



2 December 2011

Mr. Greg Mullins AFSM
Commissioner
Fire and Rescue NSW
PO Box A249
SYDNEY SOUTH NSW 1232

Attn: Assistant Director Human Resources Bernard King

Dear Mr Mullins,

Re: Matrix amendments

I write in response to your letter dated 2 December 2011 and with reference to email correspondence from your Assistant Industrial Relations Officer Joanne Prados-Valerio to Union Industrial Officer Anthony Samson on 19 and 20 October 2011 and his response of 4 November 2011 (attached).

Please find attached a spreadsheet containing the Union's calculations of matrix distances in relation to Baulkham Hills Fire Station. The Union used Google Maps in order to calculate distances. You will note that there are some significant differences between the Union's calculations of the actual distance necessarily and reasonably travelled and the Department's matrix calculation.

The primary reason for the differences is because the Department has failed to calculate routes based on the "actual distance necessarily and reasonably travelled" in accordance with Clause 12.9 of the Award, but have instead calculated distances on the shortest distance possible in all cases.

This issue arose back in March 2010 with the recalculation of several matrix distances. In email correspondence of 18 March 2010 the Union wrote:

I understand that you believe the custom and practice has been to measure the distances using the shortest route possible. Having had a close look through our files myself, I can't find anywhere that this is the case. However, the Award makes a reference to the calculation of matrix distances:

12.9 - ..."distance" shall mean the actual distance necessarily and reasonably travelled

I would be happy to reassess my position if you could provide me with some corro that shows the Union and Department agreeing to use the shortest distance as the route travelled in every case.

Given the completion of the arterial motorways within the GSA in the last few years (M4, M5, M2 & M7), travelling via such roads would often be considered as necessary and reasonable under Clause 12.9.

For example, the distance from Bonnyrigg Heights to Ryde Fire Station which you have calculated uses the Hume Hwy, rather than the M7 and M4 motorways, which, according to Whereis lowers travelling distance by 11km, but increases travelling time by 11 minutes each way. Similar results are achieved with the distance between Bonnyrigg Heights and Gladesville.

New South Wales Fire Brigade Employees' Union (FBEU)

1-7 Belmore Street Surry Hills NSW 2010

Telephone 02 9218 3444 Facsimile 02 9218 3488 E-mail office@fbeu.net Website www.fbeu.net

This information was repeated by the Union in the aforementioned email correspondence of 4 November 2011.

Metro North 2 Matrix distances

The Union has been in contact with the member who was asked to recalculate the MN2 matrix distances. The Union believes that this member was incorrectly instructed by the Department to calculate matrix distances according to the shortest distance possible rather than the actual distance necessarily and reasonably travelled.

In order to understand the matrix recalculations provided by the Department, the Union seeks to be provided with information in relation to process undertaken by the Department in recalculating the MN2 and Baulkham Hills Fire Station matrices. Specifically:

1. The device/website used to determine the distance (Google Maps, Whereis, electronic wheel, motor vehicle, etc); and
2. The method used by the Department in determining the actual distance necessarily and reasonably travelled in accordance with Clause 12.9 of the Award (shortest distance, quickest route, quickest route avoiding tolls, shortest route avoiding tolls, route submitted by a firefighter, etc).

The Union believes that the calculation of matrix distances should be in accordance with the quickest route because for all intents and purposes, this will be the actual distance necessarily and reasonably travelled by the firefighter. Should the Department contend that a different method be used, the Department must provide information as to why that method should be considered to meet the definition of "distance" provided in Clause 12.9 of the Award.

Should you wish to discuss this matter further, do not hesitate to contact Industrial Officer Anthony Samson on 9218 3444.

Yours faithfully,

A handwritten signature in black ink that reads "Casey". The signature is written in a cursive, flowing style.

Jim Casey
State Secretary

Region	Station	Station Name	Department KM Calc	Union KM Calc
ME1	013	Alexandria	62	73
ME1	012	Balmain	53	60
ME1	076	Bondi	73	77
ME1	001	City of Sydney	60	64
ME1	004	Darlinghurst	63	65
ME1	010	Redfern	62	69
ME1	038	Pyrmont	57	66
ME1	003	The Rocks	61	62
ME1	011	Woollahra	67	71
ME1	018	Glebe	58	68
ME1	022	Leichhardt	52	54
ME2	060	Avalon	96	95
ME2	058	Beecroft	22	19
ME2	075	Berowra	58	55
ME2	036	Crows Nest	52	51
ME2	069	Dee Why	73	72
ME2	006	Mona Vale	81	81
ME2	025	Mosman	60	59
ME2	053	Neutral Bay	56	55
ME2	068	Narrabeen	81	82
ME2	040	Willoughby	51	50
ME2	051	Forestville	59	58
ME2	037	Gordon	43	40
ME2	050	Hornsby	38	37
ME2	061	Lane Cove	48	47
ME2	024	Manly	72	70
ME3	014	Ashfield	48	65
ME3	062	Bankstown	46	43
ME3	015	Burwood	42	43
ME3	052	Campsie	51	53
ME3	085	Chester Hill	33	39
ME3	016	Concord	38	40
ME3	017	Drummoyne	47	55
ME3	005	Newtown	57	74
ME3	047	Revesby	49	55
ME3	066	Rhodes	37	42
ME3	019	Silverwater	26	28
ME3	064	Lakemba	49	53
ME3	030	Lidcombe	31	34
ME3	028	Marrickville	55	59
MW1	086	Penrith	57	81
MW1	102	Regentville	67	79
MW1	043	Seven Hills	13	13
MW1	077	St Marys	41	55
MW1	096	Schofields	23	23
MW1	097	Huntingwood	26	26
MW1	094	Kellyville	18	24
MW1	063	Blacktown	20	22
MW1	071	Castle Hill	17	11
MW1	032	Mount Druitt	37	41
MW1	083	Riverstone	34	37

