

## James Millar-Coote

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**From:** Kevin Gudmundsson [Kevin.Gudmundsson@mbie.govt.nz]  
**Sent:** Friday, 12 February 2016 2:27 p.m.  
**To:** Small Passenger Services Review  
**Subject:** Small passenger services review [UNCLASSIFIED]  
**Categories:** Blue Category

Good afternoon,

My Name is Kevin Gudmundsson and I work for Trading Standards, which is an operational unit within the Ministry of Business Innovation and Employment. One of the main functions of Trading Standards is to oversee New Zealand's trade measurement system and as our teams name suggests, the foundation for this is formed on established and adhering to current traceable standards of measurement. I therefore find your proposal relating to removing the regulatory controls on taxi meters an interesting move.

The consultation document states quite clearly that MOT preferred choice is 'option 4', which involved the removal of the regulatory controls on taxi meters.

I have noted two points below:

1. If the MOT decides to permit the use of taxi meters as a method of calculating a fair, Trading Standards would suggest that it harmonises with the controls and testing procedures already used countries. Like New Zealand, that are signed members of the International Organisation of Legal Metrology (OIML) .
  - a. A type approval system
    - i. All meters to be type approved. Meaning each type of meter has been subject to an examination to ensure that it is of a standard accurate enough to ensure accuracy is maintained between calibration checks and the controls are in place to restrict fraudulent interference.
  - b. Testing Procedure
    - i. Taxi meters are tested in accordance with international best practise which is agreed and documented in "OIML R21 Taximeters - Metrological and technical requirements, test procedures and test report format".
    - ii. Traceable system back to the national standards held at Measurement Standards Laboratory
2. The consultation paper states that the fair charged can be based on the distance of the fair.

Are there any controls in place to ensure that the instrument or online system used to determine a kilometre is accurate?

For example, the algorithm that Uber uses to determine distance between two points, is there any check that the distance is accurate?

Or

taxi meters or drivers that are reliant on odometer readings / time, is there any checks to ensure the distance being quoted by the driver or the instrument is accurate?

Thank you for considering my submission, if you would like any further information on the international system in place for controlling taxi meters or weighing instruments (as they are not that dissimilar) then please don't hesitate to contact me.

Good luck with review.

P.S. I have forwarded the SPS consultation document to the MBIE Consumer Protection team to comment if they wish.

Kind Regards

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