Summary of submissions on proposed changes to the RUB for targeted engagement – Transport Agency recommended response

NUMBER	ITEM	RATIONALE	REFERENCE	SUBMISSION	RECOMMENDED RESPONSE
1.	Rewrite introduction	To update the strategic context and clarify incorporation of the RUB specification is required for all new Public Transport Operating Model contracts.	Section 1.0	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **Bay of Plenty Regional Council (BOPRC)** 1. Introduction (Section 1). The substantial redrafting of the introduction clarifies the purpose of the document and its relationship with both Transport Agency procurement standards and the Public Transport Operating Model (PTOM). Council supports the greater ease of use these amendments will allow. **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed. **Greater Wellington Regional Council** **General** GWRC supports the NZTA's aim to standardise urban bus requirements across New Zealand to create efficiencies and improve the usability and accessibility of buses for all customers. GWRC supports the national and local benefits provided by the RUB.	Make only minor amendments as required.
2.	Regional Council/Auckland Transport contracted school and rural services are exempt from the requirements for existing buses under section 8, but section 8 can be used at a Regional Council's/Auckland Transport's discretion or as a guide for what specification to	The market for school services is a finite one therefore it is hard to justify high capital costs. Separating school buses from urban buses keeps capital costs down eg maximises the economic life of buses, but also enables lower cost new school bus options (eg truck chassis school buses) as these do not have to be Super Low Floor buses. Targeted services are provided for school students who are unable to use a typical school bus eg SESTA. Alternatively school students can use regular scheduled services with Super Low Floor buses where these services are suitable. Separating school buses from urban buses	Sub-section 1.2.5	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **BOPRC** 2. Discretion provided to Regional Council Controlled School Buses and Rural Services from section 8 (Subsection 1.2.5). Exemption for contracted school and rural services is welcomed by Council as this permits the use of those standards which are the most appropriate for the service type. In view of the separate application of SESTA services, School Bus services have a lesser need for some of the accessibility features required for public urban services. Council is focussed on providing a cost-effective school bus service and the ability to select appropriate standards provides value for money solutions. Similarly, while rural services are a vital lifeline for isolated communities Council recognises the need to tailor services to the needs of those communities and the geography of their routes.	Keep changes as proposed.

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	apply.	also assists applying Euro 3 emissions standard in many locations as the minimum acceptable standard for existing buses, as the majority of the oldest buses in urban fleets are predominantly used for school services.		**Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	
3.	Definition of a Small Bus (and therefore Large Bus)	To allow larger 35 seat (excluding the driver) smaller buses to be operated with only one door. This helps to facilitate the use of imported smaller buses, some of which have more seats than the previous threshold of 32. Small buses have cheaper capital and operating costs. They can be ideal for some feeder services and where the loadings on a service may not warrant a large bus, or where the physical dimensions of the road infrastructure and/or topography is not suitable for a large bus. These buses may also be useful in smaller urban centres in New Zealand where the average loadings are lower. We have changed the definition of a large bus as a result of the change to the small bus definition.	Sub-section 1.3	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **KIWI BUS BUILDERS** Doesn't make sense to me your talking about smaller buses to enable access to areas but are basing that on seat numbers surely you should be talking the physical size of the bus as they do overseas. Eg 12m 10m 9m 8m etc. Changing the number of seats doesn't match your rationale of why. **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	Keep changes as proposed. The assumption is that operators and regional councils will seek to maximise the seats available per bus, therefore number of seats is a reasonable proxy for bus size. By implication a smaller seat capacity bus is usually smaller dimensionally, i.e. shorter length and therefore has improved manoeuvrability in areas of restricted road width and accessibility.
4.	Fold-up seating in the priority seating space must maintain aisle width clearance when the space is unoccupied by a wheelchair/pram user.	To clarify that aisle width clearance is crucial for access to the wheelchair/multi-use space for wheelchair users or caregivers with prams, if fold-up seating is provided in the priority seating area.	Sub-section 3.1	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **BOPRC** 3. Fold-up seating (Subsection 3.1). Council supports the clarification of requirements for the priority seating area. It is important to maintain aisle clearance and provide full use of the aisle width for all users. **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury**	Keep changes as proposed.

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				Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	
5.	Step depth to rear saloon area	To increase minimum step depth to improve access and safety.	Sub-section 3.3	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	Keep changes as proposed.
6.	Use of safety yellow for areas or physical components of the bus requiring colour contrast to enable customers with a visual impairment to be able to more easily and safely use the bus.	Safety yellow is considered the most easily distinguished by people with visual impairments. However, we are seeking feedback on whether other colours should be allowed provided they meet the minimum visual contrast requirement of 70 percent.	Sub-section 4.2	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **KIWI BUS BUILDERS** In my opinion there should be one colour and uniformity so the disabled/sight impaired are always finding their way in familiar surroundings, but if other colours meet the requirement, it's hard to make a case calling for uniformity. Unless the visually impaired hold a position where they consider some colours less safe than others, even if they are deemed to comply. **CCS Disability Action** We recommend option 1, mandatory safety yellow. **BOPRC** 4. Use of Safety yellow (Subsection 4.2). Council supports Option 1 the Mandatory use of safety yellow as this aligns with feedback provided by organisations working with the visually impaired. This provides a clear message to all operators and a consistent national approach. **Blind Foundation**	Safety yellow is made mandatory for the reasons set out by the Blind Foundation, and because this is supported by the majority of the main stakeholders. Yellow, especially high visibility style is internationally accepted as being several times more visible than the next colour and therefore benefits persons of restricted vision; it is used worldwide for tactile pavement markers.

