PSPC – Certification Requirements

Driving Instruction Vehicles – Passenger Side Pedal Controls

Passenger side pedal controls (PSPC) fitted to light vehicles are specific modifications to driving instruction vehicles that allow the driving instructor to gain control of the vehicle speed in an emergency situation.

This modification does not apply for heavy vehicles or those performed to a light vehicle involving steering controls.

Certification of the fitment is required for all installations of PSPC for vehicles with a compliance date of 1 JULY 2018 onwards.

From 1 October 2018 certification of the fitment is required for all installations of PSPC, to vehicles not under a current driver instructor vehicle (AIS type 5) inspection program.

PSPC are currently outside the scope of Vehicle Standards Bulletin 14, however are modifications recognised by the Registrar of Motor Vehicles.

The fitment of PSPC must not affect the vehicles compliance with applicable Australian Design Rules (ADRs).

An AVC 4 may certify the installation of PSPC produced by a proprietary supplier specialising in PSPC subject to the PSPC being designed for the make and model of vehicle they are installed into.

An AVC 1 or 2 is required for the design certification of PSPC that are individually constructed for the specific vehicle, or that have not been manufactured by a proprietary supplier or are being adapted to another make or model of vehicle.

Minimum technical standards and additional certification requirements for PSPC, are included in (Attachment E) of this document.

For the purpose of PSPC modifications:

– Mechanically coupled means brake or clutch controls which are mechanically coupled directly to the original actuation mechanisms (using pedals or levers by mechanical or hydraulic methods).

– Hydraulically coupled means brake or clutch controls which are directly interconnected to the relevant control hydraulic system.

Passenger side pedal controls - required features

PSPC must have at least:

- A passenger side brake pedal that is mechanically or hydraulically connected to the vehicles service braking system;
- A secondary internal rear vision mirror mounted on the windscreen and positioned so the driving instructor can see traffic approaching from the rear;
- The pedal/s are removed or disabled without the use of tools or by the fitment of a cover.
- A label affixed in a position visible to both front seat occupants, of the minimum dimensions specified below, and stating "This vehicle is fitted with passenger side pedal controls only to be used for driving instruction purposes" example on next page.

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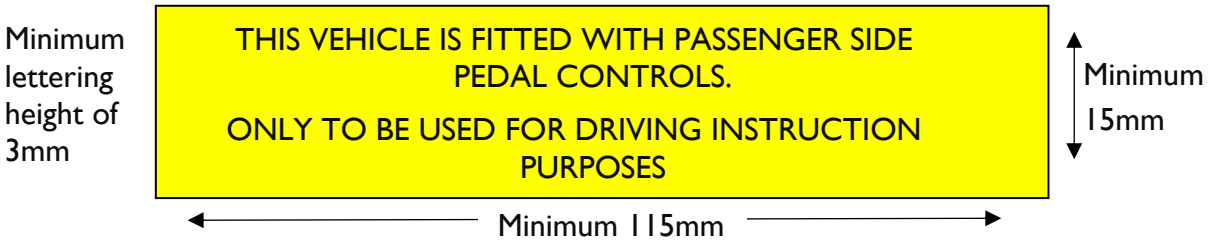

Attachment C; Non VSB modifications

Non VSB	Modification Code	Modification	Description	AVC 1	AVC2	AVC3	AVC4	AVC4a
Driver Controls-Motor vehicle controls-(Adaptive systems for people with disabilities)	AC	Driver Control-Hand control	a control that enables the driver to operate by their hand a control that is designed for foot operation	y*	y*	y*	y*	
	AC	Driver Control-Pedal Extension	an apparatus to relocate the surface of foot pedals	y*	y*	y*	y*	
	AC	Driver Control- left foot accelerator	a left foot operated accelerator for altering the vehicles motive power source	y*	y*	y*	y*	
	AC	Driver Control-Spinner Knob	enables one handed use of a steering wheel	y*	y*	y*	y*	
	AC	Driver Control-extension device	apparatus that extends the operation point of existing controls	y*	y*	y*	y*	
Driver Instruction passenger side pedal controls	LC1	Passenger side pedal controls (design)	Design, manufacture and the installation of vehicle specific passenger side pedal controls	y	y			
	LC2	Passenger side pedal controls	Installation of passenger side pedal controls ONLY	y	y	y	y	

