



ROAD TRANSPORT FORUM NEW ZEALAND INC

ROAD TRANSPORT FORUM NEW ZEALAND'S RESPONSE TO THE HEAVY VEHICLE ENTRY CERTIFICATION REVIEW PROPOSED RECOMMENDATIONS

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AUGUST 2018

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REPRESENTATION

Road Transport Forum New Zealand (RTFNZ) is made up of several trucking associations for which the Forum provides unified national representation. The Forum members include Road Transport Association New Zealand, National Road Carriers, and New Zealand Trucking Association. The affiliated membership of the Forum is some 3,000 individual road transport companies which operate 16-18,000 trucks involved in road freight transport as well as companies that provide services allied to road freight transport.

The Forum is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 22,600 people (3.0% of the workforce), has a gross annual turnover of \$6 billion and transports about 70% of New Zealand's land-based freight on a tonne/kilometre basis.

RTF interest in the entry certification review

Initially RTF elected not to participate in the review of entry certification because the Forum viewed the re-development of the entry certification process as being largely applicable to manufacturers, suppliers and engineering certifiers of heavy transport vehicles. We did confirm we would be interested in commenting on the proposed outcomes when they became available.

Since that time RTF has been involved in discussions with NZTA on the implementation of the Weigh-rite initiative, the PBS project, and the potential for

improvements to HPMV/50MAX permitting and HPMV mapping and route access.

It became obvious fairly quickly that if costs were to be reduced within the permitting system and processes streamlined and the Weigh-rite programme achieve design maturity, the critical component required to underpin each of these aspects was the capability to correctly identify the vehicles involved. This would involve confirmed dimensional, component compliance characteristics and permit status.

RTF therefore applauds the 4 proposed outcomes set out on page 6 of the proposal document. From our perspective the most critical outcomes are 1 and 4 and how they are implemented to support the objectives discussed above.

Proposed implementation (Page 7)

We note the reference to the 3 step process and in principle agree with the concept. However, we question where collateral benefits of an improved entry certification scheme sit within the 3-step process. To revamp the process on the basis of current functionality and user interfaces is to perhaps short sell the benefits of a more green field approach that could be used to support the data processing requirements alluded to above. We also note the aspiration to not leave any potential benefit or opportunity unrealized however the two or three-year time frame has to be of concern when some of the other NZTA initiatives mentioned are expected to be delivered in the next 12 to 18 months. RTF would like to see the evaluation implementation process expedited more quickly.

Discussion question 4. Outcome 1 (page 8)

From our perspective the discussion options in this section reflect clearly the entry process and involvement of Landata interface user practitioners that are outside NZTA. Because the RTF members are not participants in this data processing and data management space it sits outside our specific sphere of interest. However, from a purely observational position the 10 elements outlined should provide the confidence needed to make the certification process and data management process function correctly and reliably.

Outcome 2 (page 8)

The objectives of objectives 11 to 20 present a rational approach to ensuring the users have adequate knowledge and capability to use the system. Objective 12 is a laudable objective e.g. the purchase template but this has never succeeded in the past despite the efforts of ourselves and TTMF to introduce such an approach. Most operators are quite transient in the way they conduct options to purchase and there will inevitably be some difficulty to address the fluidity of that particular process. We question whether this is an area NZTA should even be considering as part of the re work of the certification process. Conversely an official Statement of Compliance would be nice to have option but this only becomes meaningful as part of the actual purchase documentation.

Under objective 13 discussion is centered on electronic record keeping. The recent Wastney and drawbar/drawbeam certification revocation process showed the weaknesses of the present Landata system to correctly identify components and vehicles and any relationship between the two. RTF supports certifiers and inspectors keeping electronic files on record but are of the view engineering certifications including all supporting information such as calculations and drawings and schematics as well as photographic evidence must be kept in single repository managed or overseen by the Agency. This approach would enable recalls to managed with a higher degree of confidence than at present as well as provide an improved opportunity for the Agency staff to audit certifier service providers and their work. It also would tidy up an age-old problem of custody of certifier records when a certifier ceases to practice for whatever reason. Pretty much everything else in Outcome 2 falls within the scope of the certifier community to manage with the Agency setting appropriate expectations. Interestingly we see no realistic scope for NZTA to correct the current situation where engineers are not attracted to the mechanical engineering discipline despite the demands for more capacity although Robert Brodnax touched on this at a recent meeting of the RTF board.

Outcome 3 (page11)

It's hard to disagree with any of the 8 objectives outlined in Option 3. Overall, we would see most of them falling into the business as usual category of the Agency's work streams. Objective 25 is an interesting objective and we would have thought the Agency would have had the ability to take action for negligence well sorted out. A number of the Rules include statements that allude to some penalty regime for inadequacies by certifiers so it somewhat surprising nothing to back these statements up exists other than the revocation option. The problem is that anything that results in some sort of penalty for certifiers invariably impacts on the operators and owners of the vehicles they have certified. The issue then arises if the Agency acts unilaterally against a certifier the collateral cost and business impact falls on the clients, that is the transport operator. Any penalty mechanism needs to be thought through and more importantly the key action should be focused on correcting the faults whatever they are at the derelict certifiers cost.