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				The Blind Foundation supports option 1: Mandatory safety yellow for the following reasons • Provides the most visible contrast to most backgrounds • Consistency across bus fleets nationally - expectations • Unable to control the background colours of items such as seating which may not provide sufficient contrast in all lighting conditions **Mana and Newlands Coach Services** Consultation question re yellow vs. 70% minimum visual contrast. Mana would support yellow. **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support mandatory yellow. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed. **Greater Wellington Regional Council** GWRC supports option 1. Yellow is preferred. This option improves consistency of colours used, and supports the opinions of the Royal New Zealand Foundation for the Blind, and the Blind Citizens of New Zealand that safety yellow is the colour most easily distinguished by the visually impaired. For consistency, other sections within the RUB that identifies a similar aspect should be updated to reflect the requirement of the Mandatory safety yellow. E.g. 3.4 Floors and 4.3 Stanchions/handrails. **Bus and Coach Association NZ** 6.1 In response to the consultation question, the BCA favours option 1, to make safety yellow mandatory. 6.2 We agree with RNZFB and the Association of Blind Citizens of New Zealand.	
7.	Tree guards are mandatory for large bus double deckers.	To improve customer safety and reduce damage to the bus.	Sub-section 4.6	**NZ BUS** NZ Bus supports the proposed changes to the RUB **KIWI BUS BUILDERS** Not sure from what position this is called for in NZ for passenger safety. If it is considered required, then there needs to some parameters around what it has to be. For example putting the radio aerial there or a piece of number 8 wire, both of these will be as effective as a light tube rail if you hit something solid with 20 tonne of weight and forward motion.	Tree guards of the style used in UK may not deflect initial brushing with low density foliage but do deflect/absorb the initial impact of the larger protruding branch that carries that foliage. Therefore damage to both bus structure and the front upper windscreen is prevented or minimised in an area of the upper nearside of the double decker bus. Front screen replacement costs are very significant. While recent experience of double deckers in urban, charter and intercity operations has not resulted in any known

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				Mana and Newlands Coach Services Regarding new LBDD requirements 'tree guards' and 'elevated hazard warning devices'. Q. What are these? **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	incidences of damage to the top deck area, Auckland Transport's recent evaluation trial of routes for possible use for double decker services identified many areas where tree and/or verandah damage could be a significant problem. A deflection bar is considered a sensible precaution and a low cost protective measure. Specification of a tree guard for the RUB: A single vertical/profile following circular bar of sufficient strength (35 – 50 mm in diameter), and of a length to protect the upper deck front left hand corner bus superstructure and the upper front screen, mounted on to the left front corner of the upper deck of the double decker bus.
8.	Elevated warning device for large bus double deckers.	To improve customer safety and prevent damage to the bus.	Sub-section 4.6	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **Mana and Newlands Coach Services** Regarding new LBDD requirements 'tree guards' and 'elevated hazard warning devices'. Q. What are these? **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	Specify an elevated hazard warning system for the RUB as optional only, for the same reasons as mentioned for tree guards above: A hazard warning device is an electronic/optical warning device to warn the driver that the vehicle is approaching an area that has some form of projecting hazard at a level that is in the vehicle line of travel.
9.	Air conditioning climate control systems for new	To improve customer experience. We are seeking feedback on whether this item should be mandatory for all urban areas or	Sub-section 4.7	**NZ BUS** NZ Bus supports the proposed changes to the RUB. Our comment on air conditioning is that we would like to see it nationwide. This because of passenger comfort and	Make mandatory for Auckland, Wellington and Christchurch and 'good practice' for others. Apply only to diesel buses at this stage, until the impact on fuel efficiency savings from

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	buses.	just Auckland, Wellington and Christchurch.		consistency across the bus fleet. **CCS Disability Action** We recommend option 1, mandatory climate control for all new urban buses in urban areas. As noted, this will increase passenger comfort and patronage. In addition some people's impairments fluctuate with temperature and they experience reduced mobility in abnormal conditions. We also note it would make little sense to focus on just three cities, when other cities south and north of these experience greater temperature diversity. **BOPRC** 5. Air Conditioning (Subsection 4.7). The mandatory inclusion of air conditioning on buses at a national level is one that Council would consider problematic in view of the climate range across the country. We prefer Option 2 as while we consider it necessary in the Bay of Plenty we would find it acceptable if it were optional in other regions. **Mana and Newlands Coach Services** In its summary of submissions, NZTA reported *'Some regional councils did not support air conditioning climate control due to increased cost and because they thought it was unnecessary for their climate. Recognising the increased capital and operating costs and vehicle weight concerns from some regional councils, we have made the fitting of air conditioning climate control systems 'highly recommended' rather than a requirement.'* Mana supports the recommendations of the 2010/11 review. Q. This matter would seem to have to have been comprehensively put to bed at the last review (and with considerable expert input). What is the reason for it being revisited? **Go Bus** Go Bus supports Option 1 – that air-conditioning is mandatory for all new urban buses in urban areas – as it strongly believes the same standards of travel should exist for all regions. The RUB was designed to create efficiencies, and improve the usability and accessibility of buses for all customers. This two tier approach would significantly reduce the benefits of the above stated primary purpose of the RUB. Go Bus regularly moves buses around its NZ fleet and the RUB has great benefits for the regions we serve. Just this month we have moved buses from Hawkes Bay to Tauranga. Differences in standards of heating, ventilation and air conditioning will affect this flexibility. Go Bus also strongly supports the notion that the benefits of air-conditioning should be enjoyed by all urban passengers in any New Zealand location, and can see no just reason for such benefits to be isolated to the three big cities. **Horizons Regional Council** Re: air conditioning, we're happy that this is just mandatory for the big three as we see no reason to make this mandatory for our services. **Environment Canterbury** Support Option 2 to allow flexibility for smaller regions (only mandatory in Auckland, Wellington and Christchurch). **Tranzit Group** Support the changes as proposed.	hybrid buses can be established. Note the alternative requirement for others of "...a saloon heating and ventilation system…" is intended to go some way to providing an acceptable passenger comfort level. The fitment to double decker's upper saloon of passenger adjusted directional overhead air conditioning outlets/vents is an optional extra. The largest bus operators (making up the bulk of the urban fleet in New Zealand) have indicated that they will put air conditioning climate control systems on all new buses anyway as they operate in multiple regions and are keen to make use of these systems to improve the experience and comfort of their customers. However, some Regional Councils with smaller populations and bus services networks have a harder time increasing the ratepayer contribution for such level of service increases. Therefore for these reasons, air conditioning climate control systems will be good practice, but not mandatory at this stage. We will revisit this issue in three years' time with a view to making air conditioning climate control systems mandatory for all new vehicles.