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Attachment E; Passenger Side Pedal Controls

Minimum Technical Requirements

Driver instruction vehicles fitted with passenger side pedal controls (PSPC) require compliance with the following items:

- The pedal/s are to be easily disabled without the use of tools, to prevent accidental use when the vehicle is not being used for driver training/assessment. For example removal/insertion of pins or a cover over the pedals;
- The installation is not to compromise the vehicles compliance with relevant Australian Design Rules applicable to the vehicle;
- Mechanically Coupled pedals must move freely without unintentional movement, restriction or interference with the movement of the driver side controls;
- Hydraulic Coupled brake pedals must be designed and installed in accordance with VSB14, Section LG – Brakes, and must not affect the driver side brake controls or the vehicles compliance with ADRs;
- The controls are to be mounted to a structural section of the vehicle;
- The controls are to replicate the layout including the horizontal and vertical plane of the driver side pedals;
- Pedal faces are to be fitted with a non-slip surface;
- Pedal travel, free play and response is to be similar of the driver's side pedals;
- Where any part of a pedal assembly "slips" into a holder, there must be a secondary device that prevents the assembly from sliding out when in use;
- Pedals, cables, pivots and mountings are to be equivalent in strength, material and durability as the original controls;
- The brake lights must operate when the passenger side brake control is operated;
- The pedal installation must be suitable to withstand the forces that may be applied during emergency braking;
- Fasteners are to be in accordance with VSB14, Section LZ, Appendix A – Fasteners;
- All welding is to be in accordance with industry best practice;
- In-service testing is to be conducted on the pedals taking into account the following:
    - pedals move freely,
    - pedals do not interfere with the operation of the driver's side pedals,
    - pedals return to the released position freely and without delay.

PSPC – Certification Requirements

Additional Requirements

- A completed report identifying type of pedals installed, for example: Brake and Accelerator. The report must also state that the fitment of the PSPC, does not affect the vehicles compliance with relevant ADRs;
- Certification report must describe the type and method of pedal actuation, example: Brake mechanically coupled, accelerator mechanically coupled via cable;
- Modification plate (to be affixed to the vehicle), modification certificate issued as part of the MRS portal process. The modification codes LC1 (design), LC2 (installation) are to be used for certification as applicable;
- Completed checklists (located at the end of this attachment).

Decommissioning

Where a vehicle is no longer used as a driving instruction vehicle, it must be decommissioned with the removal of PSPC. Decommissioning a vehicle will require:

- The passenger side pedal controls are removed;
- All holes within the floor pan or firewall that have been created for the fitment of the passenger side pedal controls are to be filled or where required cover plates are to be fitted;
- The additional internal rear vision mirror is to be removed;
- Removal of the warning decal;
- AVC is to produce a report detailing the above requirements have been met; and
- AVC is to notify vehicle.standards@stategrowth.tas.gov.au notifying of the removal of the modification plate. This written request must include:
    - Reason for removal of modification plate;
    - details of modification(s) (removal);
    - modification plate serial number;
    - vehicle's VIN;
    - AVC number;
    - station number; and
    - AVC's report.

On receipt of a return email the AVC may remove the modification plate and send to AIS Compliance Unit.

NOTE: The modification plate must ONLY be removed from the vehicle after all work is completed and the AVC has received approval from Vehicle Standards.

