

Government of South Australia

TRS19D2871

Treasurer Level 8 State Administration Centre 200 Victoria Square Adelaide SA 5000 GPO Box 2264 Adelaide SA 5001 DX 56203 Victoria Square Tel 08 8226 1866 treasurer.dtf@sa.gov.au

Hon Stephen Mullighan MP Member for Lee Unit 1, 62 Semaphore Road SEMAPHORE SA 5019

lee@parliament.sa.gov.au

Stenhan

Dear Mr Mullighan

APPLICATION UNDER THE FREEDOM OF INFORMATION ACT 1991

I refer to your application made under the *Freedom of Information Act* 1991 (FOI Act), dated 16 October 2019.

Your application seeks access to:

"All minutes, briefings and correspondence titled 'CTP Regulator – Compulsory Third-Party Regulator – Premium Setting Process' as described on the Objective document management system, between 23 February 2019 and 16 October 2019."

The legislative prescribed timeframe to determine this application has expired and is now deemed to have refused you access to all documents relevant to your application. I refer to my letter dated 3 November 2019 where I sought additional time to make my determination.

The purpose of this letter is to advise you of my determination. An extensive search was conducted within this office. A total of 1 document was identified as answering the terms of your application.

I grant you access in full to 1 document; a copy of which is enclosed.

Please note, in compliance with Premier and Cabinet Circular PC045 - *Disclosure Logs for Non-Personal Information Released through Freedom of Information* (PC045), the Department of Treasury and Finance is now required to publish a log of all non-personal information released under the *Freedom of Information Act* 1991.

In accordance with this Circular, any non-personal information determined for release as part of this application, may be published on the DTF website. A copy of PC045 can be found at the following address: <u>https://dpc.sa.gov.au/resources-and-publications/premier-and-cabinet-circulars</u>. Please visit the website for further information.

As I am determining this application as Principal Officer, Section 29(6) of the Act does not provide for an internal review. If you are dissatisfied with my determination you are entitled to exercise your rights of external review with the Ombudsman.

Alternatively, you can apply to the South Australian Civil and Administrative Tribunal. If you wish to seek a review, Section 39(3) of the Act states you must do so within 30 calendar days of receiving the determination.

If you require any further information, please contact Vicky Cathro on 8226 9769.

Yours sincerely

Hon Rob Lucas MLC Principal Officer

¹8 January 2020

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TO: THE TREASURER

RE: COMPULSORY THIRD PARTY REGULATOR – PREMIUM SETTING PROCESS

Timing: ROUTINE

Recommendations/Issues:

It is recommended that you:

- Note the premium setting process as outlined in the Premium Regulation Policy (Attachment A) including key milestone dates and the premium classes for the 2019/2020 financial year (Attachment B)
 - Noted
- Note the Regulator will provide a Minute to notify you of the premium bands and the CTP Insurer premium rate filings for each premium class.

Noted

Hon. Rob Lucas MLC Treasurer

21/3 / 2019

Key Points:

- A function of the CTP Regulator (Regulator) is to determine premium amounts payable for CTP insurance policies (under section 5 of the *Compulsory Third Party Insurance Regulation Act 2016*). During the transitional period, premiums have been fixed to increases around three per cent per annum in line with CTP Insurers' contract terms.
- The premium setting process for the 2019 2020 year has commenced, detailed in the Premium Regulation Policy (Attachment A). For policies effective from 1 July 2019, CTP Insurers will set their own premiums for each premium class within a band determined by the Regulator.
- The number of premium classes have been reduced from 104 to 54 from 1 July 2019. Separate premium classes for vehicles with and without Input Tax Credit (ITC) entitlement will be removed. This will simplify the premium rating structure, and make it unnecessary for vehicle owners to change premium class when their ITC entitlement changes. In

addition, two premium classes for rideshare vehicles such as Uber have been added. See table of premium classes to apply from 1 July 2019 at **Attachment B**.

