INQUIRY INTO HEAVY VEHICLE SAFETY AND USE OF TECHNOLOGY TO IMPROVE ROAD SAFETY

Organisation: Road Freight NSW and Teletrac Navman

Name: Mr Simon O'Hara

Position: Chief Executive Officer

Date Received: 5 March 2018

Staysafe Committee Inquiry into heavy vehicle safety and use of technology to improve road safety

Joint submission from Road Freight NSW and Teletrac Navman

5 March 2018

Table of Contents

Background Information

ABOUT ROAD FREIGHT NSW (RFNSW)

Road Freight NSW began as ATA NSW in 2007. The organisation has developed to become a respected advocate for trucking operators, as a conduit to government, regulators and enforcement agencies. In 2015 the new name, Road Freight NSW, articulates our independent and authoritative viewpoint thanks to our respected executive leadership and the passion and expertise of members contributing to the Policy Council.

ABOUT TELETRAC NAVMAN (TN)

Teletrac Navman leverages 25 years of telematics experience to help customers enhance business performance and lower operating costs through solutions that improve fleet management. With 40,000 customers globally and 900 employees across the United States (U.S.), Europe and Asia Pacific, we have a deep understanding of the challenges faced by fleet managers worldwide.

Over the years, we've continually developed our fleet management technologies to help businesses meet these challenges. From early mobile navigation devices to ruggedised tracking solutions, electronic work diaries and fleet intelligence systems, our solutions have been at the forefront of telematics in Australia and New Zealand since we launched our first integrated tracking unit as Navman Wireless in 2006.

RFNSW & TELETRAC NAVMAN PARTNERSHIP

The General Manager of RFNSW, Simon O'Hara, welcomed the new partnership on behalf of Road Freight NSW members. "Partnering with Teletrac Navman will be a step forward for our members for a wide range of reasons," Mr O'Hara said.

"Mindful of the greater need for CoR compliance and a more proactive approach to managing road safety risks, our members will have access to a risk management platform that includes innovations like FTC Manager and new electronic work diaries, as part of our strengthened relationship with Teletrac Navman."

Andrew Rossington, Vice President – Transtech at Teletrac Navman said: "We're passionate about the proactive risk management benefits that technology brings to the transport industry. Driven by the joint desire for better safety outcomes, our customer base has seen significant benefits moving from reactive Fatigue Management to a pro-active, technology based solution with Sentinel. Working with RFNSW, the voice of the transport industry in NSW, gives us the opportunity to help build the best safety outcomes for drivers, other road users and the sector."

"Teletrac Navman has worked with NSW transport companies for over 25 years. We're confident that this partnership with RFNSW will underscore the importance of technology in road safety and drive transport efficiency," Mr Rossington said.

Introduction

Staysafe Committee Inquiry into heavy vehicle safety and use of technology to improve road safety

RFNSW and Teletrac Navman would like to thank the committee for the invitation to provide a submission to the Inquiry into heavy vehicle safety and use of technology to improve road safety. Both organisations are advocates of the existing National Telematics Framework (NTF) and the use of technology to provide effective risk management of all heavy vehicle safety risks.

The National Telematics Framework has been recognised by the International Standards Organization (ISO 15638), with TCA's work in deploying operational applications through the Framework considered a world's best practice approach to facilitate the sustainable use of telematics and related intelligent technologies.[1]

The Framework provides a nationally-agreed, sustainable environment to support the current and emerging needs of government, industry sectors and end-users, and supports the principles of the Policy Framework for Intelligent Transport Systems in Australia.

The following submission outlines the key issues, benefits and recommendations regarding the use of technology to provide better safety outcomes relating to the following terms of reference:

a) The management of heavy vehicle driver fatigue and other safety risks through in-vehicle technologies, including benefits, costs, availability and adoption by industry

b) The development of connected and automated vehicle technologies specific for the heavy vehicle industry and opportunities for further development in this space

c) The role of compliance and enforcement in maintaining the safety of heavy vehicles on our roads

Whilst it was noted that the terms of reference were expanded to include the road toll during the period commencing 1 December 2017 through to 31 January 2018, we cannot comment generally about the road toll as each incident needs to be investigated individually, there may be many varying root causes. What we can say is that whilst it may not have prevented all or any of the incidents during the identified period, on board telematics and other in vehicle technology would provide the data to assist in root cause analysis investigations.

It is the ability of telematics to provide data that is at the core of this submission. The benefits additional data can provide are significant from a proactive risk management point of view, for incident investigation and at a macro level for infrastructure planning.

We have one simple aim that has held true for more than 350 years......

