

Appendix A – Reply Form

Please Note: DVA is unable to consider any views submitted anonymously. Please complete your name and address below.

Reply Form:

Name: Title: Mr /Mrs/Miss/Ms.

Organisation (if applicable).....

Address:.....

.....

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Postcode:

Telephone number:

Email address:

Please tick the appropriate box.

If you need to use a separate sheet to complete your answer to any of the proposals, please ensure the sheet is cross referenced with the proposal number.

Q1: Do you agree with the recommendation that all new learners should complete CBT?	Yes	12
	No	
<p>Additional comments:</p> <ul style="list-style-type: none"> • Should also include car drivers, but all need more than a 1 day (8 hours) training course. Perhaps minimum 12 / 16 hours. • Safety First for 16 year olds. • Either option 2 or 3 seem feasible. • Control should be assessed off road before any attempt to ride on our busy roads. • Yes because most young riders go out on the road with no road sense at all. • Either option 2 or 3 seem feasible. • Yes, because most young riders go out on the road with no sense at all. 		

Q2: Do you agree with that all existing learners should take a CBT course once they need renewed their provisional licence?	Yes	9
	No	3
<p>Additional comments:</p> <ul style="list-style-type: none"> • Once CBT is implemented all provisional licence holders should undergo CBT. A public awareness exercise well in advance of the implementation of CBT should encourage existing provisional licence holders to undergo the motorcycle test. • There should be a date set in the future for all 'L' motorcyclists to do CBT, this may encourage them to do their full test. • Option 2 is better. This is the method previously used when 250cc entitlement was removed from licences. To allow people to ride without CBT for up to ten years in the future seems to be remove much of the road safety benefit as many people taking their test are current licence holders. It leaves thousands of people exempt from CBT. • We need CBT now for all learners. They should have to take CBT before they renew and then repeat CBT if renewing their licence. Earners currently on the roads could ride for 10 years with L plates, before they would have to take CBT when they renew their licence. This legal loophole needs closed. • Option 2. • There should be a date set in the future for all 'L' motorcyclists to do CBT, this may encourage them to do their full test. • I believe that once CBT is implemented that all provisional licence holders should undergo CBT. A public awareness exercise well in advance of the implementation of CBT should encourage existing provisional licence holders to undergo the motorcycle test. 		

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Q3: Do you agree with DVA's recommendation to <i>allow instructors more flexibility in their approach to training courses, with legislation specifying the general aims of the course?</i>	Yes	10
	No	

Additional comments:

- 2 responses were question marks
- AMI are doing basic car park training before the rider goes on the road.
- I do agree with this but we should be made aware of what the requirements are likely to be before being asked to comment.
- Training needs must be geared to the individual. The goal will always be to achieve the same standard of required pass.

Q4: Do you agree with a paper certificate as evidence of CBT completion?	Yes	12
	No	

Additional comments:

- If the recommendation is the same as question 3 on my printed paper the answer is yes.
- The DL196 seems to work on the mainland so yes.
- Yes, as it is in GB.
- Something similar to the existing theory and practical pass certificates. The rider must have something to produce to the police if stopped. The other copy being forwarded to DVA to complete computer records.

Q5: Do you agree DVA should maintain a central electronic record of training completed in Northern Ireland?	Yes	12
	No	

Additional comments:

- Yes, an electronic record of CBT completed.
- A good statistical tool and means of assessing each AMI.

Q6: Do you agree that a CBT certificate should be valid for two years?	Yes	12
	No	

Additional comments:

- Same as mainland.
- Yes, as in GB.

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Q7: Do you agree that a provisional licence should be a requirement for those wishing to take a CBT course?	Yes	12
	No	
Additional comments:		
<ul style="list-style-type: none"> • It would be illegal otherwise. • But CBT could be taken a few months before 16th or 17th birthday. 		