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				Blended Fuel Solutions Ltd Support the changes as proposed. **Greater Wellington Regional Council** GWRC does not support either of the options within the amended RUB at this time and requests that Option 3 – Preferable be retained. Currently our research identifies a number of issues relating to fuel cost efficiency benefits being lost, operational problems of A/C units and increased maintenance costs when fitted to high capacity hybrid vehicles. A/C units are heavy and contribute to the overall gross vehicle mass (GVM) of the vehicle, and due to axle weight limitations in New Zealand under the Vehicle Mass and Dimension Rule (VDAM), passenger numbers are reduced to accommodate this. GWRC does agree that A/C is preferable if it is cost effective, it suggests more research and information is required on the impacts to high capacity vehicles and hybrid/electric vehicles before a mandatory position is taken within the RUB. **Bus and Coach Association NZ** 7.1 In response to the consultation question, the BCA favours option 1. We believe air conditioning climate control should be mandatory for all new urban buses in all urban areas, for the following reasons: a. air conditioning climate control is becoming increasingly wide-spread in the industry; b. passengers value having a comfortable and stable temperature environment; and c. it assists with demisting requirements, as set out in subsection 4.8.	
10.	Wider rear destination sign.	To improve customer experience by providing more useful information as needed.	Sub-section 5.3	**NZ BUS** NZ Bus supports the proposed changes to the RUB **BOPRC** 6. Wide rear destination sign (Subsection 5.3). The optional inclusion of wide rear destination signage is supported by Council. It is not essential for this to be provided immediately, but should be programmed in for bus upgrades. **Mana and Newlands Coach Services** Bottom shaded box 'LB' requires a 'wide rear destination signage similar to a front destination sign'. Q. Is it envisaged this is a full Hanover unit as used for the front display? Q. Does this apply to existing buses? (refer also 2. above) **Go Bus** Go Bus appreciates that there are likely customer benefits of having wide rear destination signs (similar in size and content to a front destination sign) and notes the RUB specifies these as 'desirable.' However, larger rear signs will devalue the advertising space on the rear of the bus, the most lucrative and attractive bus advertising medium. As bus advertising keeps the cost of contracts and fares down, we believe that this suggested change should be given further consideration so as the trade-offs are well understood. A suggestion is that this option is available to Councils upon agreeable evidence of all-up benefit being provided to NZTA.	Keep changes as proposed. Yes. A "'Hanover" style sign that is wider than the simple three rear route number that displays additional information on destination and potentially other matters. Does not apply to existing buses.

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				Horizons Regional Council Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	
11.	Signage adjacent to the front door to indicate the maximum loading of the manual ramp and maximum width of the mobility aid that can fit.	To improve customer information and reduce the potential for driver-customer disagreements.	Sub-section 6.5	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **CCS Disability Action** We fully support the new signage requirement for ramps. Good clear signage, especially of weight limits, can prevent and solve difficult situations for drivers and bus users. **BOPRC** 7. Maximum loading signage (Subsection 6.5). The inclusion of a sign providing width and weight limits gives clear information to wheelchair and pram users and therefore is supported by Council. We would suggest that reference to the support of an appropriate disability group would permit Councils and drivers to explain the requirement. **Go Bus** Go Bus appreciates the issue that a dimensions and weight sticker for wheelchairs might be trying to address. However, displaying of stickers adds to visual clutter, stock control and maintenance issues. Warning and regulatory stickers should also be limited to those that really matter, such as those for emergency controls for bus doors. We believe a more appropriate approach is to target the wheelchair weight and dimension restrictions message to users through their various agencies. AT and Regional Councils have excellent relationships with these agencies through their Total Mobility management function. **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	Keep changes as proposed. This is a universal and regular area of discussion, disputes and misunderstandings. Providing a sticker with this information will provide clarity and reduce the potential for driver-customer disagreements. Organisations representing people with disabilities have undertaken to publicise the carriage limitations for urban buses through their own various channels of communication.

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12.	Allow existing buses used for school services to be up to 23 years old.	To provide more consistency with potential Ministry of Education contracted school bus requirements.	Sub-section 8.1	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **KIWI BUS BUILDERS** Allowing existing buses to be 23 years old, in the rational it's to bring it into line with MOE. Moe is 26 years. Not sure if a typo or a rationale behind it I am not aware of not attending the workshops. **BOPRC** 8. School Bus Age (Subsection 8.1). Council supports the increase in permitted age of school buses as this provides value for money but proposes an amendment to state: 'providing evidence is provided of a planned maintenance and replacement programme.' We find that the standard of maintenance is a key component in the safe operation of older vehicles. **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed. **Tranzit Group** Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed.	Keep changes as proposed. This improves flexibility and better reflects practice across New Zealand for the provision of school services, which is to allow older vehicles to be used provided they are well maintained and meet the legal safety requirements.
13.	The minimum emissions standard for existing buses in urban fleets is to be Euro 3 (excluding buses used for school or rural services) in Auckland, Wellington and Christchurch. For buses used in other urban centres, the emissions standard (excluding buses used for school or rural services) is to be at least Euro 2.	To reduce pollution from a significant number of buses operating in areas of high employment and population densities such as city centres.	Sub-section 8.2	**NZ BUS** NZ Bus supports the proposed changes to the RUB. **Mana and Newlands Coach Services** Section 8.2 requires all used buses (a bus registered in New Zealand prior to 1 January 2009) used in Auckland, Wellington and Christchurch to meet EURO 3 emissions standards by 1 July 2015. The existing requirement is for buses to meet EURO 2 by that date. focussing on the late night and After Midnight services. Q. What authority does the review group have to impose retrospective requirements? Q. What authority does the review group have to impose retrospective requirements with no lead-in period? Q. What is the review group's understanding of the number of buses that would be taken out of the system with the move to EURO 3 by 1 July 2015? Q. What is the review group's understanding of the number of buses that would be taken out of the system with the move to EURO 2 by 1 July 2015? **Horizons Regional Council** Support the changes as proposed. **Environment Canterbury** Support the changes as proposed.	Delete start date of 1 July 2015 and apply as "PTOM contracts are rolled out." Following consultation and economic analysis, we have concluded that the financial and operational impacts on operators can be significant, particularly for those with larger proportions or significant numbers of pre-Euro 3 buses. Therefore the RUB will include the ability for a Regional Council/Auckland Transport to agree a one-off transition plan with operators to phase out these vehicles from urban service as soon as practicable after the start of any new PTOM contract. We recommend Mana and Newlands Coach Services read Section 1 of the RUB and previous versions which describe in detail the reasons and processes that led to the development of the RUB in its current form, and where the authority for application lies ie through the Transport Agency's procurement rules under section 25 of the Land Transport Management Act 2003. The application of the RUB has never been intended to be retrospective.

