



NATIONAL ROAD TRANSPORT ASSOCIATION

Submission to the National Transport Commission

**HVNL Review: Consultation Regulation Impact Statement: Fatigue, including
Fitness to Drive**

30 September 2020

Introduction

1. The National Road Transport Association (NatRoad) is pleased to make comments on the HVNL Review Consultation Regulation Impact Statement (CRIS)¹ prepared by Frontier Economics and published by the National Transport Commission (NTC) on 25 June 2020. This is the fifth submission in a series of submissions on the CRIS. The submissions generally follow the chapter headings of the CRIS.
2. We also note the publication of the NTC document *HVNL 2.0 A Better Law Scenario*² (Better Law) That document sets out one possible scenario for a future law.
3. NatRoad is Australia's largest national representative road freight transport operators' association. NatRoad represents road freight operators, from owner-drivers to large fleet operators, general freight, road trains, livestock, tippers, car carriers, as well as tankers and refrigerated freight operators.
4. This submission responds to some of the issues raised in Chapter 8. Whilst the immediately prior submission related to Chapter 6, the subject of accreditation and operator licencing dealt with in Chapter 7 is likely to be the last submission made by NatRoad given that accreditation should be reflective of the other elements of any restructured Heavy Vehicle National Law (HVNL). Similarly, whether any scheme of enrolment or licensing system is needed is contingent on the terms of the revised HVNL so as to be a matter to be considered at the end of the current process.
5. NatRoad members have provided feedback that reform to this area of the law should be given priority, including that there should be an acceleration of this area of reform that could proceed ahead of the main restructuring of the HVNL. At the least we seek a freeze in the indexation of fines for minor, administrative offences connected with the current fatigue management regime or, indeed their timely abolition.

Fundamental Change Needed but the CRIS Adopts an Imprecise Focus

6. As we emphasised in submissions relating to fatigue in the earlier process of responding to the NTC's Issues Papers, the current fatigue system is broken. Tinkering is not an adequate response. Incremental reform is not appropriate. Administrative controls don't work to optimally manage fatigue and the nexus between those controls as a fundamental underpinning of the law and proper fatigue management must be disconnected. There must be a focus on outcomes. Essentially, the framing of fatigue as a work health and safety issue in the context of the revised HVNL must more closely follow the work, health and safety management of fatigue successfully implemented in Western Australia (WA).
7. As indicated in the Better Law document, the law must be reshaped so that the revised HVNL "better aligns fatigue management with fatigue risk."³ In the current context the Better Law document sets out the options in a clear and well-presented way whereas the CRIS lacks cohesion: member comments are that it is "clunky", "hard to follow" and not "industry-focused.". We have therefore decided to concentrate on an analysis of the options presented

¹ https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.ntc-hvlawreview.files/5715/9304/9833/HVNL_RIS_25_June.pdf

² <https://www.ntc.gov.au/sites/default/files/assets/files/HVNL-2.0.pdf>

³ Id at p13

in Better Law as extracted from the CRIS but presented in a more cohesive and clear form when compared with the CRIS discussion.

8. The CRIS touches on a number of issues that are either truncated or which need to be better sourced and integrated. It is as if there have been hurried edits that add to the issue of lack of coherence. For example, when articulating the current problem with the fatigue laws, the discussion touches on rest stops (or rest areas) and says: “In addition, it has been recognised that there is a shortage of suitable rest stops across Australia for trucks which can make complying with prescriptive limits difficult.”⁴ The source of that proposition is not disclosed: this is because footnote 99 in the CRIS indicates it is the same source as for footnote 98 which is, however, a reference to a section of the HVNL and cannot possibly be the appropriate source for the proposition.
9. The lack of adequate rest areas is a highly problematic issue and **does** rather than **can** make compliance difficult in practice. This important topic is integral to proper fatigue management being undertaken and would have been open to quantification (rest areas by State or Territory and what distance from the prior rest area they occur and how and when their construction is integrated with infrastructure spending) and linked to research in this area, particularly the important US study that shows that more frequently placed rest areas has a major, positive impact on fatigue-related accidents.⁵
10. This critical element of managing fatigue has led NatRoad to the policy that in the construction of new or upgraded road infrastructure it should be mandated that heavy vehicle rest stops are incorporated in any tender and must become a mandated component of construction. Members have commented that there appears to be a “lack of thought” about this issue in the design phase of road construction. Plus, as there is a dearth of rest areas, there needs to be sufficient flexibility in the fatigue laws that would permit drivers to access rest areas that would enable better sleep rather than have a strict counting of hours (as reflected in the current law) that does not provide them with that flexibility.

