



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

Dear Mr Retter

NTC discussion paper: regulatory options for automated vehicles

Thank you for the opportunity to comment on the NTC paper on regulatory options for automated vehicles. As you know, the ATA provided a written submission in March on potential regulatory barriers to their introduction, and we are generally satisfied with the options and timeframes that have been subsequently proposed in the latest discussion paper.

In the March submission, the ATA agreed with the NTC that there are many laws that may need to be amended because of automated vehicles, and we recommended national regulatory consistency where possible.

The road freight industry today is benefiting from the advanced technology that is available in the market. New braking systems and other highly sophisticated electronic equipment are transforming operational safety and on road performance for trucks as well as reducing fuel consumption and emissions, and improving fleet communications and logistics efficiency. However, although heavy vehicles are steadily becoming more automated, an autonomous or 'driverless' truck remains a futuristic concept and is not a current priority for the industry.

A priority that was raised in the earlier ATA submission was the importance of managing early interactions between autonomous vehicles and standard road vehicles. The prospect of a driverless vehicle suggests they will bring a range of safety advantages and disadvantages. This month, the first fatal crash caused by an autonomous car (which failed to prevent a collision with a truck and trailer making a legitimate left-hand turn) indicates that initially at least, autonomous vehicles will present another hazard on the road for the trucking industry.

In this context, future regulatory oversight by government in the following areas may be crucial for the safe operation of autonomous (light) vehicles on public roads:

Managing interactions with people and non-autonomous vehicles

- To ensure truck driver safety, autonomous vehicles should have high visibility markings and have dashcams and rear cameras installed
- To ensure the safety of truck drivers, pedestrians and workers, autonomous vehicles would need to recognise hand signals and the use of hand-held signs at roadworks, or safely hand over control to a human driver.

Managing maintenance requirements and vehicle standards

- Scheduled maintenance requirements will be crucial if autonomous vehicles are, as envisaged, operated more frequently than standard private vehicles
- Standards for vehicle modifications (mandatory and optional) software upgrades and other equipment upgrades will be of major importance.

Managing loss of driving skills and user alertness

- Crashes may be caused by a lack of occupant readiness or the sheer inability to take control of the vehicle. Distraction-related and fatigue-inspired collisions may occur more often which will compromise the safety of truck drivers and other road users.

No-blame investigations into autonomous vehicle accidents

- Accidents involving autonomous vehicles will need to be investigated by experts in the technology, safety systems and human factors so safety improvements can be made. The existing procedures for investigating road accidents (including fatalities through the coronial system) are not suitable for this purpose. The best way to understand the causes of accidents involving autonomous vehicles and generate recommendations to prevent their recurrence would be for these accidents to be investigated through a no-blame accident investigation process, such as those carried out by ATSB. An accident investigation process like this would need to be able to access data from the autonomous vehicle involved.

The ATA appreciates worldwide efforts to improve road safety through innovations in automotive technology including the autonomous vehicle concept. The NTC can also be congratulated for undertaking the necessary preparatory work for their legal introduction onto Australian roads. However, at least until such vehicles become the norm, the ATA seeks that there be as little impact on industry safety and operations as possible and that other vehicles share the road safely with us.

Should you wish to discuss this matter further, please contact Ms Ro Mueller, Senior Adviser Road Safety and Productivity, ATA on 02 6253 6943.

Yours sincerely,



Christopher Melham
Chief Executive

6 July 2016