



"... to uphold the freedom ..."

REPORT

MoT CONSULTATION

ANALYSIS OF RESPONSES TO FBHVC'S ON-LINE SURVEY

Contents

<i>Section</i>		<i>Page</i>
1.	Main results	2
2.	Background	2
3.	Methodology & confidence	2
4.	Overall results	4
5.	Reasons quoted for supporting a pre-1960 exemption	5
6.	Reasons quoted for supporting a pre-1945 exemption	5
7.	Reasons quoted for limiting exemption to pre-1920	6
8.	Reasons quoted for making no change to current system	6
9.	Alternative views	6
10.	Views on testing requirements for vehicles used commercially	7
11.	Views on voluntary testing of exempt vehicles	7
12.	Conclusion	8

P H J Whyman.
11 January 2012

1. MAIN RESULTS

- 74% of respondents wish to see testing requirements for historic vehicles relaxed.
- 59% support the government's preferred option of exempting all pre-1960 vehicles.
- 71% believe historic vehicles in commercial use should be subject to test.

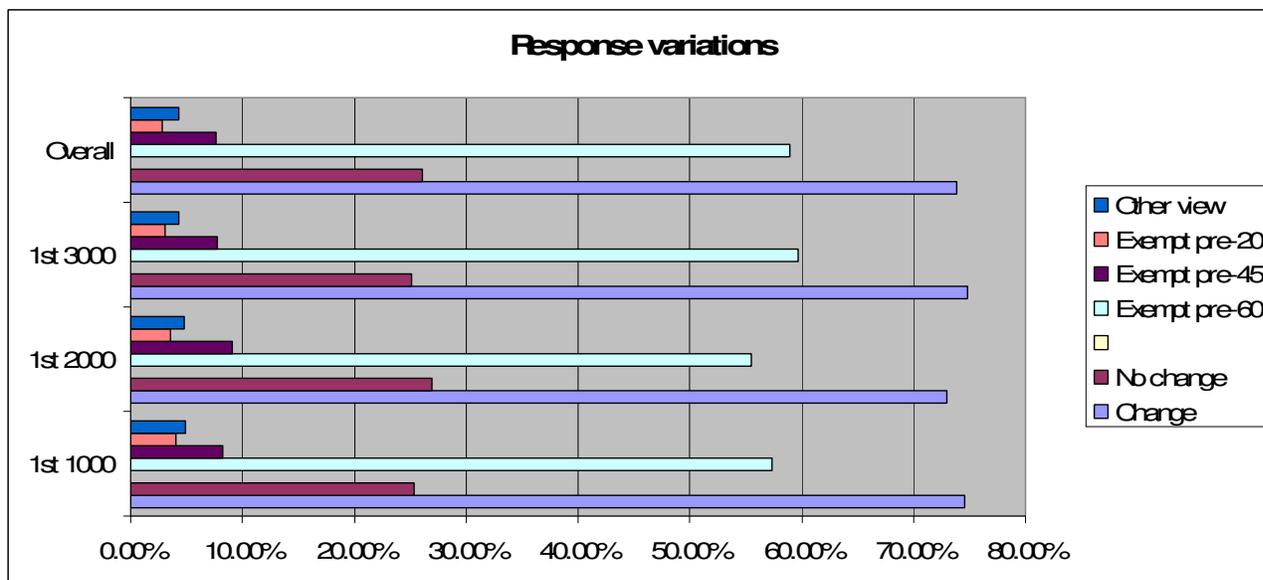
2. BACKGROUND

1. Government is seeking to reduce red-tape and, if practical, reverse the trend for UK to set regulatory standards that exceed minima required by the EU (so called 'gold plating').
2. UK currently requires an annual roadworthiness test (the MoT) for all light vehicles over 3 years old. The EU Roadworthiness Testing Directive allows a more relaxed approach and in summer 2010, Earl Attlee, (government transport spokesman in the House of Lords) announced that the government would be considering a reduction in the frequency of testing for all vehicles.
3. Later in 2010, FBHVC officials met Mike Penning MP, Under Secretary of State at the Department for Transport (DfT), to discuss government policy in respect of historic vehicles. The opportunity was taken to raise the possibility of a relaxation of testing for some historic vehicles (the Roadworthiness Testing Directive allows member states to exempt pre-1960 vehicles from testing).
4. FBHVC subsequently reported that, having suggested a possible relaxation for light vehicles built prior to 1921 and large passenger vehicles built prior to 1941, discussion with DfT was under way. FBHVC member organisations were invited to comment.
6. The Department for Transport issued a consultation paper in November 2011 proposing as its preferred option a complete exemption from testing requirements for all pre-1960 vehicles, a far wider proposal than had been considered within FBHVC. Other options being considered by DfT were complete exemptions for all pre-1945 vehicles and all pre-1920 vehicles.
7. The three month consultation period was inadequate for FBHVC to employ its usual method to gain feedback on these wider proposals. Consequently, it was decided to gauge the views of individual enthusiasts by means of an on-line survey. This report is the result.

