



30 September, 2011

Mr Nick Dimopoulos  
Chief Executive Officer  
National Transport Commission  
L15/628 Bourke Street  
MELBOURNE VIC 3000

Via email: [mbereni@ntc.gov.au](mailto:mbereni@ntc.gov.au)

Cc: Mr Tony McMullan, Truck Industry Council

Dear Mr Dimopoulos,

**Subject: TIC Submission to “A national framework for modular B-Triple operations”  
Discussion Paper August 2010**

### **Introduction**

The Truck Industry Council (TIC) is the peak industry body representing manufacturers and distributors of heavy commercial vehicles (that is, with Gross Vehicle Mass above 3,500 kg) in Australia.

TIC member companies supply heavy commercial vehicles to the Australian market today that represent significant improvements in levels of safety and environmental performance when compared to those trucks available just a few years ago. A majority of TIC members produce at least one model truck designed for the 26-m B-Double market, and with little or no change to specification, will be suitable for use with the proposed modular B-Triple standard.

TIC and several of its member companies have been consulted on multiple occasions to provide input into the project and Discussion Paper, however a number of comments and recommendations are provided in this submission to assist the NTC with the final stage of development of the modular B-Triple policy.

### **General Comment**

TIC supports initiatives that will assist governments to achieve their safety and environmental objectives. Such initiatives that also deliver productivity benefits and assist with modernizing

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the national truck fleet are rare, and should be pursued to benefit all stakeholders. The NTC is commended in its efforts to develop a B-Triple vehicle combination that will assist Australia achieve its freight task growth projections over the next 20 years. The Discussion Paper clearly identifies substantial safety, environmental and productivity benefits arising from a moderate national introduction of the modular B-Triple concept. Further, the requirement to start with the components of a 26-m B-Double combination will ensure that modular B-Triple operators will update (in many cases) to late model vehicles to ensure compatibility. This will lead to a reduction in the average age of the truck fleet, especially in the heavy articulated segment.

### Specific Comments & Recommendations

1. **Key Requirements. (4.2)** TIC strongly supports the simple, short list of key requirements for the proposed national modular B-Triple. That is:
  - a. **Configuration.** The requirement to create a legal 26-m B-Double from the prime mover plus either of the A-Trailers and the B-Trailer is logical and offers maximum flexibility to operators.
  - b. **B-Double Compatibility.** This requirement ensures that the prime movers will have, as a minimum, a Front Under-Run Protection System (FUPS), a minimum exhaust emissions level of ADR80/02, a cabin strength certification to ECE R29 and Anti-Lock Braking System (ABS). Accordingly, the permissible prime movers will already be significantly safer than over 40% of those still on the road due to the availability of these and other advanced technologies now in today's trucks.
  - c. **Overall Length.** TIC supports the 35-metre overall length requirement, which is demonstrated to be satisfactory for the majority of likely component lengths. While this will not be consistent with overall length of some B-Triples already in operation under permits, it will allow operators of new B-Triple combinations a wide variety of prime mover and trailer sets.
  - d. **Kingpin to Rear Dimension.** The requirement for this dimension to be no more than 29.6 m, and therefore allowing the use of most prime movers used in 26-m B-Double combinations, allows for maximum flexibility and operator choice of vehicle.
  
2. **Mass Limits.** TIC supports mass limits that stay within General Mass Limits (GML) or Concessional Mass Limits (CML) for B-Triple combinations (i.e. 84.0 tonnes or less). This will reduce the possibility that some vehicles may be excluded from the modular concept unnecessarily. Access for vehicles reaching Higher Mass Limits (HML) would increase the maximum permissible GCM rating to more than 90 tonnes, which would exclude many prime mover options on performance and mass rating considerations, therefore limiting the modularity concept.

3. **Access Routes: Initially and into the future.** TIC believes that safer, more environmentally friendly combinations should be given as broad road access as possible, especially on those routes featuring a continuous length of two (or more) lanes on each side of the road. However, it is acknowledged that the NTC's strategy to maximize the chances for adoption of the modular B-Triple concept nationally is to begin with Type 1 Road Train routes. While this first step will be a good achievement in itself, TIC supports rapid expansion of the permitted B-Triple route network to include the majority of inter-capital highways (e.g. Melbourne-Sydney, Melbourne-Brisbane, Sydney-Adelaide and Melbourne-Adelaide). It is extensive use of modular B-Triples on the expanded route network that will provide the most significant safety, environmental and productivity gains.
4. **Adoption of 35-m Modular B-Triple as the national standard.** TIC strongly supports the adoption of the modular B-Triple with 35-m overall length as a national standard, and therefore permitted in every jurisdiction without individual permit. The National Heavy Vehicle Regulator (NHVR), when commencing operations in 2013, would be the obvious entity to administer national rules and regulations concerning modular B-Triples.
5. **Intelligent Access Program (IAP) considerations. Consistent with the NTC recommendation,** TIC does **not** support the mandatory inclusion of an IAP system on board all modular B-Triple combinations. The IAP is still being developed, and does not yet feature mass or trailer monitoring over the total combination. Therefore the use of IAP will currently require the driver to self-declare when the prime mover is towing three trailers or two. Further, the "base" prime mover for 26-m B-Double operations does not require IAP, except in special circumstances in some states, therefore the modularity concept would be compromised. Finally, original equipment technology that may meet IAP requirements is still under development in the home markets of many TIC members; since we are a technology taker in the Australian market, TIC would prefer to wait until on-board telematics is a standard feature before considering a mandatory IAP requirement.
6. **Performance Requirements (4.3.4).** TIC supports the 10% startability requirement at the maximum General Mass Limit of 83.0 tonnes GCM, however a maximum gradeability figure (stated as 12%) without specifying a speed is not very useful. TIC would prefer to see a requirement matching that of B-Doubles for gradeability; i.e. able to climb a 1% grade at 70 km/h or more at maximum GCM. It is understood that this requirement was the basis for the minimum 500 HP power rating, however TIC members would prefer to see the requirement explicitly stated rather than just a

maximum power figure, which does not account for torque levels and at which engine speeds these are generated.

- 7. Identification.** Careful consideration should be given to a plate or label affixed to the prime mover that indicates compliance with all the requirements of the national modular B-Triple rule. This may simply be additional text to the existing B-Double certification plate, however TIC requests that any ID plate or label be consistent nationally, and mutually recognized across all Australian jurisdictions.
  
- 8. Vehicle life and warranty considerations.** While TIC members develop their products as much as possible to suit the Australian market, they use components developed for overseas markets where operating GCM levels of 70 tonnes and higher do not exist. Therefore, it is reasonable to expect that all major components (engines, transmissions, drive shafts, axles, brakes, cooling systems) of trucks used in B-Triples will experience accelerated wear rates when compared to the same trucks used in B-Doubles and semi-trailers. This will be taken into account by TIC members in offering warranty, service intervals and calculating life expectancy of some components, when used for B-Triple service.

I trust that you and the Commission find this feedback constructive, and a useful basis for further discussion. The strong relationship and open dialogue between the NTC and TIC is appreciated and I trust that it will continue.

This submission is the result of consultation with all TIC members, and therefore represents the combined views of TIC member companies. A current membership list can be found at <http://www.truck-industry-council.org/content.php/category/id/2>

Please contact the undersigned, on 0427 554 775 or [shumphries@truck-industry-council.org](mailto:shumphries@truck-industry-council.org) for any questions about this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Humphries', is enclosed within a thin black rectangular border.

**Simon Humphries**  
Chief Technical Officer