval
Terberg Benschop B.V.
The Netherlands

internet www.terbergbenschop.nl