# कार्यालय परिवहन आयुक्त, उत्तराखण्ड, सहस्त्रधारा रोड, देहरादून।

पत्रांक 879/ विज्ञप्ति-टी.आर./ 2019

दिनांक 08.03.2019

# विज्ञप्ति

सभी संबन्धितों को सूचित किया जाता है कि दिनांक 01.01.2019 से पंजीकृत होने वाले सभी नये सार्वजिनक सेवायानों (दुपिहयां एवं तिपिहिंयां वाहनों को छोडकर) पर व्हीकल लोकेशन ट्रैकिंग डिवाईस एवं पैनिक बटन (ए.आई.एस.-140 मानक के अनुरूप) लगाने की अनिवार्यता है। वाहनों पर इस डिवाईस को लगाने के लिए इच्छुक आपूर्तिकर्ताओं/ डीलर्स द्वारा परिवहन आयुक्त कार्यालय से अनुमित प्राप्त करने के लिए आवेदन पत्र प्रारूप एवं शर्तों का विस्तृत विवरण विभागीय वैबसाईट www.transport.uk.gov.in से डाउनलोड कर आवेदन किया जा सकता है।

परिवहन आयुक्त, उत्तराखण्ड।

# Empanelment of Vehicle Location Tracking (VLT) Devices (AIS-140 Compliant) Manufacturers for specified public service vehicles in Uttarakhand

No- 879 /TR/IV-9/VLTMS/2019, dated 08-03-2019

By

Transport Commissioner Office, Uttarakhand, Kulhan, Shashtradhara Road, Dehradun E-mail ID – transportdeptuk@gmail.com

#### **Document Control**

**Document Title:** Vehicle Location Tracking & Monitoring System Uttarakhand

**Document No.**: 879/TR/IV-9/VLTMS/2019

Name of Organisation: Uttarakhand Transport Department

**Abstract:** This document provides the detailed procedure for empanelment VLT units for the implementation of AIS-140 standard based Vehicle Location Tracking and Monitoring System for all Public Transport Vehicles registered in Uttarakhand. For this certified AIS-140 certified VLTs from manufacturers will been listed based on the selection procedures specified in this document.

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## **Abbreviations/Acronyms:**

ARAI	Automotive Research Association of India
NIC	National Informatics Centre
GSM	Global System for Mobile Communication
ISO	International Organization for Standardisation
RTO	Regional Transport Office
SIM	Subscriber Identity Module
UKTD	Uttarakhand Transport Dept.
VLT	Vehicle Location Tracking Unit
GNSS	Global Navigation Satellite System
MORTH	Ministry of Road Transport and Highways
AIS	Automotive Industry Standard
eSIM	Embedded SIM
RFC	Retro fitment Centre

## **Glossary of Terms**

The definitions of various terms that have been used in this document are as follows.

"Manufacturer" means a registered firm manufacturing AIS-140 certified Vehicle Location Tracking units in India.

**RFC/Franchisee"** means a firm registered in Uttarakhand who is authorized to resale, install, support and service AIS-140 certified Vehicle Location Tracking Unit of empaneled Manufacturer.

#### 1. Background

Uttarakhand State has a good network of roads. The total length of roads in Uttarakhand is nearly 12,268.10 Kms. Nearly 27 lakhs of vehicles are currently registered under different categories in this state.

Uttarakhand Transport Department, under the Ministry of Transport, Government of Uttarakhand is the principal agency for the enforcement of the Motor Vehicles Act and Rules in the State. Enforcement of public road transport rules and its effective monitoring for the large number of vehicles is definitely a challenge. Vehicle Location Tracking & Monitoring System is a technology used by many countries, companies and individuals to track vehicles using Global Navigation Satellite System(GNSS). Apart from enforcement of public road transport rules, the system can also give other valuable services to UKTD and the general public. UKTD has taken steps to track and monitor all public transport vehicles registered in Uttarakhand.

For tracking, a Vehicle Location Tracking unit has to be installed in these vehicles. MORTH has released a common standard for tracking devices under AIS-140 standard. UKTD has decided to follow MORTH's AIS-140 standard to send data from the VLT units to the State server. For this UKTD has decided to empanel manufacturers who can meet the specifications of AIS-140 standard and the specific requirements of the State. The Manufacturers are to be selected through an empanelment process, as defined in this document and UKTD will approve the selected Manufacturers to sell/install/support and service their devices in Uttarakhand.

