

10<sup>th</sup> December 2025

Elle Petlivanova,  
Manager PBS Review  
National Heavy Vehicle Regulator  
Level 6 Skyring Terrace,  
Newstead Queensland 4006  
VIA EMAIL

Dear Elle,

I write in response to your request for feedback on the Revised Technical Standard and Implementation Approach to Directional Stability Under Braking (DSUB) and on behalf of our members at HVIA.

HVIA has provided feedback to NHVR previously on the standard, the most recent of which was provided in September 2025 and still stands. We can see you have addressed the topic of combinations with > 5 trailers with Trailer EBS. We are satisfied with the solution proposed for non-mandating of the CAN signal on the converter dollies in this case, as we acknowledge the ISO11992 standard does not yet cover this case. We are also pleased that some manufacturers have solutions for this and will not be inhibited from utilising these in the new standard.

We still have concerns around Trailer EBS Status Lights and ADR compliance, as we acknowledge that work continues to clarify what fitments are considered ADR compliant as they are not explicitly covered in any of the ADR lighting standards. We will continue this work with regulators outside of the DSUB standard to ensure clarity for operators moving forward. We would request however that due consideration be given by roadside enforcement to operators who are utilising lights to meet this standard, now that Trailer EBS Status Indicators are a requirement. **A sensible interim solution would be a Vehicle Standards Guide clarifying for operators where and how Trailer EBS status lights which meet the DSUB standard can be fitted. We welcome further discussion on this topic.**

Overall, we are pleased with the approach to DSUB implementation and welcome and increase in the safety of our PBS Fleet moving forward by utilising some of the latest electronic braking, stability control and safety systems available. We also welcome the practical and simplified implementation approach which will no doubt be a relief for operators, industry and application processing times.

We will continue to work with NHVR now and in future to ensure that PBS Safety Standards are kept up to date and progress with technology as it arises or become reasonably practicable and beneficial to industry to do so.



**RACHEL MICHAUD**  
**CHIEF ENGINEER**

**NATIONAL OFFICE**

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