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1. Introduction

The National Transport Commission (NTC) review of heavy vehicle charges process has been a constructive experience for industry and the NTC.

The paper accurately reflects the issues industry raised with the NTC in this review. The recommendations the NTC have proposed to investigate further in a RIS, after the Standing Council on Transport and Infrastructure's (SCOTI) approval, are the result of the transparent and respectful consultation with all stakeholders.

The proposed options, such as increasing the variable fuel component, are consistent with the ATA's approach and the findings of the forthcoming PwC report into road supply and charging. This would improve the PayGo model by reflecting use of infrastructure, easing cash flow constraints and making operating costs easier to pass onto clients.

Simplifying the charges schedule for industry by treating trailers consistently as one class supports the modular use of different trailers and operator desire to use high productivity vehicle combinations, which are relatively safer than traditional combinations.

Axle group charging for trailers would improve the PayGo model by recognising that sharing loads over greater axles reduces pavement wear.

The refinement of the model data and methodology will increase the accuracy of the PayGo model and should extend the life of PayGo into the future of heavy vehicle charges. Specific areas of improvement are ESA updates, population checks against real registrations and the re-examination of the annual adjustment.

In moving forward with this determination it is imperative that the impact of any suggested options on industry are evaluated adequately.

The proposed options for reform present a real opportunity for industry, states and the NTC to improve the performance of PayGo.

The ATA recommends that SCOTI agree to allow the NTC to commence with a RIS process in order to improve the performance of the PayGo model

2. Australian Trucking Association

The Australian Trucking Association (ATA) is the peak body that represents the trucking industry. Its members include state and sector based trucking associations, some of the nation's largest transport companies, and businesses with leading expertise in truck technology.

3. Recommendations

Recommendation 1

The NTC continue to investigate the over/under recovery argument presented by industry and states.

Recommendation 2

The pricing principles should recognise trailers as a single class of vehicles.

Recommendation 3

Externalities should not be included in the cost base.

Recommendation 4

The 7 year averaging period in the PayGo model should continue.

Recommendation 5

It is unnecessary at this stage to update the cost allocation matrix. However, it should be reviewed prior to a future determination in conjunction with industry.

Recommendation 6

The SMVU should be retained in the PayGo model, if it is transparently trended to the most recent PayGo year.

Recommendation 7

The sample size and the frequency of the SMVU should be increased.

Recommendation 8

Jurisdictional heavy vehicle registration populations should be compared to the SMVU population in order to monitor the PayGo model.

Recommendation 9

The ATA believes jurisdictional reporting of heavy vehicle expenditure should have the same level of accountability as any other public entity spending.

Recommendation 10

Improving the guidelines accompanying the NTC expenditure template should improve accurate expenditure reporting by states.

Recommendation 11

The variable fuel component of the PayGo model should increase to support industry paying for use and strengthen industry's ability to pass on costs to clients.

Recommendation 12

Legislating for an increase in RUC is possible and is not an impossible barrier to increasing the RUC share.

Recommendation 13

The Federal Interstate Registration scheme (FIRS) like formula of distributing revenue should be mimicked in the PayGo system with an increase in RUC share. Alternatively a tiered heavy vehicle access network could be used to efficiently distribute revenue.

Recommendation 14

Trailers should be treated as a single class in the charges schedule.

Recommendation 15

The ATA recommend the NTC pursue axle group charges for trailers, as it would promote using the most efficient and safe vehicles for the freight task.

Recommendation 16

The ATA supports ESA calculation by axle group, as it reflects the modular use of trailers and will simplify the calculation of attributable costs.

Recommendation 17

The ATA recommend the NTC pursue Investigating ESAs of Buses, coaches and light vehicle will refine the PayGo model.

Recommendation 18

The ATA recommend the NTC pursue a mini-determination in the annual adjustment process.

Recommendation 19

If a mini determination is not feasible, the suggested amendments to the annual adjustment should occur.

Recommendation 20

The ATA supports maintaining Vehicle Kilometres (VKT) travelled as the cost allocator for common costs between light and heavy vehicles.

Recommendation 21

The NTC examination of alternative methods for the allocation of the relative contributions of individual heavy vehicle classes continues.

Recommendation 22

Enhancing the transparency of the road train subsidy in the PayGo model should occur.