#### **About UKTD**

The Uttarakhand Transport Department is a line department of Transport Department, Government of Uttarakhand. The Transport Department functions under the provisions of Section 213 of the Motor Vehicles Act, 1988. The Transport Department, Uttarakhand, was formed in the year 2001. The Department is administered by the Transport Commissioner who is the Head of the Department.

The Department has four functional levels

(i) Head Office under the Transport Commissioner

- (ii) Four RTO Offices under Transport Commissioners
- (iii) Twenty Sub Regional Transport Offices under Regional Transport Officers. In addition, there are 19 Transport Department Border Check Posts headed by TTO-2.

These vehicles which are required to be fitted with VLT devices along with Panic button are categorized into:

- Stage Carriages (Transport / Private Buses)
- Educational Institution Buses (EIB)
- Hospital Vehicles
- Taxis & Auto Rickshaws
- Goods Carriers
- Contract Carriers
- Government Vehicles

#### About "AIS-140 standard based Vehicle Tracking & Monitoring System"

Uttarakhand Transport Department envisages to track the public service vehicles in Uttarakhand. The objective of the project is to introduce a tracking system for continuous monitoring of public transport vehicles for better road safety and better support for enforcement services.

# Components of AIS-140 based Tracking System

The tracking system is a combination of hardware, software and communication technologies. The major components of tracking system are

- 1. **Vehicle Location Tracking Unit(VLT):** VLT is a hardware unit equipped with GNSS logger, a GPRS/3G/4G based communication system, power supply and back up mechanism. The entire system is packed into a rigid enclosure with proper indications and power input.
- 2. **Vehicle Location Tracking Software:** A software system receives the data from VLT, passes it and logs it. This data is further processed for generating automated alerts and messages. The software resides in server(s).
- 3. **Communication facility:** VLT sends the geo-location information to the server in a predefined interval. The most common communication method is using GPRS/3G/4G, made possible through the existing mobile networks

using eSIM.

4. **Monitoring System**: A map system is integrated to the software for real time plotting of the vehicles on a map. Monitoring centres can view this map displayed on a web browser.

#### 2. Empanelment of VLTs

UKTD intends to empanel manufacturers of Vehicle Location Tracking units (VLTs), which can be used in the public service vehicles, for enabling tracking and monitoring of the vehicles. The objective of VLT empanelment is to standardized the VLT data protocol and data format specification to meet the state specific requirements and to support the customers to avail good quality VLT devices and after sales services. Accordingly, the pre-qualification requirements for the manufacturer and the specifications for vehicle Location tracking unit firmware details are listed in this document. Empanelment is for the devices, and as such, multiple devices from the same manufacturer will require separate applications for empanelment. The UKTD will publish the list of empaneled VLT models and the vehicle owners will be advised to procure only the empaneled VLT models.

- 1. The Manufacturers can apply their VLT models for empanelment based on the criteria specified in this document.
- 2. If manufacturer wants more than one VLT model to be empaneled, separate application is to be submitted for each VLT model.
- 3. The evaluation of application for empanelment would be carried out based on the pre qualification criteria and technical evaluation.
- 4. Only empaneled VLT models are to be used by public service vehicles in Uttarakhand.
- 5. VLT manufacturers cannot sell their models for the public service vehicles in Uttarakhand once their authorisation/certification issued by the testing agency is suspended, cancelled or not renewed for any reason.
- 6. Manufacturers must give an undertaking to UKTD that in case their authorisation/ certification is suspended, cancelled or withdrawn for any reason, they will continue to support the devices already sold for the public

service vehicles.

- 7. Manufacturers must have a Call-centre or similar arrangements to address the queries and any other issues from the end users.
- 8. Manufacturers must arrange a registered RFC or franchisee who is authorised to sell, install, support and service the VLTs in each of the Regions in Uttarakhand, as well as in at least four districts out of nine districts lying in hilly areas viz Uttarkashi, Tehri, Rudraprayag, Chamoli, Pauri, Bageshwar, Pithoragarh, Champawat and Almora. Hence the manufactures must submit a declaration for the same along with the application form.

Approval to RFC/ franchisee is provided based on the site inspection and verification of facilities provided by agency/franchisee by UKTD officials.