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				Tranzit Group Support the changes as proposed. **Blended Fuel Solutions Ltd** Support the changes as proposed. **Greater Wellington Regional Council** GWRC supports the Euro3 standard for emissions, however has concerns regarding the timing of the standard included in the RUB for Wellington. GWRC fleet improvements (to ensure all buses meet Euro 3) will not begin until 2017 when the PTOM tenders are underway. The 1 July 2015 Euro 3 emissions standard for Wellington is an unrealistic timeframe. GWRC therefore requests that this be noted within section 8 of the RUB and the requirement date of 1 July 2015 be extended to 1 July 2017. **Bus and Coach Association NZ** 9.1. The BCA has serious concerns for the consequences of a Euro 3 emissions standard for use in Auckland, Wellington and Christchurch. Many operators have Euro 2 buses currently operating in these three urban centres. By imposing this requirement, the RUB is effectively declaring these vehicles to be of zero value. This will cause some operators in Auckland, Wellington and Christchurch, to be seriously disadvantaged[1]. 9.2. The BCA submits that there is insufficient reason to apply a different standard to Auckland, Wellington and Christchurch, given the purpose of RUB is to standardise urban bus requirements across regional councils and Auckland Transport. 9.3. The BCA submits that either the same Euro 2 emissions standard be applied to all urban centres, or an exception be made to allow those buses currently in use in Auckland, Wellington or Christchurch, with Euro 2 engines, to continue in use, until the maximum permitted vehicle age of 20 years is reached. [1] Mandating Euro 3 for all existing vehicles would be financially and operationally devastating for many operators of the BCA. One such urban operator has a fleet comprising approximately one quarter Euro 2 buses, and, if the RUB mandated Euro 3 for existing buses, then effectively one quarter of their fleet would become completely redundant. Additionally, some operators have approximately 6 – 8 years left of urban use in their Euro 2 buses, again, mandating Euro 3 will have significant adverse cash-flow and business planning implications.	
OTHER ITEMS STAKEHOLDERS PROVIDED FEEDBACK ON					
14.	Expand RUB to other types of bus services.			**CCS Disability Action** With the aging population, especially in provincial and rural New Zealand, the current exemption for rural buses from accessibility requirements is likely to prove unsustainable. Likewise, the need for accessible Intercity and tourist coach services is only going to grow. We recommend that the New Zealand Transport Agency works with relevant parties to look at expanding the Requirements for Urban Buses to other types of bus services.	These services are not contracted by regional councils and do not receive a subsidy, therefore the Transport Agency/Regional Councils/Auckland Transport cannot require additional quality standards for these vehicles over and above the minimum legal requirements. However it should be noted that the bus and coach industry and associated travel and tourist companies are well aware of the need to make all forms of bus and coach travel more widely accessible to all types of passengers and so will continue to incorporate new technology and concepts where it is demonstrated that they have greatest passenger benefit and value for money.

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15.	Mobility scooters			**CCS Disability Action** We recommend that the Requirements focus on weight and size restrictions, rather than exclude a whole category of mobility equipment outright. This would make the Requirements more adaptable to the often rapid changes in technology. The New Zealand Transport Agency does not exclude mobility scooters outright and instead focuses on weight and size restrictions.	Keep status quo. There is a general understanding in the public transport sector, including bus drivers, of what is clearly a mobility wheelchair, manual or powered, and the different performance/profile of longer range mobility scooters which are less favourable in terms of accessing a bus. We will review in 3 years or possibly sooner if information comes to hand of technical developments that better match mobility scooters with wheelchair characteristics.
16.	Priority seating signage			**CCS Disability Action** Current signage does not identify who has priority. Usual practice overseas is for wheelchair users to have priority. This is because carrying a child and folding a pram is usually easier and more feasible than a wheelchair user transferring and folding a wheelchair. We recommend signage states that wheelchair users have priority and that prams/buggies need to be folded on request.	The wording on the sticker is already quite lengthy and common sense and courtesy must apply; this can form part of driver inductions or refresher training.
17.	Wheelchair orientation and restraints			**CCS Disability Action** As noted, rearward facing chairs do not require restraints. This enables people to position themselves independently, especially if the restraints are difficult to operate. Many wheelchair users prefer forward facing spaces, however. In a forward facing position they can independently observe the direction of travel and anticipate upcoming bus stops. We recommend large buses provide wheelchair parking spaces where a passenger can choose to sit either forward or rear facing. **Mana and Newlands Coach Services** Bottom shaded box 'LB' requires 'a minimum of one wheelchair (preferably rearward facing and on the nearside)'. This arrangement is typical of ADL product but not found elsewhere to our knowledge. It has also proved unpopular with disabled passengers who feel embarrassed and exposed forced to face all of the other passengers. It has also proved to be an unworkable arrangement for some powered wheel chairs unable to manoeuvre into the space. The next page 'Interpretation' first paragraph suggests the rearward facing position has been the subject of some research by the review group? Q. Is this requirement the result of the review group's research or due to the current widespread use of ADL's in NZ? Q. Are ADL's typical of the current fleet? Q. Are ADL's typical of new product being offered by other manufacturers? **Go Bus** We reiterate again the value to Go Bus of the RUB and we request that there are few if any exemptions, exceptions etc. allowed for between various parts of the country. An example of a costly exception is the forward facing wheelchair position that ECan requires. This is different to other regions and expensive modifications need to be made when we move buses into or out of Christchurch.	No change to the RUB is required as it already allows for rearward or forward wheelchair spaces to be provided. The project team developing the RUB believes that rearward facing, however, is safer, more efficient as the driver and/or customer does not have to spend time connecting the restraint, and a rearward orientation is easier for a person in a wheelchair to move in to and out of. Rearward orientation is also common practice in Europe. Rearward facing seats (usually mounted on the rear of the front wheel arch) have been – and still are – features on urban buses for decades, since attempts were made to reduce floor height and improve capacity. The present concept was developed long before ADL buses became available in New Zealand. Previous RUB project teams conducted research both overseas and in New Zealand, on options and preferences for seat orientation. To maintain passenger capacity, ease of access for all passengers and eliminate the need to provide wheelchair restraints (which can be difficult and time consuming to fit), the current rearward facing option is already being comfortably met by suppliers.
18.	Aisle width and bus sizes			**CCS Disability Action** With the increase in seat allowances for small buses, we believe the aisle width should be increased to match large bus requirements. Currently, small buses can have the	Noted, but increasing the aisle width may well limit the availability of makes and models from current suppliers as aisle width is determined from chassis design

