



Isle of Man
Government

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COUNCIL OF MINISTERS
ROLE, REMIT AND OPERATION OF THE ROAD TRANSPORT LICENCING
COMMITTEE

PUBLIC CONSULTATION DOCUMENT

MARCH 2015

Introduction

This document is part of an ongoing consultation with the public on how best to deliver Government services in the future. Agenda for Change¹ details the priorities that will be delivered by Government before September 2016. The Review of the Road Transport Licensing Committee will ensure the delivery of targets and objectives listed within Agenda for Change for the 'Good Government'² policy theme. This includes assessing a proposal for a more efficient and coherent regulatory regime through bringing together the road transport licensing function together with other Government regulatory functions within a 'fused regulator'³.

The Road Transport Licensing Committee (RTLCL) is a statutory body constituted under Road Transport Act 2001. The purpose of this body is to regulate the road transport industry including public passenger and goods transport and their operators.

This consultation is required to identify and fully understand the requirement for regulating the road transport industry and how public safety can be safeguarded in the most efficient and cost effective manner. This consultation is required to obtain the following information:

- Identifying and understanding the road transport needs of the Island and its population;
- Identifying and understanding the needs of the road transport industry;
- How bureaucracy and duplication associated with regulating and administering the road transport provision on the Island can be reduced; and
- If the costs associated with regulating road transport offers value for money or could be achieved in a more cost effective manner;

It is important that the review committee receives as many views from the public and the road transport industry as possible to ensure we have a detailed understanding of the issues facing users, drivers and operators of bus, coach, taxi, private hire vehicles, mini bus and goods vehicle prior to making a firm decision on how these services will be regulated in the future.

I urge you therefore to take the time to read through this document and let us know your thoughts. Please answer the questions contained in the questionnaire at the end of the document and add any additional comments you may have within the sections provided.

Hon Tim Crookall MHK, Chairman of the RTLCL Review Committee

February 2015

¹ <http://www.gov.im/about-the-government/government/the-council-of-ministers/agenda-for-change/>

² <http://www.gov.im/about-the-government/government/the-council-of-ministers/agenda-for-change-policy-overview/good-government/>

³ http://www.gov.im/medis/878074/modernising_government.pdf

Why Do We Need to Change?

On the 17 June 2014 Tynwald approved a motion for a Council of Ministers' committee to review the role, remit and operation of the Road Transport Licensing Committee. During the debate on this Tynwald motion a number of concerns relating to the Road Transport Licensing Committee were raised by members of Tynwald these included:

- Why elected politicians receive a high number of complaints and comments in relation to the operation and policies of the Road Transport Licensing Committee;
- Why volunteer drivers including minibuses are regulated;
- The high cost of applications for volunteers to obtain licenses to drive public passenger vehicles;
- Why volunteers must renew licenses to drive public passenger vehicles every three years;
- Why do volunteers have to pay for Police checks when renewing a license to drive public passenger vehicles every three years;
- How the safety of young and elderly who use public passenger transport are to be protected;
- Why an independent body is required to regulate the road transport industry;
- Can the regulation of the transport industry be reduced to make it smaller and more efficient; and
- Is Road Transport Licensing Committee restricted by the existing legislation?

In addition, the Council of Ministers' Report on Modernising Ministerial Government dated December 2013⁴ sought to reduce the number of separate Government entities to improve communication, reduce costs and increase customer service. This document suggested efficiencies and a more coherent regulatory regime could be provided if some regulatory functions including the Road Transport Licensing Committee were brought together as a Fused Regulator. This new body could provide:

- Enhance Efficiency and Effectiveness
- Enhance Co-operation
- Improve Governance and Accountability
- Enhance Public Clarity
- Reduce Conflicts of Interest

This consultation document seeks the public and road transport industry views on the role, remit and operation of the Road Transport Licensing Committee. The consultation is specifically designed to exclude proposals to modify the extent and scope of existing legislation for ply for hire taxis, private hire vehicles, buses, coaches, mini buses and goods vehicles and their operators. However, this document will seek to identify the key issues in these areas which may result in proposals being brought forward in the future. Any changes of this type will be subject to their own separate consultation during the development of any legislative changes to the Road Transport Act 2001.

⁴ http://www.gov.im/medis/878074/modernising_government.pdf

What is the Purpose of the Road Transport Licensing Committee?

