

HEAVY VEHICLE DRIVER FATIGUE
Results From an On Road Trial of
the Proposed
National Driver Work Diary

July 2005



Prepared by
National Transport Commission

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(Results from on Road Trial of Proposed National Driver Work Diary)

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REPORT OUTLINE

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Objectives:	The Heavy Vehicle Driver Fatigue (HVDF) review is a key component of the third heavy vehicle reform package. The aim of this review is to improve road safety through the implementation of policies and practices addressing the management of fatigue in the road transport supply chain.
NTC Programs:	Fitness for Duty, Heavy Vehicle Driver Fatigue
Key Milestones:	This report on an on road trial of the work diary is being released in conjunction with the record keeping policy proposal. Public consultation on both draft legislation and policies developed for the HVDF reform will take place later in 2006 upon receipt of the draft legislation.
Abstract:	Logbooks and record keeping have been identified as essential tools which assist in the management of fatigue in drivers of heavy vehicles. They provide enforcement agencies with the necessary information to ensure compliance with road transport regulations. A national driver work diary will replace the existing national driver logbook. An on road trial was conducted of two draft versions of the proposed national driver work diary to identify problems and gauge acceptance of the document.
Purpose:	The results from the on road trial of the work diary are presented here in support of the proposed recordkeeping policy under the new HVDF regulations.
Key words:	Heavy Vehicle Driver Fatigue, HVDF, recordkeeping, work diary, logbook, records, driving hours regulations
Comments by:	Not applicable.

FOREWORD

The National Transport Commission (NTC) is a body established under an intergovernmental agreement with a charter to develop, monitor, and maintain uniform or nationally consistent regulatory and operational reforms relating to road transport, rail transport, and inter-modal transport. The NTC is funded jointly by the Australian Government, States and Territories.

Fatigue is one of the main causes of crashes involving heavy vehicle drivers. The Heavy Vehicle Driver Fatigue Review is a key component of the Third Heavy Vehicle Reform Package. The aim of this review is to improve road safety through the implementation of policies and practices addressing the management of fatigue in the road transport supply chain.

This policy paper articulates the NTC's view on recordkeeping issues which were unresolved at the time of the ATC endorsement of the Heavy Vehicle Driver Fatigue policy proposal in 2004. Presenting the issues and stating our position on recordkeeping is intended to assist stakeholders in understanding the rationale for this policy and the options which were considered. Stakeholders should note that the views expressed are those of the NTC which have been informed by discussions with industry, regulators and relevant experts. These views have not been endorsed by any other organisations including the Transport Agencies Chief Executives or by industry peak bodies.

The policy position put forward in this paper is subject to change. The NTC will be undertaking further consideration of these issues over the coming months and will advance a final draft Heavy Vehicle Driver Fatigue recordkeeping policy proposal in mid 2006, after consultation with transport agencies and industry.

Final Heavy Vehicle Driver Fatigue draft policy proposals will be made available through the NTC website along with the draft legislation and a regulatory impact statement.

While NTC is not formally seeking comment on this paper, the project manager is happy to consider any written or verbal responses and may be able to attend meetings or seminars to discuss the policy issues. Contact details are provided below. The NTC plans to release the package of revised policy papers, RIS and draft legislation in August 2006 for a six week period. Formal comment will be sought at that stage. Comments will then be analysed and a final package will be sent to the Australian Transport Council for endorsement in December 2006.

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Michael Deegan

Acting Chairman

SUMMARY

Logbooks and record keeping have been identified as essential tools which assist in the management of fatigue in drivers of heavy vehicles. They provide enforcement agencies with the necessary information to ensure compliance with road transport regulations.

A proposal to improve record keeping was outlined in the Heavy Vehicle Driver Fatigue policy proposal approved by Australian Transport Council in 2004.

Long distance heavy vehicle drivers--those drivers operating outside the 100kms limit--are currently required to keep a logbook of all work and rest activities. Copies of these on road records are also retained by employers and owner/drivers for compliance audit purposes. Much criticism has been directed at the current heavy vehicle driver logbook system which is open to abuse and falsification with low compliance levels.

The NTC looked at replacing the current national driver logbook with a more effective work diary providing a more complete continuous record of day-to-day heavy vehicle driver rest and work activities.

Consultation on the proposed new document was conducted through the Recordkeeping Advisory Group comprising of representatives from the Australian Trucking Association, State transport agencies, the South Australia Police (SAPOL), Occupational Health & Safety agencies and the Transport Workers Union (TWU). A series of focus groups were held with heavy vehicle drivers in Sydney and Melbourne in 2004 and an on road trial of two versions of the proposed national driver work diary was conducted in 2005.

This report is the result of that on road trial. Members of the Recordkeeping Advisory Group were instrumental in getting long distance and local heavy vehicle drivers and road transport operators involved in this trial.

This feedback has been incorporated into the current version of the work diary being made available here for public information.

It is anticipated that the version of the work diary being made available along with the record keeping policy proposal and supporting documentation may undergo some further changes before being finalised.

The work diary is being developed primarily for those heavy vehicle drivers operating outside the local area zone. However, it will also be used by heavy vehicle drivers operating under the Basic and Advanced Fatigue Management schemes who will be required to record all work and rest activities in the work diary regardless of zone of operation.

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1. INTRODUCTION

As part of the development of the new Heavy Vehicle Driver Fatigue (HVDF) regulations, a new work diary is being developed to replace the existing logbook. Primary users of this document are long distance drivers, and enforcement officers who from time to time conduct roadside audits to check compliance with current Driving Hours Regulations.

