

NATIONAL ROAD FREIGHTERS ASSOCIATION



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National Transport Commission

Public submission –

Developing a Heavy Vehicle Fatigue Data Framework Discussion Paper

Level 15/628 Bourke Street

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By way of introduction, the writer has been involved in the Australian Transport Industry as a heavy vehicle operator “driving and maintenance” since 1968. Throughout that time I’ve been involved in livestock haulage, general interstate freight, bulk explosives manufacture and haulage and multi combination road train tipper rural operations.

Key points on data collection.

1/ This Association, along with retired chair of the ATA David Simon have been calling for a number of years for the Australian Transport Safety Bureau. “ATSB” to have funding made available to investigate **all** serious heavy vehicle accidents. Without the independence, incredible ability and resources of the ATSB at reconstructing accidents a reliable and thorough file, will never be compiled as to the cause of heavy vehicle accidents. This is the only true and reliable way forward with assessing accidents.

2/ Training of police officers to collect data. While many police officers are very good and totally unbiased in their line of duty, there are numerous officers who are extremely biased against Road Transport and therefore it is a belief of the writer, for the cost of training the reliability of the information gained could be questionable.

3/ In vehicle cameras. While in vehicle cameras may provide a method of gaining some information I believe even they are questionable. Firstly, they can cause intimidation. Secondly because cameras are focused on the driver’s eyes they encourage the driver not to check his gauges and surrounds, as to do so triggers the recording of a sleep event. This is fact as the information has been gained from a number of truck drivers operating vehicles that are camera equipped in the mining industry. Additionally, should a driver have a sleep event in which their head goes back the equipment does not record a sleep event. Gauges are in a vehicle for a reason. They warn of situations to the vehicle and should be checked regularly as often as every 10 minutes. I believe this also encourages a bad attitude to checking gauges.

4/ 28 day snapshot. Thought should be given to collecting this data from any intercepted driver. Care should also be taken so as not to give authorities another reason to pull trucks up. Companies who have gone to the expense of fitting satellite tracking want those wheels rolling, that is the reason the Telematics have been fitted. Needless delays by intercepting offices could cause drivers to push the boundaries to reclaim time when they should be pulling up for a non-regulated break.

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Additional suggestions.

1/ Credibility of persons offering information on fatigue. While fatigue experts can offer an insight into fatigue the only persons who are completely expert on the subject in the transport industry are those who have operated in a wide selection of criteria for a long period. The transport industry is unique in that there are numerous issues which can create fatigue. Any and all discussions on fatigue in this industry should and must involve very experienced persons who have been involved in the industry for a long period of time.

2/External studies. I note comment from external studies such as "Alertness C RC" are mentioned a number of times throughout the paper. Firstly, once one rises from bed in the morning they are subject to fatigue. Secondly, driving any vehicle or doing anything causes fatigue. Thirdly, driving most modern heavy vehicles on the open road creates no more fatigue or maybe even less fatigue than driving a car towing a caravan. I strongly suggest caution when using external studies from third parties. These people all have a motive and generally it is to sell their wares.

In closing I thank the NTC for the effort and sorting out this serious issue. There is much more I could do but unfortunately time prohibits it.

Yours sincerely

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