Q8: Do you agree with the recommendation to create an offence for CBT evaders?	Yes	12
	No	
Additional comments:		
<ul style="list-style-type: none"> • There must be penalty points and fines put in place for evaders and this must be enforced by the PSNI. • Definitely has to be enforced otherwise no point in CBT existing. • If not we could have people passing CBT and riding on the road without a driving licence. I personally would not be delivering CBT to a student unless a Driving licence is produced. • Yes, an offence should be created and penalty points are the only way to deter people these days. • Enforcement will be the key for the success of this requirement. 		

Q9: Do you agree that DVA should inspect sites used for CBT courses on an ad hoc basis and issue a set of criteria which the sites must meet?	Yes	5
	No	7
Additional comments:		
<ul style="list-style-type: none"> • It should, be up to the ADI to have his/her site up to the criteria. • Definitely, to get the best training for new riders, helps (would) to eliminate poor instruction. • If you do not have sanctions that can be enforced then there is no use in starting the scheme. • Necessary to uphold a good standard of tuition. • Sites should on an ad hoc basis inspect sites. • I have answered yes, but would reserve judgement until I see the criteria. I must point out that sites in NI are limited and setting unrealistic criteria may well put the delivery of CBT outside the financial limits of AMI's. • Inspection of these sites should take place to ensure standards are of the highest order. • Instructors need assistance with land / sites. 		

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Q10: Do you agree that DVA should have discretion to suspend / remove instructors from the register who are delivering CBT courses at unsuitable sites?	Yes	11
	No	1

Additional comments:

- I think a fine (pre-set) would suffice.
- Absolutely, otherwise poor standards would ensue.
- It depends on availability of suitable sites.
- You should have a meeting first with the instructor and point out why the site is unsuitable. If they fail to fix it then action could be taken.
- Not all AMI's will want to deliver CBT. They may well offer On Road training to people who have obtained a CBT certificate or advanced training, so should they be removed from the Register? My answer to that is NO. However if an AMI is delivering CBT and the site is deemed unsuitable by all means suspend them from delivering CBT until the issue is resolved, but not removal from the register.

Q11: Do you agree that GB riders with a GB CBT certificate should be allowed to ride in Northern Ireland without completing an additional CBT course here?	Yes	11
	No	1

Additional comments:

- How do we know to what standard the rider was trained?
- Yes, if a NI rider went to GB, they would want it to be valid.
- Provided a NI CBT certificate has the same status in GB.
- As long as this is reciprocated to us by GB.

Q12: Do you agree with the suggestion to introduce a compulsory register of Motorcycle Instructors?	Yes	12
	No	

Additional comments:

- Very, very much so. We give high quality instruction at MTS, which most trainees realise they cannot get from other non approved A.M.I's.
- I have been on the voluntary one since its inception about 20 years ago.
- Very long overdue.
- Yes, about time.
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- Not all instructors will want to deliver Novice training as is the case now. Some may wish to deliver Advanced training only, something which the DVA should and does support. Some form of recognition will therefore be needed to gain access onto the register for these very well qualified instructors. Production of certificates from recognised training bodies e.g. – ROSPA Diploma holder, Diamond diploma holder to mention two, there are more, but my point is made.
- Grandfather rights for existing AMIs.

Q13: Do you agree with the proposed eligibility criteria for Motorcycle Instructors?	Yes	12
	No	
Additional comments:		
<ul style="list-style-type: none"> • I do believe that all existing instructors should undergo the examination. • At least 4 years. Question with existing requirements, person could have last licence 4 years, with 0 miles. 		

Q14: Do you agree with a three stage examination for Motorcycle Instructors wishing to be added to the DVA register?	Yes	12
	No	
Additional comments:		
<ul style="list-style-type: none"> • Of course, any 3 of the stages not there, not good. • Grandfather rights for existing AMIs. • They cannot teach what they don't know themselves. • Yes, about time. • The instructional ability of the test must recognise there are those who will not wish to deliver novice training. • The standard of motorcycle instructors must meet the high standards that we have set for our Driving Instructors. 		

Q15: Do you agree with the content and duration proposed for the theory test part of the examination of assessment for AMIs?	Yes	12
	No	
Additional comments:		
<ul style="list-style-type: none"> • Grandfather rights for existing AMIs. 		