- The band for each premium class will be determined by the Regulator based on independent actuarial advice of Scheme experience. The Regulator will ensure the determined Class 1 premium band is fair and reasonable. Other premium classes will be assessed against Class 1 to ensure they are fair and reasonable.
- On 15 April 2019 the Regulator will notify CTP Insurers of the premium bands.
- CTP Insurers are required to lodge their annual premium rate with the Regulator on 7 May 2019 to be uploaded by the CTP Insurer into the Department of Planning, Transport and Infrastructure's Transport Regulation User Management Processing System (TRUMPS) on 10 May 2019.
- On 17 May 2019 the CTP Insurers will activate their premium rate data files in TRUMPS once approved by the Regulator. Motorists with policies commencing from 1 July 2019 will be able to view the premium rates from 18 May 2019 via EzyReg and their registration renewal notices.
- The Regulator will provide a Minute to you on 17 May 2019 containing the premium bands and the CTP Insurers' active premium rates for policies commencing on or after 1 July 2019.
- The Regulator may adjust the premium bands during the year if required in response to changing economic conditions and Scheme related factors materially impacting on the risk premium as discussed in the Premium Regulation Policy (Attachment A).
- CTP Insurers can adjust their premium rates throughout the year within the premium bands. This means that if a motorist renews registration (for the same or a different vehicle in the same premium class) at different time of the year, the premium may increase or decrease.
- The premium bands will not be published by the Regulator. The floor and ceiling premium bands are commercial industry information not relevant to SA motorists. There are a number of risks in publishing the floor and ceiling premium bands.
 - The premium band floor will be set as the cost of CTP Insurance policy with no profit margin. The purpose of setting a lower limit on the premium is to protect the SA Government and community from CTP Insurer insolvency by ensuring no insurer can offer a premium below cost rate. Publishing the premium band floor would mislead motorists into believing there will be premium price drop that will most likely never occur.
 - Publishing the upper band limit may discourage CTP Insurers from offering a competitive premium. The upper band limit may be read by the market as acceptable to the motorists, diminishing the appetite of insurers to offer premiums below the ceiling. This will reduce the motorist's opportunity to benefit from the competitive market.

 It will be open to you to announce the CTP Insurers' premium rates for policies commencing on or after 1 July 2019 on the day you are notified of the filed rates. Any public announcement should be based upon the premium rates for Class 1 vehicles.

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Kim Birch CHIEF EXECUTIVE, CTP REGULATOR

103/2019

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Contact Officer:	Kim Birch
Telephone:	8226 4136

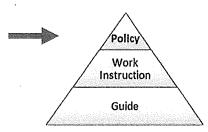
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Attachment A: Premium Regulation Policy Attachment B: Premium Class table



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C P INSURANCE REGULATOR



	Premium Regulation Policy	
Related Documents:	Regulator Premium Regulation Work Instruction	
	Compulsory Third Party Insurance Regulation Act 2016 (SA) Act	
	Motor Vehicles Act 1959 (SA) Act and Regulations	
	Approval Documents	
	Commercial Rule 3 Premium Det time to time	ermination as amended from
	Document Control Summary	
Version:	1.0	······································
Policy Owner	Senior Premiums and Finance Officer	
Reviewed by:	Peter Siderius	Date:
(Subject Matter Expert)	Manager, Premiums and Finance	
Authorised by:	Ivan Lebedev Director, Scheme Analytics and Finance Signed:	Date:
Approved by:	Kim Birch	Date:
	Chief Executive Signed:	0.5/03/2019.
Implementation Date:	1 December 2018	
Next Review Date:	1 July 2020	

Version	Brief description of change/s	Initiator	Date
1.0		Peter Siderius	5 March 2019

PURPOSE

This Policy outlines the CTP Regulator's (Regulator) approach to determining Premiums in accordance with the CTPIR Act.

REGULATORY FRAMEWORK

The setting of Premiums in South Australia is governed by the *Compulsory Third Party Insurance Regulation Act 2016* (SA) (CTPIR Act).

Under section 5(1)(b) of the CTPIR Act, the Regulator has the function "to determine premium amounts payable in respect of CTP insurance policies".

Section 5(3) of the CTPIR Act provides:

- (3) In determining premium amounts, the Regulator-
- (a) may not fix differential premiums except on the basis of 1 or more of the following: (i) vehicle type;
 - (1) VOINOIO LYPO,
 - (ii) vehicle use;
 - (iii) garaging location;

(iv) entitlement under the GST law to an input tax credit in respect of compulsory third party insurance premiums; and

(b) must be satisfied that the premiums are fair and reasonable to the registered owners of the motor vehicles.

Nothing in this Policy derogates from the CTPIR Act or the *Motor Vehicles Act 1959 (SA)* (MV Act) and the CTPIR Act and the MV Act prevail over this Policy to the extent of any inconsistency.