The Road Transport Licensing Committee (RTLCC) is a statutory body constituted under Road Transport Act 2001. The purpose of this body is to regulate, register and/or licence the transport of passengers and goods by road and for connected purposes. The Road Transport Act 2001 includes the following:

1. Granting passenger vehicle operators' licenses to operators of vehicle constructed or adapted to carry passengers for up to five years duration.
2. Granting goods vehicle operators' licenses to operators of motor vehicles (including trailer) for carrying goods for up to five year duration
3. Compiling and keeping up to date a register (registration) of all passenger vehicle operators.
4. Compiling and keeping up to date a register (registration) of all goods vehicle operators.
5. Approving a suitable operating centre for a licensed or registered operator.
6. Specifying the maximum number of vehicles for a licensed or registered operator.
7. Varying, revoking or disqualifying a licensed or registered operator.
8. Granting public passenger licences for regular services (not excursions) using public passenger vehicles. These are provided on more than one occasion, for the carriage of passengers at separate fares on either predetermined routes or variable routes, whether passengers are taken up or set down at predetermined stopping places or on demand for a period of up to five years.
9. Granting public passenger ply for hire service licences for standing or plying for hire in a road or other public place for a period of up to five years using public passenger vehicles (Transitional Schedule 2 Provisions are still in force).
10. Granting public passenger private hire vehicle (advance booked public passenger vehicle transport usually by telephone) licenses
11. Revoking regular or ply for hire service licences
12. Licensing drivers of public passenger vehicles for up to a three year period.

In addition, the RTLCC have regulatory powers to set its own procedures; exempt voluntary organisations for the carriage of passengers; condition licences or registration; receive statutory returns from passenger service licence holders; and inspect maintenance facilities.

Secondary legislation has been promoted by the Department of Infrastructure since 2001 to allow the RTLC to regulate the following:

1. Fixing maximum fares which may be charged for public passenger vehicle journeys
2. Examining public passenger vehicles
3. Regulating the conduct of drivers, inspectors and conductors on public passenger vehicles
4. Regulating the conduct of passengers on public passenger vehicles
5. Controlling the number of passengers on public passenger vehicles
6. Regulating the minimum age of public passenger vehicle drivers
7. Requiring a medical examination for public passenger vehicle drivers
8. Examining the geographical knowledge of public passenger vehicle drivers
9. Exempting non-resident and temporary uses
10. Permitting the transfer of licenses and registration
11. Requiring the display of certificates and badges
12. Regulating use on airfield roads when they are available for public use

The Road Transport Act 2001 permits the Department of Infrastructure to make regulations in respect to any proceedings of the Road Transport Licensing Committee. In April 2014 the Department of Infrastructure became responsible for public passenger transport by bus and rail. This is in addition to the contracting, vehicle fleet management and vehicle testing services the Department of Infrastructure already provided.

What is the Road Transport Licensing Committee?

The RTLC website⁵ provides the following information on their duties and resources:

The Road Transport Licensing Committee (RTLC) acts as an independent body of Government with responsibility for regulating the transport of passengers. It is the duty of the Committee to administer and enforce the provisions of the Road Transport Act 2001, to benefit and protect the public through the provision of sufficient, efficient, safe, and quality services of public transport.

The Act provides for the licensing of all public passenger vehicles that are used commercially on the Island, (i.e. taxis, private hire vehicles, minibuses, buses, and coaches), and their drivers, plus the licensing or registration of operators. The Act also

⁵ <http://www.gov.im/RTLC/>

embraces the operation of heavy goods vehicles, but regulations for the licensing or registration of such vehicles have yet to be made by the Department of Transport.

The RTALC consists of 5 members appointed by the Council of Ministers, subject to the approval of Tynwald, and each member shall hold office for a term of 5 years. The Committee is supported by a Secretary, Administration Officer and a part time Public Passenger Vehicle Inspector.

