

National Transport Commission

Review of 'Guidelines for trials of automated vehicles in Australia'

July 2020



Australian Motorcycle Council Inc.

Automated Vehicle Team
National Transport Commission
Level 3
600 Bourke Street
Melbourne VIC 3000

Australian Motorcycle Council
GPO Box 1895 Adelaide SA 5001

<http://www.amc.asn.au>
committee@amc.asn.au

About Australian Motorcycle Council Inc.

The Australian Motorcycle Council (AMC) was formed in 1982 and is the peak body for motorcycle road riders in Australia.

The objectives of the Council are to:

- Promote and improve all aspects of road safety concerning motorcycling in Australia
- Promote, improve and protect the use of motorcycles in Australia, recognising their environmentally beneficial place in urban and land transport planning and systems
- Promote and improve at all levels the full knowledge, awareness, understanding and acceptance of motorcyclists' welfare and safety needs in Australia

The AMC wishes to thank the National Transport Commission for this opportunity to make a submission in response to the Review of 'Guidelines for trials of automated vehicles in Australia'.

Should you require further information on the information contained within this submission, please feel free to contact the AMC committee@amc.asn.au or Brian Wood at 02 9804 6638.

Regards,

Brian Wood
Chair of the AMC's sub-committee on Automated Vehicles

Consultation questions

Question 1: Should the guidelines be updated to improve the management of trials (section 3 of the guidelines) and, if so, why? Consider in particular

Response:- while trials have been conducted in all state and territories and it is requirement of a traffic management plan to engage with other stakeholders which includes other road user groups. Neither the AMC nor any of its state or territory based member organisations have been consulted regarding any of these trials except for the bus trials in Perth where the Motorcycle Riders Association of Western Australia became aware of the trial by way of its membership of the Vulnerable Road User Advisory Group. It is noted that a trial in Queensland is specifically to consider all users in the road environment specifically vulnerable road users.

If the community and in particular the motorcycle community is to have confidence that it will be safe to share the road with automated vehicles, then it needs to kept informed that risk is being properly managed.

The AMC recommends the development of a consistent set of trial management guidelines to be used nationwide. The management plan should include details of all infrastructure and environments the trial is likely to encounter, especially high risk situations such as interaction with vulnerable entities such as pedestrians, bicyclists and motorcyclists. Trial locations to be classified and a consistent report structure complied with to manage the assessment of all trials.

Question 2: Should the guidelines be updated to improve the safety management of trials (section 4 of the guidelines) and, if so, why? Consider in particular

Response:- A requirement of the safety management plan is to consider the risk to other road users. As neither the AMC nor any of its state or territory based member organisations have been consulted regarding any trials except the bus trial in Perth, the AMC is not able to comment on how effectively the safety of motorcyclists has been considered.

Question 3: What issues have been encountered when obtaining or providing insurance?

Response:- The AMC is unable to provide comment on this issue

Question 4: Are the current insurance requirements sufficient (section 5 of the guidelines)? If not, how should they change?

Response:- The AMC is unable to provide comment on this issue

Question 5: Should the guidelines be updated to improve the provision of relevant data and information (section 6 of the guidelines)? Consider in particular:

Response:- End of trial reports need to be made public so that community concerns and public complaints are addressed.

Question 6 Is there any additional information the guidelines should include for trialling organisations?

Response:- The AMC is unable to provide comment on this issue

Question 7 Should the guidelines apply to any other emerging technologies (discussed in chapter 4 or other technologies) and operating domains?

Response:- Yes, the use of the guidelines should apply to other emerging technologies to reassure the public that safety implications have been adequately addressed. Insurance and liabilities may be different in non-carriageway or non-public domains however autonomous vehicles need to be accountable in all situations with the public advised of the safety implications.

Question 8 Are there any additional criteria or additional matters relevant to the trials of automated heavy vehicles that should be included in the guidelines?

Response:- The AMC is unable to provide comment on this issue

Question 9 Are there currently any regulatory or other barriers to running larger trials? If so, how should these barriers be addressed? (Consider the guidelines, state and territory exemption and permit schemes, and Commonwealth importation processes.)

Response:- The AMC is not aware of any regulatory or other barriers to running larger trails

Question 10 Should the guidelines continue to allow commercial passenger services in automated vehicle trials? If so, should the guidelines reference additional criteria that trialling organisations should be subject to, and what should these criteria be?

Response:- Yes, the guidelines should continue to allow commercial passenger services. The AMC is unable to suggest any additional criteria for conducting these trials.

Question 11 What challenges have you faced with administrative processes when applying for approving trials of automated vehicles, and how could these be addressed?

Response:- The AMC has not applied to conduct a trial though the AMC suggests that the formation of advisory committees along the lines of the South Australian Automated Vehicles Trials Advisory Committee, would be helpful in improving the administrative approval process

Question 12 Are there any other barriers to cross-border trials? Is there a need to change current arrangements for cross border trials?

Response:- There appears to be a need for states and territories to establish legislative processes to recognise trial exemptions approved in other jurisdictions

Question 13 Should there be a more standardised government evaluation framework for automated vehicle trials? If so, what are the trial issues that should be evaluated?

Response:- There would appear to be benefit in a more standardised government evaluation framework with consistent reporting structure across different classifications of trials.

Question 14 Should the results of evaluations be shared between states and territories? If so, how should commercially sensitive information be treated

Response:- The AMC considers there would be benefit in sharing information between states and territories but the AMC is not able to comment on how commercially sensitive information could be treated.'

Submission – Review of 'Guidelines for trials of automated vehicles in Australia'

Question 15 What works well in the automated vehicle importation process, and what are the challenges?

Response:- The AMC is unable to provide comment on this issue.

Question 16 Is there anything further that should be done to facilitate a transition from trial to commercial deployment?

Response:- None that the AMC can suggest

Question 17 Are there any matters that the NTC should consider in its review of the guidelines?

Response:- None that the AMC can suggest

End of document