Issues with the current logbook include:

- ease of falsification and manufacturing of records;
- working beyond prescribed hours (continually stretching the rules);
- non recording of local area work;
- non recording of loading/unloading activities and location of these activities;
- non recording of either the total kilometres/distance travelled or any odometer readings on vehicles used;
- confusion over recording two up driving;
- issue of phantom two-up drivers;
- confusion over recording time zone;
- inadequate and unclear instructions;
- widespread perception that current logbook does not assist with managing driver fatigue; and
- low compliance levels.

In November 2004, a focus group was held with drivers in Melbourne and a series of interviews with drivers was conducted in Sydney (Elliott & Shanahan, Nov 2004) to gauge reaction to the introduction of a proposed new work diary and in particular the proposal to collect third party signatures. Feedback from both was discussed by the Recordkeeping Advisory Group. The feedback indicated that while enforcement officers saw the introduction of a document to replace the current logbook as an opportunity to provide a more effective means of managing driver fatigue, transport operators argued the practicality of introducing third party signatures and were not happy with the additional calculations for driver rest breaks.

In February 2005, jurisdictions decided to drop the contentious requirement to collect third party signatures primarily since it was judged to difficult to implement. Also dropped from the original draft work diary were some complicated calculations primarily focused on getting a driver to plan out his rest breaks. These decisions resulted in a simpler format with a design much closer to the original logbook but with the addition of several new fields.

The work diary draft tested during the on road trial contained the following fields:

1. **A simplified 24 hour timeline separated into Rest/Work/Two Up** columns. The definition of Work now incorporates all driving and non-driving activities such as loading/unloading, queuing and driving from/to home from/to base in a heavy

- vehicle (12 GVM). All driving and non-driving activities now are recorded in the **Work** column.
2. A version of the document with a **blank timeline** was included for testing since some drivers operating on regular nightly schedules find this format more flexible and easier to complete.
 3. The driver records the State where the trip started--the **time zone**--rather than EST or DST etc. and continues to record activities using the time of the zone the trip was started in until trip completion.
 4. **Odometer readings are recorded** at the start and finish of each work period and once at each *change of activity*, along with vehicle registration details and location e.g. from work to rest and vice-versa.
 5. In addition to their name and licence number, two up drivers were required to record the **State of issue of their licence** and **their signature**.
 6. An optional **Notes section** was included for drivers to take useful notes.
 7. A section was included for recording **fatigue scheme details**. This was included for completeness only and was not required to be completed during the course of the trial. Under the new HVDF regulations, each transport operator will be required to register under a fatigue management scheme. The driver, in turn, will be required to record the fatigue scheme he is working under for a particular trip.
 8. **Size and Format:** The trial document was A4 in size and vertical in orientation as opposed to the current logbook which is horizontal in format and approximately B3 in size.

1.1 Objectives of the On Road Trial

The purpose of the on road trial was to:

- gauge reaction to the incorporation of additional fields in the work diary e.g. odometer readings from both drivers and enforcement officers;
- gauge reaction to the simplification of the timeline and the redefinition of **work** combining driving and non-driving activities under the one heading;
- gauge reaction to the use of a blank timeline to allow drivers more flexibility in recording their work / rest activities;
- assess if the time zone field addressed the current problem with confusion over recording timezones;
- assess if additional two up driver details would go some way to addressing the problem of phantom drivers;
- assess if an additional optional notes section for drivers would be useful;
- assess whether the vertical format would be easier to complete than the current horizontal format; and

- Establish what further clarification and modifications were required to product a practical document to replace the current logbook.

1.2 Scope

Local and long distance heavy vehicle drivers (large and small, interstate and intrastate, transport operations, independent owner/drivers), bus operators and enforcement officers were asked to take part in the trial.

Local drivers, currently not required to complete a logbook, also took part in the trial to assess the practicality of extending the use of the work diary to local area work. In addition under the HVDF proposal a work diary will be required to be completed by all drivers accredited under the Basic Fatigue Management (BFM) and Advanced Fatigue Management (AFM) options regardless of whether they are operating locally or long distance.

1.3 Details of Trial

Two versions of the draft work diary were distributed. One with a marked timeline **midnight to midnight** and one with a **blank timeline** on which the driver could mark the hours according to his work/rest activities. Industry indicated that the second would be useful for the large number of drivers who regularly start work at night.

All drivers participating in the trial were asked to complete a version of the work diary in addition to their logbook over a period of two weeks. Drivers were allowed to select whichever version they wanted to test.

Since the draft design was being trialled under existing driving hours regulations with no exemptions, an abbreviated set of definitions and instructions were included in the document tailored to current Driving Hours regulations. The work diary was distributed to nominated contacts at transport operators for distribution to drivers with an explanatory cover letter.

A questionnaire was included with the draft work diary inviting open comment from drivers and some demographic information.

Not included with the draft were descriptions of the proposed fatigue management schemes, a driver base page, an explanation of the new driving hours limits and of the proposed concept of a 'night bank', in order to avoid confusion.

A proposed Driver Rest Summary page was not included for drivers to avoid confusion but was circulated to enforcement officers for comment.

2. SUMMARY OF FINDINGS

2.1 Statistics

101 drivers were nominated to take part. Two dropped out. To date **115 out of 197** work diaries have been received back, fully or partially completed.

12 transport companies, 2 bus operators and 14 independent operators took part in the trial;

21 local area drivers, 86 long distance drivers, and 5 other (combination local and line haul) drivers responded;

41% of responses received were from drivers of B-doubles and 37% from drivers of semi trailers;

43% of respondents were in the 46 to 55 age bracket;

All respondents were male; and

83% of respondents were right handed while 12% were left handed.

A number of respondents did not fully complete the attached questionnaire with a less than 100% response rate for some questions.

Enforcement officers from NSW, SA, VIC and Qld met in focus groups to provide comment on the design and on the completed work diaries from the on road trial. Summaries of enforcement officer feedback are included in this report.

