

**From:** Dunn's transport [mailto:info@dunnstransport.com.au]  
**Sent:** Friday, 8 July 2011 11:51 AM  
**To:** Giannakos, Anna  
**Subject:** TRIM: Spam: ACCC Submissions N95450 - N95456

I am sending this submission in regards to the application made by several Melbourne container parks listed in the above submissions to the ACCC to allow time slotting for the return of empty containers to there container park.

If the are allowed to start requiring transport companies to have to time slot for the return of empty containers it will cause increased costs and major disruption to the transport industry.

Currently on a daily basis we receive email's from empty container yards advising of delay they are experiencing . A large number of these delays are caused by equipment breakdowns or staff unavailability. Also we receive notification from empty container parks that the they are not receiving certain empty containers that were originally destined for them due to lack of space and they are redirected to another yard.

If the Melbourne container parks are allowed to implement this system the flexibility to be able use spare time to dehire empty containers will be lost. Once one yard experiences delays due to the above mentioned factors that they claim to be beyond there control and if we have trucks delivering to multiple yards per trip and one delays the truck we will miss other time slots booked in good faith thinking we have allowed enough time for the truck to be able to do the multiple deliveries of empty containers.

Currently a time slotting system is being used by the two major stevedores in Melbourne. One has a system that works well 90 percent of the time the others system works well 10 percent of the time any trying to arrange for trucks to complete multiple pick ups of containers from these two yards is extremely difficult and almost impossible for many carriers.

The is also no alternative to using these yards as we are advised by the shipping lines as to where we need to take empty containers to and only one yard is nominated there is no flexibility in the return at all.

Just imagine the chaos caused and expense incurred if 10 empty container yards start using a time slot system each one only interested in there own yard and not worrying about the transport company who has to then proceed to another yard to try and complete there deliveries.

The time slot system would be a move in the right direction to improve productivity only when all the business involved can eliminate any delays within the total system and unfortunately with the mixture and number of

businesses involved in the system currently now is not the time to allow the application made by the empty container yards.

If you need to contact me I can be emailed at this address or contacted by phone on (03) 5336 0555 and our address is Dunn's Transport, P.O. Box 240, Wendouree, Vic, 3355.

Regards

Shane Dunn  
Dunn's Transport