Recommendation 23

The ATA Council calls on the NTC to ensure that the outcomes of the NTC's Charges Review achieves equity between combinations, such as B-doubles, B-triples and BAB quads, with vehicles of similar characteristics such as 9 axle truck and dog combinations, and road trains.

Recommendation 24

The charges review should not disadvantage particular sectors or regions including, rural, regional and remote operators and their communities, by maintaining recognition of CSOs and current outcomes, and applying them as appropriate to safer combinations.

Recommendation 25

The NTC explore the options of establishing agreed principles to encourage national consistency on concessions.

Recommendation 26

NHVR provide high level input into the NTC review.

Recommendation 27

Industry should be made aware of the implications of NHVR funding decisions on heavy vehicle charges.

4. Industry issues and NTC response

The ATA has provided detailed issues on the PayGo model since 2007. The ATA has also offered solutions for many of the issues identified. We have detailed industry issue raised with specific issue in the paper and the NTC response.

4.1 The performance of PayGo – over and under recovery

While the NTC has generally presented the ATA views, the staging and comparison of the PayGo heavy vehicle expenditure versus revenue in a given year is an issue that is not fully explored in the NTC paper.

The NTC paper compares revenue and expenditure recovered in a same year, analysis of this has found an under-recovery of 6%. However, the ATA believe a lag of the revenue received should be factored in given that charges are set in year A to be recovered in year B. When the NTC assessed the impact of this there was a 0% under/over-recovery. However, it is unclear whether a one year lag in the document is the correct comparison to make and represents what industry actually pays for.

In the PayGo model, the cost base industry pays for includes lagged expenditure from the previous 7 years that has been adjusted for inflation before it is averaged to derive the current years cost base. Industry pays for charges based on a population that is taken from the mid-point of the PayGo model. Therefore the while the expenditure to be recovered is current, the population expenditure is shared over is different to the current operating population, leading to an over-recovery.

The NTC modelling is based upon 392,453 heavy (motor) vehicles, while the ATA has used actual registration database information provided by road agencies, which identifies 570,294 heavy motor vehicles (being trucks, prime movers, buses and special purpose vehicles, but not including trailers). Information from road agencies showed the actual registered heavy vehicles as at 31 December 2011 was 789,489 (this number includes trailers)¹.

The ATA has calculated over-recovery for 2013-14, by comparing the PayGo cost base to be recovered in 2013-14 (\$2.9 billion) with the estimated revenue taken in the 2013-14 period using actual registration figures from December 2011. Estimated revenue is calculated using 2013-14 heavy vehicle charges and the RUC for 2013-14. Industry is projected to pay \$3.7 billion, meaning an over-recovery of over \$800 million.

¹ See ATA submission: Assessment of Actual Heavy Vehicle Registration Population Data against the NTC PayGo Model, 2011, for further details

	Expenditure cost base to be recovered in 2013-14	Estimated registration revenue collected in 2013-14 (excludes concessions given by states)
NSW	\$ 421,800,000	\$ 280,897,664
VIC	\$ 177,600,000	\$ 335,809,104
QLD	\$ 359,300,000	\$ 301,135,332
SA	\$ 61,700,000	\$ 109,273,288
NT	\$ 14,000,000	\$ 20,811,748
TAS	\$ 15,000,000	\$ 22,449,544
ACT	\$ 13,000,000	\$ 3,104,519
WA	\$ 116,600,000	\$ 218,425,747
Commonwealth (RUC)	\$ 1,703,179,408	\$ 2,408,946,662
Total revenue	\$ 2,882,179,408	\$ 3,700,853,608
Difference		\$ 818,674,200

Source:

- Expenditure cost base to be recovered 2013-14: NTC annual report 2011-12 page 93
- Commonwealth (RUC): based on SMVU figures from Table 15. Scenario B usage and cost allocation data (for recalculated 2012/13 charges) page 37 of the NTC Heavy vehicle charges – Report to the Standing Council on Transport and Infrastructure February 2012 multiplied by 0.2614 cpl for 2013-14.
- Estimated registration revenue collected in 2013-14 (excludes concessions given by states): from December 2011 registration figures multiplied by 2013-14 heavy vehicle charges
- Commonwealth (RUC) revenue: 2011 December registration figures allocated to NTC vehicle classes multiplied by 0.2614 cpl for 2013-14. See appendix A for further information.

Recommendation 1

The NTC continue to investigate the over/under recovery argument presented by industry and states.