The manufacturer RFC/franchisee should facilitate eSIM in VLTs along with a subscription of two years for new vehicles and one year for old vehicles from service providers on behalf of the Vehicle Owners. And must take necessary steps to ensure the continuity of the service once the eSIM validity period is expired.

RFC/franchisee of corresponding manufacturers should have sufficient infrastructure like computer, internet service, official phone number, technicians etc. to provide assistance to end users.

UKTD can terminate the approval of the registered RFC/ franchisee at any time if it is found violating any of the provisions of the CMVR- 1989, AIS-140, any other direction issued by the UKTD or any other applicable law.

- 9. UKTD reserves the right to change the terms and conditions governing the certification and approval at any point of time.
- 10. Unless the Certification of any VLT model is cancelled by UKTD, the certification of VLT model shall remain valid as long as such model continues to comply with the terms and conditions in AIS-140 standard or for 3 years whichever is less. Before the expiry period manufacturers have to renew the certification in accordance with UKTD regulations.

- 11. UKTD reserves the right to modify the VLT firmware specification or add additional features to existing specification. The release of the VLT specifications will be in a version controlled fashion.
- 12. Every VLT models and service of manufacturers selected through empanelment process will be reviewed every 3 months and subsequent actions will be taken against those who violate any of the regulations listed out in this document.
- 13. UKTD may initiate the empanelment process, as and when required.

Interested Manufacturers for the respective VLT models which comply with the UKTD requirements may download the registration document from the website and submit the same duly filled in and supplemented with all relevant documents to UKTD for further processing.

## 3. Scope of the project

Uttarakhand Transport Department is planning to track all public service vehicles operating in Uttarakhand in phased manner. These vehicles should be tagged with VLT devices. The Owners of the vehicles registered Prior to 01-01-19 should purchase the VLT devices from selected manufacturers/franchisees only.

VLT Manufacturers/ registered RFC will be given controlled access to the Vahan Portal/UKTD application for tagging (connecting) and feeding the details of the VLTs to the application. Manufacturers should train the registered agencies/ franchisees for installing the VLT devices in vehicles and support the customers whenever required. Manufacturer shall provide warranty (at least for one year) and AMC for their products. Manufacturers/ the registered RFC/franchisees have to supply and support certified VLT models across the State. Any complaint registered through the UKTD application should be serviced within 48 hours of complaint raised by the customer. For redressal of complaints a suitable mechanism shall be developed and monthly reporting to UKTD shall be ensured.

The list of Regional/Sub Regional Transport offices is:-

Sl. No.	Locations (RTO/ARTO Office)
1	UK-01 Almora
2	UK-02 Bageshwar
3	UK-03 Champawat

4	UK-04 Nainital
5	UK-05 Pithoragarh
6	UK-06 Udham Singh Nagar
7	UK-07 Dehradun
8	UK-08 Haridwar
9	UK-09 Tehri
10	UK-10 Uttarkashi
11	UK-11 Chamoli
12	UK-12 Pauri
13	UK-13 Rudraprayag
14	UK-14 Rishikesh
15	UK-15 Kotdwar
16	UK-16Vikashnagar
17	UK-17 Roorkee
18	UK-18 Kashipur
19	UK-19 Ramnagar
20	UK-20 Ranikhet

# 4. Pre-Qualification Criteria for VLT Manufacturer

UKTD shall constitute an evaluation committee, which shall carry out the evaluation process of VLTs. Manufacturers have to meet the following prequalification criteria for empanelment.

# **Pre-Qualification Criteria**

S. No.	Criteria	<b>Required Documents</b>
1	The Manufacturer should be a	Certification of incorporation
	registered company in India under the	
	Companies Act, 1956.	
2	The Manufacturer should not be	Self declaration by the
	blacklisted by any Central/ State	manufacturer signed by the
	agencies in India.	authorized signatory
3	Only OEMs will be allowed to	Copy of relevant Certificate
	participate in empanelment.	
4	The VLT model which Manufacturer	Copy of relevant Certificate(s)
	intends to submit for empanelment	
	must be certified according to AIS-	
	140 standard.	
5	The Manufacturer shall arrange an	Self declaration by the
	authorised RFC in 4 regions (Almora,	manufacturer signed by the
	Nainital, Dehradun, Pauri) and in at	authorized signatory
	least four districts out of nine	

	districts lying in hill areas viz-	
	Uttarkashi, Tehri, Rudraprayag,	
	Chamoli, Pauri, Bageshwar,	
	Pithoragarh, Champawat and Almora	
6	The Manufacturer shall agree to	Self declaration by the
	open an Office in Uttarakhand State	manufacturer signed by the
	within one month, once the	authorized signatory
	Manufacturer is empanelled.	