MW2	101	Bonnyrigg Heights	45	Baulkham Hills Mat	68
MW2	049	Cabramatta	37		42
MW2	027	Parramatta	18		23
MW2	042	Ryde	33		42
MW2	065	Rydalmere	21		22
MW2	041	Smithfield	30		31
MW2	057	Wentworthville	14		16
MW2	059	Eastwood	27		28
MW2	073	Fairfield	31		34
MW2	023	Gladesville	39		45
MW2	055	Guildford	27		34
MW2	072	Merrylands	22		25
MS2	029	Arncliffe	63		91
MS2	035	Botany	69		83
MS2	080	Bundeena	131		133
MS2	054	Cronulla	85		88
MS2	034	Riverwood	54		58
MS2	039	Randwick	70		74
MS2	048	Mortdale	60		64
MS2	046	Sutherland	79		83
MS2	133	Engadine	91		96
MS2	020	Hurstville	60		62
MS2	021	Kogarah	66		68
MS2	070	Maroubra	77		81
MS2	026	Mascot	65		77
MS2	056	Matraville	76		85
MS2	090	Menai	68		70
MS2	045	Miranda	76		78
MS3	031	Busby	47		85
MS3	088	Campbelltown	84		112
MS3	087	Rosemeadow	94		126
MS3	093	Narellan	89		124
MS3	092	St Andrews	74		108
MS3	007	Horningsea Park	58		76
MS3	079	Ingleburn	68		99
MS3	008	Liverpool	51		93
MS3	084	Macquarie Fields	62		96

From: Anthony Samson <asamson@fheu.net>
Subject: **Re: Matrix amendments to MN2**
Date: 4 November 2011 5:31:08 PM AEDT
To: "Joanne Prados-Valerio" <Joanne.Prados-Valerio@fire.nsw.gov.au>

Joanne,

Apologies for the delay in responding.

It will take some time for the Union to discuss your proposed distances with the members of Metro North in order to verify your proposed distances.

However, having had a glance at some of the distances I'm probably right to assume that your recalculations are based on the shortest distance possible rather than the most direct route (and hence, shortest time) as calculated by Google Maps.

We've had this discussion before - just ask Laura.

Here's an excerpt from an email to her:

I understand that you believe the custom and practice has been to measure the distances using the shortest route possible. Having had a close look through our files myself, I can't find anywhere that this is the case. However, the Award makes a reference to the calculation of matrix distances:

12.9 - ..."distance" shall mean the actual distance necessarily and reasonably travelled

I would be happy to reassess my position if you could provide me with some corro that shows the Union and Department agreeing to use the shortest distance as the route travelled in every case.

Given the completion of the arterial motorways within the GSA in the last few years (M4, M5, M2 & M7), travelling via such roads would often be considered as necessary and reasonable under Clause 12.9.

For example, the distance from Bonnyrigg Heights to Ryde Fire Station which you have calculated uses the Hume Hwy, rather than the M7 and M4 motorways, which, according to Whereis lowers travelling distance by 11km, but increases travelling time by 11 minutes each way. Similar results are achieved with the distance between Bonnyrigg Heights and Gladesville.

In short, the Union will not agree to some arbitrary calculation of matrices based on shortest distance when a far more direct (and quicker) route is available.

Nevertheless, I will pass on your proposals to members in Metro North for their consideration and get back to you with the results, given that the Award provides for the actual distance necessarily travelled.

Regards,

Anthony Samson
Industrial Officer
FIRE BRIGADE EMPLOYEES' UNION
1-7 Belmore St, Surry Hills NSW 2010
P 02 9218 3444 | F 02 9218 3488

On 19/10/2011, at 2:53 PM, Joanne Prados-Valerio wrote:

Hi Anthony,

Attached is proposed amendments to the MN2 matrix.

On the first sheet highlighted in yellow are the distances in contention.

Sheet 3 termed "issue log" highlights discrepancies between what Metro North has identified as km distance and what IR has calculated.

In line with the Award, could you please advise whether the FBEU are agreeable with figures as stated in "Department KM Calc" column highlighted in orange.

Kind Regards,
Joanne

JOANNE PRADOS-VALERIO | Assistant Industrial Relations Officer | Employee Relations | Human Resources
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<MN2 matrix 2011 update.xls>