

FBHVC reports

The Federation of British Historic Vehicle Clubs exists to uphold the freedom to use old vehicles on the road. It does this by representing the interests of owners of such vehicles to politicians, government officials, and legislators both in UK and (through membership of Fédération Internationale des Véhicules Anciens) in Europe. FBHVC is a company limited by guarantee, registered number 3842316, and was founded in 1988.

UK LEGISLATION

Report From the Regular Meeting Between DVLA and FBHVC

Ian Edmunds, August 2015

According to some surveys Swansea is the wettest city in the UK but nevertheless it was a beautiful warm and sunny July day when your Legislation Director, Secretary and DVLA Liaison person converged there for our regular meeting with DVLA. You will recall that this meeting had to be postponed due to the constraints placed upon Civil Servants in the run up to a General Election. We received the usual warm welcome from our contacts there and a very useful meeting ensued. We have attempted to summarise this for you in these pages.

Show and Share

We were mystified by this item on the agenda, distributed before our regular meeting, but delighted to discover what it was all about. On Wednesday 23rd September 2015 the Driver and Vehicle Licensing Agency will be holding a Historic Vehicle Event at Swansea. The three hour event aims to provide guidance on various matters relating to the registration of historic vehicles including the V765 scheme, reconstructed classics and age related registrations. There are limited places available and invitations to FBHVC members and V765 representatives will be sent out by the Agency soon. Places will be restricted to one representative per club.

Many of you will recall the club meeting held at the then Local Office of the DVLA at Theale, Berkshire in 2011. This too was a mid-week event and just over 20 clubs were represented as well as a few of the classic car press. At the last meeting questions had to be submitted in advance – and these ranged from transferability of registration numbers, queries on engine numbers and the allocation of correct age-related numbers, consistency of Local Office decisions, VIN numbers, driving licences, vehicle inspections plus many other related topics.

For this **Show and Share meeting** we understand that DVLA personnel will be giving presentations and these can be followed by question and answer sessions. Questions to DVLA will not have to be submitted in advance this time. Members of the FBHVC team will also be in attendance.

We were very pleased with this development as we felt, along with those clubs that attended the Theale meeting that it was, and this 2015 meeting will also be, a very valuable exercise and an opportunity to put a friendly face to an otherwise faceless government agency.

Please do not apply to FBHVC for a place at the meeting – it is DVLA who are solely responsible for the organisation in Swansea.

V765, Evidence for Applications

Many of you have contacted the Federation in the last few weeks with various comments and questions relating to changes in DVLA policy with regard to the evidence required to support **V765 applications for the reallocation of original registration numbers**. We were able to discuss this with the relevant staff and to understand the situation. It was stressed that the **basic requirement is, and always has been, to demonstrate a clear link between the chassis/frame number (i.e. the identity of the individual vehicle) and the registration mark being claimed**.

The preferred documents to demonstrate this link are either the original RF60 brown or green log book, or an authenticated copy, or extract from the old county registration records. This latter is only valid where those records show the chassis or frame number and unfortunately not all of them do. However DVLA do recognise that there will be cases where neither of these is available and are prepared to consider other valid documents which provided the necessary link, these can include Bills of Sale, factory records or similar. Where appropriate heritage certificates issued by manufacturers or organisations with a clear connection to the manufacturer will also be considered. However items like old tax discs, whilst they may be useful corroborative evidence, are not acceptable evidence on their own as, apart from the registration number the information is generic rather than specific.

The DVLA position, which we do not entirely accept, is that this is not a change in policy but rather the correct rules being more consistently applied now that services are centralised. They do acknowledge that certain of their guidance is now potentially misleading, for instance V765/3 with regard to tax discs, and they promised to get it changed.

On the subject of old style log books we were informed that DVLA are now seeing a number of forged books, so club officials are asked to be particularly vigilant in this area and to be understanding of requests for original documents etc.

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We also discussed the V765/3 Guidance Notes document. You may remember a few months ago I enquired if anyone had been aware of the September 2014 revision to this. The replies were all in the negative which I can now explain. This document is only sent to the nominated V765 club signatories and the original procedure was to send the latest version of the Guidance Notes to the clubs together with the annual V765/1 return used to maintain the list. DVLA admit this procedure has lapsed but it will be reinstated in the near future. I am told there may be some revisions to the Guidance Notes to make the evidence requirements explained above a little clearer and that there may be a request for additional information on the V765/1 return which will in turn lead to some enhancements to the list itself.

DVLA now have a dedicated email address for all queries relating to the authorised V765 clubs and the V765/1 list. This is V765clubs@dvla.gsi.gov.uk

Replacement Bodies and Other Matters

It became apparent from our conversation that some of the terminology that we have all been using, e.g. rebuilt, restored etc. can lead to misunderstandings of what has actually been done to the vehicle. For example a motorcycle purchased dismantled in boxes and reassembled may be described by **the owner as 'rebuilt' but to DVLA a rebuild can imply something more fundamental to which different rules have to apply**. It may be beneficial to provide a short description of the work done, such as 'reassembled from previously dismantled original parts'.