Compliance and Enforcement Issues

11. The seeming lack of engagement with the compliance problems that confront operators who must comply with both non-HVNL and HVNL issues (mentioned critically in the first NatRoad submission in this stage of the review) is again confronted in the CRIS in this chapter.
12. The CRIS says:

As a final note the HVNL fatigue management requirements do not apply in Western Australia or the Northern Territory. These inconsistencies could further complicate the compliance and enforcement environment for interstate operations in relation to fatigue. For example, for journeys between jurisdictions that do and don't participate, operators must comply with both jurisdictions' requirements. They also must maintain records under the HVNL, even when

⁴ Above note 1 at p98

⁵ Bunn, Slavova and Rock *Association between commercial vehicle driver at-fault crashes involving sleepiness/fatigue and proximity to rest areas and truck stops* (2019)
<https://www.sciencedirect.com/science/article/abs/pii/S0001457517304189>

they aren't in participating jurisdictions. The extent to which this is a problem is unclear, for example, in the Northern Territory an operator can continue to manage driver fatigue in accordance with the option they operate under in the HVNL⁶

13. The last sentence, in particular, has prompted negative feedback from NatRoad members. Operators in the Northern Territory (NT) don't continue to operate under the HVNL "option." It is unsuitable. There is no evidence that they adopt it in their NT operations. Further, the inconsistencies do complicate compliance and enforcement. Dual compliance is unnecessary, complex and cost-ineffective. That should have been a matter of little consequence to verify.
14. The passage extracted at paragraph 12 above has elicited a response from members that is unfavourable typified by the following received from one member:

Fatigue management is a key driver of on-road safety and there must be one set of regulations in force nationally. The Legislation being considered is the NATIONAL Heavy Vehicle Law: how can that law not cover 50% of our mainland area? I quote 'these inconsistencies COULD complicate compliance' No, these inconsistencies DO complicate compliance. Again "the extent to which this is a problem is unclear'. Nonsense, the extent to which this is a problem is perfectly clear to operators: they have to juggle conflicting and unworkable regulations as they cross borders trying to manage a safety factor which does not recognize borders and transcends those borders. It is blatantly stupid to have a core safety regulation which mandates different rules and processes based on a border crossing. There must be a consistent regulatory process which covers all operating conditions irrespective of State. The NATIONAL Heavy Vehicle Law MUST apply Nationally. The whole point of this review is to replace an outdated poorly conceived conglomeration of superseded state-based regulation with a single consistent national regulation. One would hope that embraces the selection of the best parts of existing regulation irrespective of source and produces a single cohesive new Law. If that cannot be achieved, we have wasted everyone's time, commitment and fervent hope for a safer industry.

15. Despite the fact that a review of enforcement has been foreshadowed to occur at a later time, the chapter dealing with fatigue in the CRIS is intertwined with discussion of enforcement. We reiterate the criticism of the CRIS set out in the first, third and fourth NatRoad submissions that enforcement is not analysed in the CRIS, albeit a further review is anticipated. In the current context, there is a perception that, for example, breaches of pedantic diary requirements are used for revenue-raising purposes (to which point see Tabler 1 and 2 below). They stand as a blight on the working career of heavy vehicle drivers, a sentiment recently encapsulated in a NatRoad media release.⁷

Work Diary Reforms Supported and Reframing of Offences Required

16. As expressed in the media release referred to in the prior paragraph, infringements for minor breaches of clerical requirements (not drawing a straight line, for example) should not be used as a revenue-raising device based on miscalculation or clerical error when these matters have very little to do with proper management of fatigue: if office workers were fined the recently revised amount of \$171.00 every time they made a clerical error there would be an uproar in most workplaces. Yet that is what heavy vehicle drivers face every day. This would be an easy manner to quantify, we would have thought, in order to frame reform measures against current costs. These costs of maintenance and breach act as a

⁶ Above note 1 at p 98

⁷ <https://www.natroad.com.au/news/natroad-opposes-hvnl-penalties-set-increase-1-july-2020>

drag on efficiency and disincentives to starting in employment as a driver and disincentives to remain in employ. These were reflected in the case studies presented in the NatRoad submission on the NTC fatigue Issues Paper and in the Issues Paper itself. We call for a freeze on their indexation whilst the law is reviewed, as anticipated earlier in this submission, or their timely separate review and abolition.

