

Our Ref: JB/SA
Your Ref:

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Response to the consultation on EU road transport proposals to establish common rules

1. **pteg** represents the six English Passenger Transport Executives which are the publicly accountable strategic public transport bodies for six of the largest conurbations outside London. Transport for London and Strathclyde Partnership for Transport are associate members but this response does not include them.
2. We do not operate bus services directly but support the proposals on PSV operator regulations which we believe could help contribute towards the raising of standards of operator competence, stability, performance and safety. This in turn will bring benefits to passengers.
3. Raising the minimum standard and threshold for PSV operators in the UK could contribute to addressing significant shortfalls in performance and vehicle standards which currently occur. This is reflected in Government statistics which show that:
 - around 16% of vehicles spot checked by the Government's Vehicle and Safety Agency are subject to prohibition notices;
 - 0.8% of all scheduled bus mileage in England outside London is currently lost due to factors within operators' control.
4. We have concerns however about the potential implications of the proposals for community transport operators. By their very nature community transport operations are often tightly resourced and rely on significant voluntary input. We would be concerned if applying legislation which is primarily aimed at raising the thresholds for commercial providers was to lead to the curtailment of services by the community / non-profit transport sector. Therefore there may well be a case for a further relaxation of the requirements of this legislation for the voluntary / community sector.

Yours sincerely

SIGNED

Jonathan Bray