3. METHODOLOGY & CONFIDENCE

1. A simple survey was set up using SurveyMonkey, a commercial on-line survey system. The survey comprised an introductory page, explaining the government proposals, which included a link to the consultation document. Respondents were asked to state their preference by ticking the appropriate box: to make no change, to exempt all pre-1960 vehicles, to exempt pre-1945 vehicles, to exempt pre-1920 vehicles. They were given a fifth option, to disagree with all. The survey could not be completed without making a choice. Once a choice had been made, respondents were asked to explain their reasons, but could continue to the remainder of the survey without doing so if they wished. Subsequent questions related to the question of whether historic vehicles used commercially should continue to be tested if similar vehicles were to become exempt and to seek respondents' views on submitting their vehicles for a voluntary test. Respondents were asked to give information about their vehicle ownership and whether they were active MoT testers or specialist traders.

2. Care was taken when drafting the survey questions to avoid leading or bias.
3. The survey went live on 22 November 2011 with access from FBHVC's website. E-mails were sent to all FBHVC subscriber clubs and all specialist publications urging them to give the survey urgent publicity by whatever means possible. A prominent article appeared in FBHVC's December 2011 Newsletter, and articles appeared in several commercial specialist magazines including Classic Car Weekly, Land-Rover World, Old Bike Mart.
4. The data collected were checked for duplications and incomplete responses. 115 duplicated responses were ignored, leaving 3,973 usable responses. Of these, 458 were choice-only responses (i.e. those where a respondent simply voted for one choice but declined to respond further) and 140 gave no reason for their particular choice, although these responses did include information about vehicle ownership etc. The data was tested to establish whether the inclusion of choice-only/no reason responses affected the overall balance. The difference was less than 1% and choice-only responses were retained. Respondents were asked to state if they were members of an historic vehicle club, and if so, to name the club that was most important to them. 70% named a FBHVC subscriber club.
5. Approximately a dozen respondents implied they represented a group or club. No weighting was attached to such responses for analytical purposes.
6. Background data collected during a 2011 study of the UK British Historic Vehicle Movement undertaken by FBHVC in conjunction with the Historic Vehicle Research Institute estimated that there are between 420,000 and 440,000 people in UK with an interest in vehicles over 30 years old.
7. Such a population requires little over 1,000 responses to provide a 95% confidence level. The response received thus provides a higher confidence level. This can be confirmed by comparing overall results after each additional 1,000 responses: variations are less than 3 percentage points with each additional tranche of responses.



4. OVERALL RESULTS

4,088 gross, 3973 usable

These results have been reached by counting the numeric data and making informed judgements about the qualitative data offered by respondents. In analysing qualitative data one is required to develop a typology or at least designate categories of explanations. In seeking to construct categories for the very many nuanced explanations and comments offered, the research team has used its knowledge and experience to discern difference and similarity where required.

Whilst many respondents offered a clear and unqualified opinion on the change and their rationale for that opinion many respondents included conditional statements. That is they offered an opinion and reason for their choice providing certain conditions applied, such as that there would be:

- no risk of restriction on use (although two respondents thought this would be sense);
- no risk of increased insurance premiums for untested vehicles;
- no risk of insurers demanding (expensive) engineer's reports;
- some facility for a formal standardised test to demonstrate roadworthiness.

In looking at the result overall it can be seen can be seen that:

74% of respondents believe that the MoT testing regime for historic vehicles should be relaxed in some way while 26% believe the test should continue as it is.

71% respondents believe that pre-1960 historic vehicles in commercial use should remain subject to testing even if other pre-1960 vehicles are exempt. 14% said commercial use should make no difference to testing requirements; 15% did not answer the question.

53% of respondents said they would take their vehicles for test if this could be done on a voluntary basis; 33% said they would not seek a voluntary test; 14% did not answer.