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				slightly narrower aisle width of 780mm. The increase to 800mm is small enough to have little effect on transport operators, but will help wheelchair users manoeuvre easier. Over time, the trend seems to be for seat allowance to increase for small buses. It is important that this does not compromise accessibility. This is especially important as small buses may serve more provincial routes, where the impact of the aging population is likely to be the strongest. We recommend that aisle width requirements are equalized between small and large buses.	limitations/factors such as front steering, suspension and braking geometry. Most suppliers are well aware of the requirement to maximise aisle width in their products for urban use. We will review again in 3 years' time in the event more supply source options become available.
19.	Change of organisation name		Throughout document	**Blind Foundation** The Royal NZ Foundation of the Blind is now named Blind Foundation and we request that this is changed throughout the document.	Change all references to RNZFB to Blind Foundation.
20.	New to urban service definition		Sub-section 1.2.2	**Blind Foundation** The Blind Foundation is concerned at how this will be managed where older buses are moved to other urban area (as has happened in Christchurch following the earthquakes) with no requirement on the maximum that can be entered onto routes within the city or purchased by operators in a city with multiple operators. This affects the accessibility of routes and has resulted in limited options of travel destinations and times. Will this be managed under the next section 1.2.3 Regular fleet replacement which states operators will be required to ensure that they maintain or improve on the fleet age matrix?	No change to the RUB is required. Yes, the fleet matrix and average age profile of the fleet ensures that vehicles are regularly replaced. The Regional Council also has to agree that the existing vehicle moving to their jurisdiction is acceptable.
21.	Items not included		Sub-section 1.2.11	**Blind Foundation** The Blind Foundation understands that infrastructure design and driver training is not part of this document and that the NZTA is developing a document on Infrastructure Design. We request to be included as a stakeholder in the development of this document as those who are blind or have low vision need to be able to safely and independently travel to the bus stop, access information, locate the bus boarding position, board and disembark and continue on their journey. Inaccessible design creates a barrier for our clients and the general public who have low vision. It is noted that NZTA and the BCA developed a training programme for drivers in 2011. Was there any input from major stakeholders in the disability sector to ensure this is inclusive and has the outcome of the drivers providing the appropriate assistance and feeling comfortable in their interactions? The Blind Foundation recommends that this be reviewed and that the training be provided by approved trainers and assessors. The Blind Foundation has been working with AT and Ecan on a training package due to the issues experienced by people who are blind or have low vision.	Out of scope. PT Infrastructure and Facilities Guidelines sought feedback from organisations representing people with impairments. Out of scope. Yes there was. Noted.
22.	Ticketing systems should be easy to use		Sub-section 3.1	**Blind Foundation** The Blind Foundation recommends that any tag-on/tag-off equipment is based on proximity cards rather than accurate placement on a screen.	Out of scope, but is being addressed through the introduction of new ticketing systems throughout New Zealand which all use "proximity" cards.
23.	Update reference for Blind Foundation signage guidelines		Sub-section 3.4	**Blind Foundation** Interpretation: Please update reference to Blind Foundation signage guidelines http://blindfoundation.org.nz/about/business-services/environmental-design-advisory/accessible-signage/download-the-accessible-signage-guidelines	Update RUB with new reference.

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24.	Leg room measurement		Sub-section 3.6	**Blind Foundation** Leg room – question the accuracy of the ≤300mm is this meant to be ≥300mm. **Mana and Newlands Coach Services** Second to last paragraph requires an increase in leg room from greater or equal to 250mm to less than or equal to 300mm. Q. Is this a typo? Q. Assuming a change of some measurement is intended, does this apply to existing buses? (refer also 2. above)	Change to ≥300mm. No.
25.	Seating design		Sub-section 3.7	**Blind Foundation** The Blind Foundation recommends including a comment on materials not being highly patterned which can cause visual discomfort or visual clutter that takes away visibility of other features such as handrails and handgrips and handholds.	Keep status quo. After many years of evaluation and experience, the random, multi-coloured pattern textile cloth has emerged as the most preferred practical hard wearing and therefore long life fabric from the impacts of staining, dirt, cutting, chewing gum, graffiti and other vandalism, maintenance and cost aspects.
26.	Lighting measurement		Sub-section 4.5	**Blind Foundation** The Blind Foundation would like more information on how the measurement for lighting at 1000mm above ground was determined rather than at ground level. We have an ageing population and people age their eyes take longer to adjust to changes in lighting levels.	The intention is that external light level is still measured at ground level. The added centre point of step being aimed to clarify on what line it should be measured. The 1000mm measurement height refers to the measurement inside the bus saloon and was chosen as being typical of the height of the reading material used by seated passengers.
27.	External destination display		Sub-section 5.3	**Blind Foundation**  The Blind Foundation recommends guidance on the signage to ensure legibility. Where letters hang below lines (i.e. y, g, p,q,j) they should be presented this way – not as shown in the Papanui on the Red Bus above. The quality of the lettering, font, height, luminance, contrast, consistency of location and viewing height are importance considerations. The attached photos show difference in legibility. The first is from the new electric trains in Auckland, the second a bus and information sign in Christchurch. In the interpretation section the Blind Foundation recommends the insertion of the link to the Accessible signage guidelines.	Include reference in the RUB.