17. NatRoad sought data from Transport to NSW (TfNSW) in order to inform the discussion about the number of fatigue offences issued over time. That data reveals heavy vehicle fatigue incidents and notices are triggered by:

Heavy Vehicle Intercepts via heavy weighing stations, special operations or on-road enforcement. Notices are issued manually by inspectors. This would include items such as failure to provide work diary details, not recording items in work diary, driver direction due to driving more than standard maximum times permitted and the various other current offences; and

Safe-T-Cam (STC) automated monitoring system. This is a system-generated incident which identifies a potential offence. All fatigue-related offences are detected by the STC program and monitored by TfNSW through an adjudication process that requires administrative input by operators.

18. TfNSW advised as follows:

Intercepts (heavy vehicle intercepts)

There were 3,554 fatigue/work diary notices issued in 2019. There are four notice offence categories that exist – see below table. For example, a driver may be intercepted by a heavy vehicle weighing station and identified that he/she has driven longer than the permitted time based on work diary entries. The driver is then directed to take a rest at a location. Fatigue/work diary notices represented 7.11% of all notices issued in 2019 (see below Table 1). Over time, despite the number of total notices falling, fatigue notices have increased as a percentage of total notices issued: shown in Table 2.

Table 1	
Offence Notice Category	2019
Fatigue	2,806
Fatigue/Work Diary	2
Driver Direction	371
Fail to Provide Details	375
Total	3,554

Table 2 Offence_Defect_Category	2015	2016	2017	2018	2019
Fatigue/Work Diary	5.45%	5.97%	6.07%	6.77%	7.11%
Fatigue/Work Diary	3,824	4,450	4,461	4,558	3,554
Total notices	70,215	74,487	73,451	67,284	49,976

The safe-T-Cam automated monitoring system uses digital camera technology to monitor heavy vehicle movement. This technology provides data relating to driver fatigue. In 2019 a total of 1,921 notices were issued.

19. The CRIS contains only one reference to the use of cameras. It is not an analytical statement and is as follows:

*The NHVR's Intercept app and national cameras assist authorised officers with roadside vehicle intercepts. The NHVR believes that technology and data will play a key role in its future compliance and enforcement strategies.*⁸

20. The NatRoad submission on the earlier NTC *Effective Enforcement* Issues Paper detailed a number of problems with the current camera systems in use for enforcement, particularly in relation to fatigue. We said in relation to their use that a number of questions should be answered during the course of the review. These are repeated here:

*A number of questions arise that the NTC should be concerned with: What is the timing for the roll-out of a National Camera Network? Will the "new technology" cameras outside of Safe-T-Cam "talk" to the Safe-T-Cam cameras now and in the future? If not, as we suspect, what linkages between the two systems will be made? Can either set of technology be programmed to detect vehicles owned by operators who have qualified for BFM or AFM or whatever manifestation of these fatigue regimes survives the review? Surely that should be a simplified process under a national registration plate system currently being rolled out, with the criticism of that system outlined in detail by NatRoad in the submission on vehicle standards? Is it intended to apply the camera system in a manner currently confronted in the measurement of following distances ie applying these rules as strict liability offences even where no safety issue is palpably at issue? Why doesn't the HVNL better regulate camera use, taking into account all of the issues about privacy and other sensitivities about data set out in the Issues Paper?*⁹

21. These questions remain. They should be dealt with at some point in the review. We note the concerns about detecting various fatigue regimes (AFM, BFM) should there be introduced a similarly tiered system as is currently in place. The camera system generates a large number of Notices to Produce which are a drag on the efficiency of road transport

⁸ Above note 1 p63

⁹ NatRoad submission 31 October 2019 https://www.ntc.gov.au/submission_data/704 at para 52

operators: see Attachment A where this is gauged at \$200.00 per Notice. This is a subject that needs much greater attention. It falls into the category of technology which should assist the driving task but which currently represents an administrative burden and raises issues where technology is used to punish rather than assist.

