



John MacLellan  
Vehicle and Operator Services Agency  
4<sup>th</sup> Floor  
Berkeley House  
Croydon Street  
Bristol, BS5 0DA

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Direct Dial: 01494 545706  
Email: jay@bvrla.co.uk

Dear John

### **Statutory Fees for VOSA Services in 2008/09**

Thank you for inviting us to comment on the latest proposals for fees for HGV and PSV testing and inspections, operator licensing, bus registration, tachograph centre approval and single vehicle type approval.

Whilst not all of these fees are payable by our Members, we believe a 5% increase across all these fees is disproportionately high given that the last increase was also 5% and this was less than 2 years ago. We also feel that given the uncertainty surrounding the future of VOSA's services with the ongoing outsourcing, excessive price increases do not currently appear appropriate. We note the areas of investment include:

- Developing and maintaining e-enabled services
- Refurbishing old test stations and installing modern equipment
- Supporting better targeting of enforcement in line with the Government response to the Hampton report
- Additional enforcement sites in key locations; and
- Service loans used to pay for such developments which have been capitalised

We are interested to note that VOSA has recognised the importance of justifying where the additional revenues from these increases will be spent. We are pleased to comment that this addresses our previous comments to VOSA's consultation on fees. .

We welcome the fact that VOSA are recognising the importance of developing electronic enabled services and we hope that the BVRLA and its Members will be fully involved with any discussions in relation to such work. We hope that real improvement measures will come out of this work which will help to alleviate the pressure that these cost increases put on our Members businesses and hopefully improve operational efficiencies for all parties concerned.

It is noted that the proposals relating to VOSA's proposals for merging the O-licence fees into the annual test fee are not mentioned within this particular consultation. We hope this is in part to do with our previously raised concerns with our requirement for these fees to be shown separately so that our Members can if necessary pass the O-licence fee onto the customer. We would nevertheless welcome further clarification on this area as to how VOSA intends to proceed.

#### **British Vehicle Rental and Leasing Association**

River Lodge, Badminton Court, Amersham, Bucks HP7 0DD  
tel: 01494 434747 fax: 01494 434499 e-mail: info@bvrla.co.uk web: www.bvrla.co.uk

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Honorary Life President: Freddie Aldous Chairman: Nigel Stead  
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Director General: John Lewis  
Registered in England No. 924401

John MacLellan – VOSA

March 2008

We welcome the opportunity to continue our constructive dialogue on this and any other issues VOSA is working on that effect our industry and hope our Association will be able to continue to add value to the shaping and development of your work.

Yours sincerely



**Jay Parmar**  
Head of Legal Services

***Bona-fides BVRLA, the Industry and its Members***

- The BVRLA is the representative trade body for companies engaged in leasing and rental of cars and commercial vehicles. Its Members provide short-term self-drive rental, contract hire and fleet management services to corporate users and consumers. BVRLA Members operate a combined fleet of 2.6 million cars, vans and trucks of widely differing sizes from 3,300 locations throughout the UK.
- BVRLA Members provide a vital service to UK industry and commerce, facilitating the movement of goods and people for essential business and consumer purposes. Members buy around 1.1 million new vehicles every year, at a cost of nearly £15.4 billion, representing the biggest volume of purchases by any fleet sector. In making these purchases, Members are a major support to the UK automotive industry. In addition, by way of ancillary services, Members spend an additional £2 billion.
- Together the Rental, Leasing and Commercial Vehicle sectors of Membership provide the significant voice of an industry which represents 65% of leased or rented commercial vehicles, 85% of rental cars and 95% of leased cars in the United Kingdom. It is a unique organisation that represents three combined sectors allowing Members to share representation on committees and in the activities of the BVRLA.
- BVRLA Members subscribe to a mandatory Code of Conduct which sets out stringent standards in terms of operation, the quality of vehicles and the commercial propriety of Members. The BVRLA uses a strict process of vetting applications for Membership and only companies that are of sufficient standing and quality will qualify for to join the Association.