The 74% of those who support some relaxation is made up as follows:

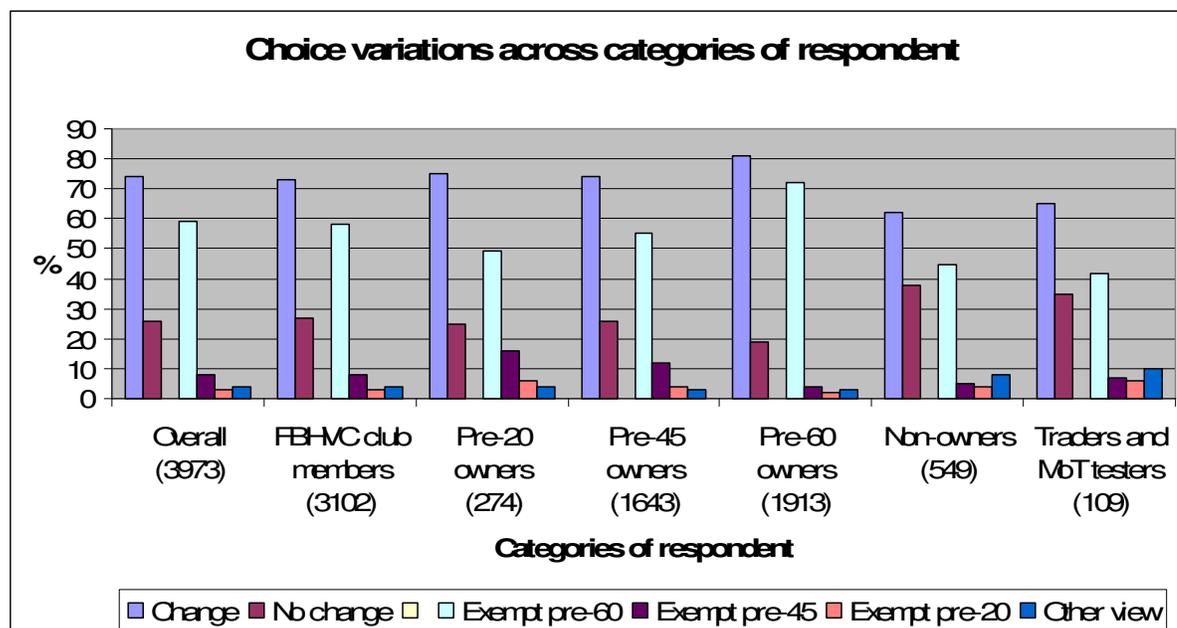
59% agree with the proposal that all pre-1960 vehicles should be exempt;

8% believe the exemption should be limited to pre-1945 vehicles;

3% think only pre-1920 vehicles should be exempt and

4% think there should be some relaxation, but do not agree with the three options above.

Responses were divided into categories and the data re-analysed to see if there was any significant variation in opinion between categories of respondent, as shown on the chart below.



Self-interest goes some way to explaining the variations between groups: pre-1920 vehicle owners are more likely to favour an exemption covering all pre-1945 vehicles as a significant number of them also own vehicles of the 1920s and 1930s; owners of 1945-1959 vehicles are more likely to opt for an exemption that includes their own vehicles; those who don't own any pre-1960 vehicles, on the other hand, are less likely to see a problem with having vehicles tested. All these sub-groups follow the same trend - over 60% believe the testing regime should be relaxed, with over half believing it right to exempt all pre-1960 vehicles.

Specialist traders and MoT testers follow the same trend. This group is small in relation to the others but perhaps because of their professional interest in the subject, a greater proportion disagreed with all proposals, proffering instead alternative methods of relaxing the regime whilst leaving some testing in place to minimise risk of unsafe historic vehicles on the road.

5. EXEMPT ALL PRE-1960 VEHICLES 2408 gross, 2338 usable

Reasons quoted by respondents making this choice were:

Such vehicles are enthusiast owned & well maintained	58%
Such vehicles cover low mileages and/or tend to be slow	44%
Modern testing methods are inappropriate for such vehicles	19%
Cost/convenience	10%
Concern about competence of testers	8%
To align regs with EU minima (as case with pre-1960 HGV)	4%
Such vehicles pose no safety risk	3%
Because such vehicles have heritage value	3%
There are few such vehicles	2%

Other comments/thoughts:

Responses agreeing with the proposal, but expressing concerns	2%
Relax requirements by reducing frequency to 2 or 3 years	1%

6. EXEMPT PRE-1945 VEHICLES 313 gross, 307 usable

Reasons quoted by respondents making this choice were:

Later vehicles should be tested for road safety	40%
Such vehicles cover low mileages and/or tend to be slow	29%
Most logical cut off date in terms of vehicle development*	22%
Such vehicles are enthusiast owned & well maintained	20%
Modern testing methods are inappropriate for such vehicles	17%
Concern about competence of testers	7%
Concern about ability of owners to check later vehicles*	4%
Cost/convenience	3%
Fear of restriction if later vehicles not tested	3%
Fear of insurance problems if later vehicles not tested	2%
Public will accept a pre-1945 exemption, but not pre-1960	1%

Other comments/thoughts:

Relax requirements by reducing frequency to 2 or 3 years	1%
--	----

*Specific items mentioned (almost all relating to cars) include: universal use of hydraulic braking systems after this date with associated risks of perished seals and seized cylinders; adoption of monocoque construction leading to greater corrosion risks; the difficulty of carrying out a thorough underside inspection without professional lifting equipment; the difficulty of checking braking performance/balance without professional equipment.

