

Victorian Department of Transport / VicRoads feedback to NTC re Public version of draft AFTD sent 11.6.2021.

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Item #	Page #	Section in Public consult version of draft 2021 AFTD [REDACTED]	Concern	Recommended text
1	194	Section 10.2.2 Visual Fields Subsection titled Monocular vision (one eyed driver) The current wording for commercial drivers regarding requirements for visual fields is inadequate.	This section should clearly state requirements for consideration of monocular commercial drivers. Appears that too much was removed when editing this section.	<i>A commercial driver seeking to drive when monocular must meet the following criteria, otherwise a driver licence will not be issued:</i> <ul style="list-style-type: none"> the visual acuity in the remaining eye is 6/9 or better, with or without correction; and the visual field in the remaining eye has a horizontal extent of at least 140 degrees within 10 degrees above and below the horizontal midline; and there is no significant visual field loss that is likely to impede driving performance
2	197	Section 10.2.2 Table 10.3 section titled Visual Fields (including monocular vision) The current wording for commercial drivers regarding requirements for visual fields is inadequate.	The table should clearly state that commercial drivers seeking to drive when monocular need to have 140 degrees horizontal in the remaining eye. This is not mentioned in this section. The visual acuity should also be stated as needing to be better or equal to 6/9. Most HPs go straight to the table to check for this information. Appears that too much was removed when editing this section.	Monocular vision A person is not fit to hold an unconditional licence: <ul style="list-style-type: none"> if the person is monocular. <i>A conditional licence may be considered by the driver licensing authority subject to two-yearly review, taking into account the nature of the driving task and information provided by the treating optometrist or ophthalmologist, and the comments made in section 10.2.2 Visual fields under the subheading Monocular vision (one-eyed driver). The following criteria must at least be met, otherwise a driver licence will not be issued:</i> <ul style="list-style-type: none"> the visual acuity in the remaining eye is 6/9 or better, with or without correction; and the visual field in the remaining eye has a horizontal extent of at least 140 degrees within 10 degrees above and below the

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				<p><i>horizontal midline; and</i></p> <ul style="list-style-type: none"> • <i>there is no significant visual field loss that is likely to impede driving performance</i>
3	195	Section 10.2.8 Bioptic telescopes	<p>Insufficient information here to flag the range of issues that require consideration for use whilst driving.</p> <p>Readers (potential drivers with vision impairment) unfamiliar with the devices, how they interact with drivers, limitations etc., may be misled into unrealistic expectations, pursuing costly assessments and making fruitless enquiries of DLAs.</p> <p>The proposed wording recognises that there may be differences in how DLAs apply the requirements.</p> <p>Victorian policy position</p> <p>Victorian medical review policy does not permit the use of bioptic lenses to enable a driver to be licensed who would otherwise not meet the vision standards as outlined in the national Assessing Fitness to Drive Guidelines.</p> <p>As is currently the case for all medical review considerations pertaining to long term significant vision impairment, the applicant</p>	<p><i>At present there is little research, human factors, safety or user experience information to help us understand impacts of using these devices in a dynamic driving environment.</i></p> <p><i>Of particular concern are the information processing and visual field scanning requirements of the driver to detect and respond to hazards occurring anywhere external to the vehicle when using these devices.</i></p> <p><i>No specific bioptics standards are set but the visual acuity and visual fields standards will always apply. The Driver Licensing Authority will be responsible for the final licensing decision based on state application of standards, policy and procedures.</i></p>

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			should submit a medical fitness to drive assessment and a vision assessment from an ophthalmologist who is familiar with their history.	
4	210	Appendix 2 forms Subheading: Information required in a medical report form	Please add more detail 1. Missing date of birth – this is required for validation of a person’s identity within the driver licensing system 2. Spell out any form needs to include the drivers’ postal address not just an email address as implied by “contact details”.	Add the following details: new words in red <i>Driver details:</i> <ul style="list-style-type: none"> • <i>name, date of birth and contact details (postal address, phone number)</i>
5	229	Appendix 7: Seatbelt use Subheading: Medical certificate regarding exemption again they’ve ignored our request to add in certificate currency wording.	Missing information pertaining to the Victorian system previously provided. Reinstate our wording	Add this wording to the end of the paragraph for Victoria.... <i>The certificate (a) must be carried by the person or the driver of the vehicle whenever they are travelling in a car, (b) must clearly display a date of issue and (c) will expire after 12 months.</i>