

Dear LTO

It has come to our attention that false information is being added to the certificate of registration (CR) of Indian designed three-wheeled vehicles such as the Bajaj RE and the Piaggio Ape.

Firstly we would like to ask if it is legal for false information to be entered on a CR? The false information we are referring to is the fact they are putting on the CR that it is a “motorcycle with sidecar” when clearly there is no sidecar attached to the Bajaj RE or the Piaggio Ape.

Also we see on LTO website the requirements to register a Motorcycle with sidecar.

I. BRAND NEW MOTORCYCLE WITH SIDECAR (TC)

Original Sales Invoice

Appropriate Insurance Certificate of Cover

Original Affidavit of Attachment for Sidecar executed by the Owner and Mechanic stating among others the date of completion

Original Certificate of Stock Reported (CSR)

Original PNP-HPG MV Clearance Certificate

Because one of the requirements is an “Original Affidavit of Attachment for Sidecar executed by the Owner and Mechanic stating among others the date of completion” would we be correct in believing that somebody is submitting an affidavit of attachment for sidecar for the concerned vehicles? And if this is the case why are LTO accepting the affidavit of attachment for sidecar? when you must be aware that no sidecar has been attached.

In Republic Act No 8794 which you referred to in Memorandum 2018-2148 it states that “The LTO shall also release the proper classification of said new motor vehicle model on or before the scheduled release of such new model to the market, but in no case later than three (3) months after its receipt of the new motor vehicle’s specifications.” Which makes us ask why the classification was changed after more than 3 months.

While we are writing to you we believe we should make you aware of some points about these Indian designed three-wheelers.

LTO seems to think they are a safety hazard on a National Highway yet they are allowed in the European Union (EU) that has probably the strictest safety standards in the world, and in the United Kingdom they are even allowed on Motorways.

Maybe like many you believe they are slow, when the fact is they can travel safely at 80kph which is the speed limit on national highways. Because they are symmetrical they do not get steering shake like a motorcycle with sidecar, which makes them safe at speeds up to 80kph.

The braking system on these Indian designed three-wheelers is the same as a car, however because the weight of the vehicle is much less than a car it means the stopping distance is much less than that of a standard car.

If you still believe the vehicles concerned should be prohibited on National Highways, could you please provide us with the data you used to come to this conclusion.

In view of the above we would ask that you correct the registration of the mentioned vehicles so they no longer have false information on the CR and remove the ban on national highways.

Yours sincerely