The RTALC must lay an annual report before Tynwald which sets out the duties the RTALC have discharged in each financial year. These annual reports are available on the RTALC's website⁶. The annual report to 31 March 2014 provides the following data⁷:

Annual Statistics	To 1 April 2014	To 1 April 2013
Total Number of Registered Operators	248	231
Total Number of Registered Public Passenger Vehicles	434	450
Number of Ply for Hire Licenses	200	210
Number of Private Hire Cars Licensed	69	68
Number of Buses, Minibuses and Other Vehicles (Including trikes, funeral cars, etc)	165	172
Total Number of Registered Public Passenger Vehicle	1,308	1,271
Number of Public Passenger Vehicle Drivers Licensed to Drive Ply for Hire Taxis and Private Hire Cars (approximate)	700	580
Total Number of New Applications For Public Passenger Vehicle Driver Licenses	126	93
Number of New Applications For Public Passenger Vehicle Driver Licenses to Drive Ply for Hire Taxis and Private Hire Cars	50	37
Number of New Applications for Public Passenger Vehicle Licenses to Drive Buses, Minibuses or Restricted Public Passenger Vehicle Driver Licenses	76	56
Total Number of Renewal Applications for Public Passenger Vehicle Driver Licenses	208	218
Total Number of New Applications	252	186
Total Number of Renewal Applications	208	218

The RTALC Annual Reports for these years include the following data on matters considered by the Committee:

⁶ <http://www.gov.im/RTLC/>

⁷ <http://www.gov.im/RTLC/about.xml>

RTLTC (Committee) Annual Statistics	To 1 April 2014	To 1 April 2013
Total Number of Committee Meetings	15	18
Total Number of Applications Determined by the Committee	66	72
Total Number of New Applications For Ply for Hire (Taxi) Licenses Determined by the Committee	3	3
Total Number of New Applications For Ply for Hire (Taxi) Licenses Approved by the Committee (Number of Applications Withdrawn)	0 (2)	0 (0)
Total Number of Applications to Vary or Transfer Ply for Hire (Taxi) Licenses Determined by the Committee	22	22
Total Number of Applications to Vary or Transfer Ply for Hire (Taxi) Licenses Approved by the Committee (Number of Applications Withdrawn)	22 (0)	22 (0)
Total Number of New Applications For Private Hire Vehicles Licenses Determined by the Committee	29	20
Total Number of New Applications For Private Hire Vehicles Licenses Approved by the Committee (Number of Applications Withdrawn)	27 (2)	20 (0)
Total Number of New Applications for Regular Services (Bus and Coaches) Licences Determined by the Committee	12	27
Total Number of New Applications for Regular Services (Bus and Coaches) Licences Approved by the Committee (Number of Applications Withdrawn)	12 (0)	27 (0)
Total Number of New Applications Refused	1	3
Total Number of Existing Licenses Revoked by the Committee	1	1

This data indicates the following:

1. The majority of renewal licenses are dealt with by the permanent support staff employed within the RTLTC and approximately a quarter to a third of new applications is determined by the Committee directly.
2. The Committee focus on the public passenger transport.
3. This majority of the applications considered by the Committee are all the new, varied or transferred Ply for Hire (Taxi) and Private Hire Vehicle licenses.
4. The only applications refused are Ply for Hire (Taxi) Licenses and no new Licenses of this type were approved within this two year period.
5. During the same two year period all transfers and variations for Ply for Hire were approved.
6. No new applications for private hires or regular services were refused by the Committee.

In addition to this work the Committee and their support staff carry out a number of other functions these include:

- Reviewing taxi fares;
- Providing advice to the operators and drivers including the provision of a guide to maintaining vehicle roadworthiness;
- Providing training to improve customer care;
- Improving access for users with special needs;
- Investigating the occurrences of vehicle test failures for existing operators;
- Investigating the occurrences of criminal convictions and cautions for existing operators and drivers.

What are the Costs of the RTLC?

The costs associated with operating the RTLC must include the following:

- a. The income to the RTLC and the cost to road transport industry including the voluntary sector from licensing and registration fees
- b. The cost in providing this regulating body including permanent staff

The fees which must be paid when making an application are listed on the RTLC website. The main fees are show below:

Type	Application Cost	Renewal Cost
Registration of Operators for a business which will use vehicles commercially	£60	-
Ply for Hire or Regular Service License	£45 (5 years)	£30 (5 years)
Ply for Hire/Private Car or Minibus Operator Disc	£83 per year	£83 per year
Ply for Hire Operator Disc for each additional area	£55 per year	£55 per year
Bus/Coach Operator Disc	£105 per year	£105 per year
Registration of Operators who will use only ONE taxi or Private Hire car, (i.e. up to 8 passenger seats, excluding the driver), which is NOT used for radio dispatch.	£45	-
Ply for Hire/Private Car or Minibus License	£45 (5 years)	£30 (5 years)
Ply for Hire/Private Car or Minibus Operator Disc	£83 per year	£83 per year
Ply for Hire Operator Disc for each additional area	£55 per year	£55 per year
Variation Application	£15	-
Ply for Hire/Private Hire Car or Minibus Public Passenger Vehicle Driving Licence	£45 (3 years)	£25 (3 years)
Bus or Minibus Public Passenger Vehicle Driving Licence (restricted use only)	£25 (3 years)	£25 (3 years)
Disclosure & Barring Certificate (Actual Police Check Costs)	£44	£44

The annual budget expenditure for the RTLC was £154,000 in 2012/13 and £125,000 in 2013/14. This was achieved with a significant under spend in the 2013/14 financial year and without the requirement to increase fees which provide approximately £40,000 income per annum towards this budget.

Options for Change

Should the road transport industry be regulated?

The public passenger and goods transport is regulated in the public interest to ensure the following:

- The availability of convenient and reliable public passenger transport;
- The availability of accessible public passenger transport for all users;
- The affordability of public passenger transport;
- The safety of the public who use public passenger transport;
- The safe and appropriate storage of public passenger transport vehicles when they are not in use;
- The availability of convenient and reliable goods transport;
- The safe and appropriate storage of goods transport vehicles when they are not in use;
- The safety of other highway users; and
- International reputation when the Isle of Man public passenger and goods operators travel in neighbouring jurisdictions.

The removal of road transport industry regulation including the RTLC could save Government approximately £105,000 to £125,000 per annum. This figure includes approximately £40,000 per year income the RTLC receive from the road transport industry from licensing fees and does not include the £25,000 fees associated with the Disclosure and Barring Service checks which is paid directly to the Department of Home Affairs. However, without this regulation public passenger and goods vehicle transport could be operated on a lowest cost commercial model. This would remove the requirement to take account of the public interest issues described above and could reduce the safety, quality of employees and public access in this industry.

Do we need an independent RTLC Committee?

The Department of Infrastructure and its predecessor the Department of Transport have changed significantly since the Road Transport Act was approved by Tynwald in 2001. In this time the Department has become the Isle of Man Government's main:

- Contractor for undertaking construction, engineering, building and maintenance operator;
- Vehicle fleet procurement, management and maintenance operator;
- Bus public transport operator; and

- Vehicle testing operator

The Road Transport Act 2001 specifically states public and local authorities are not exempt from this legislation. This result in the goods and public passenger transport activities carried out by the Department being regulated by the RTLC.

A conflict of interest could be seen to exist if the Department of Infrastructure's employees were regulating both the Department of Infrastructure as well as other external operators engaged in the same trade or business activity. This is the case for services offered by the Department's contractor, vehicle fleet and bus public transport operators. The statutory requirement for the RTLC overcomes this issue through the provision of an independent committee to regulate the activities of the public authority, local authority and private operators while still having access to the specialist vehicle testing and transport legislative skills and knowledge which are contained within the Department of Infrastructure.

Could another Department regulate or sponsor the road transport industry?

The Council of Ministers' Report on Modernising Ministerial Government dated December 2013⁸ sought to reduce the number of separate Government entities to improve communication, reduce costs and increase customer service. This document suggested efficiencies and a more coherent regulatory regime could be provided if some regulatory functions including the Road Transport Licensing Committee were brought together as a Fused Regulator. This document proposed merging the Office of Fair Trading with the RTLC. The following similarities in expertise exist within these bodies:

1. Both bodies have support services which include corporate governance, financial management, legislative support and administration support.
2. Both bodies assess appropriate pricing and levels of completion are in place for the Island's consumers and users.
3. Both bodies protect consumer/user interests, consumer/user safety, register service providers and license services.
4. Both bodies provide advice and education.
5. Both bodies have sponsoring Government Department's to promote legislation for their areas of regulation. The Department of Economic Development sponsor the Office of Fair Trading and the Department of Infrastructure sponsor the RTLC.

Alternatively, another Government Department could take on the RTLC functions directly or sponsor the existing RTLC structure.

Should some of the RTLC functions be carried out by local authorities?