The Manufacturer must submit all the certified and authenticated documentary proof for meeting the pre-qualification criteria. Such documents may include AIS-140 certification for submitted model, company registration certificates and other credentials.

#### 5. Technical Specification

Once the Applicant has passed through the Pre-qualification stage, they have to subject their AIS-140 certified VLT models to the following tests and get it passed.

- Communication Protocol as Per AIS140 standards in line with Ministry of Road Transport & Highways (MoRTH) directives and notifications.
- Demonstration of test server configuration in the submitted VLT device
- Fitment of the VLT device with Panic Button System, in a test passenger vehicle
- Demonstration of Alert Messages as per AIS-140, when the Panic button is pressed
- The primary source of power for the device should be from vehicle's battery. When the device is disconnected from vehicle battery it should start operating on internal battery.
- Alert on tampering and vehicle battery removal.
- Device should meet all the features prescribed as per AIS-140
- The panic buttons should be fitted in location easily accessible to the person(driver/passenger) intended to use it. In public transport vehicles like buses the emergency buttons should preferably be fitted on the vertical pillar above the window rail below the luggage rack. Refer Annexure D.

# **6. Submission of Application for Empanelment**

The Manufacturer can apply for empanelment of one or more models of VLT devices.

#### **General Conditions**

Manufacturers are advised to study the document carefully. Submission of application will be deemed to have been done after careful study of all instructions, eligibility norms, terms and requirement specifications in this document with full understanding of its implications. Applications not complying with all the given clauses in the document are liable to be rejected. Failure to furnish all information specified in this document or submission of application not substantially responsive to the document in all respects will be liable for rejection.

Application for empanelment will be hosted in UKTD official web site (www.transport.uk.gov.in) and can be downloaded and used for submission of application forms. Application fee shall be paid to UKTD along with the submission of application.

In case the last date for submission of application is declared holiday in Uttarakhand, the next working day will be treated as the last date for submission of application. There will be no change in the timing.

Un-signed and un-sealed application shall not be accepted.

All pages of the application and documents being submitted must be signed and sequentially numbered by the Manufacturer.

Ambiguous applications will be out-rightly rejected.

Applications not submitted as per the format will be rejected straight away.

No deviations from the specifications will be accepted.

The Manufacturers will bear all costs associated with the preparation and submission of their applications. UKTD will, in no case, be responsible or liable for those costs, regardless of the outcome of the empanelment process.

UKTD may, at its own discretion, can cancel the empanelment; extend the date for submission of applications or any clause of this document.

#### **Registration fee:**

The application shall be submitted along with registration fee of Rs. 10000/-. It can be submitted as a demand draft in favour of "Transport Commissioner Uttarakhand" payable at Dehradun for each VLT model. For additional VLT models being submitted for registration, the manufacturer shall submit an additional fee@ Rs. 10000/- for each model.

The registration fees paid to UKTD will not be refundable. An application not accompanied by the aforesaid payment shall be considered as non responsive and will be rejected.

#### **Performance guarantee Fee:**

A performance guarantee of Rs 20,00,000 shall be submitted by the manufacturer intending to be empanelled. The performance guarantee shall be in the bank guarantee issued from any the nationalized banks and shall remain valid for five year from the date of publication of list of manufacturers empanelled for the purpose on the website of the Transport department Uttarakhand.

## **Submission of Application**

- a) A Manufacturer can apply for empanelment of one or more models of VLT devices. Separate application is to be submitted for each model.
- b) The Manufacturer is required to submit statement of compliance of the devices with the specifications as set out in this document.
- c) The Manufacturer is required to submit their application in the prescribed format in this document. The Manufacturer is also required to submit two VLT devices, eSIM with 3 month data plan validity and all other necessary documentation needed for interfacing and testing. The devices will be retained by UKTD and will not be returned to manufacturer irrespective of the empanelment outcome.
- d) All communications and proceedings shall be in writing, in Hindi or English language only.

