

Scoping report for review of the LVV certification system

13 October 2015

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Purpose

The objective of this scoping phase of the Low Volume Vehicle (LVV) Review is to understand the sector's perspective of the LVV system. Specifically the aim of this report is to capture the elements of the LVV system which are working well and those that are not working effectively.

Background

Standards New Zealand entered into an agreement with the New Zealand Transport Agency to undertake the scoping phase of a review of the Low Volume Vehicle (LVV) certification system. Standards New Zealand facilitated the scoping phase and worked collaboratively with New Zealand Transport Agency and industry representatives to gain an understanding of the elements that are working well (the 'positives') and those that are not working effectively (the 'pain points'). The outcome of this scoping phase will inform the New Zealand Transport Agency in considering the next steps.

We developed a survey and distributed this to LVV system participants; we subsequently collated and categorised the feedback and identified high-level themes and priorities.

Process

Standards New Zealand met with subject matter experts at the New Zealand Transport Agency, and industry representatives to gain an understanding of the LVV system sufficient to prepare the draft LVV questionnaire. This draft was further developed and refined through meetings and email exchanges between New Zealand Transport Agency and Standards New Zealand.

The survey recruitment process followed by Standards New Zealand was to collate the contact details of individuals and groups from a range of sources to produce email distribution lists of survey participants. These sources included:

- contact details for companies (key contacts) and individuals supplied by the New Zealand Transport Agency
- contact details for key contacts within LVVTA member organisations
- individuals contacting Standards New Zealand directly.

We canvassed interest groups and organisations by contacting the key contact persons within the nominated interest groups, businesses, and agencies and requesting that they should circulate the survey to up to 50 interested parties within their organisations. The survey was distributed to the identified groups and individuals by email on 5 August 2015 and the key contacts were contacted individually by phone to ensure they had received the email.

Through the survey period Standards New Zealand responded to a number of requests for information on the questionnaire and the survey process. The survey closed on Wednesday 19 August 2015.

This report includes the survey results and the high-level themes and priorities from participants' comments.

Survey response level

1102 people started the online survey

828 completed all questions

274 dropped out before completing all questions

High-level themes and priorities

The comments received were reviewed to identify the key themes and priorities. These are presented below for 'home hobbyists' and for 'other respondents'.

Home hobbyists

The 'home hobbyists' were a large group (58% of the respondents) and there were sufficient comments to be able to identify several key priorities important to this interest group.

- There was a high level of dissatisfaction with the need to go through a full re-certification process (and incur the additional cost) when a minor change was made to the vehicle. Respondents would like to see a process which would certify the change as an add-on to the current certification.
- The cost of the certification process for a vehicle was seen as being too expensive. N.B. some of these comments are associated with the need to do a full re-certification rather than certify the changed components.
- The LVV system is seen as not being representative of the needs of enthusiasts of Japanese cars.

Other respondents

The key themes/priorities for groups other than 'home hobbyists' have not been broken down by role as the number of respondents in each role is relatively small. However, there were several identifiable themes across these groups.

These priorities were in the following areas.

- Consistency
- Type approval and accreditation
- Documentation

Consistency

Respondents reported on a lack of consistency in the interpretation of the standards. In particular:

- the way LVVTA interpreted the standards
- the need for greater consistency between certifiers and LVVTA
- the need for greater consistency between the views/decisions of individual certifiers.

Type approval and accreditation

Businesses undertaking a number of vehicle modifications found the LVVTA system not well suited to commercial certification volumes and would like alternative approaches to be investigated. These included for example, type approval of modification designs, or accreditation of specific businesses to approve certification by a suitably qualified person.

Documentation

The Hobby Car Manual was viewed as being:

- too focused on hot-rods
- too prescriptive and not allowing alternative approaches
- too complex and not always clear.

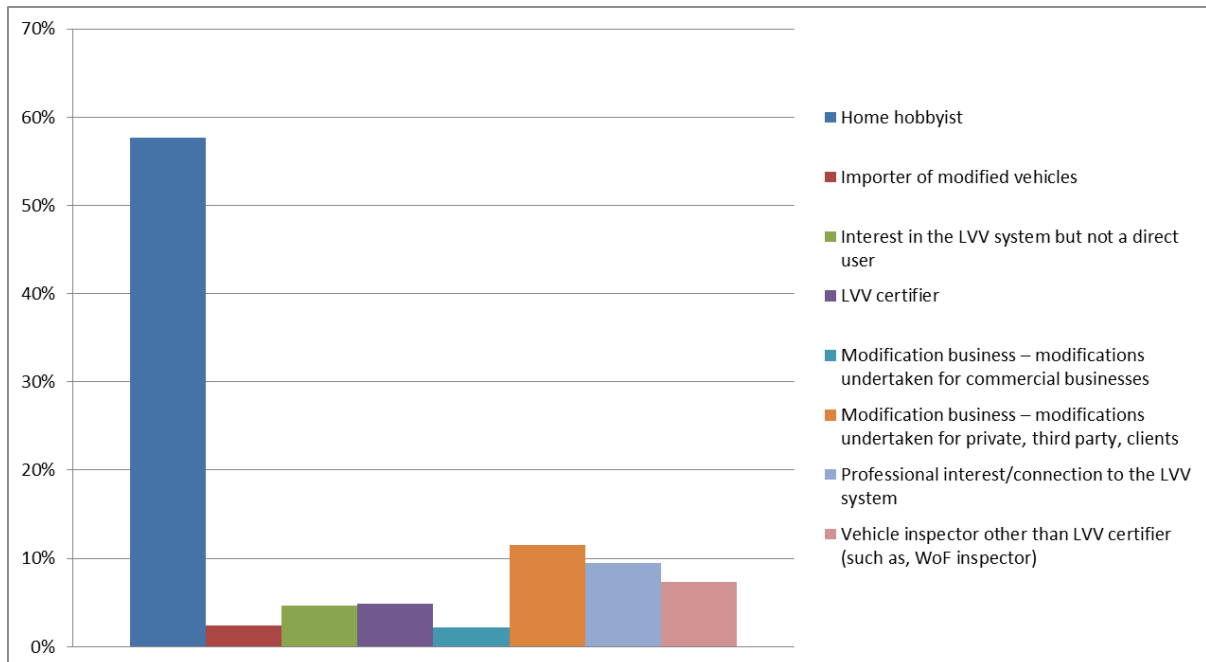
N.B. Graphs below have been prepared by NZ Transport Agency from data collected by Standards New Zealand.

LVV survey results

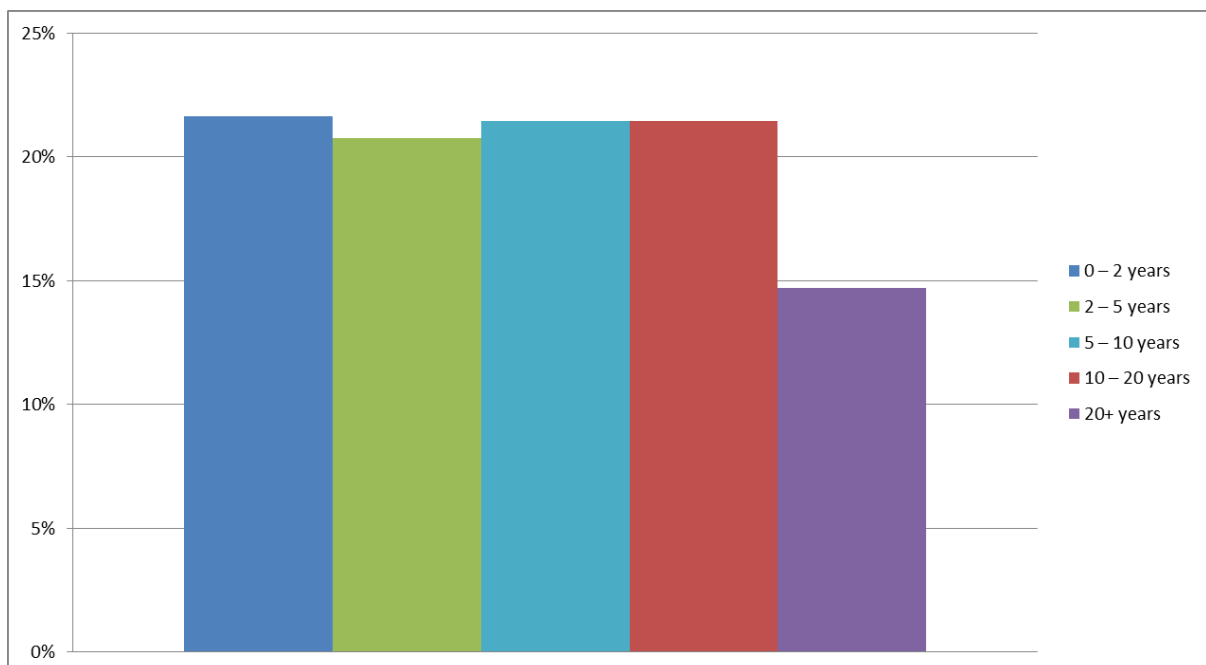
Response demographics

The following graphs show the demographic information of the respondents to the survey.

