

Issue of LVVTA Low Volume Vehicle Standard 190-70(00) Right-hand Drive Steering Conversions And associated Survey Process Sheet FS007

Introduction

This sheet provides information to certifiers relating to the release of LVVTA Low Volume Vehicle Standard 190-70(00) for the certification of Right-hand Drive Steering Conversions, together with the associated Survey Process Sheet FS007 for Right-hand Drive Steering Conversions. These documents are separate from this information sheet.

This standard has been developed by LVVTA and has just been formally approved by the Land Transport New Zealand. It replaces the LTNZ Policy Statement 11 (the document previously used for the certification of right-hand drive conversions), and is now, together with the Survey Process Sheet for right-hand drive conversions, the two source documents for those LVV Certifiers who are authorised to certify right-hand drive conversions.

The standard applies to all light vehicles of any class that have been converted, and it applies regardless of when and where the conversion took place. This means that even if a vehicle was converted 20 years ago, but is now required to be certified to the Low Volume Vehicle Code because the vehicle is modified (RHD conversion) and has to be re-registered (due to lapsed registration for example), this is the document and inspection process that applies. The same applies for a vehicle that was converted overseas.

The Standard

There are a couple of items which have been treated differently in this standard than in the past, relating to welding, and to non-destructive testing:

Welding

This standard, in 2.3 (19), recognises that both an appropriately certified welder and a skilled person without formal qualifications can carry out welding on converted vehicles provided certain conditions are met. Where the welder is not trade certified in the type of welding process employed, they are required to demonstrate their competence to the LVV certifier by means of a test piece similar in nature to that used in the vehicle being certified. The process by which you make this judgement of competency is outlined in NZHRA Technical Bulletin # 5. This bulletin will be developed further in the near future, but the concept will remain the same, placing significant responsibility on the shoulders of low volume vehicle certifiers to pass judgement on the competence of the individual concerned. This concept will thread through other LVV Standards in the future. If you don't have a copy of the bulletin, please contact the LVVTA office.

Where a weld is acutely safety critical, specific non-destructive testing (NDT) is required, as detailed in both the standard and the survey sheet.

Non-destructive testing

Non-destructive testing (NDT) is easily misapplied, due to the belief that it will detect bad welds. In many cases it achieves nothing in relation to the welds, as most methods of NDT are aimed at identifying cracks rather than poor penetration. In this standard, you will note the type of NDT required where it applies to welded components is specified as 'ultrasonic'. This method is considered by the industry experts as the primary method of NDT capable of identifying poor weld penetration or lack of fusion, as well as cracks. Ultrasonic NDT will become a requirement in other standards where this type of testing is necessary to help assess weld quality.

This standard, like all LVV standards, is a legal document and therefore has to be written in such a way as to stand up legally, so it can never be made to appear as user-friendly as we'd like it to be. However every effort has been made to keep the standards as straightforward, and as plain English as possible. At any time, and certainly while you are initially getting your head around the document, call me (Tony Johnson) at the LVVTA office on (09) 268 9550 for help with the interpretation and application of the standard.

Survey Process Sheet

The Survey Process Sheet FS007 is the inspection document which goes hand in hand with the right-hand drive conversion standard. This is essentially the main part of the Formset specific to right-hand drive conversions. When you certify a vehicle that has undergone a conversion, the documents you will need to fill in and send to LTNZ are this survey process sheet, and the additional documents that you need to send with all LVV Certifications.

These comprise;

1. the signed off FS001; and
2. your Indemnity Form; and
3. the Vehicle Information Sheet; and
4. the Rectification Form; and
5. additional documents required by the Survey Process Sheet.

The survey process sheet is prepared in such a way that it should follow the logical sequence of events that would normally take place during a right-hand drive conversion certification. It starts with the preliminary inspection when the vehicle is in a raw stripped-down state, (although that doesn't stop you from carrying out an initial pre-inspection with the converter before the vehicle is stripped down), and should follow all the way through the various aspects of an inspection.

You will note sentences at the end of some clauses that are shaded. These are to draw your attention to the additional bits of information that the LVV system needs you to provide. There has been some clarification recently on what LTNZ should be asking for in the way of additional documentation, and the result is that any such requirements are shown within the survey process sheet. If they are shown on the survey process sheet, they must be supplied. If an item is not specified as needing to be provided, then it is not required, and you will not be asked to provide it. If we all follow this, our lives will become easier, although you may volunteer to supply information additional to that specified to give a better picture of the conversion.

The fourth column (stds ref) shows you the clause number of the full legal requirement contained in the right-hand drive conversion standard, and you can refer to this as needed for expansion or clarification of the requirement shown on the survey process sheet.

You will note space has been provided for you to make brief comments within the survey process sheet on the right hand side of the pages. We would encourage you to make comments where you can, which should provide a basic descriptive commentary on the vehicle that you are inspecting. Please note that there are good reasons for this:

1. Certification documentation that provides good descriptive information about the vehicle gives the auditors a level of comfort that the vehicle is in fact being thoroughly surveyed; and
2. if a subsequent modification contributes to an accident later on in the life of the vehicle, and you have done a good job of describing and detailing the components, systems and methods of attachment used prior to that further modification, you are way better protected. Over the past 8 years there have been a number of times when, by being able to refer to a well-detailed Formset, I have proven that the vehicle was not certified in the condition which brought about the query or accident, due to good documentation.

Other bulletins are referred to within the survey process sheet also, and if you do not have any of them,