⁸ http://www.gov.im/medis/878074/modernising_government.pdf

Local authorities could undertake some of the RTALC regulatory functions. For example, ply for hire (taxi) is currently licensed and operated on a geographical basis and the RTALC have a statutory obligation to consult the relevant local authority to obtain their views when assessing applications for licensing and registration.

However, the majority of the other road transport industry areas operate across a number of local authority areas and this could create problems coordinating regulatory activity and could increase bureaucracy and costs. In addition, those RTALC functions which currently operate on a geographical basis may not do so in the future as a consequence of more efficient logistic and communication technologies.

A number of local authorities currently operate some public passenger and goods road transport services, through their contractor and voluntary service activities. This will result in these local authorities regulating the private sector and their own activities locally which could be perceived as a conflict of interest. In addition, some local authorities may not have the technical and regulatory expertise to undertake and sponsor these regulatory functions. It is likely this work would still need to be done by the Department of Infrastructure who currently sponsor local authority legislation.

Should voluntary organisations and charities be subject to more self regulation?

A significant number of RTALC reported activity related to licensing public passenger vehicle drivers. The numbers of drivers appears high for those involved in the commercial transport of public passengers on the Island. The licensing statistics contained within the report establish 208 renewal applications for public passenger vehicles licenses were made within the twelve month period. In addition, it reports approximately half of the public passenger vehicle drivers are ply for hire and private car drivers. This means approximately 600 public passenger drivers are involved in the non-taxi related commercial transport of passengers.

The Road Transport Act (2001) allows charities and voluntary organisations to apply to the RTALC for an exemption from licensing and registration. In addition, the Act defines passenger vehicle commercial use as:

- Adapted vehicles which can carry more than 8 passengers in addition to the driver;
- The passengers' payment exceeds the running expense for the journey; and
- The payment by passengers is made during or after the journey began.

Guidance or new legislation could be implemented to allow more self regulation for voluntary organisations and charities to allow them to use drivers which are not licensed directly by a regulator. This exemption would be conditioned with a requirement for the voluntary organisation or charity to undertake regular checks on the suitability of their drivers and to send this information to the regulator.

This approach would increase the responsibility on voluntary organisations and charities to monitor and validate the suitability of the drivers they use. Many of these organisations would already undertake Police checks and this may reduce duplication. However, the

operating costs for these organisations and the risks to vulnerable members of our society may increase if these checks are not undertaken as a consequence of introducing this measure.

Should the duration of the licenses for public passenger transport drivers be extended subject to it being governed through the introduction of more self regulation?

The Road Transport Act (2001) specifies a five year maximum duration for the following licenses:

1. Licenses to operate passenger vehicles constructed or adapted to carry passengers;
2. Licenses to operate motor vehicles (including trailer) for carrying goods;
3. Licenses for public passenger regular services (not excursions) including private hire vehicles using public passenger vehicles;
4. Licenses for public passenger for standing or plying for hire in a road or other public place; and
5. Licenses for public passenger private hire vehicles

However, the Road Transport Act 2001 specifies up to a three year maximum duration for the licensing of drivers of public passenger vehicles. New legislation could be implemented which extends the duration of the license for public passenger vehicle drivers. This increase in duration would require more frequent checks by employers on the suitability of the drivers they use and to provide this information to the regulator. This must be made an operator license conditioned requirement or an exemption conditioned requirement for voluntary organisations or a charity. How this condition is complied with would be an essential part of the regulator's assessment when considering any renewal applications.

This approach would increase the responsibility on operators, voluntary organisations and charities to monitor and validate the suitability of the drivers they use. Many of these organisations would already undertake Police checks and this may reduce duplication. However, the operating costs for these organisations and the risks to vulnerable members of our society may increase if these checks are not undertaken as a consequence of introducing this measure.

What is the RTLC's role in promoting changes to the Road Transport Act (2001)?

The RTLC have not issued any ply for a hire (taxi) license in the last two years and this is the only area of the RTLC (Committee) responsibility where they have refused new applications. In the majority of the cases this is because the applicant has not proved there is an unmet need for any new ply for hire licenses in accordance with the legislative requirements. In the same period of time the RTLC (Committee) have not refused any applications to transfer or vary existing licenses or private hire vehicle licenses which are not required to prove a need.

The Road Transport Act (2001) has legislation relating to the fitness of drivers and vehicles for public passenger use. This legislative provision does not exist for goods vehicles and is inconsistent with neighbouring jurisdictions where some of the Island's good vehicles must travel.