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28.	Electronic information displays and announcements		Sub-section 5.4.1	**Blind Foundation** As noted above access to written information relies on the quality and location of the signage. The Blind Foundation recommends that to be inclusive auditory signage be a standard requirement (linked to GPS).	Noted. RUB recommends such systems as good practice. Aside from Auckland Transport's plans to require this, Regional Councils have not prioritised investment in these systems yet.
29.	Priority seating area		Sub-section 6.2	**Blind Foundation** The Blind Foundation recommends the addition of a comment to state the extra space requirement for guide dogs within the priority seating area.	Make changes to the RUB regarding guide dogs.
30.	Should the RUB be a land transport rule and follow the same regulatory processes		Sub-section 1.1.2	**Mana and Newlands Coach Services** Current Section.1.1.2 states *'Because the RUB sits outside the formal rules framework (which are secondary legislation) it enables changes to be made much more simply and quickly compared with the more lengthy and wider consultation process required for changes to the rules'.* The RUB is a powerful document capable of overriding Land Transport Rules. A vehicle considered compliant and fit-for-purpose under Land Transport Rules may not be considered so by the RUB. Failure to comply with the RUB may mean the end of a vehicle's useful life. The industry must question why such an influential document is sitting outside the Rules framework. What are its checks and balances, what is its legal basis? The RUB can put vehicles off the road, it can also put operators out of business. Land Transport Rules may take time to create but they are produced using a robust and transparent process that applies quality risk and regulatory impact assessments to determine the extent of legislative intervention necessary and the effects of such intervention on the wider community, industry etc. The process also includes a post-project review to assess how well the regulatory and Rule processes were undertaken as well as the quality of the document produced, the effectiveness of the new engagement and the consultation processes and the timeliness of the project. These processes apply to a greater or lesser extent to all regulatory intervention and documents produced by the Agency. *'Regulatory stewardship* *On 4 March 2013, Cabinet agreed to a set of expectations for agencies in exercising their stewardship role over government regulation.* *The regulatory expectations outline at a high level how agencies should be designing and implementing regulatory regimes, and their stewardship role in administering those regimes. The expectations are that agencies will:* • *monitor, and thoroughly assess at appropriate intervals, the performance and condition of regulatory regimes to ensure they are, and will remain, fit for purpose;*	It was the industry through BCA who came to the Transport Agency asking for standardisation of vehicle quality requirements for urban bus services across New Zealand. Land Transport Rules predominantly focus on universal safety requirements across all types of operations and vehicles, and do not focus on vehicle quality aspects. The RUB complements Land Transport Rules by addressing matters of specific interest to urban bus operations and public transport customer quality expectations, which often exceed the legal minimum safety and accessibility requirements. The legal basis of the RUB is set out in sub-section 1.2.7 (ie the use of the RUB is required through the Transport Agency's procurement rules).

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				• *be able to clearly articulate what those regimes are trying to achieve, what types of costs and other impacts they may impose, and what factors pose the greatest risks to good regulatory performance;*
				• *have processes to use this information to identify and evaluate, and where appropriate report or act on, problems, vulnerabilities and opportunities for improvement in the design and operation of those regimes;*
				• *for the above purposes, maintain an up-to-date database of the legislative instruments for which they have policy responsibility, with oversight roles clearly assigned;*
				• *not propose regulatory change without:*
				  ○ *clearly identifying the policy or operational problem it needs to address, and undertaking impact analysis to provide assurance that the case for the proposed change is robust;*
				  ○ *careful implementation planning, including ensuring that implementation needs inform policy, and providing for appropriate review arrangements;*
				• *maintain a transparent, risk-based compliance and enforcement strategy, including providing accessible, timely information and support to help regulated entities understand and meet their regulatory requirements, and*
				• *ensure that where regulatory functions are undertaken outside departments, appropriate monitoring and accountability arrangements are maintained, which reflect the above expectations.'*
				
				Q. Has the RUB been developed consistent with these processes?
				Q. What is the legal basis for the RUB?	

31.	Existing vehicles registered after 1 January 2009		Sub-section 1.2.8	**Mana and Newlands Coach Services** Clarification required on applicability. Section 1.2.8 states that s.2 to s.7 applies to all new buses that enter service 'as PTOM contracts are rolled out'. Section 8.2 states that 'by 1 July 2015 all used buses (a bus registered in New Zealand prior to 1 January 2009) used in urban services, at a minimum, shall meet the [following] requirements [specified in s.8.2 table]. Q. Does the RUB apply to used buses first registered after 1 January 2009 but before 'PTOM contracts are rolled out'?	Delete "(a bus registered in New Zealand prior to 1 January 2009)" from sub-section 8.2, as this wording is no longer required.
32.	List of Land Transport Rules does excludes Operator Safety Rating 2008		Sub-section 1.2.6	**Mana and Newlands Coach Services** The Government's Operator Safety Rating system is administered by NZTA and is specifically designed to target and address poor operator safety performance in the transport service industry. Domestic operators tendering for PTOM contracts will have all been assigned safety ratings under the Operator Safety Rule. Granting contracts to operators with poor safety ratings and not monitoring safety ratings during the term of the contract would be indefensible if not negligent. Q. Why has the Operator Safety Rule not been included in the RUB?	The list was never intended to be exhaustive, and was developed prior to Land Transport Rule: Operator Safety Rating 2008 being finalised. Update list in RUB.
33.	Emissions reference in sub-section 2.3		Sub-section 1.2.6	**Mana and Newlands Coach Services** The shaded box 'Interpretation' lists 'Emissions' and refers to 'Current Vehicle Exhaust Emissions Rule. All vehicles must comply with the Emissions Rule. Q. What is meant by this reference?	New/imported vehicles must meet current Land Transport Rules, eg emission, noise, braking etc. at year of manufacture in New Zealand or date of importation e.g., now Euro 5.

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34.	Priority seating drawing		Sub-section 3.1	**Mana and Newlands Coach Services** The fourth bullet point requires 2 of the 4 required priority seats be forward facing. An example of an ADL seating layout is shown. Q. Why are 2 seats required to be forward facing? Q. Are ADL's typical of the current fleet? Q. Are ADL's typical of new product being offered by other manufacturers?	The UK PSVAR recommends four fixed seating positions for priority seating as these are more stable for customers with physical impairments. The RUB allows priority seating to be fold-up seating. The compromise was that at least two of the four positions should be forward facing. New Zealand Design Rules are often more restrictive than those from the overseas countries from where most vehicles are sourced, so New Zealand compromises have to be made. This is unrelated and predates the arrival of ADLs. However local and overseas research indicates the elderly and those with disability limitations prefer forward facing seats. To provide four of these in a fixed seat all forward facing format would mean they had to be situated much further to the rear of the bus saloon, which would negate the intention of achieving easy access/egress and the benefit of the wide aisle width available in the area of the wheelchair space.
35.	Step height measurement		Sub-section 3.3	**Mana and Newlands Coach Services** Requires that minimum step heights be increased from greater or equal than 200mm (PSV Rule) to greater than 230mm. Q. Is the PSV Rule incorrect? Q. Does this apply to existing buses? (refer also 2. above)	This refers to Step Depth not Height. PSVR is ≥200mm. RUB increase is to ≥230mm for greater safety and passenger confidence reasons.
36.	Wheelchair floor inserts		Sub-section 3.3	**Mana and Newlands Coach Services** Paragraph two requires that wheelchair signage be inserted into the flooring. Q. Why 'inserted'? Q. Does this apply to existing buses? (refer also 2. above)	This has been current practice for most large buses procured for New Zealand urban larger centre operations for some years now. "Inserted" means it must be flush and appear part of the floor material, a pictorial international wheel chair sign is the requirement. No.
37.	Fold-up seats and locking mechanisms		Sub-section 3.6	**Mana and Newlands Coach Services** Third paragraph sates 'passenger operated lever locking systems are not permitted? Q. Does this apply to existing buses? (refer also 2. above)	No.
38.	Demisting		Sub-section 4.8	**Mana and Newlands Coach Services** Second paragraph requires full bus demisting capability where air conditioning is *not* fitted. Q. Is this not a requirement for air conditioning climate control in disguise? Q. Who is pushing for this? Q. Does it apply to existing buses? (refer also 2. above)	Not specifically worded to be read this way. Many smaller centres and the more southern regions indicated that meeting this requirement with on board heaters/opening windows could be a cheaper option than providing full all year round air conditioning. Passenger surveys indicated that eliminating wet misted up front and side windows feature high on their comfort expectations if full air conditioning could not be provided for cost reasons.
39.	Replace "passengers" with "customers"		Throughout document	**Environment Canterbury** Replace all references to "passengers" with "customers".	Noted, but need to balance consistency with legal and industry terminology and practice with desire to improve the focus on customers.
40.	Three yearly review process		Sub-section 1.1.1	**Greater Wellington Regional Council** GWRC supports the three yearly review process in place for the RUB. The meetings with all stakeholders in the time leading up to the three year review	Noted.