4.2 Pricing principles

In the past pricing principles have been used to stop the progress of improvements to the PayGo model. The NTC and stakeholders have recognised that the pricing principles are open to interpretation and should be used to enhance the PayGo model. The ATA desire to have charges recognise the modularity of the fleet by having a single charges class for trailers can be accommodated in the pricing principles and does not cause conflict with the principle of ‘no-cross subsidisation by vehicle class’. This is done changing the fixed vehicle combinations class to a single trailer class. The NTC agree with this interpretation.

The heavy vehicle industry pays for externalities through high insurance premiums and additional costs of cleaner emissions vehicles (AdBlue or increased fuel usage). The ATA agrees with the NTC that externalities should not be included in the cost base.

Recommendation 2

The pricing principles should recognise trailers as a single class of vehicles.

Recommendation 3

Externalities should not be included in the cost base.

4.3 Calculating the cost base

The PayGo model uses a 7 year average of historical road expenditure inflated to the current year. The justification for the 7 years is to smooth the total recoverable costs from year to year and is designed to avoid price shocks due to short term changes.

The ATA questioned whether 7 years was the correct length for the PayGo model averaging. The ATA suggested revising the 3 year average, which was in place before 2007. The NTC investigated and found that while the 3 years reduced the over and under-recovery in the model, it increased the volatility of the charges. The NTC argued there is also limited economic efficiency to be gained from shortening the period of expenditure recovery.

Given that industry needs to have certainty with charges and if the outcome of changing the averaging period does not promote further economic efficiency, the justification of continuing to use a 7 year average is valid.

Recommendation 4

The 7 year averaging period in the PayGo model should continue.

4.4 Cost allocation matrix

The ATA agrees with the NTC analysis of the cost allocation matrix and believes there is no benefit to be gained from updating the cost allocation matrix.

Recommendation 5

It is unnecessary at this stage to update the cost allocation matrix. However, it should be reviewed prior to a future determination in conjunction with industry.

4.5 Usage data set

The ATA questioned the accuracy and reliability of the Survey of Motor Vehicle Use (SMVU) data used in the PayGo model. The SMVU is a survey and has unrecorded years leading to a trended estimate having to be used in its place.

As mentioned above, the ATA obtained actual heavy vehicle registration data from jurisdictions for December 2011. When comparing the current PayGo population being used to the actual population and the difference was around 177,841 more heavy (motor) vehicles than the current model has. This meant the industry is being overcharged for impact given the smaller population used.

The ATA recommended that most recent actual state registration figures should be used in the PayGo model, instead of the mid-point SMVU.

The NTC investigated alternative data sets to use in the PayGo model for parameters such as population, fuel usage and vehicle kilometres travelled. However, the SMVU still provides an integrated data set superior to other sources.

The NTC compared SMVU population figures against jurisdictional heavy vehicle registration figures for the same period and found that after statistical testing SMVU data was shown to be a reliable estimate to vehicle usage. However, for some vehicle classes there were high relative standard errors, meaning for some less populated vehicle classes the data was not as accurate as it could be.

While the data set has not been recommended to change, the NTC are recommending the latest SMVU figures be trended to the most recent PayGo year using a transparent methodology.

The NTC have also recommended that they explore with the ABS costs of conducting the SMVU annually and increasing the sample size to reduce standard errors. The ATA strongly supports increasing the frequency and sample size of the SMVU.

The NTC have also suggested using actual registration data and other indicative data to cross-check the figures produced in the SMVU inputs in order to make sure it remains consistent with actual registration data.

Recommendation 6

The SMVU should be retained in the PayGo model, if it is transparently trended to the most recent PayGo year.

Recommendation 7

The sample size and the frequency of the SMVU should be increased.

Recommendation 8

Jurisdictional heavy vehicle registration populations should be compared to the SMVU population in order to monitor the PayGo model.

4.6 Expenditure template and expenditure accountability

The current state heavy vehicle road expenditure and maintenance inputs into the PayGo model are unaudited. Industry has raised the issue of efficient spending due to the fact that the expenditure industry pays for is based in the absence of independent audits.

The findings in the Deloitte Review of Reported Jurisdictional Road Expenditure Data report showed inconsistency in what some states included in categories, including costs which were not listed in the guidelines.

It is disappointing that an independent audit of inputs was not strongly recommended in the NTC heavy vehicle charges review, given the wide-ranging discrepancies reported. Additionally, the inputs appear to have been unaudited since 1991 when the template was originally put in place.

