



12 September 2012

Mr Bjarne Nordin
Inquiry Manager
Parliament of New South Wales
Joint Standing Committee on Road Safety
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Dear Mr Nordin

I am responding to your letter of 29 August 2012 following the appearance of the Australian Mobile Telecommunications Association (AMTA) on Friday, 24 August, 2012, at the inquiry undertaken by your Committee into Driver and Road User Distraction.

We have no additions, changes or deletions to the transcript of our evidence before your Committee.

I have attached to this letter AMTA's answers to the Committee's Questions on Notice.

I also undertook to provide the Committee with details of a United States study on banning young drivers from using mobile phones. I mentioned this study in my evidence and Committee Chair, Mr Greg Aplin, asked if I could supply details of the study, "Effect of North Carolina's restriction of teenage driver cell phone use two years after implementation".

I raised this study in the context of legislators should take care when introducing new laws and explore all possibilities, including unintended consequences, when undertaking a cost-benefit analysis of such initiatives because they can produce outcomes that are more dangerous than the behaviour they were designed to tackle.

(AMTA supports the ban on mobile use by Learner and P1 drivers)

I have supplied a link to access this study because I am not sure about the copyright implications of me sending you the report.

Here is a link to the study:

<http://www.sciencedirect.com/science/article/pii/S0001457512000619>

Finally, there have been concerns expressed from some quarters about the growing proliferation of in-car smartphone functionality. I have attached a copy of a study of the connected car, "A status update on in-car smartphone integration", which shows the ways in which smartphones are revolutionising motoring and improving safety for motorists.

The head of Ford Motor Company, Bill Ford, said his company was committed to taking “advantage of the car as a rolling collection of sensors to reduce congestion and help prevent accidents”. See link to Mr Ford’s speech:
(http://media.ford.com/article_display.cfm?article_id=36078)

AMTA thanks the Committee for the opportunity to present its viewpoint on these important road safety issues.

If you have any questions I would be happy to assist.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Althaus".

Chris Althaus
Chief Executive Officer

AMTA's reply to Questions on Notice from the Parliament of New South Wales Joint Standing Committee on Road Safety

1. Cyclists' use of mobiles is not something that AMTA has considered – our focus has been on car drivers and encouraging safe, responsible and legal use of mobiles by drivers. We think the same principles would apply to cyclists that apply to drivers: they should take all steps to ensure they keep their eyes on the road.

We are aware that the issue of pedestrians being distracted through mobile device use has been an issue in media reporting over the past 12 months or so.

Education and awareness for pedestrians is an issue that is being considered by AMTA. We believe that this would be a preferable path instead of regulating their behaviour because it is not clear how regulation of pedestrians would work, other than observing normal traffic rules.

2. AMTA has strongly supported the targeting of the clearly dangerous and illegal practice of text messaging and driving, which has been shown to have the highest risk factor of a crash or near crash.

The 100-Car Naturalistic Study, conducted for the US Department of Transport, investigated driver secondary tasks and vehicle events for more than a year over nearly three million kilometres or 43,000 hours of driving data.

It found that text messaging was associated with the highest risk of all mobile phone-related tasks.

The study conducted by the Virginia Tech Transportation Institute (VTTI) found that texting by truck drivers resulted in 23.2 times greater risk of a driver having a crash or near crash than non-distracted driving.

This study clearly identifies driving and texting is a very dangerous practice and it should be tackled as a priority by governments and road traffic authorities. Some reviewers have attempted to downplay the strength of the finding of 23 times greater risk from texting while driving a truck because it is based on a small amount of data and research on commercial truck drivers and is not directly attributable to the whole population, nevertheless, the finding pinpoints the area of potential concern.

A more recent naturalistic study by the VTTI for the Ford Motor Carrier Safety in the US, which was released in October, 2010, found using a mobile phone to text, email or access the internet was very risky.