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				provide a worthwhile platform to discuss any issues and potential changes to the RUB. GWRC values the ongoing collaboration with the review team and other stakeholders. Furthermore, having a formal review process in place provides for forward planning for potential changes and improvements to the current standards in the RUB.	
41.	Variations to the RUB		Sub-section 1.4	**Greater Wellington Regional Council** GWRC supports the variation process included in the RUB. While GWRC has not yet applied for any variations to the RUB, GWRC requests that the NZTA make available to all stakeholders a database of all variations, the supporting documentation for each variation, and their status (approved, declined, pending). This visibility will inform stakeholders and allow maximum efficiencies to be gained from variations requested outside of the formal three year review process.	Noted. We have had four regions apply for variations; three were approved and one declined. It should be noted that these variations are irrelevant now due to the latest amendments to the RUB to accommodate double deckers and provide more flexibility for buses used for school and rural services. There is no central database as the applications and decision-making process is dealt with at a Transport Agency regional office level, supported by expert advice from staff and advisors that have developed the RUB. These applications and decisions can be made available on request.
42.	Measuring acceleration		Sub-section 2.3	**Greater Wellington Regional Council** GWRC supports both acceleration measurement criteria. However GWRC requests that the measurement criteria and the vehicle loading specified should be reviewed to include laden. Compliance to the testing of speed and time should be provided by the manufacturer of the vehicle. Acceleration criteria are important to understand to ensure vehicles can pull from a stationary position and merge into traffic flows within a set timeframe. Testing of this standard is not possible at a bus depot level due to the environment and space required. Current measurement specified within the RUB does not identify the vehicle configuration with regard to (Laden / Un-laden). Following the review of some manufacturer specifications of various bus types, GWRC considers that the un-laden testing is not acceptable, and only criteria with vehicles in a laden state should be considered. As an example, an Alexander Dennis E500 standard diesel bus can meet the requirements in an un-laden state, 0-20 km/hr in 3 sec and 0-50 km/hr in 15 sec. However in a laden state, the vehicle only complies with the 0-50km/hr measurement criteria and it complies with a reasonably large margin. This would suggest in a laden state the lower acceleration speed criteria is too stringent and the upper acceleration speed criteria appears to be too generous. GWRC would suggest that more research is required to produce measurement criteria that would cover all types of vehicles in a laden state to GVM and measured on a 25% grade. This must include standard small and large diesels buses including hybrids, standard double decker vehicles including hybrids and articulated vehicles.	Sub-section 2.3 of the RUB (Interpretation) states "…unladen bus on level ground…." The additional 0 - 20 km/h test has been removed as part of this review. This simple easy to measure, timed, acceleration unladen bus test has been one of the main New Zealand operators' accepted methods of establishing the likely bus in-service performance for many years. When the RUB Project Team started to develop the RUB this method was agreed after considerable discussion. Other options considered were more lengthy/labour intensive/costly evaluation tests. A power to weight ratio was also considered but rejected in the end as it was not understood by many people. Modern bus transmission electronic control technology is such that the performance of a bus can be significantly varied by the gradeability or fuel efficiency. This enables operators and Regional Councils to select from a range of performance capabilities to best meet specific local requirements and operating conditions. The Project Team and the industry are of the opinion that this simple measure will sufficiently indicate the bus performance in all anticipated urban operation conditions.
43.	Hybrid technology transmission systems		Sub-section 2.4	**Greater Wellington Regional Council** GWRC requests wording is added to cover the hybrid technology options that are now available and could be identified within the RUB. GWRC proposed insert: LB LBDD Hybrid parallel or series drive systems plus retarder.	Already included in the opening line of sub-section 2.3 Engine: "All sizes – includes all modes of propulsion, i.e., liquid fuel, electricity, gas or hybrids." This carries through to sub-section 2.4 as the transmission is an integral part of the power system, so no further explanation is considered necessary.
44.	Kneeling time		Sub-section 2.5	**Greater Wellington Regional Council** GWRC requests additional information around the time taken to kneel and raise the vehicle is included within the RUB. Time taken to lower or raise a vehicle up and down from the kneeling position should take no longer than 8 seconds. Currently no time measurement is specified within the RUB. This measurement is important for testing that buses maintain an acceptable dwell time at bus stop locations, especially as the vehicle ages over time. This appears to be a simple test procedure that can be complied with by the manufacturer at time of compliance and then again at future	To the best of our knowledge this has never been raised as an area of concern and 8 seconds maximum seems generous. However, include in the RUB for clarity.