States heavy vehicle expenditure inputs should have the same level of accountability and scrutiny as other public and private entities. Expenditure should also be benchmarked to give states a reason to secure value for money spending.

The NTC asserts it cannot enforce audits and believe HVCI will be better placed to deal with audits, as it is easier to assess efficient spending in a forward looking cost model. However, the ATA believes the NTC should have raised the need for audits with Ministers, as without audit the cost recovery policy is undermined.

While independent audits are not recommended, some action has been recommended to improve the reporting of heavy vehicle road and maintenance expenditure through clearer guidelines for jurisdictions on the expenditure templates.

Recommendation 9

The ATA believes jurisdictional reporting of heavy vehicle expenditure should have the same level of accountability as any other public entity spending.

Recommendation 10

Improving the guidelines accompanying the NTC expenditure template should improve accurate expenditure reporting by states.

4.7 Structure of charges

The ATA has promoted increasing the variable component of the PayGo model through a fuel based charge for many years. The current RUC and registration split is 62:38. Increasing the variable charge reduces the cash constraint that a large fixed registration charge presents. It also promotes paying for use more as fuel burn is a proxy for mass, distance and road condition.

The NTC examined different levels of RUC and registration and effectively gauged stakeholder feedback and the impacts of different combinations of RUC.

The recommendation of further examining raising the RUC above the current level, outlining practical barriers and the carbon price and investigate possible solutions to these barriers and the timeframes required to implement them is a positive step to improving the performance of PayGo.

Some barriers identified such as legislating for a RUC above the current excise level can be amended within the time of the review.

If the variable component share changes under the PayGo model, there will need to be consideration of how the money will be distributed. The ATA supports the use of a formula, similar to Federal Interstate Registration scheme (FIRS), which is based on a freight task survey and works very effectively. Updating the freight task movements from the most recent SMVU, would reflect heavy vehicle movements accurately. Similarly, a revenue distribution based on a network level of service, focussing on heavy vehicle access levels to concentrate investment and define the service standard of infrastructure for users.

Industry would like to see trailers treated as a single class. While A-trailer registration halved last year it has had limited effects given it is still treated separately to semi-trailers. This would make charges reflect how industry uses trailers because heavy vehicles rarely stay in tied combinations. The modularity of the articulated fleet is customary; trailers are interchanged as a matter of routine business practices across the nation.

The ATA has also argued that longer combinations cause less pavement wear, given they complete the freight task in less trips than smaller combinations. The NTC endorsement of axle group charging is superior to a per axle charge because it promotes using the most productive vehicle for the freight task, compared to simple per axle charge which promotes no distinctive price signals.

Additionally, work undertaken by the NTC into examining axle grouping ESA should support the use of axle group charging, as one would expect the ESA of a semi-trailer to be the same in any configuration. Therefore, charges would reflect impact more accurately than the current systems does which measures single combinations not components.

Recommendation 11

The variable fuel component of the PayGo model should increase to support industry paying for use and strengthen industry's ability to pass on costs to clients.

Recommendation 12

Legislating for an increase in RUC is possible and is not an impossible barrier to increasing the RUC share.

Recommendation 13

The Federal Interstate Registration scheme (FIRS) like formula of distributing revenue should be mimicked in the PayGo system with an increase in RUC share. Alternatively a tiered heavy vehicle access network could be used to efficiently distribute revenue.

Recommendation 14

Trailers should be treated as a single class in the charges schedule.

Recommendation 15

The ATA recommend the NTC pursue axle group charges for trailers, as it would promote using the most efficient and safe vehicles for the freight task.

4.8 Estimating relative levels of pavement wear

The ATA has argued that the ESA figures since 2007 have overestimated the impact of high productivity vehicles and underestimated the lighter end of the fleet. This was due to the line of best fit being forced through the origin.

The NTC have sought to support the modularity of the fleet by examining ESAs for a given set of axles in a combination not the combination itself. There is a strong justification for this move based on an engineering perspective. This method of ESA by axle group would simplify the cost allocation for heavy vehicle impact, which many would support.

Further investigation into the AGM and ESA for busses and coaches would break down the costs of impact more effectively.

Finally, the examination of ESA values for light vehicles will also refine the PayGo model. Currently, road wear is only attributed to weathering and heavy vehicles, however, if light vehicles are found to contribute ESA wear to infrastructure a third category would be added to the attributable road wear.

