

1. Do you agree with the fatigue issues identified in the discussion paper? Are there other issues that should be included?

Yes. NT does not have any other specific fatigue issues to put forward to be addressed by this project, but would like the framework to ensure that the data collected and associated research should be used to reflect on the current prescribed driving hours concept as a whole – not limited to address only identified issues with the current approach.

2. What is your view on the proposed prioritisation of fatigue issues identified in the discussion paper?

As a jurisdiction not applying the HVNL fatigue regulations, NT does not have comment on the prioritisation. It is agreed these issues all need resolving, but as per the comment in question 1, believe this should evolve into a holistic approach to regulated driving hours.

3. What other data collection activities exist in government or industry that the data framework should consider?

None in NT.

4. Do you agree with the need for more comparable and accessible fatigue data to underpin future reforms? If not, what alternative approach do you propose?

Agreed.

5. Do you support an open data approach to fatigue data? Consider in your response the benefits and challenges of open data compared to other data handling approaches.

Yes. The open data concept seems the most useful. Once the format of the data and the impact on NT processes and systems can be explored further, more comment may be made on the associated benefits and challenges.

6. What is your view on the proposed framework methodology relating to proposed terminology and coding, proposed system changes and proposed process changes?

These are all important to the project to allow standard formats of data to be meaningfully collated and analysed. NT however would need to clearly understand the cost and resourcing implications prior to committing to implement them.

7. What is your view on the validity and characteristics of a fatigue likelihood scale?

This seems a reasonable approach but there is a risk that the scale still involves a level of subjectiveness. Further investigation of the concept with experienced crash investigators should be carried out.

8. What is your view on the proposed framework principles?

The suggestions within the discussion paper regarding what the principles need to include are sound.

9. What is your view on the data collection and research activities proposed in the discussion paper?

They all seem sound.

10. How best should the data framework be funded and governance arranged? Consider in your response organisations that could be best placed to undertake responsibility for the framework.

NT has not implemented the National Heavy Vehicle Regulator; as such while NT is supportive of the data framework project to achieve national consistency, the costs

and resourcing implications would need to be clearly understood prior to any commitment to participate in the governance of the framework.

Kind Regards,

Jed Graetz | Senior Project Officer | Transport Planning, Policy and Reform
Department of Transport
Northern Territory Government