CONSULTATION

This policy was developed in consultation with the Scheme Actuary, CTP Insurers and the Crown Solicitor's Office.

SCOPE

This Policy applies to determination and regulation of Premiums that come into effect on or after 1 July 2019.



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DEFINITIONS

For the purposes of this Policy, the following definitions apply:

ACST means Australian Central Standard Time.

Administration Expenses means the component of the Premium retained by the Registrar of Motor Vehicles pursuant to section 99A(14) of the MV Act and paid or payable to the Regulator after deduction of the Insurer Premium, GST and Stamp Duty. The Regulator uses this component of the Premium to fund services associated with the Scheme that are not paid by CTP Insurers, including those performed by a number of Government Agency service providers.

Annual Premium Regulation Cycle means the processes and activities employed in determining the Premium Bands for each Premium Class prior to the commencement of a new Financial Year.

Business Days means any day except Saturdays, Sundays and declared public holidays in South Australia.

CE means the Chief Executive Officer appointed pursuant to Part 2 Division 2 of the CTPIR Act, which constitutes the Regulator and exercises the functions of the Regulator under the CTPIR Act and other Acts.

Central Locked Folder means a secure system for the upload of Premium Rate Filings, as notified by the Regulator from time to time.

CTP means compulsory third party insurance.

CTP Insurer means Approved Insurer defined in section 99 of the MV Act (but does not include the Motor Accident Commission).

CTP Insurer Submissions means mandatory information requirements to be submitted by CTP Insurers as requested by the Regulator for use in the determination of Premium Bands for each Premium Class.

CTPIR Act means the Compulsory Third Party Insurance Regulation Act 2016 (SA).

DPTI means the Department of Planning, Transport and Infrastructure.

Financial Year means the year commencing 1 July and ending 30 June in the following year.

GST means the Goods and Services Tax imposed by the *A New Tax System (Goods and Services Tax) Act 1999* (Cth).

Government means the Government of South Australia.

Insurer Premium means the component of the Premium paid or payable to a CTP Insurer after the deduction of Administration Expenses, GST and Stamp Duty.

MV Act means the Motor Vehicles Act 1959 (SA).

MV Act Regulations means the Motor Vehicle (Third Party Insurance) Regulations 2013 (SA).

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Premium has the meaning attributed in the MV Act, which in section 5 provides that "*insurance premium or premium*" in relation to a motor vehicle, means the premium appropriate to the motor vehicle for a policy of insurance under Part 4, as determined by the Regulator from time to time, and includes any money that the Registrar is required to retain under section 99A(14). Accordingly, the Premium is comprised of:

- an Insurer Premium component
- an Administration Expenses component.

The following amounts are also payable by motor vehicle owners at the time of making an application for registration:

- GST which is calculated at 10 per cent of the Insurer Premium component only
- Stamp Duty, which is calculated at 11 per cent of the Insurer Premium, Administration Expenses and GST inclusive.

Premium Band means for a given Premium Class the range of amounts between and including the amounts of the minimum and the maximum Insurer Premiums that can be charged by each CTP Insurer for that Premium Class.

Premium Bands Notice means written notification from the Regulator to CTP Insurers at least 11 weeks prior to the start of a new Financial Year that:

- details the Premium Bands determined by the Regulator for each Premium Class
- summarises the bases for the determination of the Premium Bands
- notifies of the upcoming Premium Rate Filing Day.

Premium Class means a premium class set out in the CTP Insurance Premium Schedule as notified by the Regulator from time to time.

Premium Effective Date means the date on which an Insurer Premium comes into effect.

Premium Rate Data File means a file uploaded by CTP Insurers into TRUMPS that details the proposed Insurer Premium (exclusive of GST) that the CTP Insurer proposes be payable in respect of each Premium Class, and the CTP Insurer's proposed Premium Effective Date.

Premium Rate Filing Day means the date each CTP Insurer is required to submit a Premium Rate Filing to the Regulator.

C P INSURANCE REGULATOR

Premium Rate Filing means submissions by a CTP Insurer to the Regulator, in a format as determined by the Regulator, that:

- details the Insurer Premium that the CTP Insurer proposes be payable in respect of each Premium Class for the relevant Financial Year (or the remainder of the Financial Year for revised Premium Rate Filings)
- details the CTP Insurer's rationale for proposing the Insurer Premium in respect of each Premium Class and applied assumptions regarding projected claim costs and frequency, insurer expenses and margins and economic variables
- details the CTP Insurer's proposed Premium Effective Date.