Checklists LC 1

Dual controls for Driver Instruction Vehicles (Design) (TAS)

CODE LC1

(Y=Yes, N=No)

1	**Components**			
1.1	Do all components and fittings used in the passenger side pedal assemblies meet the technical requirements as listed in 'Attachment E' of the Vehicle Modification Certification Manual?	N/A	Y	N
2	**Mounting Brackets**			
2.1	Have all the brackets, mountings and passenger side pedal assemblies been designed to adequately cope with the forces generated during operation (including emergency application)?	N/A	Y	N
3	**Pedals**			
3.1	Are the pedals ergonomically positioned as per recognised automotive standards including the appropriate horizontal and vertical plane to replicate the driver side pedals?	N/A	Y	N
3.2	Are the pedal/s capable of being disabled without the use of tools?	N/A	Y	N
4	**Testing**			
4.1	Has a testing procedure been developed for the installer to follow once the controls are fitted?	N/A	Y	N
5	**Workmanship**			
5.1	Have the fitting and testing instructions been included in the design and packaged with the pedal assembly?	N/A	Y	N
6	**Compliance with ADRs**			
6.1	Does the design allow the vehicle to continue to comply with the ADRs to which it was originally built?	N/A	Y	N
7	**Records**			
7.1	Have completed records of the design been retained in a manner suitable for auditing?	N/A	Y	N

CERTIFICATION DETAILS																		
Make						Model						Year of Manufacture						
VIN																		
Chassis Number (If applicable)																		
Brief Description of Modification/s																		
Vehicle Modified By																		
Certificate Number (If applicable)																		
Vehicle Certified By *(Print)*																		
Signatory's Employer (If applicable)																		
Signatory's Signature												Date						

Checklists LC2

Dual controls for Driver Instruction Vehicles (Modification) (TAS)

CODE LC2

(Y=Yes, N=No)

1	**Design**			
1.1	Design Approval Number: ……..		N/A	
1.2	Where the product has been supplied by a reputable proprietary manufacturer the brand and model of the component is; Brand: …….. Model: ……...……..		N/A	
2	**Workmanship**			
1.2	Has the vehicle been modified in accordance with the plans and specifications in the fitting instructions:	N/A	Y	N
2.1	Has all the work including the mounting been performed in accordance with recognised engineering standards?	N/A	Y	N
3	**Pedals**			
3.1	Are the pedals ergonomically positioned as per recognised automotive standards?	N/A	Y	N
3.2	Are the pedals capable of being disabled without the use of tools?	N/A	Y	N
3.3	Do the additional pedals allow full unrestricted travel of the vehicles original pedal assemblies?	N/A	Y	N
3.4	Do the pedal(s) have a non-slip surface?	N/A	Y	N
4	**Signage**			
4.1	Has a sign been affixed in a position visible to both front seat occupants?	N/A	Y	N
5	**Fasteners**			
5.1	Do all fasteners comply with the applicable requirements of Vehicle Standards Bulletin (VSB) - Section LZ *Appendices*, Appendix C *Heating and Welding of Steering Components*?	N/A	Y	N
6	**Compliance with ADRs**			
6.1	Does the modified vehicle continue to comply with the ADRs to which it was originally built?	N/A	Y	N
6.2	Have the passenger side pedal controls been fitted in a manner that does not impede existing occupant safety systems?	N/A	Y	N
7	**Inspection**			
7.1	Have final inspection(s) been carried out on the installation and modified components found to be satisfactory?	N/A	Y	N
8	**Testing**			
8.1	Has the modified vehicle been tested in accordance with the post-installation test procedure provided as part of the design approval?	N/A	Y	N
8.2	Has a static test been conducted by applying a force equivalent to that during an emergency stop?	N/A	Y	N
9	**Records**			
9.1	Have complete records of the design, installation and testing been retained in a manner suitable for auditing?	N/A	Y	N

Note: If the answer to any question is **N (No)**, the modification cannot be certified under Code LC2

CERTIFICATION DETAILS																		
Make						Model						Year of Manufacture						
VIN																		
Chassis Number (If applicable)																		
Brief Description of Modification/s																		
Vehicle Modified By																		
Certificate Number (If applicable)																		
Vehicle Certified By *(Print)*																		
Signatory's Employer (If applicable)																		
Signatory's Signature												Date						