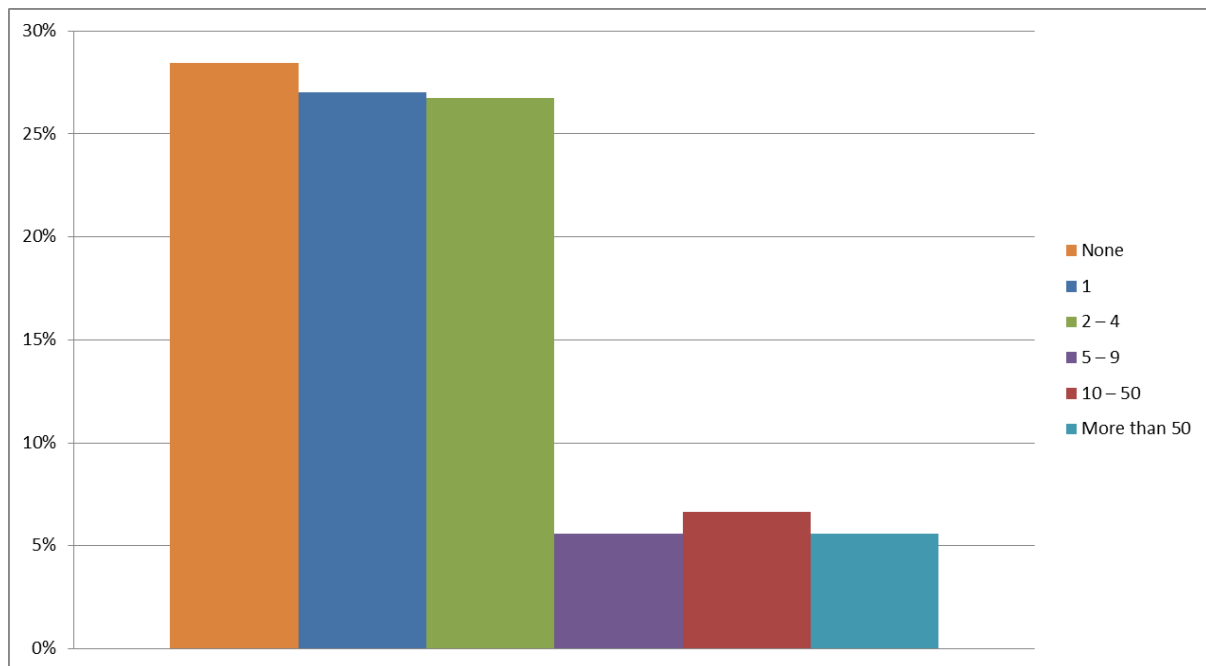
Role in industry



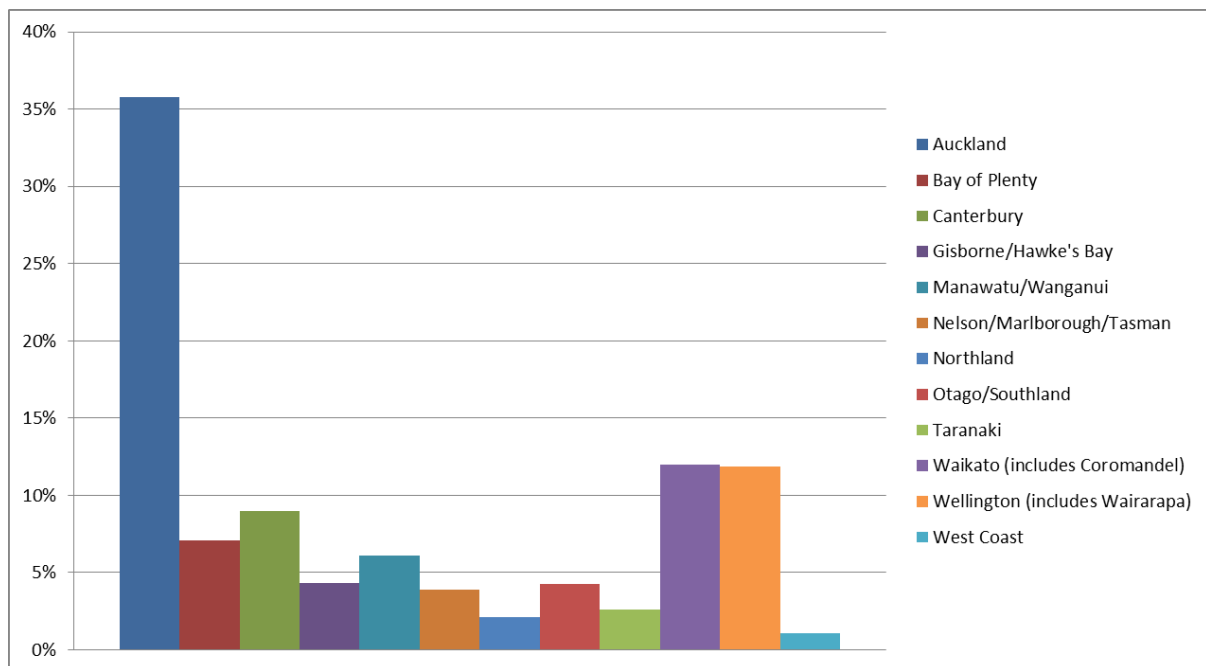
Years of involvement



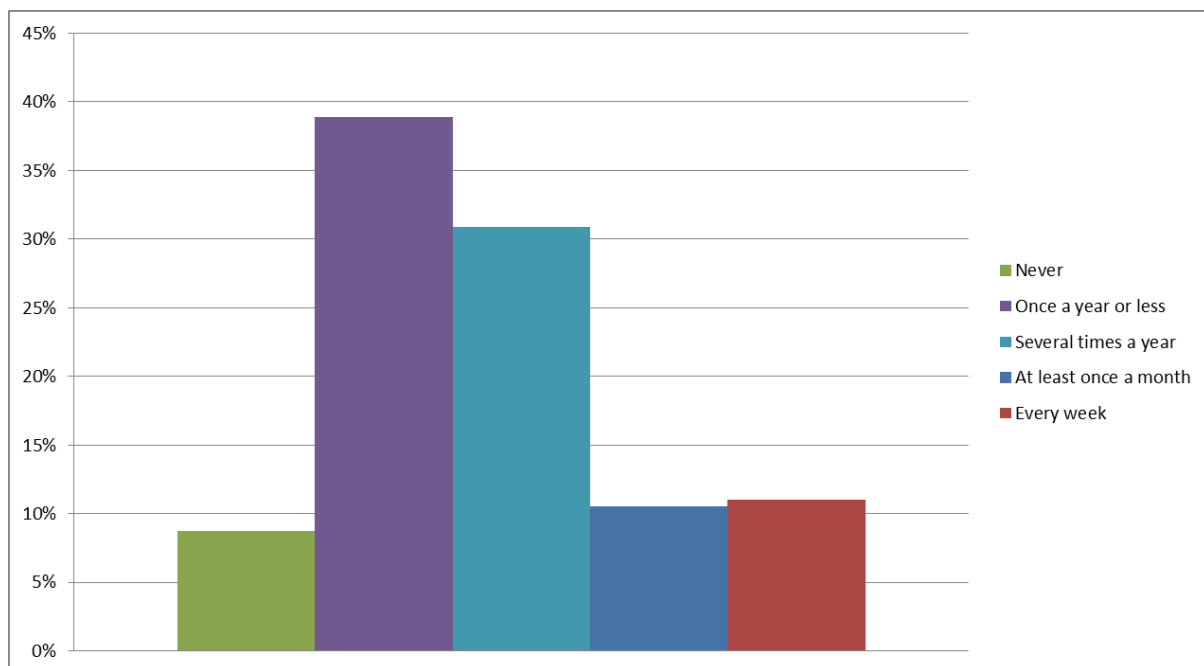
Number of vehicles certified in the last 5 years



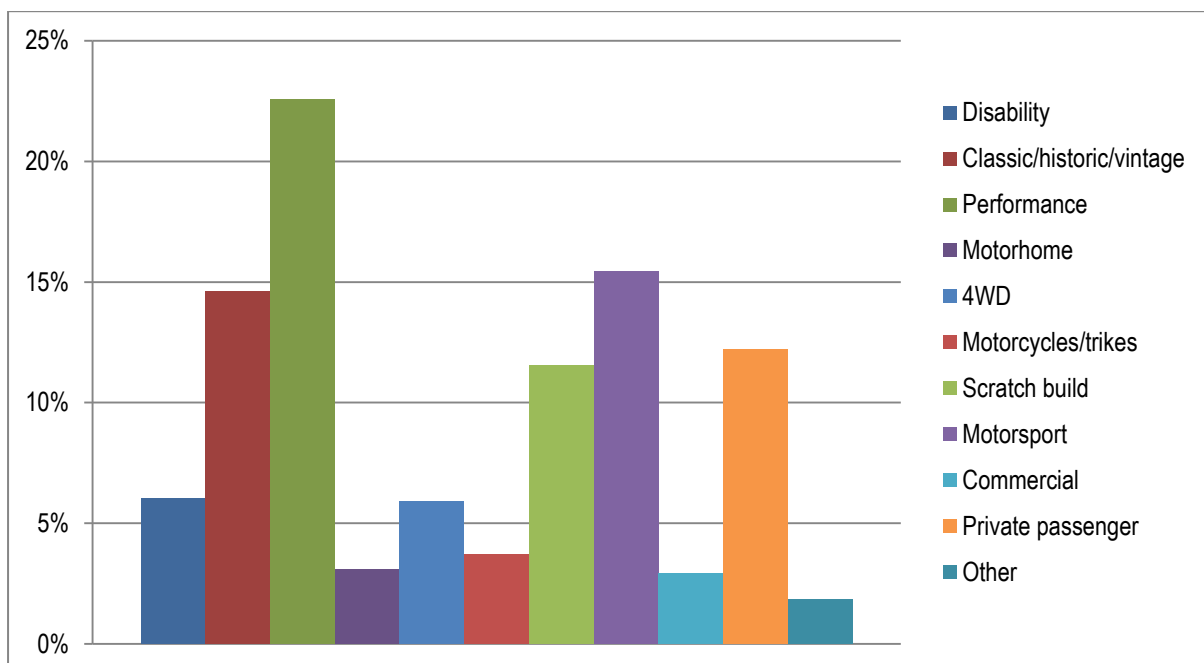
Geographic location



Frequency of interaction



Area of LVV interest

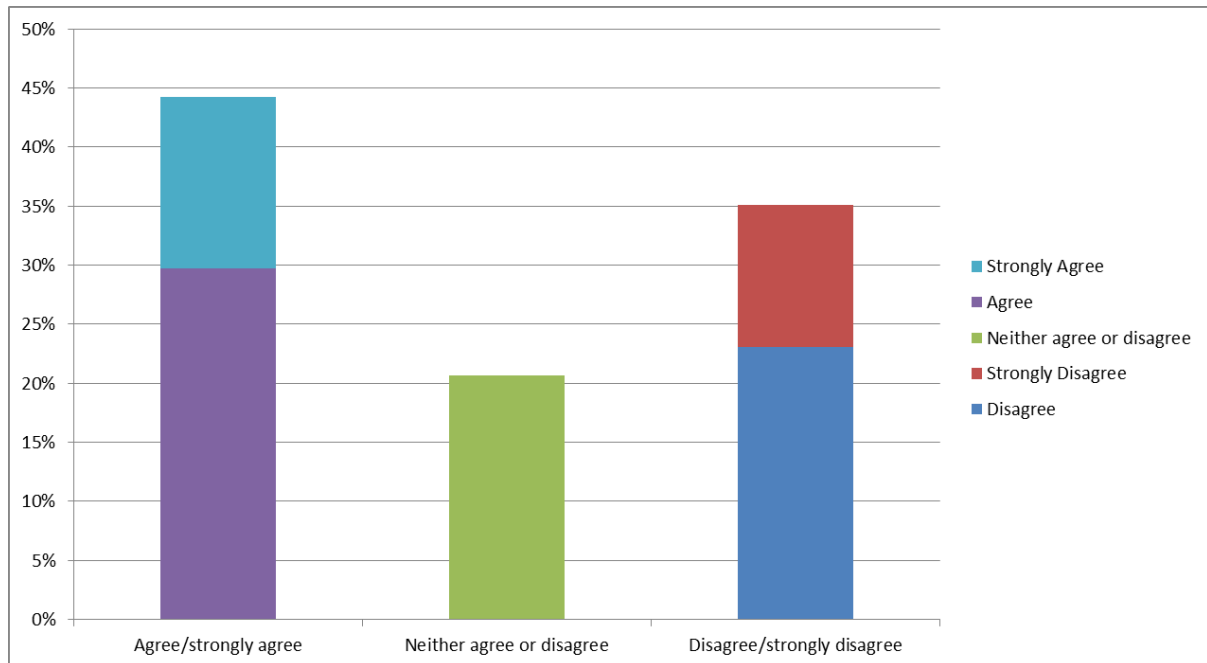


N.B.

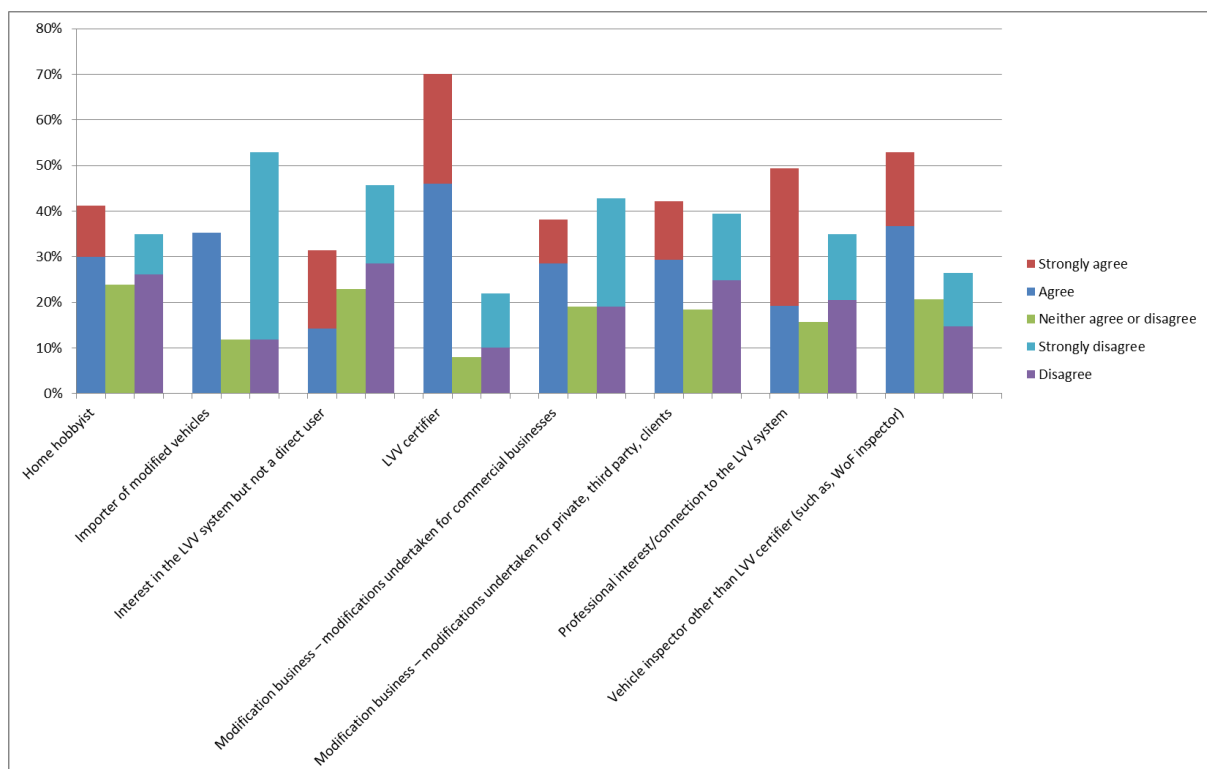
In the comments sections below there were often a relatively small number of respondents commenting within some categories. It was also not always possible to group comments into themes particularly when there was a wide range of disparate views. In these cases respondents' comments have been included where these are representative of responses (comments may have been paraphrased for brevity and clarity).