2.2 Findings

2.2.1 Content

- (i) The majority of respondents, that is 73% of drivers, expressed a preference for the marked timeline. Twelve percent opted for the blank timeline, although 55% of drivers completed the marked version and 45% the blank version. Enforcement officer feedback concurred with this preference, with pre-printed times deemed essential for more accurate recordings from drivers.

Concerns were expressed about:

- the marking of the blank timeline especially if start times were irregular, the time taken to complete the timeline, and the potential to make mistakes and therefore be fined;
- the orientation of the work diary timeline in the vertical format created some confusion since drivers were well used to the horizontal format of the current logbook; and
- more space was required for the timeline especially to allow marking of the blank timeline and for entering totals of hours of Work/Rest.

These comments have been taken into account in the revised version of the work diary design.

- (ii) The redefinition of Work and the removal of the distinction between driving and non-driving activities created a deal of confusion and also affected local area driver response. These definitions were simplified in order to capture the recording of all driving and non-driving day-to-day activities and to shift the focus to recording rest periods.

The separation of driving and non-driving activities is ingrained and it may take some time to adapt to the new method of recording. The confusion is compounded by variations to the definitions of work which have occurred in various fatigue management schemes and through adoption of the Driving Hours regulations into State and Territory legislation.

Many drivers and enforcement officers could not see why this change was being made. The redefinition is aimed at forcing the recording of other work related activities which contribute to a driver's level of fatigue and which is currently not being recorded in the logbook.

- Concern was voiced about the inability to record non-driving activities such as loading/unloading.
- Questions were raised about queuing (work) and two up drivers travelling as passengers (resting but on duty). Queuing in most cases requires the driver to be alert in order to maintain his place in the queue even though the vehicle is not moving or the engine running.
- The definition of Work provided on each page has been removed, instead a full definition of work is being included in the final instructions.
- An additional item of note, is that where transport operators make use of the work diary as a record for driver payment purposes, in some cases work may not equal paid time.

Training and face-to-face instructions should address the confusion over the redefinition of Work. Training will be incorporated into the planned implementation and communication strategies for rollout of the new HVDF legislation.

- (iii) Drivers were concerned about odometer readings, and questioned why they should be recorded. Completed work diaries indicated some confusion as to when exactly to record these readings.

An odometer reading only needs to be recorded **once** at *change of activity* e.g. when switching off the engine to take a break. It does not need to be recorded again when restarting the engine.

- Concern was voiced that odometers often fail for a variety of reasons and how does the driver deal with this when en route?
- The issue of changeover drivers was also raised, e.g. when multiple drivers use the same vehicle within one x 24 hour period resulting in a gap in the odometer reading. Enforcement officers suggested recording the name and licence number of the changeover driver in the work diary for auditing purposes.

On the whole enforcement officers were happy to see the inclusion of odometer readings as a secondary means of verification. The odometer recording replaces the

requirement to record third party signatures previously proposed in the HVDF policy proposal of 2004.

- (iv) A suggestion was made to include a vehicle inspection check in the final document. This proposal will be put to the Recordkeeping Advisory Group for consideration.
- (v) A suggestion was made to record details of origin and destination in the work diary. However, this is already recorded in the name of location at change of activity column when starting and again when completing a trip.
- (vi) There appears to be a deal of confusion around recording the time zone in the current logbook. Drivers are now required to record the time in the State at their point of departure. This appears to be accepted although a small number of drivers continued to complete the work diary using EST or town rather than State. Driver face-to-face instruction and training should address this issue.
- (vii) When two-up driving takes place additional details will be required from the second driver. This did not appear to present a problem. Enforcement officers also suggested recording the second drivers work diary number as well which would provide a cross-reference in each work diary. To avoid confusion the labels on the Work and Two-up columns will be changed to read 'Solo Work'/'Two-up'.

Clear work diary instructions and training should address the issue of how to record two up activities correctly.

- (viii) An optional notes section was included in the trialled document. The response to this inclusion was that while it was a good idea, drivers would not make use of this. Many drivers also asked would this section become compulsory.
- (ix) The driver will continue to provide a signature on each page of the work diary. One respondent objected to the phrase 'true and correct in every detail' and suggested that it be removed from the Verification section. Another suggestion was to include an instruction '*before beginning your next work diary page you must sign the completed document*'.
- (x) Local area drivers who took part in the on road trial were resistant to the imposition of a work diary to record local area driver rest/work activities and were adamant that the document would not be feasible for these types of operations.

However, in context, most local area drivers have not used a work diary to date and are not familiar with what should be recorded. Local area drivers are also not familiar with the definitions of work and rest. Drivers appeared to be recording location at loading and unloading activity at the stop and start of each change in activity, whether they take part in these activities or not and whether they took a rest break or not. Instruction and training may address this issue. In fact, with some exceptions, it may be possible to use the document to record local area work, however, this would require further extensive testing. The point to note is that under Basic Fatigue Management and under Advanced Fatigue Management, accredited drivers will have to keep a continuous record of all rest and work activities both long distance and local to provide evidence of compliance with their operating limits.

Whether the work diary will be extended to local area operations is still open for discussion. The intent of the NTC work is to develop a work diary for those heavy vehicle drivers operating outside the local area zone.

2.2.2 Layout and Format

- (i) Both drivers and enforcement officers expressed a preference for the horizontal format of the current logbook.
- (ii) The location of timeline on the edge of the left hand side created some difficulty for drivers. Both drivers and enforcement officers suggested relocating the timeline away from the edge of the page with the most frequently used columns aligned closest to the timeline resulting in a more intuitive document.
- (iii) There did not appear to be any great difficulty with the brief instructions provided or with the legibility of the document, however, the final version of the work diary will provide a more comprehensive set of instructions and examples.
- (iv) Many drivers commented on a lack of space (timeline and totals) in the document and perversely the size of the document which was deemed too large (won't fit existing covers, won't fit into glove box).