#### **Details of Document to be submitted**

The Manufacturers are required to submit the following documents.

- a) Table of contents listing documents and other details submitted.
- b) DD towards RegistrationCost.
- c) VLT Registration Form.
- d) Compliance Report in terms with Specifications for VLT devices.

Both hardcopy and softcopy (in pdf format) of the above documents are required to be submitted. The documents along with registration form need to be submitted in a sealed envelope clearly bearing the following:

# "Application for VLT Empanelment", Transport Department - Uttarakhand.

Name and address of Vendor with contact number.

The application should reach UKTD at the following address as per the timelines specified for submission in this document:-

Transport Commissioner Office Uttarakhand, Kulhan, Shashtradhara Road, Dehradun E-mail ID – transportdeptuk@gmail.com

## **Evaluation of Applications**

- a) The application found complete in all respect shall be considered for processing and testing of VLT devices for compliance with specifications.
- b) UKTD reserves the right to verify all statements, information and documents submitted by the Applicant. Applicant may be asked to submit more documents, if any clarification required.
- c) If any information or document provided by the manufacturer is found to be false or misleading during the evaluation process, such application would be liable for rejection and if the VLT device has been empaneled, its empanelment would be liable to be cancelled. Further, the Manufacturer may be considered for blacklisting.

- d) Decision of UKTD regarding empanelment/rejection of the VLT devices under this process will be final and no correspondence in this regard will be entertained by UKTD.
- e) For empanelment of devices, UKTD will follow pre-qualification criteria and the technical evaluations. Final selection will be based on technical evaluation.
- f) Selected VLT models will be published on UKTD website.
- g) UKTD may conduct site inspection and validate the facilities of registered agencies/ franchisees identified by manufacturers as RFC for distributing and fitting the VLT devices to customers.
- h) In case UKTD delist any agency/ franchisee due to any dissatisfaction or any agency/ franchisee withdrawal, then the corresponding manufacturer shall arrange alternate RFC/franchisee in the same region.

#### **Operational Evaluation**

Compliance against the operational specifications below needs to be submitted by the Applicant. The same shall be subjected to demonstration by the Applicant and/or testing by UKTD for validation, as mentioned below:-

SI.	Specification	Validation Process	Confirmation (Yes/No)
1.	Communication Protocol as Per AIS140 standards in line with Ministry of Road Transport & Highways (MoRTH) directives and notifications.	Device functionalities to be demonstrated by the Applicant at the time of submission	(165/110)
2.	Demonstration of test server configuration in the submitted VLT device	Acknowledgement of test command given to device and display of Tracking message at Test server	
3.	Fitment of the VLT device with Panic Button System, in a test passenger vehicle	Demonstration and connection, in the test vehicle	
4.	Demonstration of Alert Messages as per AIS-140, when the Panic button is pressed	Demonstration of the alert message at back end test server and emergency response server(2 messages at two different servers)	

5.	The primary source of power for the device should be from vehicle's battery. When the device is disconnected from vehicle battery it should start	A demonstration by Applicant together with supporting document as under: AIS-140 Certification.	
	operating on internal battery.		
6.	Alert on tampering and vehicle battery removal.	A demonstration by Applicant together with supporting document as under: AIS-140 Certification.	
7.	Device should meet all the features prescribed as per AIS-140	A demonstration by Applicant	

# Legend:

**Yes**: Feature is available in the Vehicle Location Tracking Device model submitted.

**No:** Feature is not available in the Vehicle Location Tracking Device model submitted.

# **Annexure - A. Application Form for VLT Empanelment**

## Format for VLT Application Form

( on the official letter head of manufacturer)

Date:

Transport Commissioner Uttarakhand, Kulhan, Shashtradhara Road, Dehradun E-mail ID – transportdeptuk@gmail.com

Sub: Registration of VLT device for the Public Vehicles in Uttarakhand

Sir,

We have fully understood the requirements of the process "Empanelment of Vehicle Location Tracking Unit (VLT) for Public Vehicles in Uttarakhand" and are submitting our registration application for the following VLT device(S) being manufactured by us together with the required details, other information as per the registration process and the compliance report for VLT specification and protocols.