Overall satisfaction

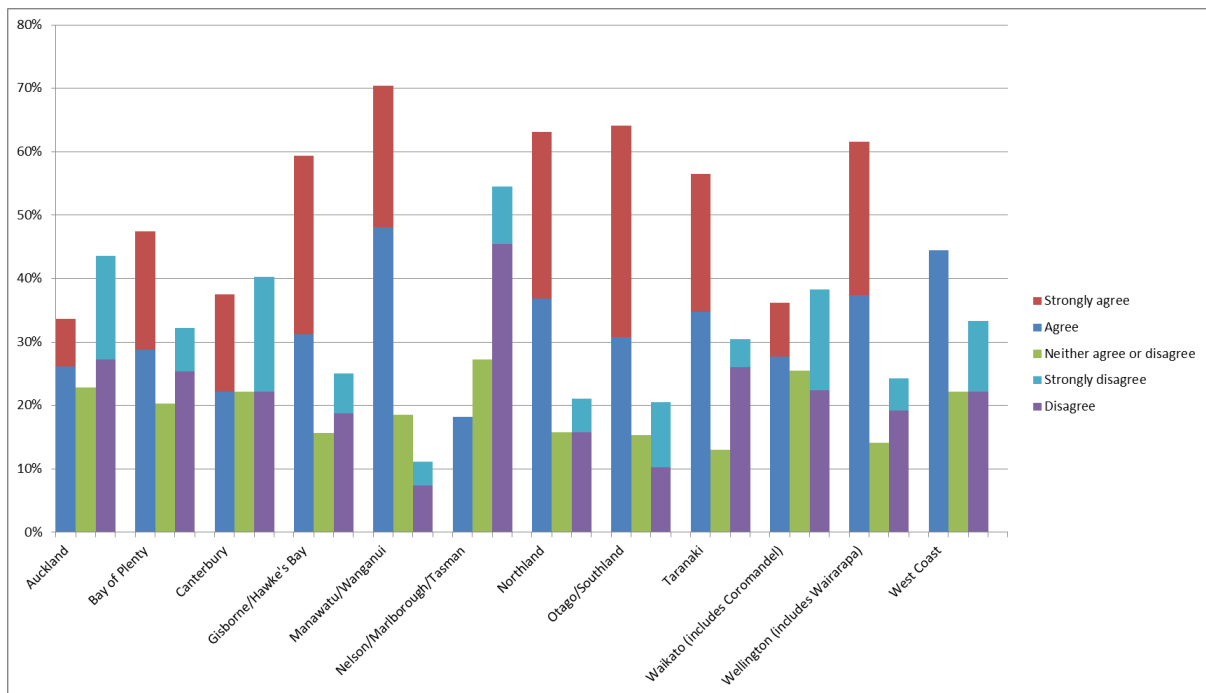
Overall I am satisfied with the LVV certification system



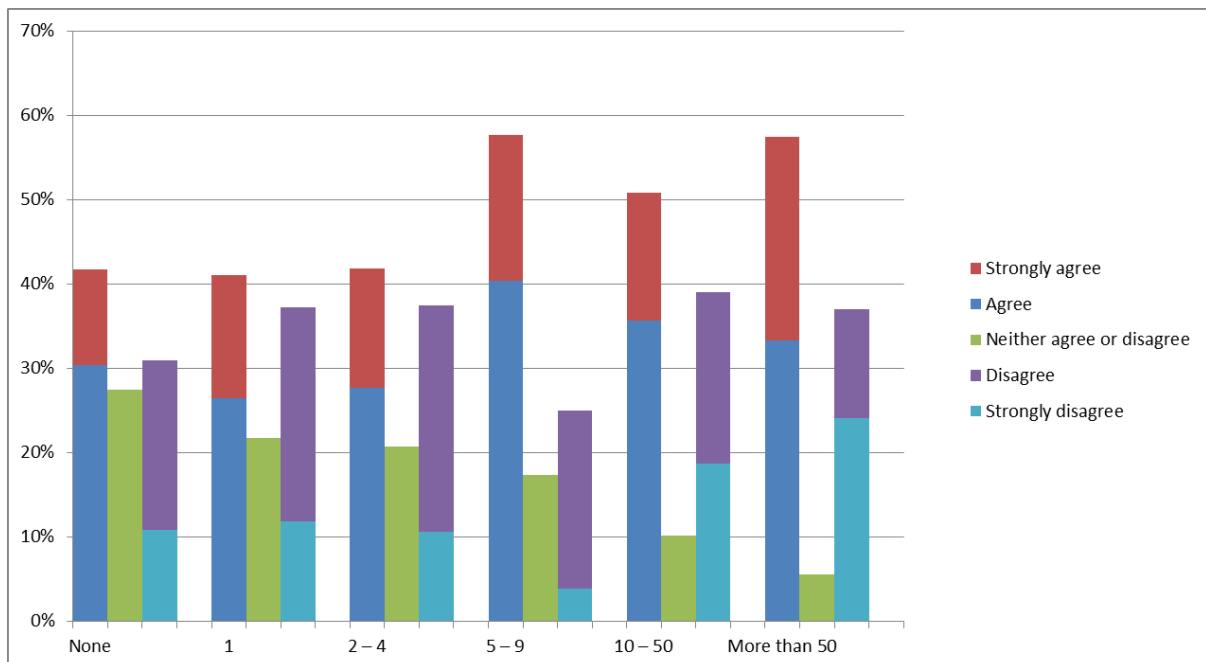
Overall satisfaction – role in industry



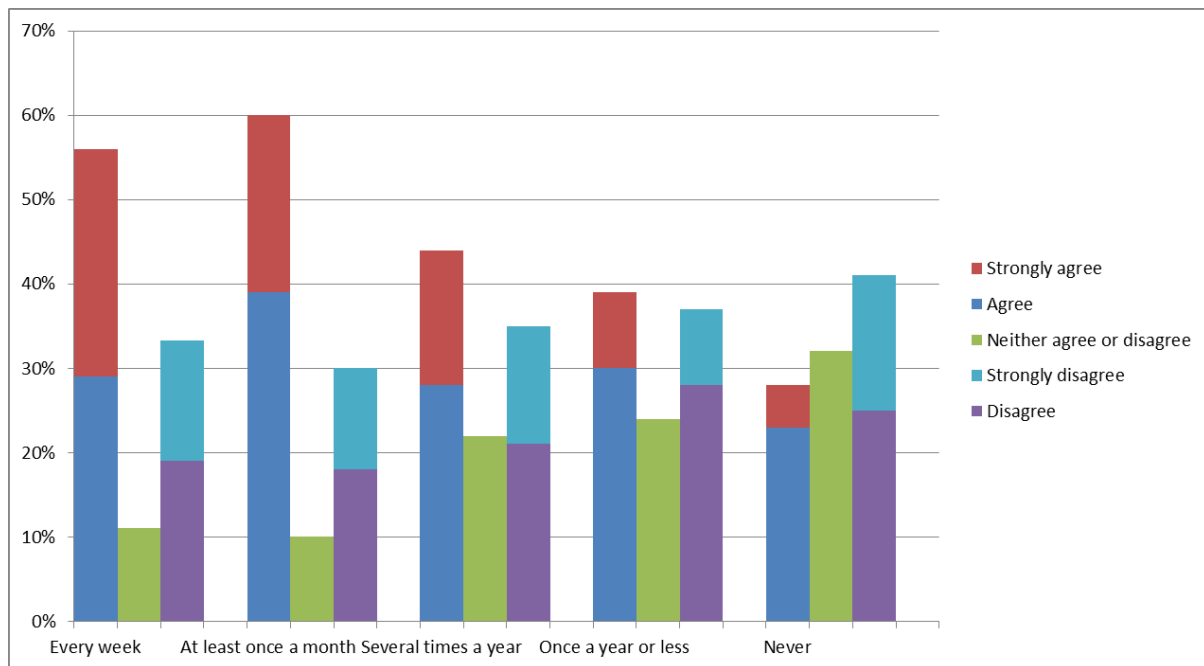
Overall satisfaction - % within region



Overall satisfaction – number of vehicles certified



Overall satisfaction – frequency of interactions



Overall satisfaction (192 comments)

The high-level summary of comments below is categorised by 'role in industry' as identified by the respondent.

Home hobbyist (83 comments)

- 15 respondents were of the opinion that it should not be necessary to get a full re-certification for subsequent minor modifications.
- 15 respondents said they were satisfied/very satisfied with the current system.
- 9 respondents described the system as flawed (mentioning more than minor problems).
- 8 respondents thought the certification process was too expensive (this is in addition to those respondents above referring to the cost of re-certifying).
- 3 respondents said the system was out of touch/not representative of Japanese car enthusiasts.

Interest in the LVV system but not a direct user (9 comments)

Individual/representative comments included the following.

- The system has some very good and well intentioned people at LVVTA and TAC. However, there is little customer focus on urgency at all levels.
- Members of the disabled community feel they have been disadvantaged.
- Too expensive.
- Many items that are certified are items that should not even need it.

LVV certifier (21 comments)

Individual/representative comments included the following.

- I strongly support LVVTA and would not like to see its system diminished.
- LVV system needs to be more proactive and consistent with training and standard moderating for certifiers.
- Overall yes [satisfied]. Anything so complex has to have some issues.
- We are lucky to have a system in place to allow us to modify issues.
- It is a great system, going through 'post-puberty' growth spurt, and struggling with the increasing demands placed on it.
- The LVV system is very good, but LVV staff regularly impose requirements on certifiers that are not in the LVV standards or HCM.
- In relation to hobby cars the system seems to work ok. In terms of commercially modified, especially vehicles modified for the disability sector, it has totally failed on many occasions.

Modification business – modifications undertaken for commercial business (8 comments)

Individual/representative comments included the following.

- Just doesn't suit cars built for motorsport.
- It has and does perform extremely well.
- The system is not fit for any volume processing. For one-off vehicles it is fine.
- Improvements could be made for commercial users of the LVVTA.

Modification business – modifications undertaken for 3rd party clients (33 comments)

Individual/representative comments included the following.

- Standards vary and some are more helpful than others.
- I have no confidence in the current LVV system.
- The LVVTA and certifiers have always been helpful and we have no issues working within these standards.
- The certification process is not meeting the needs of the disabled community.
- Too heavily influenced by hot rod mentality and thinking.
- It is a good system but there is confusion and contradiction.
- The LVV system is great but has a few main flaws.
- Some sort of certification process would be good for a vehicle that is constantly being modified and evolving.
- Overall I am happy we have this system in NZ.

Professional interest/connection to the LVV system (26 comments)

Individual/representative comments included the following.

- Cost of certification is too costly.
- The system is very much directed at installers not the end user.
- With technology changes they are truly behind the times.
- Over my 20 years in the disability industry I have seen the system go from strength to strength.
- This is an adaptable, technically adept, responsive body.
- All my interactions with LVV have had a perfect outcome.
- Needs a modern hobby guide that isn't hot-rods.
- The system works well covers a lot of ground, and overall provides a far higher level of safety than we had 25 years ago.
- NZ LVV Certification is a world-class system.