With the incorporation of additional fields and an addition column for odometer readings the document will be larger than the existing logbook.

- (v) Enforcement officers want a duplicate page included to speed up the road side auditing process. Two duplicate pages of each daily work diary sheet will be included into the final document.
- (vi) Some drivers expressed a preference for spiral binding making the document easy to flip with left handed drivers preferring the draft work diary layout which was spiral bound at the top, to the current logbook format.

2.2.3 Related Issues

- (i) Heavy vehicle driver work diary sheets and records will be required to be kept for three years as under NHVAS requirements. (Recently drafted NSW OH&S Regulation requires five years).
- (ii) Like the current logbook, the work diary will continue to be a prescribed accountable document, although the suggestion was put forward to allow transport operators to gather the required information without prescribing the format. Jurisdictions maintained this would create problems for enforcement in managing and approving a wide range of non-accountable documents and in being able to trace the completed document directly back to its owner. The work diary will, like the current logbook, continue to be distributed by road agencies in each State.
- (iii) The new fatigue regulations will retain Regulation 54, from the current *Driving Hours Regulations 1999*, allowing for the collection of electronic data (DSMDs). To date no transport operator has taken the opportunity to apply to provide electronic data in place of paper based logbooks, although with developments in fleet management systems there are signs this may change.
- (iv) Both notes on the Driver Base page have been revised to address the general confusion around the definition of Driver Base. However, face-to-face instruction for drivers and enforcement officers will go some way to addressing this confusion.

- (v) Revised regulations will address the issue of gaps in transport operator records. Both the driver and the transport operator will be compelled to give/obtain a copy of a drivers work diary pages within a specified timeframe (28 days).
- (vi) The frequently raised issue of misspellings will be addressed to some extent through revision of the current regulations (Regulation 52), however, whether a driver is fined or not will remain at the discretion of the enforcement officer.

Some remaining issues will require further on road testing of the document. These include:

- What should a driver do when an odometer is detected as being faulty en route?
- ADR 18/02 currently requires an odometer to be maintained in good working order. This requirement (see appendix) will need to be included in the HVDF regulations since it is being removed from ADR 18/02 at the end of 2007.
- How accurate are odometer readings? Clause 18.5.2.1.2 in ADR 18/02 requires that the odometer indicate 'the actual distance travelled by the vehicle to an accuracy of ± 4 per cent.' Industry pointed out that a 4% error in a trip Brisbane to Melbourne could be around 70kms (or about one hours travel depending on terrain etc).
- The proposal was put forward to include a vehicle inspection report on the back page of the daily work diary sheets which would also be handed in when the driver hands in his completed work diary sheet. This suggestion has merit but would increase the cost of the final work diary document and industry pointed out that vehicle checks vary from operator to operator.

Finally, although jurisdictions have dropped the contentious requirement for third party signature, this requirement was included in the original HVDF proposal approved by the ATC mid 2004 e.g. "*it is proposed that a provision be included in the work diary for consignor/receivers to sign confirmed at the time of pick up/delivery.*" Valid arguments, supported by real life examples from the road transport industry as to why this will not work, will be required. This information will be necessary to justify to Ministers the significant move away from the original HVDF policy proposal of 2004 endorsed by the Australian Transport Council.

3. CONCLUSIONS AND RECOMMENDATIONS

3.1 Training

Feedback indicates a need for training for both drivers and enforcement officers in the new driving hours regulations and face-to-face instruction in completion of the work diary. It was argued that drivers should not be trained by other drivers but by qualified instructors preferably from the road transport agencies. Any transport operator operating under the BFM or AFM will need to ensure their drivers are properly trained.

Training should include not only how to complete the work diary but also a full explanation of the new driving hours limits, the revised definitions and why additional information is required.

A suggestion was made to make this information available on a self-learning CD-ROM to accompany the purchase of the work diary.

3.2 Work Diary Design – Proposed Amendments

The following is a summary of revisions to the work diary design based on feedback from the on road trial:

- (i) the marked timeline version is preferred;
- (ii) the horizontal format is preferred;
- (iii) the timeline should be relocated within the layout for a more intuitive document;
- (iv) the size of the timeline columns should be increased and the timeline should be numbered on both sides;
- (v) relabel the work and two up columns to avoid confusion;
- (vi) change the label ‘where issued’ to ‘state issued’ or similar;
- (vii) the notes section and the note on the definition of work are not required and should be removed from each individual work diary page;
- (viii) include a field to record the details of the changeover driver e.g. name, licence number; and
- (ix) include a field to record the work diary number of the second two up driver.

The draft work diary design was abbreviated for the purposes of the on road trial. The final version of this document will also contain:

- (i) a set of definitions including an explanation of the bank of hours under BFM;
- (ii) a set of comprehensive instructions on how to complete the work diary page with examples;
- (iii) the new driving hours limits for all users of the document;
- (iv) an application page as in the existing logbook;
- (v) a driver base page as in the existing logbook;
- (vi) two duplicate pages for enforcement and recordkeeping purposes; and
- (vii) an optional Rest Summary page to record rest breaks over a two month period for those drivers operating under BFM and AFM.

3.3 What Happens Next?

The document is being revised based on feedback from drivers, transport operators and enforcement officers who took part in the on road trial. To all intents and purposes the design of the work diary is almost complete. It has not been possible due to space constraints to include all of the suggestions made above. Above all the document has to be practical.

The revised design is based on the current logbook design but will most likely need some further on road testing before a final version is agreed. For example, whether odometers

will provide the degree of accuracy for cross-referencing purposes remains to be seen and the issue of changeover drivers may also require further examination.