Regulator means the CTP Regulator established under Part 2 Division 1 of the CTPIR Act.

Scheme means the South Australian CTP Scheme.

Scheme Actuary means the independent actuary consultant appointed by the Regulator to provide a range of services related to the regulation of Premiums in the Scheme.

Scheme Review Industry Presentation means an annual industry forum conducted by the Regulator, where the Scheme Actuary presents to the CTP Insurer representatives and other stakeholders initial Scheme review findings and key elements associated with determining the Premium for the upcoming Financial Year.

Stamp Duty means the duty imposed by the Stamp Duties Act 1923 (SA).

Statement of Reasons for Premium Bands means an internal document prepared by the Regulator detailing the process and basis for the determination of Premium Bands for each Premium Class that apply in the specified Financial Year.

Trigger Events means the occurrence of any one or more of the following:

- A movement of ±1.5% pa or more in the economic gap rate (the average discount rate minus the average wage inflation rate).
- A movement of ±5% in core claim frequency since the previous pricing review, adjusted for seasonality. Core claims exclude workers' compensation recovery claims, interstate claims and no-fault children's claims.
- A change in legislative or legal precedents that changes the required risk premium by ±5% or more.
- A change in regulation that changes the required risk premium by ±5% or more.
- A combination of the above factors that changes the required risk premium by ±5% or more.

TRUMPS means the Transport Regulation User Management Processing System, operated by the Registrar of Motor Vehicles (DPTI) or its agent.



CONFIDENTIALITY

The Regulator will establish, and will use its best endeavours to ensure that DPTI establishes, appropriate security measures and procedures in respect of the treatment of commercially sensitive information.

Commercially sensitive information includes without limitation:

- Premium Bands determined in respect to each Premium Class
- CTP Insurer's Premium Rate Filings
- CTP Insurer's Premium Rate Data Files

Regulator staff access to Premium Bands, CTP Insurer's Premium Rate Filings and Premium Rate Data Files is limited to the Chief Executive, Director, Scheme Analytics and Finance, Director, Scheme Implementation and the Manager, Premiums and Finance.



ORGANISATIONAL COMMITMENT

The following table outlines Premium determination responsibilities of relevant Regulator staff.

Who	Commitment	How
Chief Executive (CE)	Has ultimate responsibility for the Premium regulation outcome	Determine Premium Bands by Premium Class Determine Insurer Premiums or delegate authority to do so for each CTP Insurer prior to and during the Financial Year Approve the release of a Premium Bands Notice to CTP Insurers Notify the Treasurer of determined Premium Bands and CTP Insurers' Premium Rate Filings prior to and during the Financial Year Endorse final Scheme Actuary reports
Director – Scheme Analytics and Finance	Overall responsibility for reporting to the CE on the Premium regulation process	Oversee the provision of Scheme data to the Scheme Actuary and CTP Insurers Approve the provision of data extracts to the Scheme Actuary and CTP Insurers prior to release Review Scheme Actuary reports and make recommendations to the CE Review CTP Insurers Submissions Participate in the Premium Band determination process Peer review Premium Bands Notice Peer review Statement of Reasons for Premium Bands Peer review calculation of the Administration Expenses by Premium Class Determine Insurer Premiums for each CTP Insurer during the Financial Year if delegated by the CE Peer review Treasurer briefings of determined Premium Bands and CTP Insurers' Premium Rate Filings prior to and during the Financial Year





Who	Commitment	How
Manager, Premiums and	Responsible for the	Manage the Annual Premium Regulation Cycle
Finance	management of the Premium	Manage stakeholder communications
	regulation process.	Review Scheme Actuary reports
	Responsible for	Review CTP Insurers Submissions
	calculation of Administration	Participate in the Premium Band determination process
	Expenses.	Prepare the Statement of Reasons for Premium Bands Prepare Premium Bands Notice
		Calculate the Administration Expenses by Premium Class
		Determine Insurer Premiums for each CTP Insurer during the Financial Year if delegated by the CE prior to and during the Financial Year
		Prepare Treasurer briefings of determined Premium Bands and CTP Insurers' Premium Rate Filings
Scheme Analytics and	Responsible for data provision to	Provide data extracts to the Scheme Actuary and CTP Insurers by specified due dates
Performance Team	the Scheme Actuary and CTP Insurers	Inform stakeholders of the data quality issues that may impact actuarial Scheme review and pricing analysis
		Provide observations on Scheme dynamics to understand data findings



