



30 April 2012

Patrick Ho
Regulatory Analyst
Essential Services Commission
Level 2
35 Spring Street
Melbourne
Victoria 3000

Ref: V Line Proposed Access Arrangements

Dear Patrick,

Thank you for the opportunity to provide feedback on the proposed access arrangements for V Line.

Definition of normal operating hours:

“The normal signal box operating hours (“block working hours”) for the relevant corridor of the Network. Normal signal box hours as at the date of this Access Arrangement are contained in Appendix 9, and changes will be published in Operating Handbook.”

There is no definition of normal operating hours under Appendix 9. There is no pricing of providing services outside of normal operating hours.

In addition to this there is no guarantee of attendance of staff at these signal boxes out of “block working hours”. When you are running a rail business with 24 hours a day/ seven day a week operations the inability to staff these manual signal boxes is impeding the efficient operation of the rail operator.

Cargill as a significant user of rail transport for grain movements in Victoria is incurring significant cost due to the ad hoc nature of attendance at these manual signal boxes.

It is safe working practice to have a signaller on the Vline network where there are no automated signals namely:

North Geelong

Ballarat
Maryborough
Dunolly
Birchip
Swan Hill
Ouyen
Yelta
Warracknabeal

Therefore at these locations if we run trains outside normal operating hours we are reliant on the provision of services by V Line for the attendance of staff and additional costs.

Please do not hesitate to contact me on 03 92500021 should you require any further information.

Yours Sincerely

Cargill Australia Limited
Grant McDougall
Manager Transport, Logistics and Warehousing