Two options were put forward to finalise the work diary design, either extend the on road trial or conduct two more focus groups in Melbourne and Sydney, to gauge driver reaction to revised designs. The latter option has some merit since this could be done fairly quickly and takes the burden off drivers having to continue to complete two documents on the road. For the moment the version of the work diary being made available for public information incorporates changes to the design and instructions based on the feedback from the on road trial.

Appendix A – Responses to Driver Questionnaires

The results are split between both versions of the work diary.

M = marked timeline

B = blank timeline

Comments in italics have been taken directly from feedback.

Q1. Which version of the work diary have you just completed?

197 work diaries were distributed.

Out of 115 responses....

Just under 55% of respondents completed the Marked timeline version

Just over 45% completed the Blank timeline version.

Q2. Overall, how easy or difficult did you find the draft Work Diary to fill in?

M	very easy	22.2%	fairly easy	42.9%	neither	15.9%	some what difficult	12.7%	very difficult	3.2%
B	very easy	23.1%	fairly easy	25.0%	neither	34.6%	some what difficult	15.4%	very difficult	0.0%

The results indicate that drivers were a bit ambivalent about, and experienced a bit more difficulty, completing the work diary with the blank timeline but were curious to trial this version.

Driver Comments

There appeared to be general confusion on how to mark both versions of the vertical timeline, most likely due to the fact that both the logbook and the trial work diary eg. horizontal and vertical formats were being completed at the same time.

- *‘Don’t like blank timeline with the potential for big mistakes’ and ..’takes up too much time to complete’*
- *Starting at whatever time makes it confusing*
- Suggestions were made about repositioning the marked timeline with the most frequently used columns positioned closer to the timeline
- *Timeline needs to be marked at both sides*

- *Timeline columns should be wider and lines lighter (difficult to see if marked with black pen)*
- *Boxes for column totals in both designs too small*
- *Timeline columns need to be deepened*
- A number of drivers stated a preference for the horizontal format of the existing logbook.

Q3. *Was there anything in the Work Diary where it was not clear what you were meant to fill in?*

M	No	87.3%	Yes	9.5%
B	No	84.6%	Yes	13.5%

Since the information collected by the work diary is close to that collected by the current logbook, most drivers did not express any great discomfort about completing the work diary. However, driver comments show confusion about the revised definition of work to encompass non-driving activities and in ongoing confusion about how to complete the blank timeline if not working a regular set schedule.

Driver comments

- *How to complete the blank timeline if shift starts at a different time each workday ?*
- *No distinction made between two-up and solo driving and no distinction made between driving and non-driving, why?*
- *Labels on timeline columns are unclear e.g. Work, rest, two-up*
- *What's the difference between engine running or not when in a line waiting to load/unload ?*
- *When in a line waiting to load/unload, if you fill it out as work you will shoot yourself in the foot because you will run out of driving time at the end of the day.*
- *Blank timeline messy*
- *Why have odometer readings?*

Q4. *Was there enough space to write what you were asked to fill in?*

If NO, which parts weren't there enough room for?

M	No	27.0%	Yes	68.3%
B	No	23.1%	Yes	73.1%

Around 1/3 of drivers who completed both the marked and the blank timeline said there was not enough space in the work diary.

Driver Comments

- *Timeline should be in middle of page and bigger*
- *Total hours boxes need to be bigger and wider*
- *Not enough space for location @ change of activity*
- *Need more space for marking hours on blank timeline*
- *If pickups and drop offs close not enough space in one hour slot to record location*
- *More space for work / rest / two-up area.*

Q5. How easy or difficult was the printing to read?

M	very easy	46.0%	fairly easy	36.5%	neither	9.5%	Some what difficult	1.6%	very difficult	0.0%
B	very easy	46.2%	fairly easy	32.7%	neither	15.4%	Some what difficult	19.2%	very difficult	0.0%

Legibility did not appear to be an issue with the draft work diary.

Q6. Was the timeline on the left hand side easy or difficult to rule your lines on?

M	very easy	19.0%	fairly easy	34.9%	neither	14.3%	Some what difficult	20.6%	very difficult	4.8%
B	very easy	13.5%	fairly easy	28.8%	neither	19.2%	Some what difficult	19.2%	very difficult	7.7%

- For both versions of the work diary, about 20% of drivers appeared to experience some difficulty completing the timeline especially lefthanders.
- A number of drivers stated a preference for the horizontal timeline.

Driver Comments

- *Not easy using a ruler to complete timeline at edge of book and the ruler hides the marked hours on the timeline...timeline needs to be numbered both sides (to allow for left and right-handed).... Too close to edge.*
- *Prefer horizontal.*
- *Timeline left to right across page would be easier.*

- *'Current logbook format much easier'... but 'same problem as with current logbook e.g. Rotating to fill in'.*
- *Timeline should be located in between speedo and change of activity.*
- *Timeline is too small.*
- *Somewhat left handed - ruling hours is difficult.*

Q7. Was the timeline without the times pre-printed on it easy or difficult to fill in?

B	very easy	17.3%	fairly easy	25.0%	neither	19.2%	some what difficult	0.3%	very difficult	5.8%
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Since this question was included in both versions of the work diary, drivers who used both the marked and blank timeline responded. The results presented here are from the completed blank timeline version only (48 responses out of a total of 115).

Again some ambivalence was expressed by drivers regarding the blank timeline version of the work diary. Some difficulty was expressed, however, comments indicated that drivers were more concerned about the potential for error with this version and remarked that it would only suit those drivers with a regular starting time.

