

Statement on the legal classification of the license plate lowering kit for Switzerland

1. Purpose of the declaration

We hereby explain the technical and legal classification of our lowering kit for the rear license plate of a motor vehicle and justify why no approval or testing by the Federal Roads Office (FEDRO) or cantonal road traffic authorities is required.

2. Technical implementation and compliance with Swiss regulations

The PUSHrack license plate lowering kit allows the rear license plate to be mounted approximately 200 mm lower on the vehicle to prevent it from being obscured by load carriers or transported goods.

All relevant provisions of the Swiss Ordinance on Technical Requirements for Road Vehicles (VTS, SR 741.41) and the corresponding UNECE regulations.

Legibility of the license plate: The plate remains clearly legible within the prescribed viewing angle of 30° on both sides of the vehicle's longitudinal axis and at a distance of at least 20 meters (Art. 73 (1) and (2) VTS).

Lighting: The original license plate lights remain unchanged. The illumination of the plate continues to meet the requirements of UNECE Regulation No. 4 (illumination of rear license plates).

Ground clearance: The license plate is not lowered below the minimum distance from the road surface required in practice. The vehicle geometry and ground clearance remain within the parameters specified in Art. 73 VTS.

No changes to safety-related components: The kit is mounted exclusively at existing mounting points and does not alter any load-bearing vehicle parts or safety-related structures.

3. No permit required from ASTRA or cantonal authorities

According to the provisions of the VTS, modifications to the vehicle are subject to testing or reporting if they affect safety-related systems or assemblies that require approval. Since our lowering kit only changes the position of the license plate within the legally permissible limits and does not affect any electrical or structural components, there is no approval or testing requirement by the Federal Roads Office (FEDRO) or cantonal road traffic authorities.



4. No type approval required in accordance with Art. 34 ff. VTS

Type approvals are required in accordance with Art. 34 ff. VTS for systems and vehicle parts that contain safety-related functions or lighting devices.

Since our product does not contain any independent lighting equipment and uses only the existing license plate lighting, no approval is required under the VTS. The lighting also meets the requirements of UNECE Regulation No. 4.

5. No impairment of operational safety or vehicle identification

The license plate lowering kit does not affect the operational safety or identifiability of the vehicle. The license plate remains attached within the viewing angle specified by the VTS and remains fully legible (**Appendix 1**). There is no change to the vehicle structure, lighting equipment, or load-bearing capacity of components.

5. Conclusion

The PUSHcomponents license plate lowering kit meets all requirements of the Ordinance on Technical Requirements for Road Vehicles (VTS, SR 741.41) and the relevant UNECE regulations. It is a purely mechanical adjustment within the legal parameters, without any changes to lighting, legibility, or safety-related components.

Therefore, neither a separate approval nor a technical inspection by ASTRA or the cantonal road traffic authorities is required.

For further technical information or queries, please contact:

Laurenz Dann

PUSHcomponents

Schindelka & Dann GbR

info@pushcomponents.com

<https://pushcomponents.com>

+49 8025 9269661

Ust-IdNr.: DE363257430

PUSH components – Schindelka & Dann GbR
Jahnweg 19 83714 Miesbach, Deutschland



Appendix 1:



PUSH components – Schindelka & Dann GbR
Jahnweg 19 83714 Miesbach, Deutschland