22. The CRIS proposes in Option 8.4 to simplify fatigue management record keeping. It proposes this stance saying:

*This option could remove or simplify prescriptive record keeping requirements and offences for simple administrative breaches for work diaries. Record-keeping would still be required **and work diaries could still be used to check compliance with schedules.***

Three key principles would apply if prescriptive work diaries were no longer required:

- *operators must keep a record of the driver's work and rest time. The record must be clear enough to demonstrate compliance with the relevant schedule*
- *records must be kept in a clear and systematic manner for a period of three years*
- *records must be provided to the NHVR or police on request.¹⁰*

23. Formal diaries should be discarded, as the discussion which follows argues. The CRIS also has an alternative mandated electronic diary option as Option 8.5. These 2 options are synthesised in the Better Law document.¹¹ It says that:

A simplified version of the existing national written work diary, or an approved electronic work diary, may be the base requirement for higher fatigue risk drivers who do not make use of fatigue monitoring technology.

24. In order to quantify the current costs of the written work diary on operators, NatRoad received from two large members a costing of the administrative burden on those operators of the current written work diary system. That case studies are at Attachment A. It verifies that the current system is a drag on the industry's efficiency and therefore productivity.
25. It is imperative that the current system be replaced. The propositions in the extract in the paragraph 23 are supported but the notion of a "work diary" should be discarded. As we mentioned in the submission on this matter in the earlier stages of the review:

The current highly detailed work diary requirements should be abandoned. The records to be kept should not be defined with the same level of detail as currently exists in the HVNL. The following is from the WA Code and NatRoad supports this form of record-keeping:

There is a requirement for the record to be "set out in a clear and systematic manner". As there are no prescribed forms or standard record keeping books for this purpose, the format of the record could be varied according to the type of workplace and the nature of the work. Where records are electronic, there should be a back-up copy in case the record is lost. Security measures should ensure the records are not altered.¹²

¹⁰ Above note 1 at p106

¹¹ Above note 2 at p14

¹² https://www.ntc.gov.au/submission_data/628 at para 27

26. As we mentioned in the relevant submission, so long as the records are “clear and systematic” those who seek to enforce the law have sufficient material against which to make an appropriate check rather than focusing on details that do not bear on the risk sought to be controlled. The form of the record should be irrelevant so long as it is accessible and able to be understood. Any revised HVNL should not set out formal requirements about the nature of the records required but instead detail the substance required to be recorded. That outcome would also subsume the distinction between paper and electronic records which, so long as the record was “clear and systematic” should suffice where the records reflected the substance of the law. Option 8.5 in the CRIS, making electronic diaries mandatory, is rejected as a solution. The substance is the key not the medium used for recording purposes. It is noteworthy that although mooted for some time the NHVR has not authorised any form of electronic work diary to date.
27. The CRIS concentrates on alleged difficulties in detecting breaches in the context of looking at work diaries¹³, thus once again elevating issues of compliance/enforcement over a focus on the actual industry problem.
28. NatRoad notes that the foregoing is reflected in the Better Law document where the discussion (not linked to a CRIS Option) indicates accord with the NatRoad policy and we endorse these statements:

*Fatigue records should be easy to produce and inspect, and recordkeeping requirements should be as simple as possible. The focus should be on minimising harm, not administration. That means simpler rules, clear links to safety and not penalising administrative errors.*¹⁴

Fatigue Management Based on Drivers, Not Vehicles

29. NatRoad commends the NTC on the way that the Better Law document sets out the discussion when broaching the CRIS Options 8.3(a) –(c). The option which emulates the WA system is NatRoad’s preferred stance, as was made clear in the NatRoad submission on the subject of fatigue made earlier in the review process.¹⁵
30. The Better Law document indicates that higher risk drivers would be covered by the revised fatigue laws and that the onus would be on those drivers and operators to show compliance or that they did not fall into one of these categories where drivers work:
- more than 60 hours per week;
 - more than once per week for more than 10 hours between substantive rests, or
 - more than once per week between midnight and 5 am.

These definitions reflect the WA system’s requirements.

31. NatRoad believes that the application of the WA system in its entirety should be considered as a future reform. That was argued extensively in the prior NatRoad fatigue submission. In

¹³ Above note 1 at p105

¹⁴ Above note 2 at p 14

¹⁵ Above note 10

that system, all commercial drivers are subject to the WHS based fatigue regime. This overcomes the problem of regulating a vehicle type that is fatigue regulated heavy vehicles as currently defined in the HVNL. It targets a driver's status instead. We cannot emphasise enough that this is the preferred future path. So, an adaptation to any revised HVNL would be to regulate all commercial heavy vehicles drivers who work hours as set out at paragraph 30 above.