Driver Comments

- *'Blank timeline a real pain', and 'too easy to make a mistake'.*
- *How to put in hours on blank timeline.*
- *Takes too much extra time to write in numbes.*
- *Easy to make a mistake and mistakes = fines.*
- *Harder for enforcement officers as every book they look at would be different.*
- *Only the first shift fits on one page, as start times are never the same.*

Q8. Would you prefer the timeline to have the times pre-printed on it, or to write them on yourself?

Preprinted	72.2%	Write	12.2%
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A number of drivers (18 out of 115) did not answer this question.

Q9. Were the instructions provided with the Work Diary easy or difficult to understand?

M	very easy	33.3%	fairly easy	39.7%	neither	15.9%	Some what difficult	4.8%	very difficult	1.6%
B	very easy	30.8%	fairly easy	48.1%	neither	13.5%	Some what difficult	3.8%	very difficult	0.0%

There did not appear to be any major issues with the short set instructions provided, however, the redefinition of Work is again raised.

Driver Comments

- *Work & driving cannot be in the same column.*
- *Can you drive 14 hours? Current law allows 12 driving + 2 hours work this diary doesn't distinguish.*
- *Not very explanatory with regard to work and solo driving.*
- *Blank timeline would be difficult for some.*

Q10. Overall, were there any parts of the work diary you found hard to complete?

M	No	79.4%	Yes	15.9%
B	No	75.0%	Yes	21.2%

Again, the majority of drivers responded that the document was not difficult to complete, however, the comments still show confusion over the redefinition of work and completing the blank timeline.

Driver Comments

- *Driving versus non-driving.*
- *Filling the blank timeline.*
- *Unmarked timeline when filling out when tired easy to make mistake.*
- *How to mark in the time.*
- *Just time starting with the blank spaces but worked when i got used to it.*
- *Black pen is hard to see.*
- *Timeline needs to go across the page.*
- *Location at change of activity needs to be next to timeline.*

- *Not suitable for local area work.*
- *Work diary is too big & timeline is too small.*
- *Total hours boxes too small.*
- *Why do we need to put in mileage at rest stops?*

Q11. Is there anything about the layout of the work diary you would like to see changed?

M	No	47.6%	Yes	44.4%
B	No	36.5%	Yes	59.6%

On average at least half of the respondents suggested a number of improvements.

Driver Comments

- *Timeline should be larger & horizontal.*
- *Columns should be work-rest-two up (in sequence).*
- *Should be on right hand side.*
- *Being able to fill in timeline without rotating book.*
- *Direction of timeline; prefer horizontal format' ...and...'drive time and rest times ruled across page not up and down' and `prefer old layout horizontal timeline much easier'.*
- *Blank timeline harder.*
- *Total hours boxes are too small, could be bigger.*
- *The times really needs to be pre-printed for day-to-day use so you can more easily count back your hours to keep legal. If starting times varied on start of page, it would be impossible or difficult to keep it right within the laws (14 hours in any 24 hours). Would lead to a lot of confusion on drivers and law authorities as well.*
- *It looks like you have done more driving than work.*
- *'put columns used the most together eg location should be closer to timeline; put odometer column next to timeline'... and 'combine odometer and reg no columns'.*
- *'need one page for each day' ...and...'diary needs to be set out for a 6 day period'.*
- *Keep the pre-printed timeline where one page is one calendar day.*
- *Why has driving not been separated from work? And 'add another column for un/loading'.*
- *'odometer reading is just another time consuming entry'...and `only difference is odometer reading - use old logbook format'.*

- *'What if your speedo stops working?' and 'take kilometre column out of work diary'.*
- *Driver should only need to write in details into logbook once.*
- *Time zone could be easier if it was just a box to tick.*
- *Verification section needs to state that the information is correct to the best of your knowledge.*
- *Will stress out local area drivers.*
- *Size too big - document too large & awkward.*

Q12. Do you have any other comments you would like to make on the draft Work Diary?

On redefinition of Work:

- *No different from logbook with driving and working classed as same therefore no change of activity.*
- *Driver asks 'if picking up pre-loaded vehicle then no need to record location since there is no change of activity - will he be fined?'*
- *What if a driver is travelling as a passenger in a hv?*
- *Need option of setting start time on first page before shift starts.*
- *Have we gained a 14 hour driving day or have we lost 2 hours of work?*
- *Need a clear definition of the 24 hour period.*
- *'In all the layouts, time sitting in loading and unloading queues is not addressed. It supposedly is rest time as the motor is turned off but as we all know, you don't get any rest sitting in queues hours at a time' and 'what is difference between queueing with engine running or turned off?'*

On timeline

- *'Prefer horizontal timeline' and 'use old logbook format; waste of time and money; too many changes just stick with old logbook'.*
- *Hours should be pre-written.*
- *I think that the unmarked timetable is too easy to make an honest mistake by driver and enforcement officers.*
- *I like the vertical timeline.*
- *Blank time diary has very limited use. Would only suit regular shift drivers.*
- *Timeline on the bottom of page as per old log book with other information on top. No problem with recording mileage.*

- *Mark timeline with midday/midnight at beginning middle and end.*
- *Sequence of columns next to timeline should be : timeline / location / odometer / reg no*
- *Could use same work diary for day and night shifts by marking timeline 12am / 12pm or midday / midnight at beginning / middle / end of timeline.*

On inclusion of **odometer readings**

- *Why can't enter odometer readings in old logbook? Include odometer readings in part b or part c (old logbook).*
- *Gap in odometer readings – same long distance vehicles used for local area work.*
- *Odometer readings not accurate.*
- *Need to include odometer reading at end of days work (not in instructions).*
- *What happens when the odometer in a vehicle is not working?*
- *Can new work diary include a pre- and post- vehicle check (including odometer check)?*
- *I like the inclusion of the mileage. It is a good cross check to travelling times.*
- *Don't need notes or speedo recording.*
- *I personally prefer the current system. Mileages could be included on a reprint, changing the layout slightly.*