7. EXEMPT ONLY PRE-1920 VEHICLES

117 gross, 114 usable

Reasons quoted by respondents making this choice were:

Later vehicles should be tested for road safety	68%
Modern testing methods are inappropriate for such vehicles	41%
Such vehicles cover low mileages and/or tend to be slow	40%
Such vehicles are enthusiast owned & well maintained	15%
Concern about ability of owners to maintain later vehicles	11%
Concern about competence of testers	7%
Fear of restriction if later vehicles not tested	5%
Fear of insurance problems if later vehicles not tested	5%
Public will accept a pre-1920 exemption, but not later	2%

Other comments/thoughts:

Offer a simplified, basic, test for pre-1945 vehicles	5%
Relax requirements by reducing frequency to 2 or 3 years	4%

8. NO CHANGE

1067 gross, 1043 usable

Reasons quoted by respondents making this choice were:

Independent test needed for road safety reasons	84%
Fear of future restrictions if vehicles not tested	20%
Concern about ability of owners to spot defects	16%
Concern about the effects of relaxation on insurance	10%
Worry about public perception	9%
MoT gives confidence when buying/selling	3%

Other comments/thoughts:

Relax requirements by reducing frequency to 2 or 3 years, or by introducing a simpler, cheaper test for pre-1960 vehicles	4%
---	----

9. DISAGREE WITH OPTIONS OFFERED

178 gross, 170 usable

The 4% of respondents making this choice were from opposite ends of the spectrum: those who wanted the proposal extended to a later date, usually to make it coincide with the VED exemption cut off, and those who consider some form of testing essential, but recognise that the existing regime is in need of relaxation.

Reasons and suggestions quoted by respondents making this choice were:

Independent test needed for road safety	49%
Simplified test needed for pre-1960 vehicles	34%
Exemption should be extended to later vehicles	24%
Relax requirements by reducing frequency to 2 or 3 years	26%
Fear of restriction if vehicles not tested in some way	5%
Fear of insurance problems vehicles not tested	2%
Concern about competence/complacency of owners	2%
Concern about public perceptions	1%

10. HISTORIC VEHICLES USED COMMERCIALY SHOULD BE TESTED

3,378 answers from 3,973 usable responses

Reasons quoted in favour of maintaining a test for vehicles used commercially were:

Consumer protection - general safety of the public	65%
Commercial pressures may affect quality of maintenance	9%
Commercial use likely to lead to greater wear & tear	9%
Necessary for insurance reasons	7%
To re-assure the public	6%
To deter 'cowboy' operators	1%

Reasons quotes against maintaining a test for such vehicles:

Vehicles well maintained	6%
[Assuming an exemption] to simplify bureaucracy	5%
Vehicles used little	3%
Modern test regime not relevant to historic vehicles	1%
Cost	1%

11. RESPONDENTS WOULD UNDERTAKE A VOLUNTARY TEST

3,407 answers from 3,973 usable responses

Reasons quoted by those who said they would continue to have MoT tests if available optionally:

For peace of mind & to have independent inspection	49%
To have proof of recent roadworthiness for insurance etc.	6%
To test and inspect the vehicles with professional equipment	4%
Duty of care to other roads users	3%
To provide discipline for maintenance	1%

300 respondents gave no reason for their answer. Of those who did answer, 17% qualified the reasons for their answer with comments about the cost, frequency or reason for testing.

9% would consider doing so every 2, 3 or 5 years, or on a distance travelled basis;

4% would only do so after major work or recommissioning;

3% said they would do so if the cost was reduced, or nil;

2% would do so if it helped with a sale or to reduce insurance premiums.

There were other individual reservations about the type and style of test, competence of testers and different thoughts on testing post 19** vehicles, but not testing earlier etc.

Reasons quoted for not undertaking such a test:

Unnecessary as vehicles well maintained	20%
Variations on "Why bother?"	6%
Cost	4%
Modern test regime not relevant	3%
Concern over tester's competence	3%
Unnecessary as vehicles cover so few miles	3%
No MoT test, but would have annual professional check	3%

Some qualified their answers with circumstances when they might consider having a test:

2% would if it helped with a sale or to reduce insurance premiums;

1% said they might if it didn't have to be annually;

0.5% said they might after major work or after a long period laid up

0.1% said they might do so if it was free.

12. CONCLUSION

This report of the rigorous research undertaken provides the FBHVC board with a clear indication of what grass roots historic vehicle enthusiasts feel about the government's proposals on MoT testing.

The results clearly indicate an overwhelming support for change (74%).