Vehicle inspector other than LVV certifier (9 comments)

Individual/representative comments included the following.

- A good system to keep a check on standards being applied consistently and recorded on a plate.
- Certifiers need to be unbiased in their opinion towards Japanese vehicles and some are not.
- Time-consuming and confusing.
- LVV system is far from perfect but certainly far from broken.

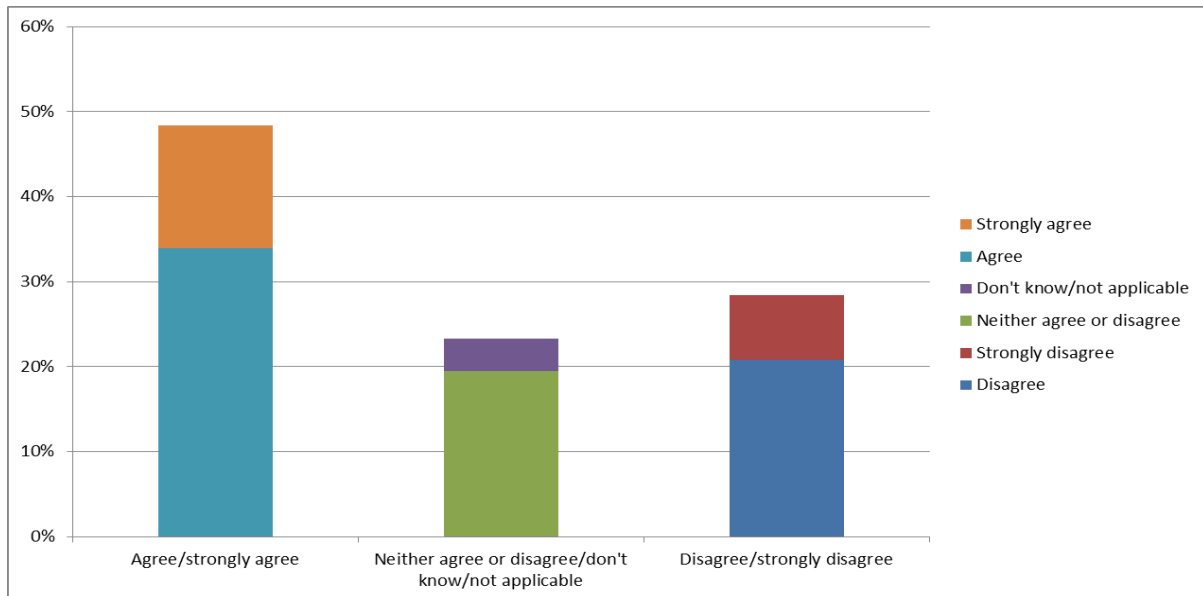
Importer of modified vehicles (3 comments)

Individual/representative comment included the following.

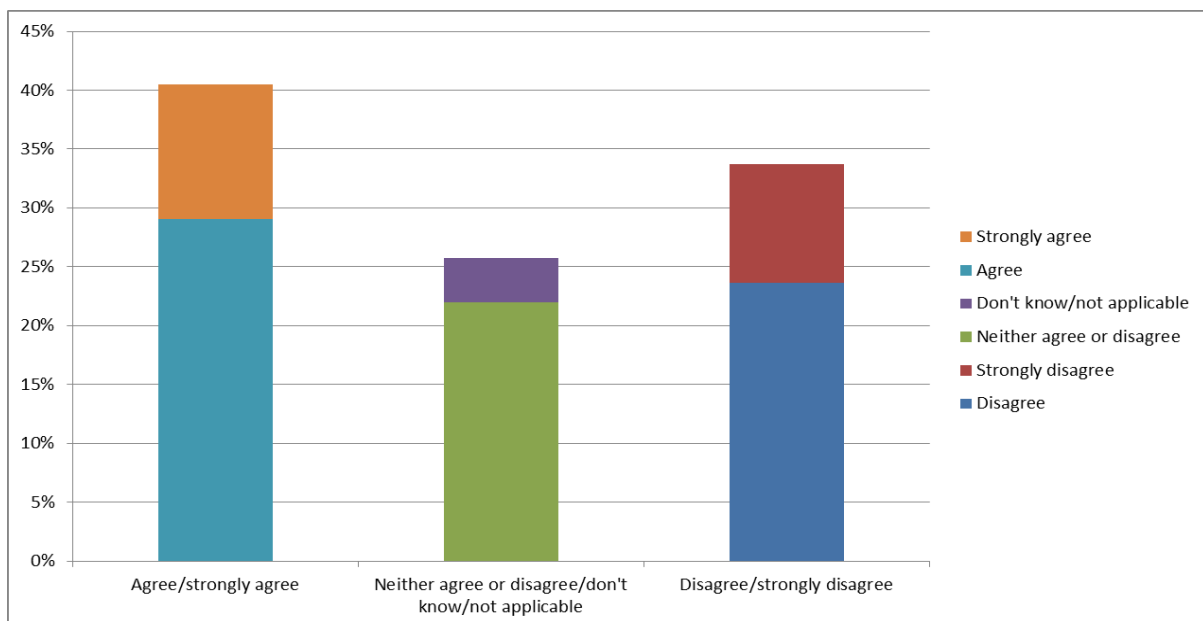
- It is apparent that the LVVTA is not suitable for commercial levels of certification required.

Processes and documentation

It is easy for me to understand which technical requirements I need to meet



The overall LVV certification is easy to follow

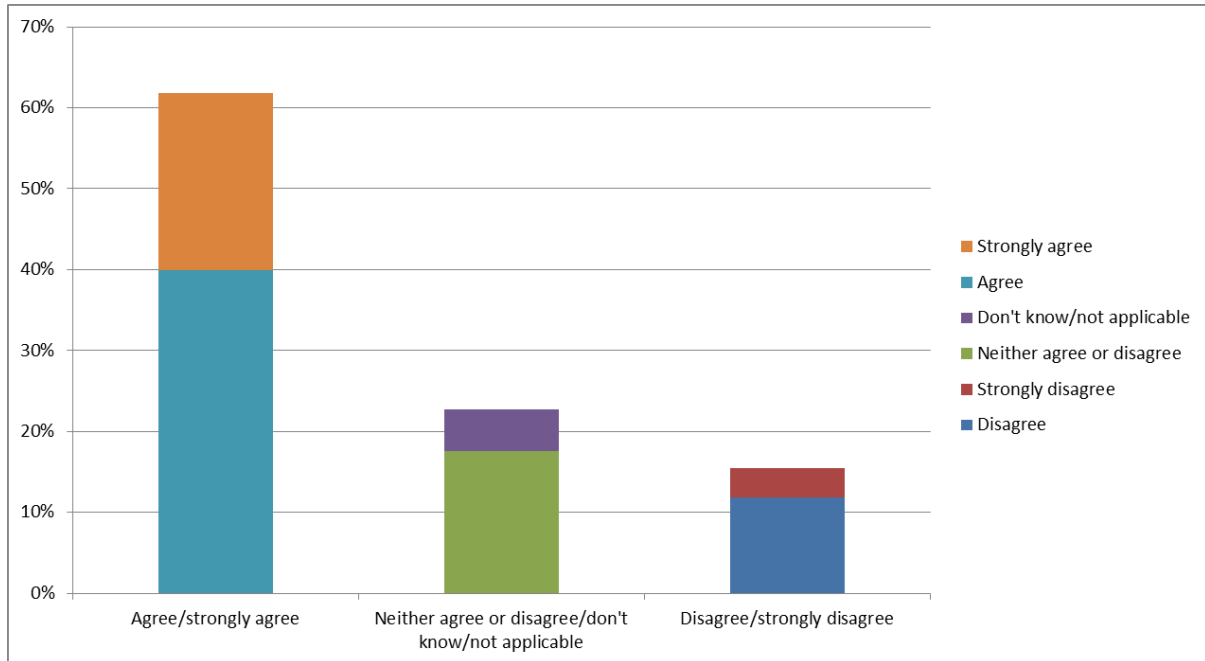


Process and documentation (158 comments)

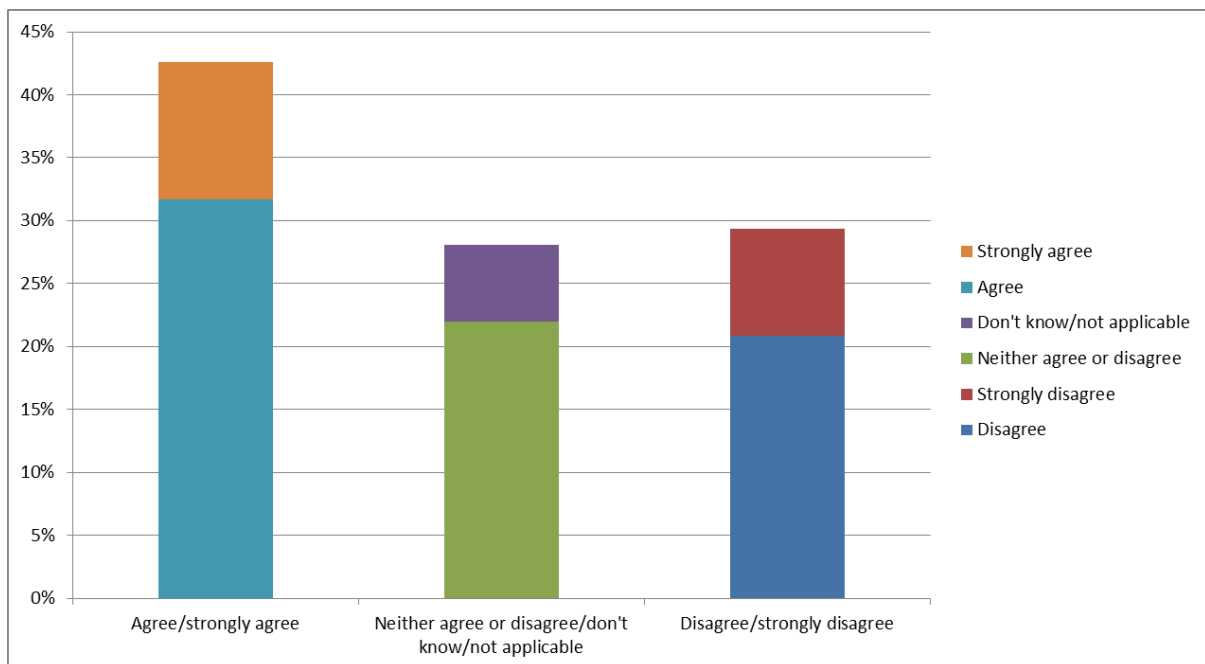
- 22 respondents said rules are open to interpretation and may be and there is inconsistency in the way they are interpreted by individual certifiers and by LVVTA.
- 15 respondents said parts of the process/documentation are not easy to follow.
- 9 respondents commented that certifiers were very helpful in guiding people through the process.
- 6 respondents said requirements change often and without notice.
- 6 respondents said the documentation not always easily accessible.