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POLICY

Policy Objectives

The Regulator will determine Premium Bands and Premiums payable by motor vehicle owners for each Premium Class in compliance with section 5(3) of the CTPIR Act by:

- ensuring that differential premiums are not fixed except on the basis of one or more of the following: vehicle type; vehicle use; garaging location; and entitlement under the GST law to an input tax credit in respect of Premiums for each Premium Class
- ensuring that Premiums are fair and reasonable to both motor vehicle owners and CTP Insurers for each Premium Class
- monitoring Class 1 Premium affordability to motor vehicle owners
- ensuring that the determined Premium Bands and overall regulation of the Scheme provides the conditions for competitive Premium Rate Filings by CTP Insurers.

The Regulator will ensure that CTP Insurers comply with obligations set out in Commercial Rule 3 "Premium Determination" in respect of Premium Rate Filings.

Determination of Premium Bands

The Regulator will determine Premium Bands and Premiums payable by motor vehicle owners for each Premium Class annually by completing an Annual Premium Regulation Cycle prior to the commencement of a new Financial Year, which includes the following activities:

- Providing Scheme data extracts to the Scheme Actuary and CTP Insurers.
- Approving Premium Class Relativities to apply based on Scheme 30 September data.
- Reviewing CTP Insurer and other stakeholder submissions.
- Approving Administration Expenses amounts and an allocation methodology to apply across all Premium Classes.
- Conducting an Annual Scheme Industry Review Presentation.
- Endorsing the Scheme Actuary's Annual Risk Premium Review based on 31 December data.
- Determining the Premium Bands by Premium Class to apply.
- Finalising the Statement of Reasons for Premium Bands.
- Approving the Administration Expenses by Premium Class amounts to apply.
- Forwarding a signed Premium Bands Notice to CTP Insurers.
- Uploading determined Premium Bands by Premium Class in TRUMPS.

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The Regulator will review the adequacy of Premium Bands outside of the Annual Premium Regulation Cycle if one of the Trigger Events occurs, which may result in Premium Bands being re-set during the Financial Year and the CTP Insurers being required to re-submit Premium Rate Filings (as discussed below) during the course of the Financial Year.

Fair, Reasonable and Affordable Premiums

The Regulator will ensure that the determined Class 1 Premium is fair and reasonable to both motor vehicle owners and CTP Insurers by ensuring that:

- the Insurer Premium is sufficient to fund a CTP Insurer with a Scheme average portfolio of risks and level of expenses
- the Administration Expenses are sufficient to fund the costs of Government services associated with the Scheme, in respect of the frequency and actual costs of each service.

The Regulator will monitor that the determined Class 1 Premium is affordable to motor vehicle owners with reference to Section 8 of the MV Act Regulations.

The Regulator will review and if required change current District 1 boundary locations every five years in consultation with DPTI, the Lifetime Support Authority and other relevant stakeholders in order to ensure that the Premium rating factor (District 1 or 2) reflects the true underlying CTP claim risk and is subsequently fair and reasonable to both motor vehicle owners and CTP Insurers.

The Regulator will consult with the Government on Scheme Reform where tension exists or is projected to exist between the objectives to ensure that Premiums are fair and reasonable to both motor vehicle owners and CTP Insurers and Premium affordability to motor vehicle owners.

CTP Insurer Premium Rate Filings

The Regulator will ensure that CTP Insurers comply with obligations set out in Commercial Rule 3 "Premium Determination" in respect of Premium Rate Filings prior to the commencement of a new Financial Year by:

- monitoring that each CTP Insurer uploads a valid Premium Rate Filing in a Central Locked Folder by 5pm ACST on the Premium Rate Filing Day
- reviewing the Premium Rate Filings as uploaded by each CTP Insurer are valid and resolving any identified issues
- monitoring that each CTP Insurer uploads a valid Premium Data File into TRUMPS within three Business Days of uploading its Premium Rate Filings to the Central Locked Folder
- reviewing the Premium Rate Filings and Premium Data Files as uploaded and within three Business Days following the uploading of the Premium Data File, notify the CTP Insurer in writing (which may be provided via a TRUMPS system notification) that the entire Premium Rate Filing is either approved or rejected
- monitoring that where a CTP Insurer's Premium Rate Filing has been approved, that within two business days the CTP Insurer activates their Premium Data File in TRUMPS.



 notifying the Department of Planning, Transport and Infrastructure (DPTI) of the Premiums for each Premium Class to be applied for the CTP Insurer where a CTP Insurer's Premium Rate Filing has been rejected.

