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Dear Paul

Thank you for inviting the Australian Trucking Association (ATA) to comment on recommendations of the National Transport Commission's (NTC) Intelligent Access Program (IAP) Review draft report. I understand the five recommendations aim to improve the governance and transparency of this program for remote monitoring of selected heavy vehicles.

I understand the ATA's response, and other stakeholder feedback, will be used by the NTC to compile a final paper for the Transport and Infrastructure Council in November. As you know, the ATA has made numerous submissions to the NTC on the IAP (and more broadly on telematics technology itself) since 2009 when the scheme became operational in a few jurisdictions. I commend this earlier ATA advice to your agency staff.

The ATA supports review recommendations 1, 3 and 5, which aim to improve understanding of the program through publication of program statistics, technical specifications and information about service provider obligations towards operators. **The ATA supports recommendations 2 and 4**, which allow for high level national discussions on the IAP's technical standards and may help speed up currently lengthy service provider certification processes. Overall, these five recommendations add a level of rigour to the IAP business model through their emphasis on greater transparency.

The ATA is disappointed but not surprised to learn from the Review certain states remain unable to appreciate the merits of granting access to HML vehicles without enrolment in the IAP. As you know, IAP does not deliver much needed first and last mile freight access and its adoption has encouraged the longstanding risk averse pre-occupation with asset protection over efficient and effective assets to support much needed productivity gains.

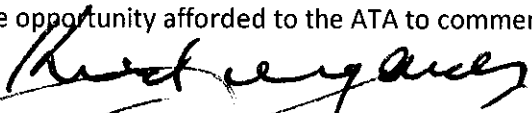
The NTC paper notes that after five years, the IAP has become operational in six states with a total of 2483 vehicles enrolled in 2013. However, amongst the states, there are quite different uses for the scheme such as monitoring buses, mobile cranes, oversize/over mass vehicles or other specialised 'small and niche applications'. Further, PBS vehicles - intended to be the very model of innovation and safety in Australian truck design - also attract IAP in certain states. None of these applications has led to improved access for the nation's fleet of B-doubles, B-triples and AB-triples, which are

the safe, prescriptive combinations used for transporting the vast bulk of road freight today.

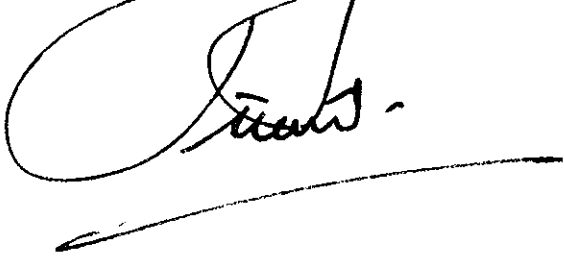
In light of the observations above, questions have to be asked about the cost effectiveness of the current approach to the IAP for both government and IAP participants. This will not change unless jurisdictions attach substantial benefits to what should remain truly voluntary use of IAP, except in specialised applications.

Thank you for the opportunity afforded to the ATA to comment on the IAP Review draft report.

Yours sincerely



Stuart St Clair
Chief Executive



25 July 2014