On inclusion of **Notes section:**

- *Will the Notes column become compulsory? Is Note for shuttle drivers a regulation or a suggestion? If the Notes section is optional, 99% of drivers will not complete.*
- *Notes section is also good. You can note things that relate to that shift and may have to be referred to again later.*

Other comments:

- *One driver scratched out 'in every detail' on each page under driver signature.*
- *Very time consuming for local area drivers ' and ` not suitable for local work.*
- *Need separate form for line haul.*
- *Location of rest - what is legal requirement? Examples shown are confusing i just used as per current regs, town or suburb of city or rest area location/name.*
- *The work diary is a waste of time. It is not the drivers fault, it's the people organising freight to be delivered.*

- *No reference to destination & origin.*
- *Colour black & white very confusing most of our pens are black & blue. I think a red pen would be better to rule your lines easier to see on the timelines.*
- *All parking bays should be named in all states.*
- *If all vehicles were fitted with satellite tracking problem would be solved.*

On ease of use

- *Trying to find a large flat space for filling in work diary (size).*
- *Time zone should be tick box.*
- *Should allow option of driver nominated base so consistent between pages.*
- *Old layout is easier and more manageable at steering wheel while filling in.*
- *I could read the diary fairly easily but having shown the diary around to some of the other drivers, quite a few said the writing was too small and difficult for them to read.*

Local Area Driver Comments

- *Too stressing for local area drivers.*
- *Not necessary for local area drivers.*
- *Not suitable for local area work. Not enough spaces - you drive for 15 minutes, work 15 minutes, rest 15 minutes.*
- *Location change of activity. Short runs and jobs in local area too hard to fill in.*
- *Difficult counting forward hours.*
- *Driving & work - work and driving - cannot be under the same column.*
- *'location and change of activity' and 'in one hour slot not enough space to write location'.*
- *Not enough room in the blank timeline.*
- *It's the same problem as the current logbook, having to rotate the book to fill in all the spaces.*
- *'stopped using ruler to make up time' and 'takes longer.'*
- *'black pen hard to see on timeline' and 'colour black & white very confusing most of our pen are black & blue'.*
- *Easy to fill out.*
- *Make the size of the old logbook.*
- *Waste of time and money.*

- *Odometer readings could easily be written into the current logbook.*
- *Can someone please tell me the difference between queuing with engine running or with the engine turned off?*
- *Preferred the layout of this much better than current logbook as i am left handed and current logbook layout makes writing very hard. Have difficulty writing near top of page due to wire spiral page binder.*

Bus Driver Comments

- *Not enough room for total hours boxes.*
- *Timeline hard to see times when ruling lines.*
- *Preferred the layout of this much better than current logbook as I am left handed and current logbook layout makes writing very hard. Have difficulty writing near top of page due to wire spiral page binder.*

Demographics

101 drivers were nominated to take part. 99 received copies of the work diary for completion.

12 transport companies, 2 bus operators and 14 independent operators took part in the trial.

Question	Range	Resp	Range	Resp	Range	Resp	Range	Resp	Range	Resp
What is your age?	17-25	0.9%	26-35	9%	36-45	26%	46-55	43%	>55	15%
Are you male or female	Male	95%	Female	0						
What type of heavy vehicle were you mostly driving while you were participating in this Work Diary trial?	Rigid	6%	Road train	5%	Other	0	Semi	37%	Coach	0
	Bdouble	41%	Bus	4%						
Was it usually local work, long distance, or something else?	Local	18%	Distance	75%	Other	4%				
Are you left or right handed?	Left	12%	Right	83%						

Appendix B – Enforcement Officer Feedback

Focus groups were held with enforcement officers in NSW, SA, QLD and Victoria.

Both summaries of comments from groups of enforcement officers and comments from a number of individual questionnaires received are included here.

On **timeline**:

- Preference stated for pre-printed timeline - *deemed essential for accuracy and ease of use for everyone. Interpretation of unmarked timelines would slow down roadside audits.*
- *Need times printed on both sides of the timeline.*
- Enforcement officers found the blank timeline version difficult to follow especially when drivers were not operating to a regular schedule eg. different start times for work and when drivers were unsure as to where exactly to mark the timeline.
- Another issue with blank timeline was *drivers did not appear to know where to mark the timeline.*
- *Columns need to be rearranged against the timeline e.g. rest, work, two-up, location @ change of activity; odometer; registration no. Alternative would be to move the timeline over to the left hand side of the page before the Notes section.*
- *Is it possible to have the pre-printed timeline marked 1 to 23 then 24/0?*

On **redefinition of work**:

- *Agree with combining driving and non-driving work under the one heading.*
- *Will need non-driving work and driving to be separated so that enforcement officers can identify accurately whether a driver is complying with the regulations.*
- A question was posed regarding the classification of 'queueing'.

On **instructions and definitions**:

- *Don't need to put note on definition of Work on each page if already in instructions / definitions section of work diary. Plus is not a complete definition.*
- *The work diary needs a definitions section with an index of terms.*
- *Need definition of a 'trip'.*
- *The work diary needs a BASE page.*
- *The work diary needs instructions section as in current logbook.*

On **odometer readings**:

- *What is reason for recording odometer readings?*
- *The inclusion of odometer readings is a good one.*

- Regarding gaps in odometer readings, a suggestion was made by enforcement officers to include the name and licence number of the changeover driver which would help with auditing.