Recommendation 16

The ATA supports ESA calculation by axle group, as it reflects the modular use of trailers and will simplify the calculation of attributable costs.

Recommendation 17

The ATA recommend the NTC pursue Investigating ESAs of Buses, coaches and light vehicle will refine the PayGo model.

4.9 Annual Adjustment

The ATA raised the issue that some of the important parameters in the annual adjustment formula have not been updated since 2007. The road use factor is currently fixed at -1, however, the inputs into the calculation such as GDP chain volume, Vehicle population and vehicle kilometres travelled have changed. The ATA recommended the RUF be updated annually.

The NTC response to the issues raised by stakeholders is to examine amendments to the current methodology including examining the RUF, A factors and road expenditure indexation. They have also sought to examine the timing of the annual adjustment factor.

Alternative ways of recovery ongoing road expenditure through a CPI adjustment or a mini-determination have also been advocated by the NTC. The mini determination will update usage and expenditure data subject to availability to run the cost allocation and charging model on a yearly basis.

The ATA supports a mini determination, as it would present the most accurate update of the cost base.

Recommendation 18

The ATA recommend the NTC pursue a mini-determination in the annual adjustment process.

Recommendation 19

If a mini determination is not feasible, the suggested amendments to the annual adjustment should occur.

4.10 Common (non attributable) cost allocation

The use of vehicle kilometres travelled (VKT) is a fair and reasonable method of allocating common costs between light and heavy vehicles, as recommended by the NTC.

The NTC have presented a range of methods to allocate the relative contributions of individual heavy vehicle classes. While the ATA does favour using the Equal Absolute Contribution and PCU, more work is necessary before a concrete decision can be determined. The ATA recognises the NTC will phase in any potential shocks to changing the allocation method away from VKT.

Recommendation 20

The ATA supports maintaining Vehicle Kilometres (VKT) travelled as the cost allocator for common costs between light and heavy vehicles.

Recommendation 21

The NTC examination of alternative methods for the allocation of the relative contributions of individual heavy vehicle classes continues.

4.11 Rebate/Concessions/National Charges

Currently, road trains receive a 30% reduction in costs due to a subsidy provided by the rest of the fleet. The transparency of who pays for the subsidy, how much the subsidy is and how it is allocated over other heavy vehicles is not transparent in the NTC model. The ATA is aware of the 'Maxman' model which calculates the allocation. However, a supporting document detailing the concession/cross-subsidy needs to be provided, as does further discussion on its inclusion in the PayGo model.

ATA Council calls on the NTC to ensure that the outcomes of the NTC's Charges Review achieves equity between combinations, such as B-doubles, B-triples and BAB quads, with vehicles of similar characteristics such as 9 axle truck and dog combinations, and road trains.

This should occur without disadvantaging particular sectors or regions including, rural, regional and remote operators and their communities, by maintaining recognition of CSOs and current outcomes, and applying them as appropriate to safer combinations.

The ATA supports state's prerogative to implement concessions. However, a national approach to concessions would support improvements to the PayGo model, given the myriad of concession in different states leads to a divergence in revenue recovered and heavy vehicle expenditure, as well equity concerns for operators in different states. An agreed set of principles for concessions would present operators with the same outcome for the same situation.

Recommendation 22

Enhancing the transparency of the road train subsidy in the PayGo model should occur.

Recommendation 23

The ATA Council calls on the NTC to ensure that the outcomes of the NTC's Charges Review achieves equity between combinations, such as B-doubles, B-triples and BAB quads, with vehicles of similar characteristics such as 9 axle truck and dog combinations, and road trains.

Recommendation 24

The charges review should not disadvantage particular sectors or regions including, rural, regional and remote operators and their communities, by maintaining recognition of CSOs and current outcomes, and applying them as appropriate to safer combinations.

Recommendation 25

The NTC explore the options of establishing agreed principles to encourage national consistency on concessions.

4.12 NHVR funding

The NTC have noted implications for charges with the introduction of the NHVR and HVNL. These include the treatment of mass and compliance cost currently included in the cost base, IGA agreed costs and the creation of a single set of registration charges.

The ATA would like to see the NHVR provide content and consult with the NTC in the review on the implications of NHVR operations and HVNL.

Additionally, it is important that industry is made aware of the repercussions for NHVR funding decisions at the time ministers consider the NTC paper/RIS.

Recommendation 26

NHVR provide high level input into the NTC review.