Certifiers

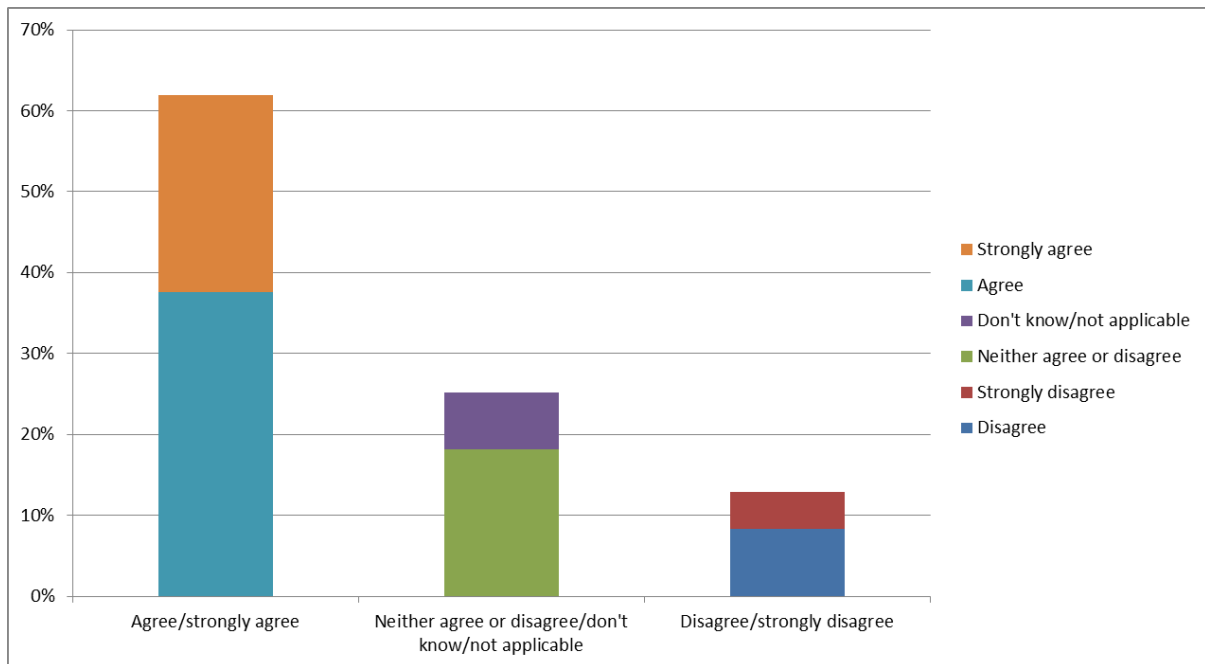
LVV certifiers are sufficiently competent



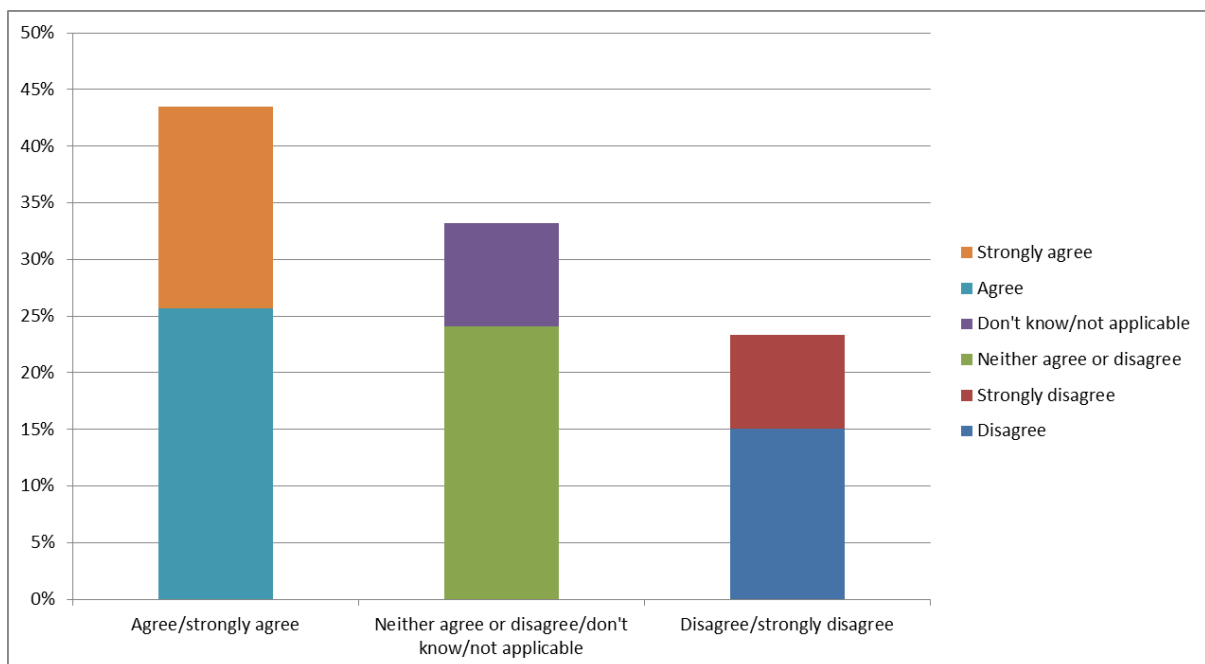
LVV certifiers provide a prompt service



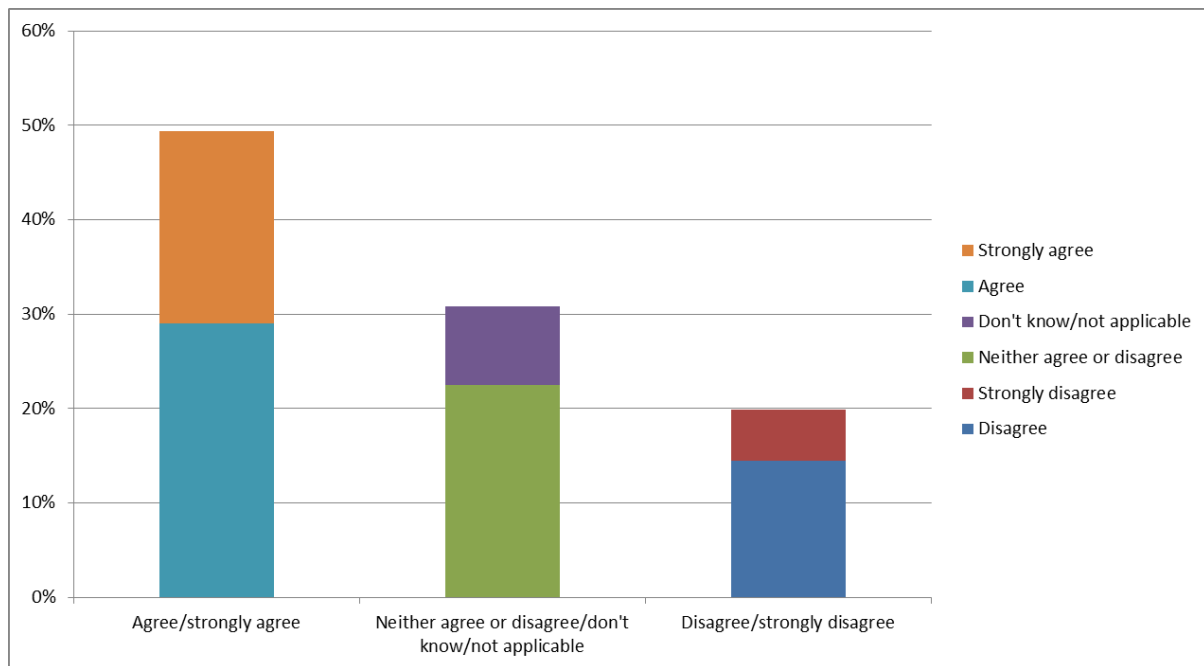
LVV certifiers provide helpful advice to ensure my modifications can be made within safety standards



I have confidence in the process for appointment of certifiers



Certifiers add value by guiding me through the certification process



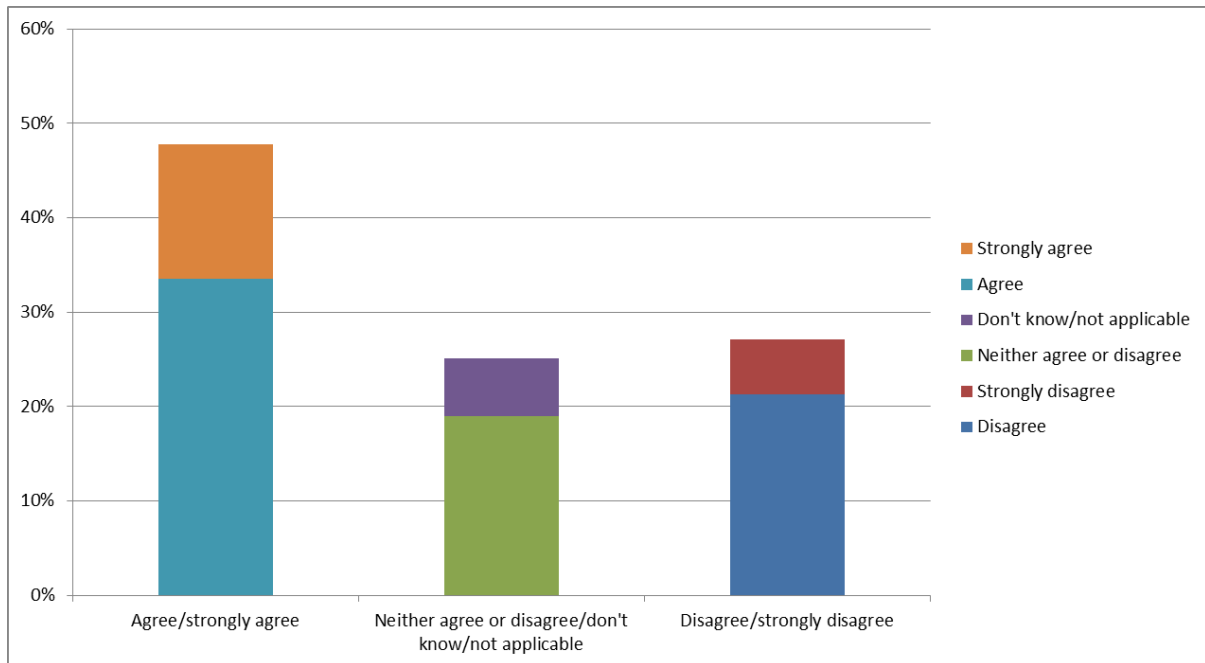
Certifiers (147 comments)

The majority of comments referred to experiences with specific certifiers. Comments were polarised.

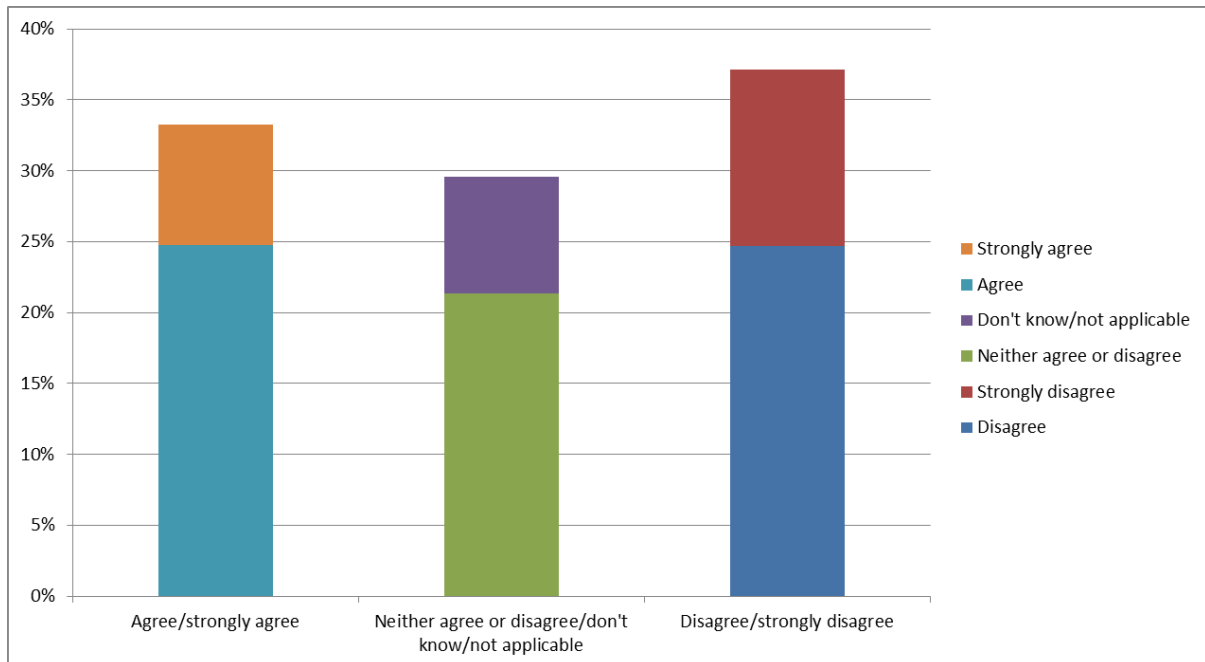
- 12 respondents said there was a shortage of certifiers
- 2 respondents said there was a shortage of certifiers for disability modifications

