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### **Current UDM position relating to certification of modern special needs vehicles in New Zealand**

The LVVTA regulatory regime appears to have worked well for recreational builders of hot rods, vintage cars, and other vehicles that usually make a virtue of old technology.

On the other hand the straightforward and predictable nature of this regulatory regime is a major disadvantage for professional companies that would make New Zealand a cutting edge exporter of automotive technology.

For example, epoxy bonded aluminium honeycomb is a high performance material (Wikipedia quote “strongest material by weight known to man!”) that is currently used in the race/performance car, aeronautical and space exploration industries. The bonding system used is a chemical process that results in a permanent bond, stronger than equivalent weld material, with much larger contact surface area and resulting strength. The LVVTA, which relies on conventional 1900’s technology, describe this as “gluing together office cubicle dividers with panel glue!”

Who is right? A report by Dr Battley, Director of the Centre for Advanced Composite Materials from the University of Auckland, who found that UDM’s design and construction, is more than strong enough for the design purpose. The LVVTA has a place, but it is not in the analysis and certification of cutting edge technology used in commercial automotive manufacturing operations.

A trades qualified opinion based system cannot provide an appropriate certification process capable of dealing with complex, modern, safe, reliable, commercially manufactured vehicles taking advantage of new materials and emerging technology. These vehicles are required to meet international safety standards which are automatically accepted, and by far the largest volume of vehicles on New Zealand roads.

The ignorance and stubborn refusal by the LVVTA to engage appropriate engineering expertise as required by their own charter, has caused huge harm to UDM’s domestic and international export efforts. After 2 years of being marginalized by an LVVTA system unable to read an epoxy bonding strength label, nor calculate a Composite honeycomb panel manufacturers load chart, nor measure rear suspension bump steer, UDM has lost patience with the misplaced “Safety” excuse continually relied upon by NZTA to explain the incompetent engineering analysis and actions of its certifying agency.

Safety has not been an issue with the exported UDM cars, now into their 4th year of operation, nor with the New Zealand cars wrongfully removed from the road and then reinstated, including a write off accident where the UDM car functioned as required of its design. The UDM car is gaining an excellent reputation for reliability, especially in relation to its world leading automated access systems, and to date there has been no measurable deterioration in any of its structural or mechanical functions. CEO

Tony Johnson's self serving statements and the actions of his staff fuelling this travesty, need to be sidelined and dealt with separately. The UDM vehicle has been internationally recognized for its design build quality and the unique service it provides. The European market cars have completed all ECE/EU compliance test requirements and operate in a far higher stress and handling related environment than the same domestic NZ market cars which rarely exceed speeds of 100kph. The LVVTA's "Safety" scapegoat and its related micro detailed finger pointing has been exposed for what it was by the NZTA's own qualified experts report, and will be seen as such by any independent review.

It is obvious that the LVVTA does not have the ability, nor desire, to operate an appropriate International standards based system needed to support UDM and any other innovative New Zealand automotive company involved in design, manufacturing and technology based efforts to produce market niche or social needs products. The organisation's mantra and track record clearly demonstrate that asking such an organization to take on any role other than hobby cars is a disservice to the Government's stated objective to encourage hi-tech innovative industry, as well as a disservice to the many disadvantaged New Zealand citizens needing mobility freedom.

The current LVV system is neither transparent, nor accountable. It must be taken out of this role, which it annexed by default, and an appropriate standards based system put in its place that cannot be manipulated.

In the meantime all UDM vehicles need to be reinstated with the original certification immediately, and an independent enquiry launched to investigate how to put in place a satisfactory, modern standards based Internationally recognized certification system for all NZ based commercial manufacturers, that genuinely supports road safety, and facilitates entry to a growing export market requirement for diversification currently supported by government for the benefit of all New Zealanders.