

12 February 2003

Dr Ken Michael Acting Rail Access Regulator PO Box 7459, Cloister Square PERTH, WA, 6850

Dear Dr Michael

Re: Request for Public Submissions on Westnet Rail Floor and Ceiling Prices

Thank you for the opportunity to respond to Westnet Rail's (WNR's) proposed floor and ceiling prices for the following routes:

- Forrestfield to Kalgoorlie;
- Kwinana to Bunbury Inner Harbour;
- Leonora to Kalgoorlie;
- Kalgoorlie to Esperance.

The documentation presented by WNR is quite detailed and full analysis would entail a relatively costly review to assess in detail the appropriateness of each feature of the rail infrastructure (given existing train operations), together with the correct cost to replace that particular component.

Consequently, due to time and financial constraints, our comments are based on a general overview of the WNR documents, with a focus on the specifications of the major infrastructure components. In particular, areas of concern that were identified included:

Turnouts: The specifications state that dual gauge turnouts are 1:16. This scope appears to be over-specified for track when cheaper 1:12 turnouts would appear suitable to meet the current operating conditions.

Rail: The price for rail appears to be over quoted (in our opinion by at least 5%), given that purchase large amounts of rail to cover relatively long line sections of track, should be able to attract a volume based discount.

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Sleepers: In some parts of the track, every second sleeper is steel, whilst other parts of the track are 1:4. Replacement of sleepers in the 1:4 steel sleeper sections should be predicated on replacing with steel sleepers on a 1:2 basis. Whilst this would be marginally more expensive on a capital cost, we believe that overall ongoing maintenance costs for the revised 1:2 steel sleepered track would be much cheaper than retaining 1:4 steel sleepers.

Signalling: This area is very difficult to assess and quantify the asset scope and cost without substantial analysis of each individual location. Consequently, we offer no comments in this area.

We would welcome any opportunity to discuss or clarify any issues raised concerning rail access in Western Australia.

Yours faithfully

Roger O'Donnell Land Transport Manager AWB Limited

The Australian Grains Marketer