



September 14<sup>th</sup> 2018

Liz O'Donnell-Chairperson  
Road Safety Authority  
Moy Valley Business Park  
Primrose Hill  
Ballina  
Co. Mayo

Dear Ms O'Donnell,

I take the liberty of writing to you following the recent media coverage on the condition and safety of private buses based on figures from the Road Safety Authority and on which you yourself wrote.

Firstly may I introduce myself. My name is John Dunne. I am the Director of the Federation of Transport Operators (FOTO). I am also a Director of the insurance brokerage, J.F.Dunne Insurances Ltd, who manage the insurance contracts for over 1, 000 small to medium family run private bus and coach operators, each of these is an Associate Member of FOTO as an added service and benefit under this insurance package. FOTO is a registered lobbyist and was founded in 1989.

I am presently conducting a survey of this group of private operators following on from the adverse publicity generated by the figures from the RSA the results of which I hope to publish in the Winter edition of our newsletter. In order to balance this I have a number of questions around the roadside tests and I would appreciate your good offices to secure for me the answers to these.

The queries I have are chosen from the survey response to date and the concern is if these issues have prompted the recent portrayal of private bus and coach operators as unsafe and putting children and general passengers at the risk of their lives by using private operator services. I note here that there is no reference to the state operators or their buses and there is therefore the added matter of competitive advantage to be considered in any future pronouncements.

The following instances where Major Fault is assigned require qualification:

- **Empty windscreen washer bottles**
- **A light bulb missing on a registration plate where there are two**
- **Inability to read a VIN (Vehicle Identification Number) due to grime or dirt**
- **Wheel trims in place**

It will be important to know if these items above, designated Major Faults, were used to inform the recent statistics issued by the RSA.

Embassy Office Park, Kill, Co Kildare  
Reg No: 152032

I noted that the RSA seemed to focus their roadside checks on known high risk operators. Why are these operators allowed to continue to operate if they are known repeat high risk offenders? This information I believe should be shared with those of us charged with managing and balancing this risk.

The RSA Risk Rating is also misleading, particularly in regard to the Amber Risk Rating designation. This designation is applied regardless of the satisfactory and complete evidenced certification of roadworthiness. It is based it seems on the absence of a roadside check! To so designate conjures up, once again, a less than safe bus when it merely denotes the inability to road side check every vehicle.

Each of our members will have full and complete records of safety and maintenance checks. A recently developed phone App that records the pre-journey walk around vehicle check and available online to the operator through the JFDunne Insurances website, is further evidence of the private bus and coach operator' wish and efforts, on a daily basis, to provide for the safety of their passengers, many of whom are their neighbours or friends or known to them.

I think you will agree that we must have clarity on the above processes, reasons for, indeed good reason for, and, that we qualify determinations that may be used to create headlines in our press and media leading to panic and fear in our school children, their parents and the other users of private bus and coach services.

I will look forward to your response

Yours Sincerely



John Dunne  
Director  
Federation of Transport Operators