Recommendation 27

Industry should be made aware of the implications of NHVR funding decisions on heavy vehicle charges.

Appendix A: Commonwealth revenue calculation for PayGo model versus December 2011 registration figures, using 2013-14 RUC

Combination	PayGo raw population figure	Fuel usage 000	Fuel usage per vehicle	PayGo population figure (summed)	ATA Population	PayGo total fuel usage	ATA total fuel usage	PayGo fuel revenue (26.14cpl)	ATA fuel revenue (26.14cpl)
Rigid trucks						litres 000'	litres 000'	\$000'	\$000'
2 axle: no trailer: 4.5-7.0t	47,278	161,727	3.4						
2 axle: no trailer: 7.0-12.0t	86,401	458,785	5.3	133,679	170,042	620,512	789,302	162,202	206,324
2 axle: no trailer: >12.0t	52,356	331,052	6.3	52,356	58,842	331,052	372,064	86,537	97,257
2 axle: with trailer <42.5	16,187	124,238	7.7	16,187	10,856	124,238	83,322	32,476	21,780
3 axle: no trailer: 4.5-18.0t	11,243	133,509	11.9	11,243	1,840	133,509	21,850	34,899	5,712
3 axle: no trailer >18.0t	35,975	445,857	12.4	35,975	53,951	445,857	668,643	116,547	174,783
3 axle: with trailer: >18.0t	5,006	93,402	18.7	5,006	16,815	93,402	313,734	24,415	82,010
4 axle: no trailer: 4.5-25.0t	1,942	27,053	13.9	1,942	36	27,053	501	7,072	131
4 axle: no trailer: >25.0t	4,965	83,082	16.7	4,965	10,108	83,082	169,143	21,718	44,214
4 axle: with trailer: >25.0t	237	19,290	81.4	237	1,731	19,290	140,890	5,042	36,829
Heavy Truck trailers over 42.5.t	9,225	306,489	33.2	9,225	9,752	306,489	323,998	80,116	84,693
2 axle PM									
Artic trucks: > 6 axle rig (not elsewhere classified)	1,943	106,630	54.9						
Artic trucks: single trailer: 3 axle rig	1,692	18,068	10.7						
Artic trucks: single trailer: 4 axle rig	3,048	61,200	20.1						
Artic trucks: single 3 axle trailer: 5 axle rig	1,942	46,958	24.2	8,625	6,206	232,856	167,548	60,869	43,797
3 axle PM									
Artic trucks: single 2 axle trailer: 5 axle rig	12,298	374,809	30.5						
Artic trucks: single trailer: 6 axle rig	31,228	1,307,622	41.9	43,526	47,893	1,682,431	1,851,231	439,787	483,912
All other PMs									
Artic trucks: B-double: <9 axle rig	1,824	146,705	80.4						

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Artic trucks: B-double = or > 9 axle rig	11,777	1,235,048	104.9						
Artic trucks: B-triple	410	35,777	87.3						
Artic trucks: Road train: 2 trailers	4,286	316,410	73.8						
Artic trucks: Road train: 3 trailers	1,068	141,706	132.7	19,365	34,165	1,875,646	3,309,137	490,294	865,009
SPV									
Special Vehicles/Other trucks	13,195	51,940	3.9	13,195	107,426	51,940	422,865	13,577	110,537
BUS									
2 axle:GVM 3.5 to 4,5 tonne	4,577	14,398	3.1						
2 axle: GVM 4.5 to 10 tonne	14,425	72,055	5.0	19,002	16,094	86,453	73,223	22,599	19,140
2 axle: GVM over 10 tonne	19,815	327,987	16.6	19,815	14,442	327,987	239,051	85,736	62,488
3 axle	2,242	64,514	28.8	2,242	8,440	64,514	242,863	16,864	63,484
articulated	445	9,295	20.9	445	1,254	9,295	26,193	2,430	6,847
Total	397,030			397,030	569,893	6,515,606	9,215,557	1,703,179	2,408,947
								Difference in revenue	705,767

Source: PayGo figures: Table 15. PayGo Scenario B usage and cost allocation data (for recalculated 2012-13 charges) page 37 of NTC Heavy vehicle charges – Report to the Standing Council on Transport and Infrastructure February 2012

ATA figures: December 2011 heavy vehicle registration figures. See Assessment of Actual Heavy Vehicle Registration Population Data against the NTC PayGo Model, 2011, for further details.