Counting Time

32. NatRoad supports adoption of the WA system of fatigue management. That was made plain in earlier submissions to the NTC. The options in the CRIS flirt with this system in respect of the matters discussed above. But they do not provide the balance reflected in the WA system, such as set out in the 2019 Code of Practice *Fatigue Management for Commercial Vehicle Drivers*.¹⁶
33. We believe adoption of the WA system would align with the main statement in the Better Law document that is "prescriptive work and rest hours under the future HVNL should be easier to apply and better tied to rest."¹⁷
34. If the NatRoad position on the wholesale adoption of the WA system is rejected (albeit not considered in the CRIS, which adds to our disappointment with the document) then NatRoad would support Option 8.1 as summarised in the Better Law document. The work and rest requirements in the WA law could set the outer limits of hours and rest time. Outer driving time limits would be set in the HVNL. However, as summarised in Better Law, the HVNL would give the power to the NHVR to approve schedules that are equivalent or lower risk than the general schedule.
35. Risk assessments would therefore consider remote operations and perhaps be limited to certified operators to help mitigate risk, although the basis of that certification would need clarity. Schedules could be developed by the NHVR, or by operators, and then put to the NHVR for approval. An adaptation of this process could be supervised by the regulator e.g. approval schedules outside of those published could be approved by the regulator based on objective criteria such as installation of fatigue monitoring equipment, lane departure sensors installed and other factors that can be devised following the principal statute permitting the process to be set out in Regulations.
36. To the extent possible NHVR discretion should be limited by objective factors and its decisions would be appealable. As with a great deal of the proposals in this Chapter, the aforementioned option would need to be fleshed out and costed as it could be administratively cumbersome. Members are reluctant to have increased registration charges imposed in a system where these costs are already punitive, without clear cut benefits being demonstrated. Registration charges are of course the principal means of funding the NHVR currently.
37. The Better Law document concisely indicates the tenor of the CRIS where it says: "The HVNL should recognise the valuable role of fatigue and distraction detection technology (FDDT). Operators who use this technology should not be unnecessarily constrained by prescriptive

¹⁶ https://www.commerce.wa.gov.au/sites/default/files/atoms/files/fatigue_122019.pdf

¹⁷ Above note 2 at p 15

rules.”¹⁸ We agree. Further, the use of this technology should be one of the objective factors referred to in the prior paragraphs where the regulator’s discretion is truncated. Both the CRIS and the Better Law document indicate different rules might apply where a safety management system is demonstrably in place. In NatRoad’s view the documented application of such a system could be one of the factors that governs the NHVR approval process hence excluding the need to build an elaborate assurance system. In other words, the in-house application of a safety management system would be one factor that permitted the use of tailored fatigue schedules.

Fitness to Work

38. Section 8.5 of the CRIS chapter on fatigue also contains a discussion about reforms associated with driver health and fitness for duty. These are matters discussed by NatRoad in the prior submission on fatigue¹⁹ and also in our submission²⁰ responding to the NTC safe people and practices Issues paper.²¹ Driver fitness and competency are critical issues. In the context of competency, we reiterate what we said in the first submission made on the CRIS. The CRIS excludes licensing and registration reform. This is disappointing to say the least, especially as the licensing regime links inextricably with competence and therefore fitness to drive of heavy vehicle drivers commencing their careers.
39. NatRoad’s perspective is again one shaped through the WA system. In our submission on safe people and practices we said that the introduction of the flexibilities in relation to fatigue management requires concomitant disciplines. So, we had proposed that in the revised HVNL a heavy vehicle driver must hold a current medical certificate that confirms his or her fitness to drive a commercial vehicle. The medical assessment should be an annual requirement or on direction by an employer. In the current context, we would suggest that this be the subject of a cost/benefit study which could be properly undertaken when the reform elements are better known and the questions in the next paragraph clarified.
40. We note that in the Better Law document a shorthand summary of the CRIS’ options are set out and that the proposal is a driver medical standard would apply a medical fitness monitoring regime in a manner similar to that applied in rail.²² Why the rail regime was chosen is not discernible from the CRIS or from Better Law. As stated earlier, why not apply the WA system’s requirements? The choice here is not explained. In any event, we support the added disciplines of regular medical examinations of heavy vehicle drivers as a means to improve the industry’s safety and workers’ welfare and the cost and benefits of that step should be further explored in the review process.
41. Better Law indicates that:

¹⁸ Ibid

¹⁹ Above note 10

²⁰ https://www.ntc.gov.au/submission_data/561

²¹ https://www.ntc.gov.au/sites/default/files/assets/files/NTC_Issues_Paper_-_Safe_people_and_practices.pdf

²² Above note 2 at p16 cited in the CRIS as the National Standard for Health Assessment of Rail Safety Workers footnote 115 page 107

*A standard could specify: • criteria and testing for periodic health assessments • criteria and testing for triggered health assessments • options to manage medical and health conditions of drivers to reduce risks.*²³

42. We agree that these matters are in contention. They should be able to be quantified, either using data from WA or making comparisons from the rail sector. The CRIS sought not to make any such costings or comparisons.
43. The Better Law document also succinctly outlines a right to be vested in drivers, which we do not oppose, as follows:

*Drivers would have a right, protected in law, to stop at the soonest safe opportunity if they are not fit to work - for example, if they become fatigued or unwell while driving.*²⁴

44. There is so much more that requires reform in this subject area. These issues include facilitating access by employers of drivers' offence records, heavy vehicle driver training and assessment and the interaction of those elements with the licensing system. Two up driving and means to facilitate that process should also be considered. All of these issues were discussed in NatRoad's submission on the Issues Paper mentioned earlier²⁵. We would ask that they be considered in the review process.

Conclusion

45. NatRoad continues to support the WA system as the most appropriate method to regulate fatigue and driver health in this country. Why consideration of adoption at the national level was not on the table is vexing, especially as one element of that system has been proposed as an option in the CRIS. Those options which touch on elements of the WA system should be adopted and the restructured HVNL should adopt the WA system in its entirety.
46. The CRIS and the Better Law document only scratch the surface with regard to driver fitness for work. We would urge the NTC to revisit all of the issues raised in the earlier stages of the review in this context and expand the current options proposed as well as added new measures that focus on the prior identified issues.

²³ Above note 2 at p16

²⁴ Ibid

²⁵ Above note 18

Attachment A 2 Case studies of large operator's cost of compliance with the diary and camera system

Company A

1. Affected employee numbers: 90 drivers driving fatigue regulated vehicles and therefore using work diaries every day they work.
2. Costs per annum
 - (a) On average, each driver purchases three Work Diaries (100 pages each) per year at a cost of \$25/diary (reimbursement): \$6,750
 - (b) Completed pages are collected daily from drivers at different locations. Estimate administrative costs: \$ 30,940
 - (c) Collected pages are returned to a central collection point for matching/verification and data input; 3 hours /day for senior Admin person: \$29,835
 - (d) We use Log Checker to verify compliance of all pages (subscription fee): \$4,584
 - (e) Pages are filed in driver records as required for audit purposes: 2 hours/day Admin Person: \$19,890Total cost: \$91,999
3. Notes: These estimates are a minimum cost as they do not allow for any additional administration or management time locating missing or unrepresented pages, nor any allowance for compliance enquiries or reporting required by customers and regulatory bodies. There is no allowance for fatigue related fines which may be reimbursed subject to individual circumstances.
4. Cameras: the operator is required to present monthly compliance reports to several major customers and respond to 4 or 5 'false positive' camera detections. Each of these enquires takes about 4 hours to prepare and process at an estimated cost of \$200 average per Notice to Produce. These costs are not elsewhere included.

Company B

1. Affected employee numbers: 150 drivers driving fatigue regulated vehicles and therefore using work diaries every day they work.
2. Costs per annum
 - (a) On average, each driver purchases three Work Diaries (100 pages each) per year at a cost of \$25/diary (reimbursement): \$11,250
 - (b) Completed pages are collected daily from drivers at different locations. Estimate administrative costs: \$35,500

(c) Collected pages are returned to a central collection point for matching/verification and data input; 6 hours /day for senior Admin person: \$49,725

(d) Pages are filed in driver records as required for audit purposes: 3 hours/day
Admin Person: \$29,835

Total cost: \$126,310

3. Notes: These estimates are a minimum cost as they do not allow for any additional administration or management time locating missing or unrepresented pages, nor any allowance for compliance enquiries or reporting required by customers and regulatory bodies. There is no allowance for fatigue related fines which may be reimbursed subject to individual circumstances.
4. Cameras: the operator is required to present monthly compliance reports to several major customers and respond to 4 or 5 'false positive' camera detections. Each of these enquires takes about 4 hours to prepare and process at an estimated cost of \$200 average per Notice to Produce. These costs are not elsewhere included.