The Regulator will ensure that CTP Insurers comply with obligations set out in Commercial Rule 3 "Premium Determination" in respect of Premium Rate Filings during a Financial Year by:

- receiving revised Premium Rate Filings from any CTP Insurer in a Central Locked Folder
- reviewing the revised Premium Rate Filing as uploaded by a CTP Insurer is valid and resolving any identified issues
- monitoring that the CTP Insurer uploads a valid revised Premium Data File into TRUMPS within two Business Days of uploading its revised Premium Rate Filing to the Central Locked Folder
- reviewing the Premium Rate Filings and Premium Data Files as uploaded and within two Business Days following the uploading of the Premium Data File, notify the CTP Insurer in writing (which may be provided via a TRUMPS system notification) that the entire Premium Rate Filing is either approved or rejected
- monitor that where a CTP Insurer's Premium Rate Filing has been approved, that within two business days the CTP Insurer activates their revised Premium Data File in TRUMPS.

Notifying the Treasurer

The Regulator will notify the Treasurer of the determined Premium Bands and approved CTP Insurer's Premium Rate Filings within two business days of CTP Insurers activating their Premium Data File in TRUMPS. This notification should include:

- Details of Premium Class 1 Premium Bands and CTP Insurer Premium Rate Filings compared to the current Premium
- Details of material changes in Premium Bands by Premium Class compared to the current Premiums and the rationale for such changes
- Comment on Premium Classes where Premium price competition is evident
- Comment on Premium Classes where Premium price competition is not evident
- Any other relevant matter.

The Regulator may notify the Treasurer as and when required outside of this process of any matter relevant to the determination of Premium Bands and CTP Insurer Premium Rate Filings.

DELEGATION

Chief Executive

Attachment B

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Premium classes for the 2019-20 Financial Year

1	Private passenger	1	1
2	Private passenger	51	2
3	Public passenger: no fare	10	1
4	Public passenger: no fare	60	2
5	Taxis	5	1
6	Taxis	55	2
7	Hire car	6	1
8	Hire car	56	2
9	Public passenger: small	7	1
10	Public passenger: small	57	2
11	Rideshare	48	1
12	Rideshare	98	2
13	Public passenger: medium	8	1
14	Public passenger: medium	58	2
15	Public passenger: heavy	9	1
16	Public passenger: heavy	59	2
17	Public passenger: omnibus	32	1
18	Public passenger: omnibus	82	2
19	Goods carrying: light	2	1
20	Goods carrying: light	52	2
21	Goods carrying: medium	3	1
22	Goods carrying: medium	53	2
23	Goods carrying: heavy	21	1
24	Goods carrying: heavy	71	2
25	Goods carrying: primary producers	4	1
26	Goods carrying: primary producers		2
27	Motorcycles:ultralight	14	1
28	Motorcycles:ultralight	64	2
29	Motorcycles: light	15	1
30	Motorcycles: light	65	2
31	Motorcycles:medium	16	1
32	Motorcycles:medium	66	2
33	Motorcycles: heavy	20	1
34	Motorcycles: heavy	70	2
35	Tractors	18	1
36	Tractors	68	2
37	Historic and left hand drive vehicles	19	1
38	Historic and left hand drive vehicles	69	2
39	Special purpose vehicles	29	- 1
40	Special purpose vehicles	· 79	2
40	Car carrier's extention: light	22	1
41 42	Car carrier's extention: light	72	2
42	Car carrier's extention: medium	23	1
44	Car carrier's extention: medium	73	2
44 45	Car carrier's extention: heavy	24	1
45	Car carrier's extention: heavy	74	2
40 47	Car carrier's extention: trailer	25	1
47	Car carrier's extention: trailer	75	2
	Unregistered vehicle permits	73 17	1
49		67	2
50	Unregistered vehicle permits	67 12	2 1
51	Motor trade plates	62	2
52	Motor trade plates		
53	Trailers	11 61	1