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Q16: Do you agree with the proposed format for the Riding Ability and Fitness Test for Motorcycle Instructors?	Yes	11
	No	
<p>Additional comments:</p> <ul style="list-style-type: none"> • 1 Response entered a question mark for this. • Don't know what it is. Instructors should have good mental health! • Grandfather rights for existing AMIs • Yes, though there are some major differences between a good learners pass and the recognised best practice for advanced riding. So are we to carry out the same test as a learner but with no more than six faults? I like to get most of my learners to that standard, but if I or some of the police riders who are instructors who can ride and instruct to some of the highest standard of riding in the UK, we could technically fail the beginner test. Only carrying out this test in Belfast and Londonderry is unfair to those of us who do not come from those areas. If it is the same test as that for beginners then why can it not be done by the existing test network? If is not the same test we should be given details before being asked to comment. 		

Q17: Do you agree with the format suggested for the final part of the examination to be an AMI?	Yes	11
	No	1
<p>Additional comments:</p> <ul style="list-style-type: none"> • The old way (Harry Green) was very good. • Grandfather rights for existing AMIs • I agree with the format but not with the only locations being available at Belfast and Londonderry. • I am concerned that we end up with parrot word for word instructional statements being stringently applied. As previously stated each instructor needs to be able to change their style of tuition to the needs of each student, this is a skill in itself and sets aside one instructor from another. Again not all will want to deliver CBT. This test should be conducted from all existing test centres. An instructor should be familiar with the road on which they train due to the need to concentrate on their own riding and that of their student. I do not agree with the examiner being the pupil during a test. The PMI should bring a candidate along and be examined on the lesson delivered to, the lesson dictated by the examiner from the approved list. 		

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Q18: Do you agree with the four year period of registration proposed for Motorcycle Instructors?	Yes	12
	No	
Additional comments:		
<ul style="list-style-type: none"> • Same as now. • Grandfather rights for existing AMIs. 		

Q19: Do you agree with the quality assurance methods proposed for AMIs involving a continued ability and fitness test?	Yes	11
	No	1
Additional comments:		
<ul style="list-style-type: none"> • Would encourage it. • Grandfather rights for existing AMIs • I have answered no only because I do not agree with the examiner role playing. Been there, done that, it does not bring the best out of someone. By all means come along and watch and listen to a live lesson. Role playing is acting; let's look at the real situation. No better way of examining someone. 		

Q20: Do you agree with the proposal for a training scheme for Potential Motorcycle Instructors in Northern Ireland?	Yes	12
	No	
Additional comments:		
<ul style="list-style-type: none"> • But reduced rates, as motorcycle lessons are at present much lower than car lessons. • When delivering CBT potential M.I. must be accompanied by an A.M.I. • Very good idea. • Grandfather rights for existing AMIs. • Have been assessed by Harry Green, everyone should be the same. • Yes, but as mentioned, further consideration and consultation, must be given to its format. The CBT scheme in the UK allows for approved instructors to 'Downtrain' other instructors who then have approval to instruct for only the first stages of CBT. • Within a time frame to ensure that existing small businesses are able to continue to operate pending introduction. 		

Q21: Do you agree with the method setting fees for the motorcycle register on a cost recovery basis?	Yes	8
	No	3
Additional comments:		
<ul style="list-style-type: none"> • 1 response was a question mark. • It must be taken into consideration that there are a lot more cars on the road than bikes and a lot for A.M.I. are part-time. 		

- Unsure about financial aspect.
- Grandfather rights for existing AMIs.
- Nobody likes to have to pay but if it has to be then fair enough. It will help towards making sure that those who make the effort actually want to instruct. Quite a few on the current register have no intention of instructing. Others, who may be known for cutting corners and standards for the highest profit, may be deterred. Though £240 seems excessive for entry onto a register with only one further check test!
- I agree that there should be a fee, but to suggest that it be the same as cars is unfair. Car instructors get a lot more business than motorcycle instructors. Motorcycle instruction is very seasonal and very dependant on the weather and to be expected to pay the same as a car instructor with a lot less return would not be fair.
- The example given mirrors that of ADIs. The implementation of the same fees would be unfair, but the reality is that 99% of people reaching 17 years want to do their car driving test thereby creating a healthy lucrative business venture. The same cannot be said for motorcycling. I do not know that the comparison is percentage wise, but the fee should reflect it.
- Fees should be exactly the same as for PDI and ADI.