> "*Measure what is measurable, and make measurable what is not so.*"
>
> Galileo Galilei (1564–1642)

---

[1] https://tca.gov.au/ntf/national-telematics-framework

The management of heavy vehicle driver fatigue and other safety risks through in-vehicle technologies, including benefits, costs, availability and adoption by industry

Benefits

1. The ability of in vehicle technology to provide proactive risk management of driver fatigue, including alerting of both the driver and operations prior to breach.

2. The provision of guidance material on Load restraint, mass and dimension.

3. The ability to conduct genuine root cause analysis accident investigations.

4. Real time compliance verification and breach alerting.

5. Provides the primary duty holder, the driver, with all the tools necessary to manage the compliance of their vehicle combination and workplace.

6. Reduces the audit burden for operators by providing and collating objective evidence of compliance electronically.

7. Accurate heavy vehicle network access information to allow for better infrastructure planning to eliminate black spots, provide better located rest areas and build more efficient supply chains.

8. Standard application of in vehicle telematics will be the cornerstone to the development of intelligent infrastructure and transports systems that will provide increased productivity across all supply chains.

Costs

9. The costs when compared with other operating costs are negligible when you consider the objective evidence of compliance produced on a consignment by consignment basis.

10. Semi-Trailer (Bogie Drive, 6-axle) variable costs including servicing & maintenance, tyres and fuel per km equate to 127.84 cents[2]:

11. Average distance travelled   Indicative telematics Cost
    per km

    a. Local - assumes 28,600 km travelled per year   7.0 cents

    b. Intrastate - assumes 80,000 km travelled per year   2.5 cents

    c. Interstate - assumes 150,000+ km travelled per year   1.0 cents

12. Costs can be mitigated by using the data collected to manage fuel tax. Teletrac Navman FTC Manager is a revolutionary solution for calculating and claiming Fuel Tax Credits. FTC Manager enables your business to streamline fuel tax credit claims with the Australian Taxation Office (ATO) and maximise claim value with full transparency and auditability. FTC Manager puts money back into an operators business, saves valuable time, minimises paperwork and eliminates guesswork.[3]

---

[2] TRANSPORT INDUSTRY COUNCIL Rates and Costs Schedule 2016-2017 Semi-Trailer (Bogie Drive, 6-axle)
[3] https://www.teletracnavman.com.au/our-solutions/compliance/ftc-manager

13. The technology is readily available to all industry participants, including regional areas.

14. Coverage is throughout Australia and there is a strong certified installer network to service the needs of the industry.

Industry take up

15. Lack of policing is a barrier to rolling out technology. Some transport operators are reluctant to install systems that could increase their perceived liability to the law. They have never been caught for an infringement, either through luck or guile, and don't want to install a system that may change that. QLD IAP speed policing as an example of where this has happened.

16. Cost is a barrier. The freight task is running very lean, high fuel prices and low freight rates mean that even nominal telemetry fees are just another cost to the business. In order to take advantage of the efficiency gains that telemetry can bring to the business the business requires change, and the operational guys responsible for the change don't have the time to implement it. It's a downward spiral that can be hard to get out of, too busy to implement processes that will save you time.

17. Scared of technology. Old school truck drivers that have grown their fleet on the back of paper based and manual methods and don't know, don't like or don't understand technology.

18. The 1-2 truck operator still makes up over 70% of the registered heavy vehicles on our roads[4] and these operators will require tangible incentives to ensure technology is adopted in a timely manner.

19. Chain of Responsibility implications are still not recognized at consigner or consignee level throughout all supply chains. Lack of recognition from the customers of road transport of the benefits and cost involved in reducing the supply chains risk profile through technology.

The development of connected and automated vehicle technologies specific for the heavy vehicle industry and opportunities for further development in this space

20. With the right technology in place, trucks can offer useful insights on everything from driver behaviour, fuel use, routes travelled and time spent at the wheel. Connecting trucks will help the industry to make sense of these insights so it can drive down costs and increase productivity, while making sure drivers are safe and businesses operate in a compliant manner.

21. Expanding on the above, real time heavy vehicle traffic management where heavy vehicles are routed on roads based on current traffic density to reduce congestion or move around delays. Artificial Intelligence can be used to provide an over-riding view of heavy vehicle movements and make decisions based on that, relaying the information directly to the driver and vehicle destination.

22. With the ageing heavy vehicle fleet in Australia and the poor infrastructure in regional areas the adoption of automated technologies will face some significant

---

[4] NTI'S GUIDE TO THE TRUCKING INDUSTRY 2016

challenges. However we believe there are significant opportunities in integrated systems of information, communications and sensors to exchange data and information between vehicles and other locations, including:

- Vehicle to infrastructure (V2I) applications
- Vehicle to vehicle (V2V) applications
- Vehicle to elsewhere (V2X) applications.