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				audit periods by Councils.	
45.	Vehicle movement when/as doors close		Sub-section 2.7	**Greater Wellington Regional Council** GWRC requests an amendment to the wording of the second sentence of the LB category to ensure that all doors are closed before the vehicle is able to manoeuvre, increasing passenger safety. Suggested amendment: " Vehicle movement above 5km/h is inhibited while the front and rear door is open or the kneeling system is activated"	Note and agreed to amend wording.
46.	Small bus accessibility		Sub-section 3.0	**Greater Wellington Regional Council** GWRC requests that the small bus category is now included to ensure compliance with the access section of the RUB. New small vehicle options can be designed to comply with this section. Door, aisle width and seat configuration is critical in order to comply with wheelchair dimensions however this can be achieved. Typography within some suburbs, particularly in Wellington means the utilisation of larger vehicles is not possible in these areas but smaller vehicles can offer a feeder bus solution delivering the same accessibility to all passengers.	Sub-section 3.0 does not exclude small buses, i.e., SB.
47.	Step height		Sub-section 3.3	**Greater Wellington Regional Council** GWRC requests that a standard kerb height design and body specification is referenced within the RUB. Damage to front noise body panels is becoming an increasing problem and has been highlighted recently to GWRC by an operator. Due to lower floor and step height requirements on new vehicles in order to improve accessibility from the kerbside, some vehicle designs, appear to be sustaining damage on the front forward body panels due to the position of the skid plates. These plates appear to be mounted in a position where they are not protecting the front panels from striking the kerb. With the various kerb heights, body damage appears to be on the increase, increasing repair costs for operators.	Within regions there are many kerb height variations and the Project Team decided not to include. Bus operators and bus suppliers are aware of the clearance problems and should where necessary design their vehicles to cope; and locate skid plates where fitted to provide the necessary protection.
48.	CCTV cameras		Sub-section 4.6	**Greater Wellington Regional Council** GWRC supports increasing CCTV cameras from three to five for LBDD vehicles. GWRC would like to propose an additional camera for SB and LB vehicles to include an external camera which records visual images of the roadway ahead of the vehicles path. This improves information available for a number of options including driver training, assistance with driver/pedestrian responsibility and insurance liability purposes during accidents.	Many transport operators, both heavy truck and bus, are already fitting this forward facing camera either internally or externally for the purpose so described. However we do not consider it a feature that should be specified in the RUB as it does not have direct passenger safety implication.
49.	Customer announcements and audio visual systems		Sub-section 5.4	**Greater Wellington Regional Council** GWRC strongly supports the installation of passenger announcement and audio visual systems within the RUB in the future. This type of system will improve the experience of all customers using public transport and in particular, those passengers that have visual and hearing impairments.	Noted. The RUB accommodates this through "good practice" provision.
50.	Definitions of new and existing buses		Sub-sections 1.2.2 and 8.2	**Bus and Coach Association NZ**	Change definitions.

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				2.1 The BCA submits that the definitions of a bus 'new to urban service' and 'existing bus' be simplified and consolidated. 2.2 The first and most fundamental step for operators applying the RUB is understanding which definition their buses fall within. Therefore, clarity and simplicity is essential. 2.3 Definitions for 'new to urban service', 'existing bus' and 'shifting from one New Zealand region to another region' are provided under subsections 1.2.2, 1.2.8 and 8.2, and all are not necessarily consistent. The BCA submits, in the interests of clarity, single consolidated definitions are provided. 2.4 The BCA submits for the definition of a bus 'new to urban service' be simplified to – *"any bus entering urban service in one specific location in New Zealand for the first time."* The BCA submits the deletion of "*(as either a new or used import)*" as it appears to limit the definition to applying only to buses that are new or used imports, and does not apply to new buses built in New Zealand or buses that are changed in use to urban. 2.5 The BCA submits that the definition of 'existing bus' under subsection 8.2 be amended to – *"all the buses currently used on or before [date the revised RUB comes into force] in urban services".*	
51.	Regular fleet replacement		Sub-section 1.2.3	**Bus and Coach Association NZ** 3.1. The BCA is concerned with the requirement for operators to maintain or improve their 'fleet age matrix' and submits, alternatively, that operators be required to use their best endeavours to improve or maintain their fleet age matrix, rather than setting an (onerous) mandatory requirement. 3.2. A potential issue with subsection 1.2.3 is with operators with new fleets. It is unreasonable to require these operators to maintain or improve their fleet age matrix at these new levels, particularly as this will come at a significant cost. 3.3. It is our view that the intention behind subsection 1.2.3 – this being the ongoing improvement and updating of New Zealand urban bus fleets – is already achieved through setting the maximum vehicle age in subsection 2.2. Operators will, and do so already, naturally on an on-going basis update their fleets under a maximum required vehicle age.	Delete sub-section 1.2.3; can rely on maximum average age.
52.	Variation process		Sub-section 1.4	**Bus and Coach Association NZ**	The RUB variation process is set out in detail including the

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				4.1. The BCA submits that there should be a higher threshold placed for a regional council or Auckland Transport to vary/have an exemption to the RUB. 4.2. The BCA strongly supports the RUB's core purpose of standardising urban bus requirements across regional councils and Auckland Transport, as it creates cost efficiencies for suppliers, operators and councils. If different regions have the flexibility to easily vary RUB standards, it undermines this core purpose of the RUB. 4.3. The BCA submits for a higher threshold for agreed variation of the RUB, or a process of consultation with those affected by the variation (suppliers and operators).	criteria for assessment, and is as stringent as it can be, given procurement rules can be varied where it can be demonstrated that a better value for money approach exists. However, this is a relatively high bar considering the RUB has been set up to improve value for money through standardisation. It should be noted that only four variation applications have been applied for over the lifetime of the RUB (three were granted, but no longer apply as the changes are now accommodated in the RUB; one was declined as the costs of the proposal outweighed the benefits).
53.	Engine – emissions		Sub-section 2.3	**Bus and Coach Association NZ** 5.1 The BCA recommends, for the purpose of clarity, that the Current Vehicle Exhaust Emission Rule be outlined in the RUB, or a clear link or direction to it be included. 5.2 For example, on its face, it may not be clear that all buses new to urban services are required by RUB to have Euro 5 engines.	Clarify in the RUB.
54.	Electronic information displays and announcements		Sub-section 5.4.1	**Bus and Coach Association NZ** 8.1. The BCA would like further clarity on what is required for "ducting and suitable mounting points".	It is far simpler and cheaper to make provision for the possible fitment of electronic equipment throughout the bus if this can be incorporated during the build phase, rather than the more lengthy complex retrofit exercise of trying to run cables and fit mounting plates without having to remove overhead or side panelling, drill framing etc. Clarify in RUB.