LVV categories and certifier accessibility

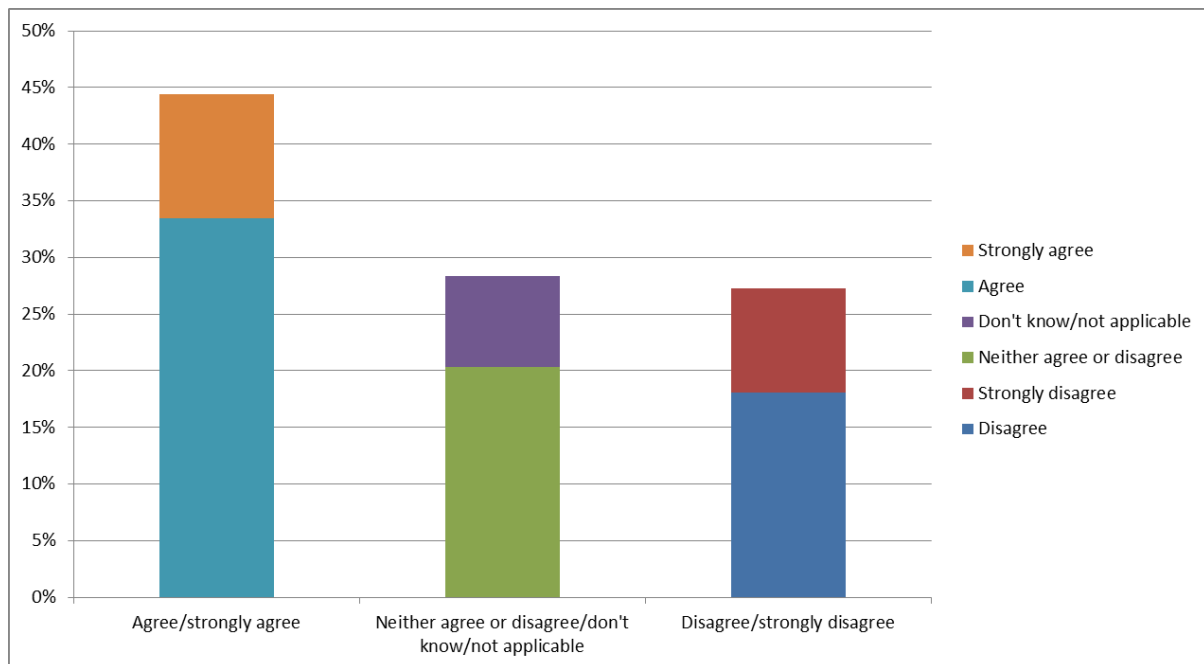
It is easy to identify which certifier I need to approach to certify my vehicle



I can access an LVV certifier to examine my vehicle with minimal delay



I am able to access LVV certifier(s) for all categories I require within reasonable travel distance

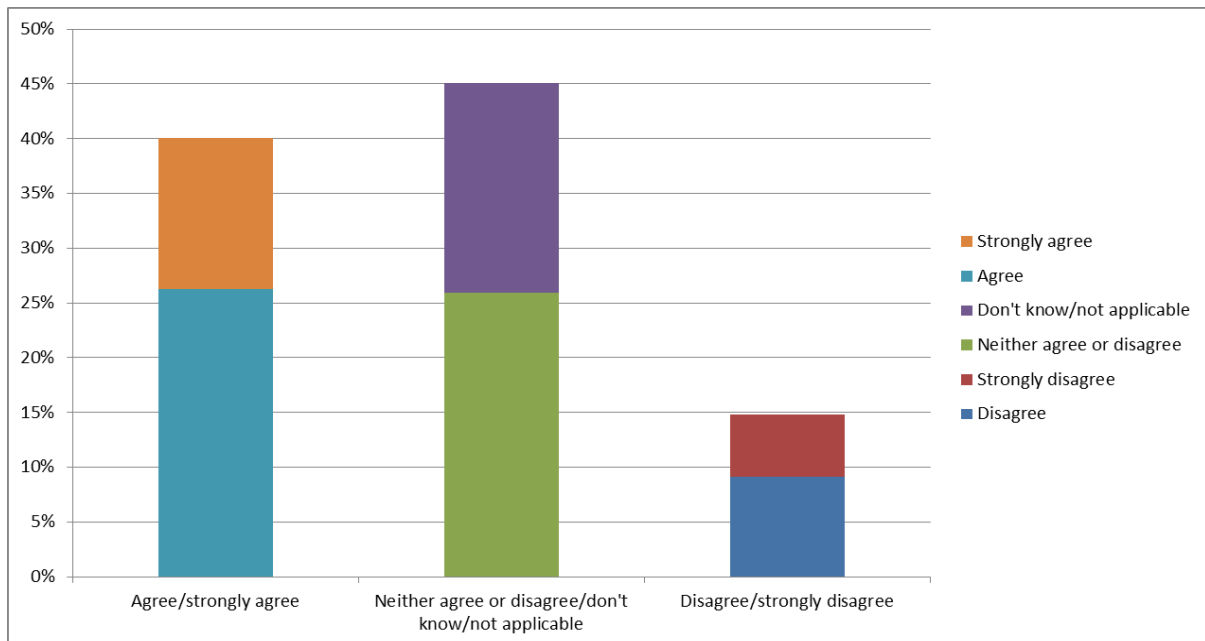


LVV categories and certifier accessibility (109 comments)

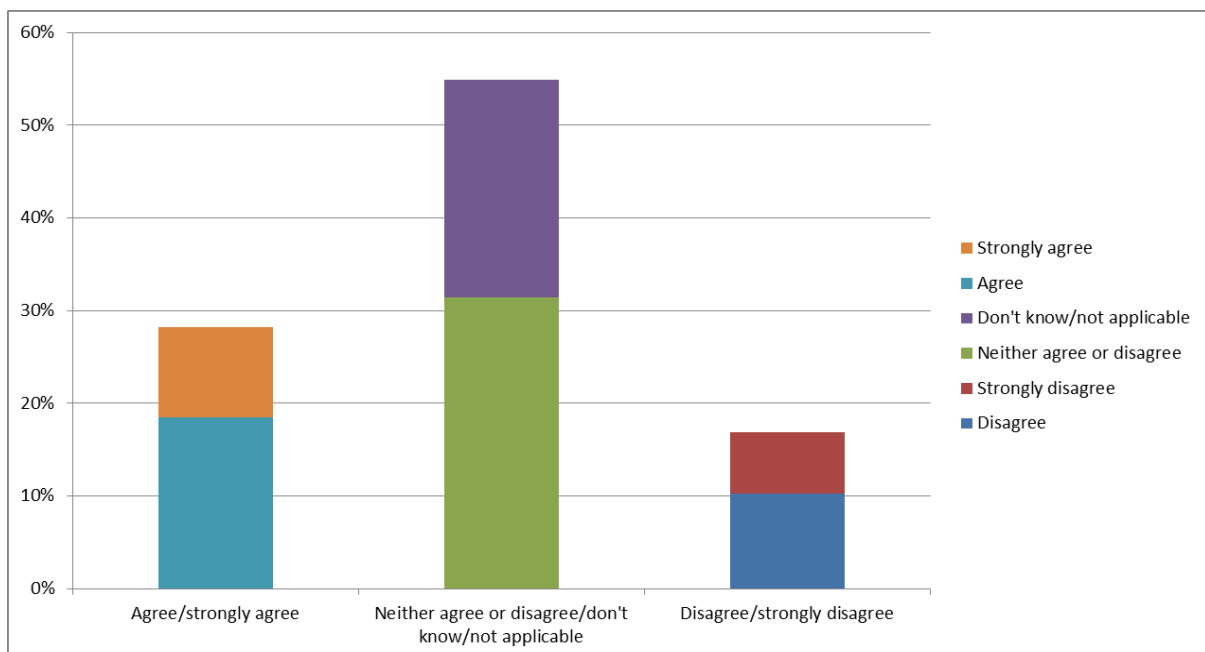
Comments related to the specific experiences in respondents within their geographic area and could not be summarised.

Technical advisory committee

The Technical Advisory Committee (TAC) is an appropriate way to handle specialist questions not adequately covered in the LVV Standards



The TAC functions effectively in responding to specialist queries

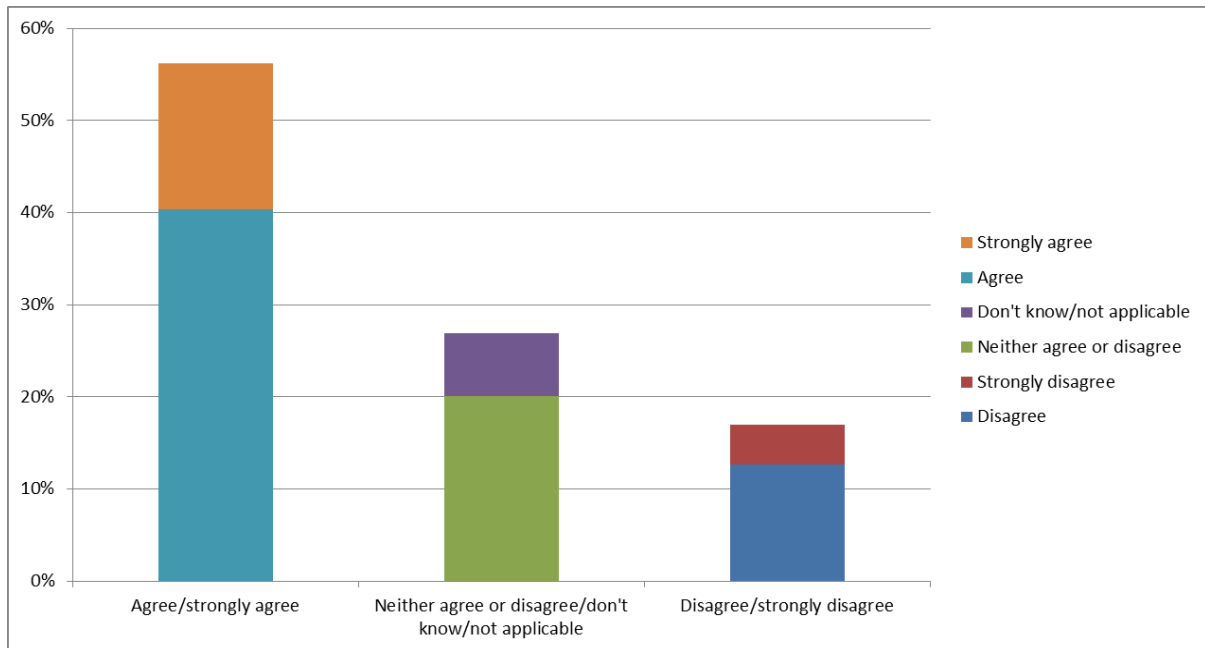


TAC (118 comments)

