



Mr Paul Retter AM
Chief Executive Officer and Commissioner
National Transport Commission
15/628 Bourke Street
MELBOURNE VIC 3000

Dear Paul

PBS marketplace review

Thank you for the opportunity to provide feedback on the *PBS Marketplace* consultation paper. I understand that this process will help assess if the PBS scheme is meeting its policy intent, if it contains systemic barriers to the operationalisation of innovative heavy vehicles, what impacts it has had on the industry and what improvements could be made.

As you are aware, ATA staff attended a NTC meeting on this topic on 21 September and found the discussion informative. We look forward to the outcomes from this meeting being published soon.

In our view, the scheme's current performance standards used to assess vehicle designs are sound and should be maintained. It may well be that in future additional performance-based standards are required, but this should only occur after a proposed new standard has been rigorously assessed for its direct contribution towards improving safety outcomes.

However, as you know, the ATA has voiced concerns about the efficacy of the PBS process rather than the merits of its policy intent. In particular, the lack of guaranteed road access for fully PBS-approved vehicles continues to plague the industry. Industry feedback suggests that this scheme has been a huge and costly disappointment for many operators with PBS vehicles because their requests for access are often delayed or simply refused outright by road managers without good reason.

The ATA understands that legally speaking, the road manager, or access decision-maker, is neither the NTC nor the NHVR but the participating states and their councils. The ATA is also aware that local council resources as well as their understanding of this scheme vary greatly, making their overall administrative performance uneven. However, numerous operators, such as those seeking to operate innovative articulated vehicle combinations, are very disappointed by the high cost of investment made in good faith in the PBS process without the commensurate level of reward.

The association is keen to understand why the scheme has facilitated the supply of so many rigid truck and trailer sets without an equally steady supply of safer, roll-coupled articulated combinations suitable for linehaul and general freight. This scheme outcome appears at odds with the nature of current commercial demand.

Finally, PBS Review Panel (PRP) meetings held with road manager representatives to assess and approve applications are infrequent, and add significant delays and costs to the scheme. At the end of the PRP process, there is no guarantee that the same road managers will allow access to their road networks even though a vehicle approved by the PRP has met all the required performance

standards. In the context of the new national regulatory environment, it is our view that the NHVR alone should oversee PBS applications, and manage the audits of all PBS-approved vehicles both at first registration and in-service to ensure long-term compliance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Melham', written over the closing 'Yours sincerely,'.

Christopher Melham
Chief Executive Officer

30 September 2016