The role of compliance and enforcement in maintaining the safety of heavy vehicles on our roads

23. Technology will enable better compliance and enforcement outcomes by ensuring that incidents or breaches can be readily identified and objective evidence of compliance or corrective actions can be reviewed electronically.

24. Integration with ABS/EBD systems in Prime movers and trailers give a detailed view into vehicle behaviours in the moments leading up to an incident or near miss. Patterns of behaviour can be identified where multiple ABS/EBD events occurred at a particular location, this can be used to identify an issue before an incident occurs.

25. Better use of resources for both on road IVR's and road regulators in general by enabling a focus on those operators that are not proactively managing transport safety risks.

26. Better industry non-conformance statistics to enable regulator education programs based on risk to drive culture change.

27. It is the view of our members and customers that compliance alone is not the answer to maintaining road safety in NSW. Any compliance action, no matter how effective or well-resourced, requires education at the front end of any action. This may mean in practice greater emphasis on education and engagement with the industry in new and agile ways that ensures that drivers, operators and the public at large are better educated on the ways to deal with heavy vehicles on the roads.

The road toll during the period commencing 1 December 2017 through to 31 January 2018.

28. The tragic serious of road incidents in December 2017 through to 31 January 2018 are a tragedy.

29. We would like to see and wait for analysis on these incidents to ensure that our comments are well founded. Speculation is rife in and around these incidents and we would like to understand those incidents better based on proper analysis. In this way, we can aid public debate rather than just aiding and abetting coverage that, we believe, would be less than worthwhile for the victims and their families.

Summary & Recommendations

In summary both RFNSW and Teletrac Navman advocate for the use of technology in heavy vehicles for the primary indisputable benefit of capturing data. Data that can inform operations and drivers of impending breaches, allow investigators to conduct root cause analysis of incidents with facts and provide regulators and planners with real world data to make informed policy and planning decisions.

To achieve these benefits we believe the following recommendations should be considered:

A. Incentivise the rollout of telematics technology into the heavy vehicle fleet, in particular the 1-2 truck operator segment of the industry that covers 70% of the vehicles on the road. Schemes like the Active Kids Rebate will cost the budget $207 million over four years. A registration rebate scheme for small fleet operators would move operators past the cost barrier whilst providing government with accurate data on take up.

B. Provide an amnesty for minor fatigue breaches for all adopters of EWD's, using TCA certified equipment that meets the standards set out in the National Telematics Framework, provided evidence of risk mitigation is available, i.e. using the technology to provide rest management flexibility like that available to AFM operators.

C. Provide regulatory concessions associated with NHVAS Mass (CML) to adopters of OBM without the audit burden as records are verified on a consignment by consignment basis.

D. Ensure all government agencies, fleets and projects are adopting and leading the way with the use of technology to manage heavy vehicle safety.

E. Ensuring, where possible that all imported safety vehicles have their full safety features enabled and allowed for use in Australia.

F. As one of the foundation members of RFNSW, Johnstons Transport, have long advocated that interacting with heavy vehicles on the roads requires testing by RMS at the early stages of light vehicle driver education. We would envisage this as being part of the computer test and also, where possible, in the practical test.

G. Reduction in taxes payable on new truck purchases that have a high safety standard ratings and improve overall performance with relation to safety.

H. Given that our figures indicate that 93% of light vehicle drivers are responsible for multi-vehicle fatal accidents where heavy vehicles are involved, we believe that it is timely for the government to invest in an education campaign in and around mobile phone use while driving and how to drive safely in or around a heavy vehicle.

I. Operation Rolling Thunder, a NSW Police and RMS 24 hour operation with the same name as the American aerial bombardment of North Vietnam in 1965, did little to instil confidence in the trucking community. In fact, the practical effect was that it undermined confidence as the operation was conducted without any understanding of the root causes of the January 2018 incidents. Perhaps, in addition to 'Operation Rolling Thunder', we could also have a sustained 'Operation Helping Hand' that would focus on education and compliance in a non-adversarial manner this would likely bear results for the industry and the public. This type of operation would require more than 24 hours – and would likely require money, resources and a desire to engage with associations like RFNSW and Teletrac Navman to bring about change. RFNSW has a good track record in engaging with safety and campaigns – we recently engaged with the Blue Mountains City Council in a safety message for the Blue Mountains and we seek to work with the community on these issues.

In conclusion we hope that our submission and recommendations provide a clear indication of the tangible safety benefits that technology can provide the heavy vehicle industry and in turn all NSW road users along with the wider community.

Yours sincerely

Simon O'Hara
Chief Executive Officer
M: ████████████
E: ██████████████████████
W: www.roadfreightnsw.com.au
A: ████████████████████████