

Draft review of the Intelligent Access Program – NSW comments July 2014

Section	Page no.	Comment
<p>Draft Recommendation 1 Availability of usage statistics</p>	36	<p>TfNSW is supportive of this recommendation.</p> <p>Better availability of usage data will help make it easier to calculate the benefits of IAP, which are currently restricted because data is primarily collected in instances of non-compliance.</p> <p>Working within the privacy provisions, NSW would support Transport Certification Australia (TCA) releasing de-identified data on total kilometres travelled by enrolled vehicles and geographic regions involved. Data on commodities carried and tonnage would only be available from enrolled operators themselves.</p> <p>Where possible improved data would ideally be collected and published on:</p> <ul style="list-style-type: none"> • Compliance <ul style="list-style-type: none"> ○ What level of non-compliance for speed, location and, where possible, weight • Direct productivity gains <ul style="list-style-type: none"> ○ Increased payload ○ Improved access ○ Emissions ○ Fuel consumption • First and last mile access • Safety of IAP fleet compared to all heavy vehicles <p>It should be noted that RMS publishes the IAP enrolled numbers in NSW each month on the RMS website.</p>
<p>Draft Recommendation 2 Intelligent Access Program specification</p>	37	<p>TfNSW supports the recommendation to streamline the approach for approving changes to the IAP specification.</p> <p>TfNSW recommends that any future changes to the specification should aim to align with the approach adopted for Electronic Work Diaries.</p>
<p>Draft Recommendation 3 Intelligent Access Program specification</p>	37	<p>TfNSW supports this recommendation and would be encouraging of a push for more providers to develop certified systems.</p>

		The publishing of the IAP specification on the TCA website should be timed to coincide with any planned future changes flagged at recommendation 2.
Draft Recommendation 4 Re-certification processes	38	TfNSW supports TCA undertaking a review of the re-certification process, noting that TfNSW wishes to be consulted regarding the outcomes of the review prior to any changes being implemented.
Draft Recommendation 5 Non-compliance reports	38	TfNSW support that operators should be able to negotiate with their service provider for extra compliance data to be provided.
3.4 Compliance Framework for Heavy Vehicle Telematics	6	<p>It should be noted that the Compliance Framework for Heavy Vehicle Telematics intends to help provide better road safety, productivity and environmental outcomes. As an applied telematics framework, the availability of IAP data has provided regulators the opportunity to develop and implement several compliance and enforcement policies.</p> <p>This has included opportunities for regulators to work closely with operators to provide information and education which assists them in better managing their information and business systems, as well as review their level of compliance performance and jointly discuss ways to achieve improvement. This process has demonstrated good working relationships between RMS and operators which are supported by IAP Service Providers and TCA.</p>
5.2.2 Applications of the Intelligent Access Program	14-15	This section notes the status of implementation for specified application types but needs further analysis of why relatively few categories of IAP applications have been made available by jurisdictions. This analysis should support a recommendation for increasing applications types, particularly those which would improve road safety especially for the movement of dangerous goods.
5.2.3 Intelligent Access Program vehicle take-up	19	<p>The report overstates the issue of a lower than expected number of vehicles enrolled in the IAP. As noted in the report, the expected numbers were estimated on information available at the time in 2006. IAP should not be applied to as many vehicles as possible, instead the IAP should be fairly applied where a real access concern exists and where issues can be mitigated by applying IAP.</p> <p>Roads and Maritime Services (RMS) has consistently advised operators that, while access to Higher Mass Limits (HML) and some other higher productivity vehicle combinations requires IAP, the option of IAP is available to transport operators who see commercial advantage to the additional mass and access permitted. In 2009, NSW had approximately 250 transport vehicles enrolled in the IAP. As at 11 July 2014, NSW now has 1,146 transport vehicles that have voluntarily enrolled in the IAP. To assist with reducing costs to operators that</p>

		<p>required limited use of IAP, TCA has reduced its fees as part of the flexible pricing initiative. This initiative recognises one time users and infrequent users compared to regular users. In addition, TCA for three consecutive years has not increased their monthly charges and RMS absorbs the administration costs of enrolling vehicles into the IAP.</p> <p>Under the IAP in NSW, high risk mobile cranes have defined networks based on dimension and mass. This means that high risk mobile cranes can travel on a network without having to apply for individual permits and it enables better planning of their route to work sites, avoiding vulnerable assets and thus reducing safety risks to the rest of the community and other road users. As at 11 July 2014, there were 511 high risk mobile cranes enrolled in the IAP in NSW (making a total of 1,657 vehicles enrolled in IAP in NSW).</p>
5.2.3 Intelligent Access Program vehicle take-up	19	<p>Regarding first and last mile access, it should be recognised that local councils have opened up access because of the IAP albeit perhaps at a slower pace than sought by industry. Furthermore, where local councils have not been able to open up access, even with the IAP, there are often genuine infrastructure limitations or assessment funding issues that prevent this from occurring.</p> <p>IAP monitoring to help ensure trucks only use approved roads in local councils areas is a positive factor but not the only factor in local councils' access decisions.</p>
5.3.3 Status of implementation	27	<p>This section notes 'NTC was unable to obtain any data related to compliance, emissions and fuel consumption of vehicles using the IAP. Therefore, the NTC was unable to calculate the overall safety and other benefits for IAP vehicles.'</p> <p>Does the NTC have any information on how many companies dropped out from the IAP and if so, what were their reasons?</p>
6.1 Performance-based approach of the Intelligent Access Program	31	<p>The idea that operators' own telematics systems may be ahead of government requirements should not necessarily be seen as abnormal or a negative for the IAP. Operators make commercial decisions based on which telematics model and provider best suits their business and it should be expected that these will sometimes exceed government requirements.</p> <p>IAP in-vehicle units are being used by many operators to carry out other non regulatory monitoring functions and operators continue to review their requirements and opt to install IAP ready boxes. TCA has advised that for every certified IAP in-vehicle unit sold for regulatory purposes, another eight units are sold for other commercial purposes. This is because the certified units are seen to have a desirable level of quality assurance.</p>

		It should be noted that in situations where industry has implemented more advanced systems than those currently required by government, any future government requirements should aim to be flexible and compatible enough to align with systems already in place.
6.1 Performance-based approach of the Intelligent Access Program	31	<p>This section notes TCA's review of entry options and the ability to recognise existing telematics systems or devices employed by operators in order to make entry into the scheme easier.</p> <p>There is the potential for this paragraph to be tied with the Compliance Framework for Heavy Vehicle Telematics (mentioned on Page 6) and possibly in a new recommendation about reviewing use of existing telematics for regulatory functions.</p>
6.2 Access decisions involving the Intelligent Access Program	31	Access for heavy vehicles will ultimately be dictated by the limitations of infrastructure and vehicle standards. TfNSW does not expect that the transition to a new access review process under the national law will result in an extensive access increases as long as existing infrastructure limitations remain.
6.3 First and last mile access	33	It appears that there is a lack of information about IAP, its benefits and compliance within local governments. Suggest including a recommendation on how this can be enhanced to maximise access to local roads.
6.6 Availability of usage statistics	35-36	While the report provides information about the IAP program, it does not provide any compliance statistics. It would be useful to have these statistics in the report as well as include it as part of the recommendations i.e. TCA to provide statistics in the annual report on breaches of conditions of travel on approved roads and speeding, as well as tampering and malfunction of the IAP system. This could be done without identifying any particular operator.