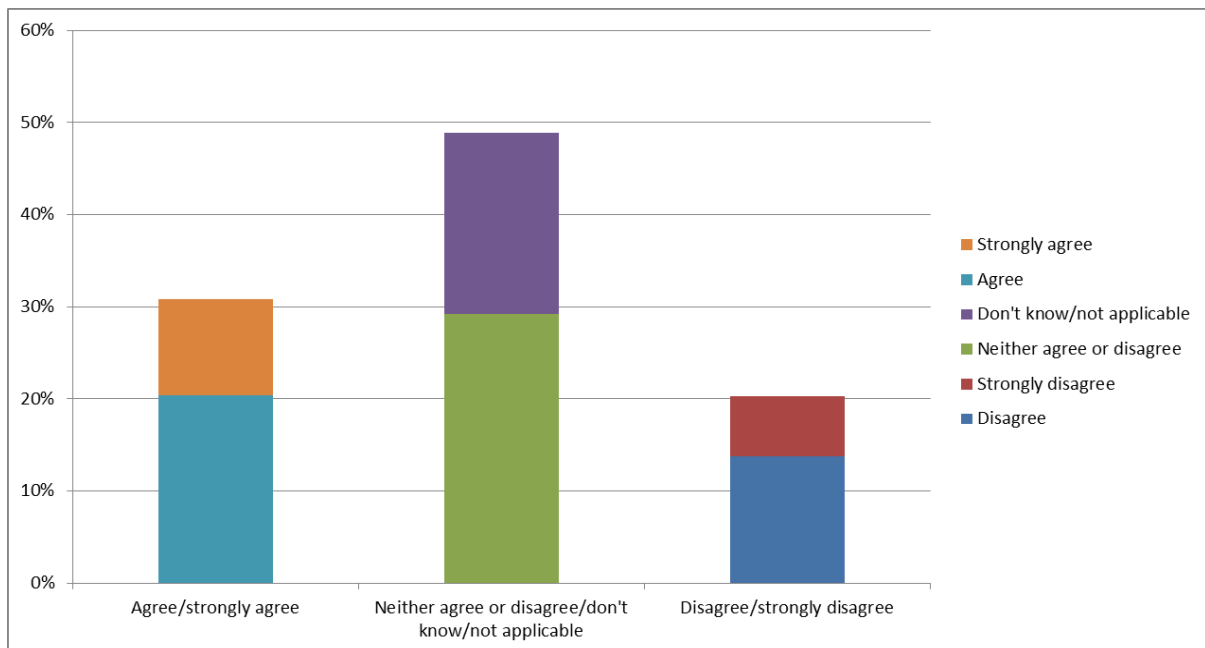
- Over 20 respondents stated they had no knowledge of the TAC
- 14 respondents said it took a long time to get a response
- 6 respondents commented on the lack of knowledge of disability modifications

Application of low volume vehicle requirements

The LVV certifiers apply the LVV standards appropriately



The TAC fairly assesses alternative approaches and designs that meet the intended outcome



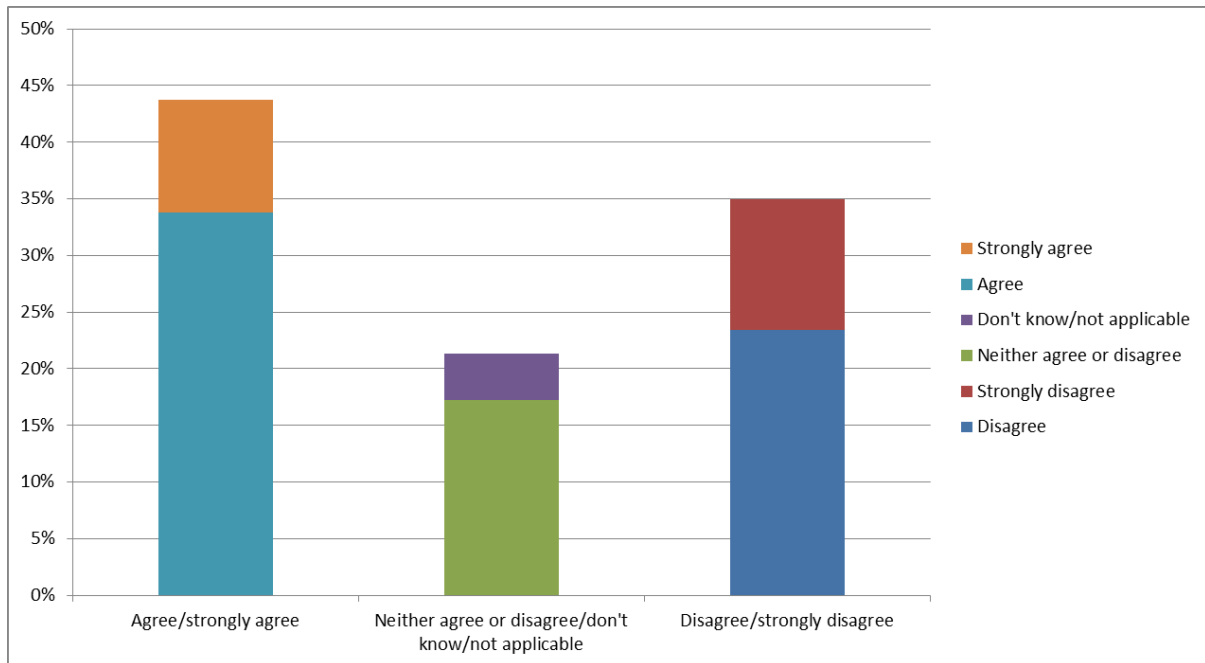
Application of LVV requirements (92 comments)

The comments in this area were highly diverse and it was difficult to identify common themes. The following themes were noted by between 3 and 6 respondents:

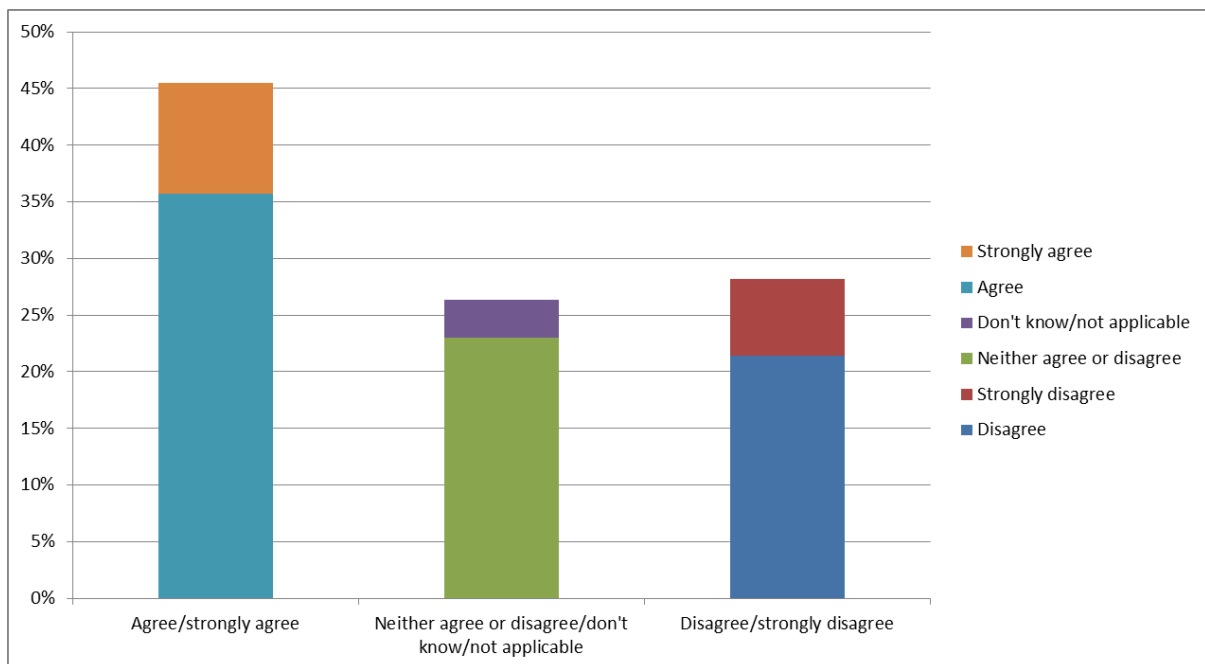
- lack of common sense in application of requirements
- too dependent on what is in the Hobby Car Manual
- not responsive to trends or new technology

LVV standards: fitness for purpose

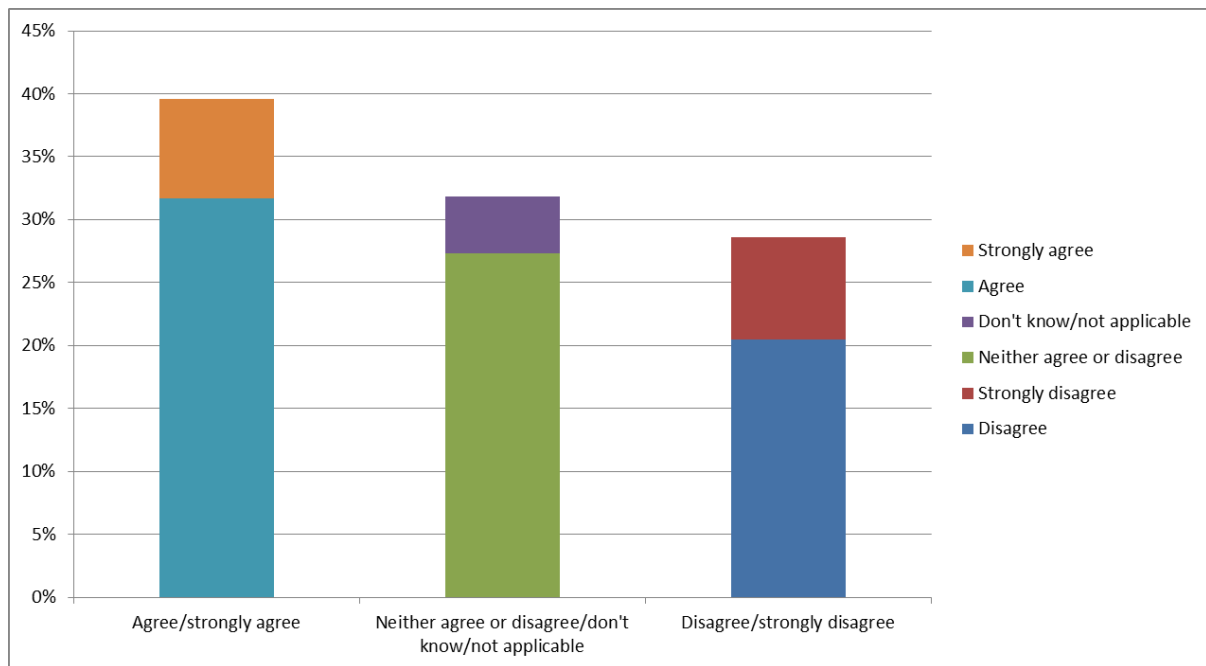
The LVV standards maintain relevancy with vehicle modification trends



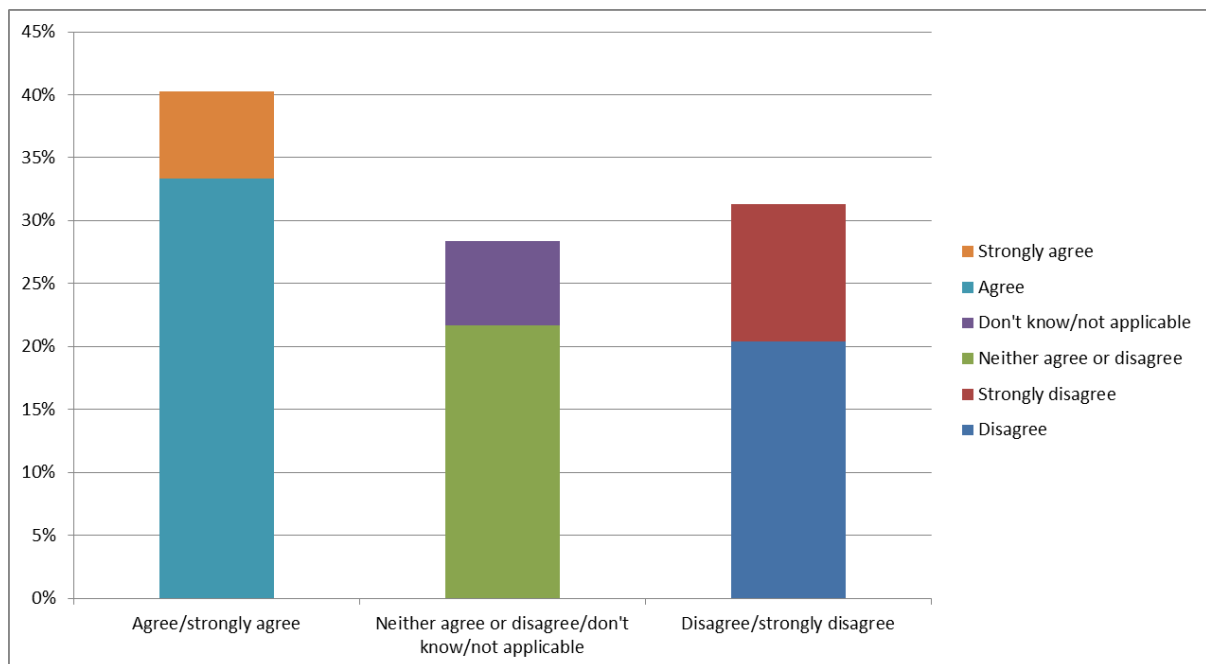
The LVV standards are easy to understand