Q22: Do you agree with the proposed appeals procedure?	Yes	10
	No	1

Additional comments:

- 1 response was a question mark.
- We don't get any complaints, so don't encourage people to complain.
- In principle however the costs may be a bit high.
- The appeals procedure is not described enough to comment. Who investigates and where does the right to appeal end?

Q23: Do you agree that DOE registered instructors should be given exemption to the examination of assessment for the DVA instructor register?	Yes	9
	No	3

Additional comments:

- 1 response was a question mark.
- Total Exemption.
- Of course that's the point of us being on the register, we have spent our time doing this good course.
- definitely as they have taken the time & effort to do the DOE course already.
- I do not think that 'Grandfather' rights should be given to current instructors as I believe that some of them may not be at an acceptable standard.
- No, definitely not. There are too many poor instructors out there. What is the point of introducing this wonderful new system with higher standards if 92 current instructors are not assessed? I could do without the hassle of going through the assessments but if it helps to improve standards (and therefore road safety) then the opportunity to check current standards should not be missed.
- The present DOE Registered Instructors have attended a one and a half day's course, which is of a lower standard than the proposed DVA Instructors Register. One of the proposals is that the existing DOE Registered Instructors be exempt from the new assessment process and be able to migrate to the new register with ease, but I believe that this is unfair. This may be less bureaucratic for the DVA and would naturally be fully supported by the existing DOE Registered Instructors, but I believe that this discriminates against other instructors such as myself. I have applied to attend this DOE Registered Instructors in October 2006, been in constant contact with the DOE Road Safety Department in seeking a course, but due to no courses having been arranged, and through no fault of my own I have not been given the opportunity to be DOE Registered. I have considered attending England to complete the course but have been advised that it would be recognised within NI. I have made a financial commitment to the commencement of my existing motorcycle training school, and I believe that I would be adversely affected by these proposals, as I have not been given an opportunity to be assessed and registered as a DOE Approved Instructor. It would be much fairer for all Motorcycle Instructors wishing to be included on the new DVA Motorcycle Instructors Register to be equally assessed and partake in the same assessment process for all within a given time frame. This makes it a level playing field and ensures that the register has the integrity that it deserves rather than have a proposed two-tier entrance requirement by use of Grandfather Rights to existing DOE Instructors.

Q24: Should this be total exemption, or until their current license expires?	Yes	2
	No	4

Additional comments:

- 6 responses did not answer this question.
- Until renewal.
- This should be total exemption as A.M.I. are training and putting riders through their tests most days of the week, there should be an examination of assessment.
- Total exemption, plus random assessments would eliminate the need for this.
- Total exemption.

GENERAL ADDITIONAL COMMENTS:

- The number of instructors on the current register is misleading. As it is a free assessment, there are a number of people who have become 'instructors' purely because they could or wanted the qualification up their sleeve and have done little or no instruction at all.
- Having said that there are far too many instructors for the numbers of trainees available in most areas. With the extra costs involved, it will make it less likely that casual applications will be made. That may mean that most of the people on the new compulsory list are the same as on the old voluntary one. To just let everybody on the old list bypass the new assessments makes a mockery of the system.
- We have been asked to comment on the introduction of CBT without any specifics of what the scheme actually entails. I have some knowledge of it but some details, and how it is expected to work with the new off road test would be useful.
- To consider CBT but not to consider the Direct Access scheme at the same time is a mistake. It is all very well teaching people whatever you like on 125cc machines, but as the majority of riders go out on larger bikes after passing the test surely it is time these people know how to handle the bigger bikes like most of Europe already does? Of all the headlines regarding motorcyclist deaths, how many were riding 125cc bikes?