VLT device model number(s) to be registered	
Manufactured by and Date	
Manufacturer at (address of VLT production centre)	
Contact Person details (If different from undersigned)	

In relation to our application, UKTD may also note the following:

- 1. Our application is unconditional and all information provided in the application is true and correct.
- 2. We hereby declare that the VLT device(s) being submitted for registration complies with the specifications as set out in the registration process document and we shall make available any additional information as UKTD may find necessary as required for clarification.

- 3. We acknowledge the right of UKTD to reject our application without assigning any reason and accept the right of UKTD to cancel the registration process at any time without incurring any liability to the registered Manufacturers.
- 4. We confirm that we are not blacklisted by any state government or central government / department/ agency in India from participating in bids for last three financial years.
- 5. We agree to keep the quality of the registered VLT models and support the customers whenever required.
- 6. We confirm that we will train all the RFCs/ franchisees to distribute the certified VLT models of our products.

Sincerely,

(Signature, name and designation of the authorised signatory) (contact no. including, phone no., fax, email and contact address)

#### **Annexure - B. List of Documents for Submission**

#### **List of Submissions**

#### 1. Details of the Manufacturer

- a) Name of the Company
- b) Place of Incorporation
- c) Date of Incorporation
- d) Address of Head Office/ branch offices, if any
- e) Details of VLT devices manufacturing facilities (also mention whether owned or contracted its capacity, third party etc)
- f) Certificates of agencies, manufacturing facility (like ISO, CE etc)
- g) Brief description of the Company including details of its main lines of business.
- h) Details of production facilities (area, machinery, manpower, production capacity).
- i) Website details /URL
- j) Particulars of the authorised signatory of the Company including name designation, address, phone no, mobile no, fax and e-mail

# 2. Documents in support of compliance of the Manufacturer with regard to criteria mentioned in this document.

- a) Certificate of Incorporation issued by the competent authority with copy of registration documents.
- b) DD towards the Application fee.
- c) Performance guarantee.
- d) Statement of Compliance reports .
- e) Two sample VLT devices with related documents (with device brochures; Do's and Don'ts; user manuals; device protocol(s)/API documents explaining all the messages, fields and their values; other certifications for VLT devices standard's compliance and eSIMs and their details).

#### **Annexure - C. Terms and Conditions Governing Registration**

- 1. Commercial arrangement of VLTs between Manufacturers and registered RFC/ Franchisees and Vehicle Owners Any commercial or other arrangements/ agreements between the Manufacturer/ registered RFC/ franchisee and the vehicle owners (customers) shall be as mutually agreed between them. The price of the certified VLT device and all other terms and conditions including those related to warranty, AMC, nature of service etc shall be as mutually agreed by and between the Manufacturer/registered RFC/ franchisee and the vehicle owners. UKTD shall have no role, responsibility and liability in relation to the same.
- 2. Response Time If any complaint is raised against the installed VLT device, then the concerned manufacturer/registered RFC/ franchisee should resolve the complaint within 48 hrs of reporting the complaint. If more time is required, then a standby VLT should be installed temporarily and replaced once the original VLTs issue gets solved. The complaint and clarifications should be logged into the UKTD application.
- 3. Monitoring and Audit Once the manufacturer/ registered RFC/ franchisee is authorised/ approved, UKTD shall have the right to monitor/audit the certified VLT devices installed in the Vehicles and the service and support provided with a view to ascertain their continued compliance with the terms and conditions governing the registration.
- 4. Cancellation of Registration If any fault is found or any complaint received from end user customers, then UKTD shall take actions against the manufacturer/ registered RFC/ franchisee and have the right to suspend or cancel the registration/empanelment issued to that particular VLT model.
- 5. Liability Manufacturer/ registered RFC/ franchisee shall be liable and responsible for performance of the VLT devices supplied to the Vehicle owners.
- 6. Jurisdiction Any issues related to registration of VLT or licensing of agencies are governed by the laws established in India and competent to deal with disputes, if any, arising out, the court in Dehradun District alone

have jurisdiction to lay any matter relating to this empanelment.

- 7. Dispute In case of any dispute related to technical (operational testing), the decision of UKTD shall be final and binding.
- 8. Use of Trademark/ Logo of UKTD Manufacturer shall not use the UKTD logo or any other trademark, symbol, or icon on or in connection with the registered GPS Devices or any of the manufacturers VLT devices including those on its packaging, manuals, promotional and/or advertising materials, or for any other purpose without an express written permission from UKTD

#### **Annexure - D. Fitment Location**