Typically, the programme for reviewing of Rules falls within the scope of the Agency. In terms of priority setting of Standards for review the certifiers are probably in the best position to provide guidance. The Agency needs to be better equipped to see the need and act according when a particular Standard required amendment or updating. This suggests a more flexible approach to updates and revisions might need consideration as its imperative that Standards are fit for purpose.

Outcome 4 (page 12)

This section of the document goes right to the crux of the issues particularly with respect to the management of information in Landata (or whatever the platform might be called) and the quality and reliability of information contained there-in.

If the objective is to build an entirely new heavy vehicle database then the opportunity presents itself to integrate the new system with an interface option that would support permitting and compliance assessment for mass and dimensions and further support the new weigh-rite screening system for heavy vehicle combinations. This particular suggestion takes the discussion back to our

opening comments and yet from reading the review document in its entirety we get the impression that what we are suggesting might in fact be a step too far.

None-the-less the principle concepts touched on above were discussed at a recent HPMV/50 MAX problem solving meeting held at NZTA where it was clear resolving many of the issues confronting the permit fleet and improving route and access management and compliance depended heavily on accessing the correct and appropriate vehicle attribute data associated with each specific permit approved combination. CVST also understood the need to move to a heavy vehicle information platform that was many steps more sophisticated than the present Landata model to improve their enforcement capability.

From that discussion it is necessary to distill the key vehicle characteristics that need to be imbedded in Landata to achieve the interface performance of the data base to be able to provide an enhanced compliance, permitting and on road vehicle management system. The success of this approach hinges on the quality of the information held by the database. However, the information currently held is based on individual vehicles identified by registration number with the VIN being a secondary identifier. A first issue might be to reverse the significance of these two numbers although realistically the registration identity might still remain the primary access query point for Weigh-rite and on road compliance as well as automated permit application processing.

The database needs may also require a two-part approach to recording the vehicle in the data base; once when the plates are issued and again when the as built vehicle is placed in service. This latter process would require a full menu of vehicle dimensions including axle spacings and tow coupling positions to be recorded here as the issue of the number plate would include verification of the primary attributes such as compliance with international standards. Engineering attributes such as tow coupling ratings, brake or chassis modifications and load anchorage rating sand any specific ratings associated with fitted body would be recorded at the pre-deployment stage. We suggest the vehicle be photographed front rear and side and this digitized file be attached to the vehicle record. This option is used in some overseas jurisdictions.

We note the USA system provides for first or primary certification, then secondary or intermediate certification and final certification. These processes and the respective certifier obligations are documented in small book titled; The Truck Equipment Handbook published by the National Truck Equipment Association: Livonia, Michigan.(NTEA) The version we have is a little out of date but we are sure there are other sources of information that lay out the process and explain how components added to a truck or trailer chassis are recorded and certified until the finished vehicle reaches the point of customer acceptance.

There are also established form for incomplete vehicles. (NTEA sells an updated guidance manual on its website).

It is only with the suggested level of detailed information discussed above will it be possible to automatically populate a permit application for HPMV or 50 MAX combination. The dimensional data will be used to support the application by drawing from the vehicle attribute information recorded pursuant to each registration number and marrying together the dimensions whether there are 2 or 3 vehicles in the combination. If this capability could be delivered this is huge step forward from the manually intensive approach we have now that presently requires an independent engineer to document the combinations attributes and remeasure everything recording this information on an attributes sheet which then accompanies the permit application.

From what we are putting forward it is easy to see that number plate recognition (NPR) (with Weigh-rite) could work seamlessly with the database by filtering out vehicles that might warrant closer inspection. The process would be enhanced if the permit approved vehicle combinations could be identified by permit number and also aligned with their current RUC licence status. The RUC licence status alignment should apply to all RUC vehicles irrespective of whether they are operated under permits or not.

Discussion question 7

We think our comments above regarding the two-step approach and our

reference to the US system probably answer the key points sought by question 7.

Discussion question 8

The difficulty is deciding what comes first. Landata as data base should have sufficient fields available to hold a lot more information than is presently collected. The first step is providing that capacity. The vehicle details such as dimensional and certification characteristics will involve additional administrative and processing costs for purchasers and vehicle owners but from a national data management perspective the benefits for the commercial sector probably outweigh those costs.

Concluding comments

Because we aren't first hand users of Landata it is almost futile for us to try to comment on some aspects of the proposals and the processes. Alternatively, RTF has some obvious views about future capability we would like to see introduced. The structure of the review document has helped confirm our aspirations into some sort of cohesive order that we hope will enable the new data base to provide a wide range of collateral benefits for the Agency and transport industry.