On the **thorny subject of replacement bodies** DVLA explained that, although they fully understand that the traditional coach built wooden framed body has a finite life which is undoubtedly shorter than that of the metal components of the chassis etc and that as such replacement bodies are unavoidable, within the rules to which they have to work a major change of body style is not acceptable. A newly built body true to the original should not be a problem. We enquired about cases where nothing remains of the original body, or where there were many options available when new or if a vehicle is rebuilt to represent a particular, possibly well-known, example of the marque. The DVLA response is that they will consider all such cases individually and do their best to assist but that certain rules still had to apply. I believe more discussion is needed on this topic and the opportunity for this will present itself – see 'Show and Share' elsewhere.

Vehicle Inspections

It has always been the case that in some circumstances DVLA have required a particular vehicle to be inspected and since the closure of the Local Offices this has been delegated to DVSA (was VOSA). From the 27th April 2015 this DVLA examination process for GB vehicles changed to a new service provider, SGS UK. For Northern Ireland the service will continue to be provided by DVA. SGS are a Swiss based company operating all over the world providing inspection services. For the DVLA service they will come to the address where the vehicle is stored and there is no charge to the keeper.

Non-Reflective Number Plates

At every meeting with DVLA we learn something completely new! In this case it is that the end date for black and white (or silver and white) number plates is linked to the historic tax class date. So we were told that non-reflective plates are now permitted on vehicles built before 1 January 1975.

Age-Related Registrations

We were informed that DVLA intend to align the standard of proof required of date of manufacture for all forms of 'first registration'. In this context, and for historic vehicles, 'first registration' means the first entry on to the current DVLA system. Thus it applies to applications for age-related registrations for freshly discovered vehicles where no evidence exists to permit the reclamation of a previous registration or for imports never previously registered in the UK. It also applies where the date of first registration shown on the V5C needs to be corrected to permit first registration in the historic tax class. A similar level of evidence is required for exemption from the MoT.

The practical effect of this is that for all applications for age-related registrations and for all applications to amend the date of first registration the basic requirements are either foreign registration documents (for imports) or authenticated data from manufacturers' records or data from the appropriate Glasses Check Book. **This means that unsupported club dating certificates are no longer acceptable for any category**. However DVLA are fully aware that there are circumstances where none of these sources are available, and that some types of vehicles (e.g. ex-military) pose particular problems. In these circumstances they will continue to assess each application individually on a case-by-case basis. Contrary to the impression that some of their recent correspondence may have given, DVLA are not inherently opposed to dating information obtained from the internet. However they, like most of us, are fully aware that not everything that can be found on the internet is necessarily reliable and it is necessary for the applicant and/or the supporting club to provide enough supporting information and evidence to give confidence in the internet data. Information gleaned from Wikipedia alone is not acceptable.

We were also reminded that all first registration applications, including new vehicles, are dealt with by the same department and that as a result the personnel do not have the same level of historic vehicle understanding as their colleagues in a different location who deal with the V765 applications. The details of any first registration application that is rejected are entered on to a data base to which the Customer Service Team in the Contact Centre has access. Thus

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any queries should be directed to the Contact Centre on 0300 790 6802 or at Vehicle Customer Services, DVLA, Swansea, SA99 1AR.

Incorrect Make and Model on V5Cs

We have initiated discussions with DVLA about a mutually acceptable procedure to enable owners to have the V5C amended, and in consequence the DVLA record, for vehicles where the 'Make' and 'Model' entries are incorrect, for example where the 'Model' has become included in the 'Make' line. I know that, especially since the Vehicle Enquiry Service has become the first way of checking whether a vehicle is properly registered, this is a topic of great interest to a number of people and we will of course keep you informed as this develops.

DVLA Vehicle Identification Numbers

Judging from my correspondence many of you have been somewhat puzzled, as have we, by the apparently arbitrary allocation of DVLA issued VIN to rebuilt vehicles even where an original manufacturer applied frame or chassis number was present. The explanation comes in two parts, firstly where there is any doubt about the identity of the vehicle a new VIN will be issued and secondly the same applies if the vehicle is considered to be a rebuilt vehicle (see comments about terminology under 'V765' elsewhere). In these days of a single centralised and computerised record it has become apparent that the old numbering systems are such that the same number will reappear on several vehicles made by different manufacturers. Thus to avoid any risk of subsequent confusion DVLA issue a unique 17 character VIN.

Incidentally, the term VIN (Vehicle Identification Number) should only be applied to the specified format 17 character identification which started to appear in the 1970s and for the UK and Europe became one of the Type Approval requirements later. Other forms of chassis or frame number are not, strictly speaking, VIN.