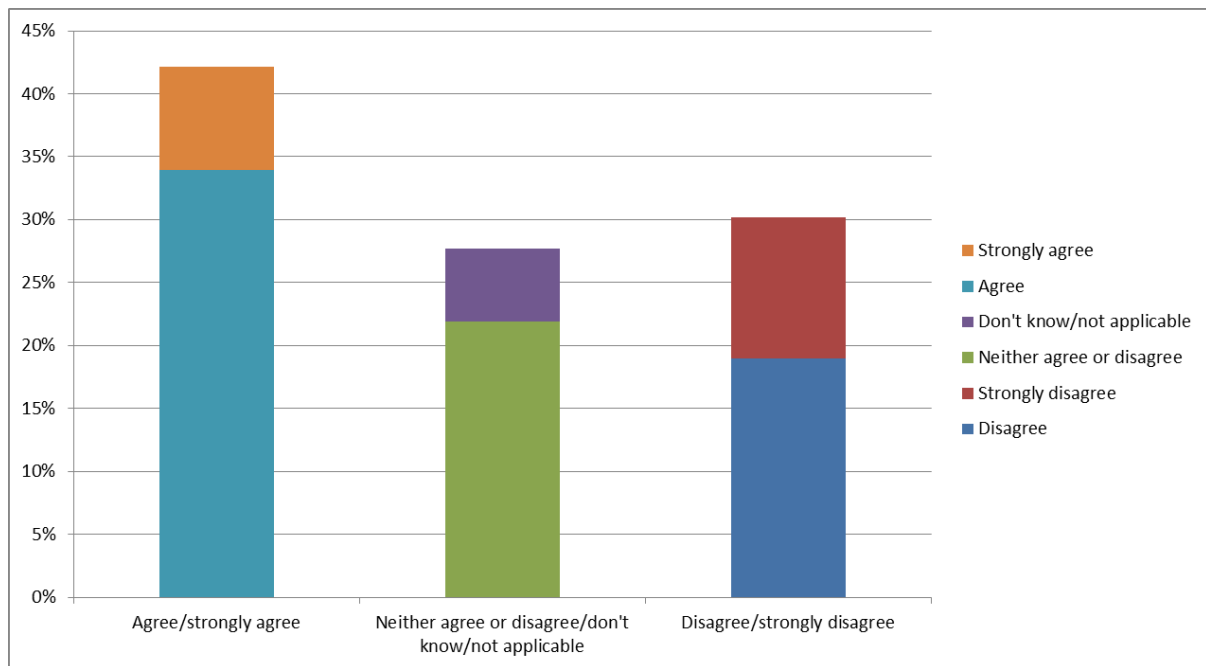
The LVV standards are easy to apply



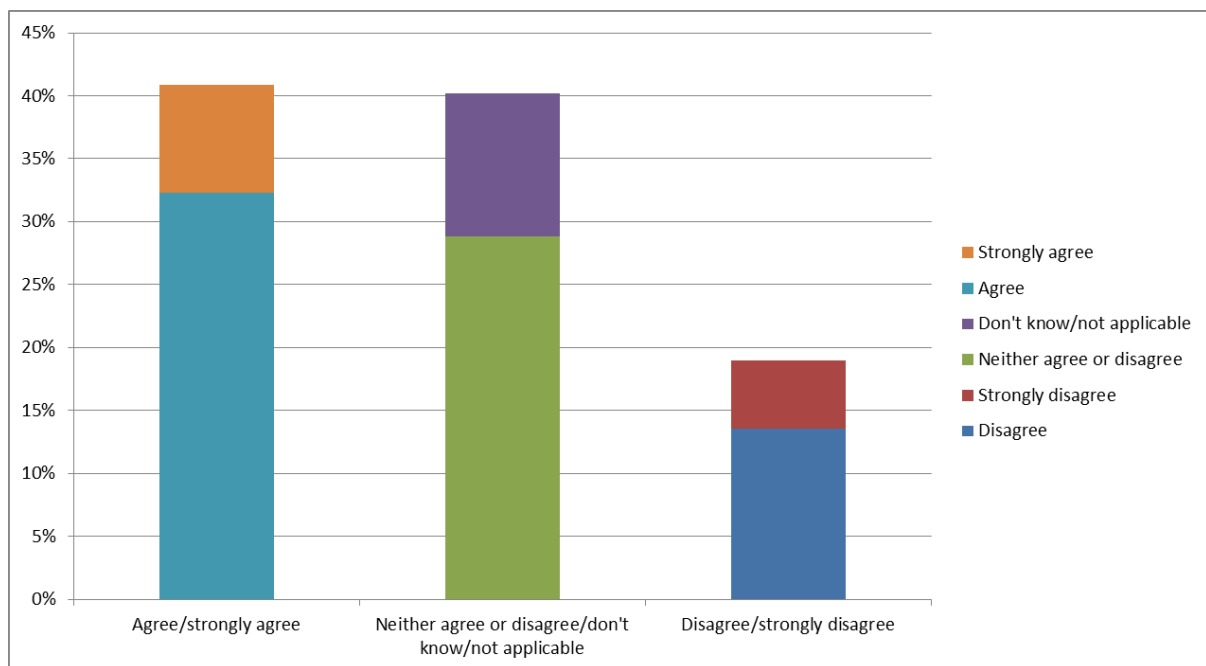
The LVV standards adequately cover all relevant categories and types of vehicle



The LVV standards adequately represent the various modification types



The operating requirements schedule provides me with clear and transparent information on how the LVV certification process operates



LVV standards: fitness for purpose (101 comments)

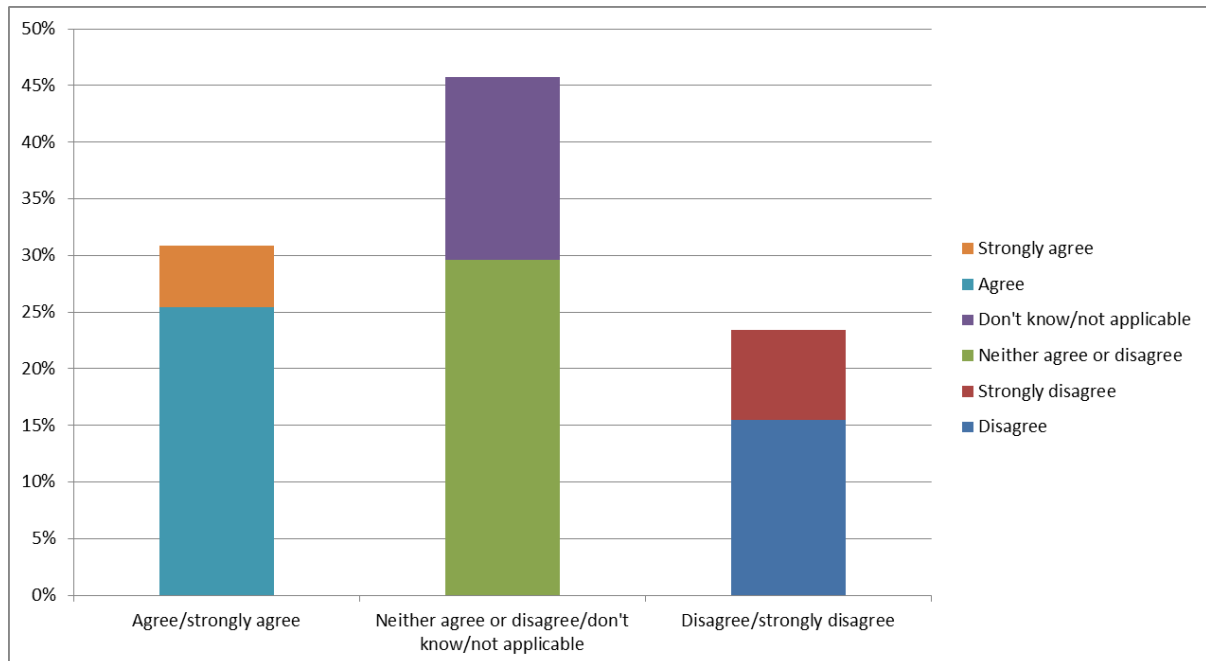
- 9 respondents said that the standards were open to interpretation
- 4 respondents described the LVV standards as well written or generally appropriate

The following areas were noted by between 2 and 5 respondents. The standards:

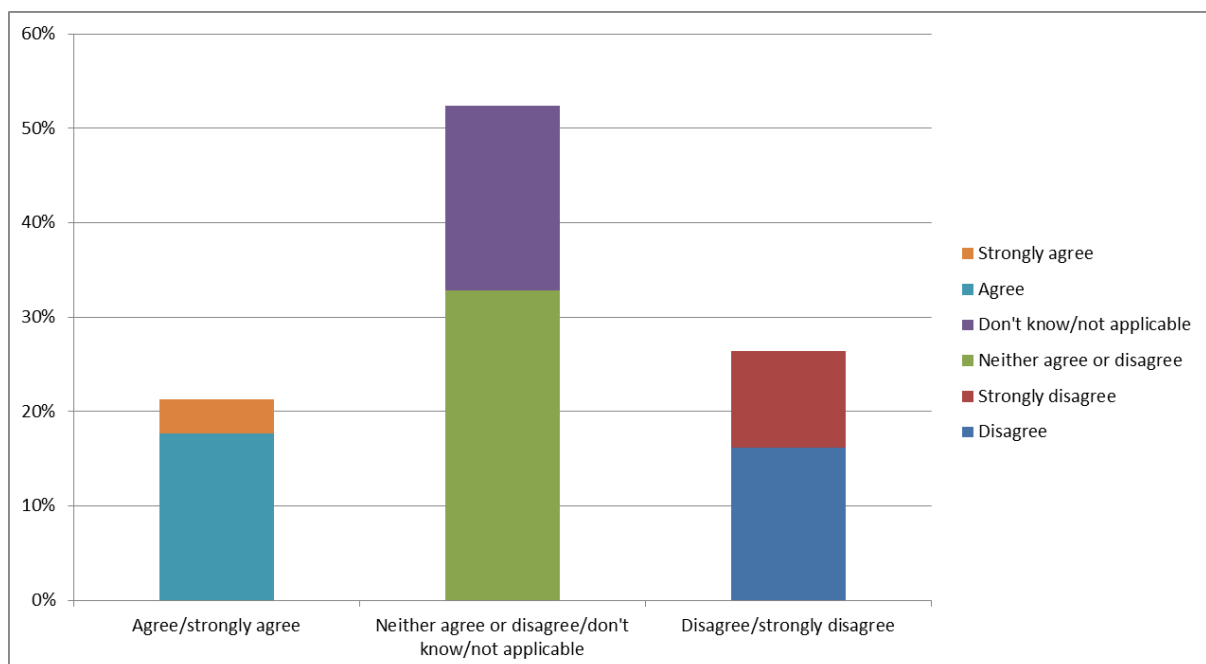
- were seen as being hot rod specific
- were not keeping up with modification trends
- were not suitable for certifying a large number of similar modifications by commercial modifiers
- did not cover specific requirements in a range of areas including disability.

New Zealand Transport Agency oversight

The Transport Agency has an appropriate level of oversight of the LVV certification system



The Transport Agency acts quickly to address any issues in the LVV certification system



NZ Transport Agency oversight (80 comments)

- 18 respondents said New Zealand Transport Agency did not have a strong enough oversight of the LVVTA system
- 9 respondents said New Zealand Transport Agency was under-resourced or did not have enough background or technical knowledge of vehicle modifications.