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The tandem axle dolly is light-weight, simple to construct, short in length and inherently unstable!

The primary problem is that it has a very short chassis that rides on load sharing suspension. Strictly speaking the two axle dolly does not need load sharing suspension to offer load sharing performance. Now let's add a short draw-bar (very popular with livestock and new generation pocket A-doubles) and then hinge that draw-bar at the chassis. We now have a component of a combination which is unstable in three places: the tow-coupling, the draw-bar hinges and the load-sharing suspension.

The tri-axle dolly by virtue of its inherently longer length and multiple axles is a vast improvement over the tandem with respect to stability and predictability. Ask any driver!

More significantly the B-trailer which inherently has an even longer length, offers a fifthwheel coupling (at both ends) with the advantage of roll stability (as opposed to a Ringfeder style coupling), does not have a hinged draw-bar and does not have any longitudinal instability in the chassis as a result of the load sharing suspension or drawbar hinges. Ask any driver!

My submission is two-fold:

1. Regulation should motivate vehicle owners to invest in longer B-trains (even though they have higher tare weights than A-trains) by offering higher Gross Vehicle Mass by virtue of longer lengths than A-trains. For example the opportunity to run a B-train with four trailers instead of an A-train with two trailers would produce an alternative vehicle with a lower centre of gravity, a marginal increase in length and far superior stability which would warrant the investment by the operator.

2. To reduce the incentive to operate and invest in unstable tandem axle & tri-axle dollies together with their associated high centre of gravity loads.

In short, I suggest that ideally Government regulation will be more pro-active if vehicle owners can readily see that investment in safer (non-traditional vehicles) actually offer significant and tangible productivity benefits.