

## RVS Consultation Submission 14

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To Whom it may concern :

With regards to the Road Vehicles Standards Legislation Public Consultation Meeting –Sydney Session 06/02/18.

At the Sydney meeting it was discussed that left hand drive converted trucks safety was compromised by the left to right hand drive conversion. (of cabins) Vulcan Motors Pty Ltd has been converting Peterbilt trucks for the Australian Market, as a small volume compliance holder (and then a R.A.W.S 2004) since 1994.

When we first started converting Peterbilt trucks, engineers were consulted about the strength and structural flexibility of the conversion. Peterbilt trucks are constructed with many alloy panels and sub frame sections. The panel pieces are huck riveted together, this give the cabin flexibility and allows panel sections to absorb and impact if involved in an accident.

Engineers consulted on the initial conversions decided that the manufactured cabin should stay intact and all new modifications to the cabin would be panel overlays over existing panels (these overlays are firewalls and floor plates). All replacement panels are huck riveted (aircraft grade) over existing panels. The firewalls and floors are ‘double skinned’ making the cabin stronger than the original Peterbilt cabin. All of the Peterbilt converters in Australia use the same standard procedure of double firewall and floor plating. We follow this procedure on all of the vehicles we convert including pre 1989 Peterbilt trucks, which are converted to meet the current ADR’s. (\*Please see: Custombuilt by Chrysties Work Instruction PB3SERIES– revision 1 pages 1-7, PDF attachment)

I would like to see your engineers evidence and data that supports your claim that Peterbilt trucks are lacking the structural integrity after conversions. The speaker at the Sydney meeting, when questioned, was unable to supply any data specific to converted Peterbilt trucks in the NC category.

The Speaker, at the Melbourne meeting,(29/01/18) when asked why there was no NC category listed in the current legislation draft, mentioned that the Australian heavy vehicle fleet was on average, around 15 years old and that the Department of Infrastructure, Transport, Regional Development wanted to “get aging and non-compliant heavy vehicles off the road”, as well that there was “no need for imported heavy vehicles seeing they are manufactured here.” The omission of the NC category singles out Peterbilt trucks as they are the only left hand drive trucks brought into the country for highway use. (as well as for truck enthusiasts collections.)

The system that we follow with our conversions, and that we are held accountable to, complies to all of the Australian Design Rules (for road vehicles) that the Department of Infrastructure, Transport, Regional Development and Local Government set.

Vulcan Motors Pty Ltd, shows commitment to delivering quality products and services to customers and are an Australian Quality Assured company. The conversion and repair of Peterbilt trucks in Australia is the only source of income for my company and I have spent hundreds of thousands of dollars on setting up, following compliance rules and tooling the workshop to make my business a success. My company will have no worth if the NC category is dropped from the new draft of the Motor Vehicles Standard Act. (2017).

With Regards,

Frank Chrystie

\*Custombuilt by Chrysties Work Instruction PB3SERIES– revision 1 pages 1-7 [pdf Attachment](#)