This information has resulted in a number of questions:

Should the regulator assess the need for any type of licenses and publish their findings?
Should the regulator assess the need for new legislation and publish their findings?

This consultation document is designed to allow the public and the road transport industry to provide the Council of Ministers' review committee with information on the role, remit and operations of the RTLC. The review committee do not wish to restrict the feedback provided by participants to the areas outlined specifically within the consultation document and the questionnaire will provide opportunities for additional comments on the following general areas:

- Which other public passenger and goods road transport industry areas should not be regulated and why?
- Which other public passenger and goods road transport industry areas should be regulated and why?
- Which other public passenger and goods road transport industry areas should be self regulated and why?
- Which other part of the public passenger and goods road transport regulatory role would you change and why?
- Which other part of the public passenger and goods road transport industry regulatory remit would you change and why?
- Would you change any other part of the RTLC's operation and why?

QUESTIONNAIRE

1.1. What are your main interests in public passenger road transport?

- Ply for hire operator (On demand at roadside including ranks)
- Private hire vehicle operator (advance booked vehicle transport)
- Regular public passenger service operator
- Public passenger vehicle driver
- Voluntary organisation or charity
- RTLC Representative
- Member of the public

1.2. What are your main interests in goods road transport?

- Goods vehicle operator
- Goods vehicle driver
- Business owner or operator
- RTLC Representative
- Member of the public

1.3. Why should the public passenger road transport industry be regulated?

- Public passenger road transport should not be regulated
- To ensure availability of convenient and reliable public passenger transport
- To ensure the availability of safe and appropriate storage of public passenger transport vehicles when not in use
- To ensure the availability of accessible public passenger transport for all users
- To ensure the affordability of public passenger transport

- To ensure the safety of the public who use public passenger transport
- To ensure the safety of other highway users
- To protect our international reputation when the Isle of Man public passenger operators travel in neighbouring jurisdictions
- Other (Please Specify)

1.4. Why should the goods road transport industry be regulated?

- Goods road transport should not be regulated
- To ensure the availability of convenient and reliable goods transport
- To ensure the availability of safe and appropriate storage of goods transport vehicles when not in use
- To ensure the safety of other highway users
- To protect our international reputation when the Isle of Man goods operators travel in neighbouring jurisdictions
- Other (Please Specify)

1.5. Do we need an independent RTLC?

- Yes
- No
- Do Not Know

1.6. Who should regulate public passenger and goods road transport?

- RTLC
- Department of Infrastructure
- Fused Regulator (Office of Fair Trading/RTLC)
- Other Government Department
- Local Authorities
- Other

1.7. Should voluntary organisations and charities be subject to more self regulation?

Yes

No

Do not know

1.8. Should the duration of the licences for public passenger transport drivers be extended to a five year duration subject to it being governed through the introduction of more self regulation?

Yes

No

Do not know

1.9. Should the regulator assess the need for any type of licences and publish their findings?

Yes

No

Do not know

1.10. Should the regulator assess the need for new legislation and publish their findings?

Yes

No

Do not know

1.11. Which other public passenger road transport industry area should not be regulated and why?

Not Applicable

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1.12. Which other goods road transport industry area should not be regulated and why?

Not Applicable

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1.13. Which other public passenger road transport industry area should be regulated and why?

Not Applicable

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1.14. Which other goods road transport industry area should be regulated and why?

Not Applicable

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1.15. Which other public passenger road transport industry area should be self regulated and why?

Not Applicable

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1.16. Which other goods road transport industry area should be self regulated and why?

Not Applicable

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1.17. Which other part of the public passenger road transport regulatory role would you change and why?

Not Applicable

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1.18. Which other part of the goods road transport regulatory role would you change and why?

Not Applicable

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1.19. Which other part of the public passenger road transport regulatory remit would you change and why?

Not Applicable

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1.20. Which other part of the goods road transport regulatory remit would you change and why?

Not Applicable

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1.21. Would you change any other part of the RTLC's operation and why?

Not Applicable

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WHAT HAPPENS NEXT

Thank you for reading this consultation. Please tear off the questionnaire, complete and return to the Department of Infrastructure by no later than 21 April 2015. Alternatively, visit the Government website at www.gov.im where the questionnaire can be completed and submitted online.

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