

## Letter from MCI to The Department for Transport

Jim Fitzpatrick MP,  
Under Secretary of State for Transport,  
Department for Transport,  
Great Minster House,  
76 Marsham Street,  
Westminster, London,  
SW1P 4DR

23<sup>rd</sup> March 2009

Dear Minister,

We are writing on behalf of the group of motorcycling organisations which have been involved in the DSA 'Stakeholder' Group on the delivery of the new motorcycle testing regime. Namely, BMF, MAG, LARSOA, MCIA and MCITA.

You will recall that we held a very positive discussion with you last summer, when we discussed the possibility of delaying the implementation of the new motorcycle riding test, given concerns about the impact on road safety and also on motorcycle training if the new regime had started on September 29<sup>th</sup>. We remain grateful to you and your officials for the six month delay that resulted.

However, we would like to request a further urgent meeting with you to discuss our strong concern that there is a risk of overload and collapse of the testing and training regime after April 29<sup>th</sup>.

Although the delay period is nearly at an end, there has been no significant improvement in the situation with regard to the promised 66 full time Multi Purpose Test Centres (MPTC), only 44 will be in operation when the new test goes 'live' on April (five more than in September 08). The original consultation on the new test, some years ago, talked about up to 90 MPTCs and no test fee increases. Over the last few months, particularly since October 2008, it has become clear that the dilution of this original position is simply unacceptable in road safety and in business terms.

As a result of this, key concerns have remained unchanged.

- The new test will be modular. This is welcomed by motorcycling organisations. However, the 'part one' module still relies on there being in place a fully operational set of full time MPTCs. We fail to see how the new test can possibly go fully 'live' until at least the 66 MPTC originally planned are open.
- We do not agree with the DSA's view that the addition of casual and VOSA sites gives acceptable coverage. These part time sites will not be capable of catering for demand and we are concerned that the presence of these sites is being used to argue the existence of coverage that not much more than illusory.
- The test booking system does not appear to be properly fit for purpose. In addition, trainers cannot get anything like the number of tests that they need for their businesses to be viable. Some can only get mainly Module One tests and some can only get mainly Module Two tests. Many report significant problems with the booking system. Businesses and jobs are at risk.
- We are extremely disappointed that motorcycle training organisation views were ignored with regard to waiting times between test retakes. The waiting time differences between part one and part two test retakes are, frankly, non-sensical.
- We are also deeply disappointed with the proposed motorcycle test price increases. The cost burden on new riders is disproportionate to the car testing regime. The new test fees represent a 50% increase in the cost of a motorcycle test since this time last year. We feel that this is unfair and unjustified, given that the car test fee increased by only 15%.

We were pleased to take part in the recent consultation and DSA Stakeholder Group. But membership of the Group by motorcycle and training organisations does not represent a 'rubber stamp' of DSA policy. We are extremely concerned that DSA officials have seen fit to criticise group members who have voiced concerns about the current situation regarding lack of test centres and other related matters. We are happy to continue dialogue, but are not

prepared to take the blame for any poor decision making on the part of the DSA in areas where our advice has been ignored.

But ultimately, what is at stake is motorcycle safety. The following points are of particular concern.

- Even with 66 MPTCs, there still will be an 80% reduction in the number of available test sites. With motorcycle fatalities running at 20% of all road fatalities, the notion that we can so severely compromise the previous ability of the testing and training regime to deliver motorcycle testing more or less on demand beggars belief.
- In the real world, journey times for test candidates will, in many cases, be vastly increased, adding to the possibility of fatigue and increased exposure to risk among possibly nervous candidates.
- There is virtually a guarantee of huge percentage increases in the number of 'permanent learners'.
- In short, unless this situation is addressed, the new test will compromise motorcycle safety, not improve it.

We have, until now, supported the new test, despite the complex and hugely expensive way that Government has chosen to implement what was originally a relatively uncomplicated set of additional new manoeuvres to the current motorcycle test (which was all that was required by Europe).

Although a further delay may not be legislatively possible at this stage, it is essential that some form of transitional measures are retained, or some way found for existing infrastructure to be used to deliver the new test, or there is a real risk of systemic collapse, business closures, job losses and compromised road safety. It should be noted that two of the ATB's which provided the expertise that informed us, and in turn the stakeholder group meeting have reported that their businesses are likely to cease trading in a few weeks time as a result of the current situation.

We do hope that you will be able to meet us at your earliest convenience to discuss how we go forward from here.