On other fields:

- *'Time zone' field seems to work.*
- *Change 'where issued' to 'state of issue'.*
- *Would like origin and destination and KMs for beginning and end of trip only.*

On Notes section:

- *Cannot see need for Notes section.*
- *Reduce size of Notes section and expand size of timeline.*

On two up driver details:

- *Additional two up driver details good. Include page no of two-up drivers' logbook.*
- *Do we need a two up column if details on two-up driver are recorded at the bottom of the page?*
- *Enforcement officers suggested that a driver involved in two up mark both the work column with his own work and rest activities, and the two up column also for the length of time he is involved in a two up arrangement.*

Other issues raised:

- *Size - can the size of the work diary be reduced?*
- *Landscape orientation preferred.*
- *Include next to driver signature the following instruction: 'before beginning your next work diary page, you must sign the completed page.'*
- *Including a duplicate page with would help enforcement officers.*
- *Will drivers doing local area work have to use the work diary? Will drivers of vehicles between 4.5 and 12 tonnes be included?*

Responses to Enforcement Officer Questionnaires

Q1. Was the time zone section easy or difficult to understand? If you ticked “somewhat difficult” or “very difficult”, please tell us why

- Driver base needs clarification e.g. Is it the garage address of the vehicle or the address from where the driver receives his instructions?
- Time boxes too small (smaller than the old book).
- Hard to fill out in the current position (right side).

Q2. The definition of Work includes both driving and non-driving activities. A note has been included on each daily work sheet listing some common non-driving activities. Was this easy or difficult to understand? If you ticked “somewhat difficult” or “very difficult”, please tell us why...

- ‘does not need to be on each page, makes each page too cluttered’ ...and ‘Perhaps put this notation in the definitions section and that’s it’ and ‘why the need to double up on instructions when recorded at start of book in definitions?’
- ‘definitions are somewhat general in nature e.g. ‘Any local pick up or delivery made immediately before or after a long distance trip in the same work period’ too open to abuse by drivers not declaring driving hours’ ...
- ‘there should be a separate time column for non-driving work’ and ‘still needs lines for driving and non-driving (e.g. Working)’.
- Note - I believe this box should be removed.

Q3. One version of the Work Diary has a timeline without the times pre-printed on it, and drivers are required to mark in the hours themselves. From an enforcement point of view is this easy or difficult to use? If you ticked “somewhat difficult” or “very difficult”, please tell us why...

- Lends it self to confusion and abuse.
- The amount of logbooks being viewed each day if each logbook hours were different, it would make mistakes in calculation more probable, if each book the same would create less confusion.
- Without the printed timeline it is too open to manipulation / excuse e.g. I made a mistake, my watch broke etc. Why exclude the printed timeline?
- Stick with pre-printed copy.
- Needs times 24 hour clock.

Q4. The work diary requires odometer readings to be recorded at each change of activity. How easy or difficult was this for you as an enforcement officer to interpret? If you ticked “somewhat difficult” or “very difficult”, please tell us why...

- Trucks before 1988 do not have to conform.
- Many odometers may be inaccurate due to modifications etc.
- May find truckies try to disable odometers or find other ways.
- Depends on the writing skills of the driver also the possibility of the trucks odometer being faulty is high. Which creates the problem of defect notice for faulty odometer?
- Problem arises when odometer not working or driver uses this as an excuse not to fill it in.

Q5. Does having the additional two up driving details in the Work Dairy make it more easy or more difficult to determine when a driver has been involved in two-up driving? If you ticked “somewhat more difficult” or “much more difficult”, please tell us why...

- Signatures if second drivers as discussed, group believes not necessary as drivers may forget, refuse, etc. May then become an offence.
- Each driver to record own hours of driving and record other drivers logbook number.
- A reference to two up should be on each page (driver details, etc). 2nd driver should carry own book.

Q6. Were the instructions, including the definitions, provided with the Work Diary easy or difficult to understand? If you ticked “somewhat difficult” or “very difficult”, please tell us why

- Doubled up on things.
- Definitions were very general in nature and departed from the existing definition of work / driving / rest sections. Suggest retain work / driving / rest not rest / work.
- Need to define definitions.
- Some overkill of instructions. Keep it simple.

Q7. Attached is an example of a rest summary which is proposed for the front of the work diary. Would you ever refer to this summary? Why do you say that ?

- Would use it as another reference to check but not as a prime summary to drivers history.
- To ensure required rest breaks are taken.

Q8. Does the work diary provide you with enough information to assess whether the driver is taking his/her required rest breaks and working within the driving hours regulations ? If NO, how can it be improved?

- Without a separate driving activity line we cannot check actual driving hours.

Q9. Is there anything about the layout of the work diary you would like to see changed? If YES, which parts?

- *'More definitions at front of book' and 'remove from bottom of each page what is work and put at front of book'.*
- *Delete the unmarked page idea.*
- *'timeline bigger and notes section smaller' and 'timeline to be mandatory.'*
- *'prefer the existing logbook size' and 'prefer the horizontal opening page'.*
- *'would like to see the addition of a drive hours line' and 'two separate lines driving and non-driving times.'*
- *National logbook setup is easily read..*
- *Activities column to be expanded..*
- *Reference to 2up (column) be deleted.*
- *Notes optional and what is work to be deleted.*

Q10. Is there anything missing which should be included? If YES, what would you like to add?

- *Would like to see the addition of a drive hours line.*
- *Definitions retained as close as possible to existing definitions.*
- *The times.*
- *Duplicate format - enforcement page or the requirement for the original days page to be removed by authorised officer (signed, etc).*
- *Prefer the existing logbook size.*
- *Prefer the horizontal opening page.*

Q11. Do you have any other comments?

- *These comments will vary greatly to that of a driver or a company.*
- *Column for working time should be included.*
- *Local vehicles 4.5 tonne and up should be included.*
- *I still question as to why the diary will be any different to the existing logbook – accuracy.*
- *Why not tachographs or on board recorders?*