"The data suggests that truck and bus drivers who use their cell phone to text, email or access the internet **are very likely** to be involved in a safety-critical event," it says. The VTTI's research paper shows that text messaging has the longest duration of eyes off the road (4.6 seconds over a 6-second interval). AMTA has calculated that

driving at 60kph a driver would not watch the road for 75 metres or half the length of the SCG!

VTTI Director Dr Tom Dingus told the Australasian College of Road Safety Conference in Melbourne on September 1, 2011, that teens engage in complex non-driving tasks much more frequently – and in riskier situations – than adults. Teens are involved in crashes or near crashes while distracted four times more often than adults and this could be a rising epidemic if it is not addressed.

AMTA believes the dangers of text messaging (emailing, web browsing and social media) should be the focus of a new approach to address driver safety and mobile phones.

We also believe that new naturalistic studies have given fresh insight into mobile phone sub-tasks, which should be looked at in terms of specific individual risk profiles instead of treating all mobile phone use as risky and dangerous by referencing the riskiest sub-task.

Tasks that require drivers to take their eyes off the road should be the clear focus of education campaigns. This includes texting on a mobile while driving (RR 23.2 for heavy vehicles) and dialling full phone numbers (RR 2.8) rather than talking or listening (RR 1.3) to a mobile phone while driving.

The task of reaching for a non-fixed object (RR 8.8) needs to be addressed by the consistent adoption and promotion of national road rules requiring the use of cradles or hands-free devices.

Using the latest research data provides evidence to tackle this issue according to the constituent parts rather than a sweeping generalisation based on the most dangerous sub-task of mobile phone use.

We believe there should be more information and focus to all motorists about the dangers of texting and driving with special focus on young drivers.

We have been supportive of restrictions for learner and inexperienced drivers (P1) drivers, but it must also be remembered that at some stage drivers need to learn how to manage all the many distractions they face, including appropriate and legal mobile phone use. This is a possible shortcoming of recent suggestions of banning drivers under the age of 26 years using mobiles while driving.

- 3.** We have not commented on the appropriate level of penalties because this is the role of State Governments in Australia.

AMTA believes there is a role for penalties and education in tackling driving distractions, including mobile phones. The level and awareness of penalties are best left with the appropriate authorities.

We believe that there is a critical role for education and awareness and this is where AMTA sees its primary role in promoting safe and responsible use of mobile phones in cars.

We believe our best course of action is to promote practical information telling drivers how to comply with the driving laws employing best practice mobile phone use. In regard to discouraging illegal and dangerous use of mobiles in vehicles, we are very concerned about mixed messages drivers receive from enforcement and road safety bodies in Australia.

There is very little information about what a driver can do to make using a mobile phone safer while driving. The public messages from some authorities revolve around advising drivers not use a phone at all even if it is legal to do so in all States. This is very confusing for drivers and doesn't improve the situation.

Some continue to give drivers potentially dangerous advice to pull over on the side of the road to use mobiles. This can have tragic unintended consequences and is not an option free of risk. In fact, UK statistics show the risk of a fatal or serious accident to an occupant of a parked car is about three times that of driving along a freeway.

There needs to be a new prescriptive approach which focuses on what drivers can do rather than what not to do because the proscriptive approach adopted by police and others is simply not working.

Our preferred approach also supports the National Road Safety Strategy 2011-2020, which recommended a focus on illegal rather than legal mobile phone use while driving.

4. AMTA was invited to present to the Australia New Zealand Policing Advisory Agency (ANZPAA) in August 2010 and offered to partner with police in a new approach as outlined below:
 - Targeting text messaging
 - Increased support, awareness and adoption of national road rules requiring drivers to use their mobiles in approved cradles to help ensure that the risk of reaching for mobiles in cars is reduced. This would also ensure drivers' eyes are forward looking over the roadway, reducing the risks of taking their eyes off the road.
 - Promotion of voice-activated, one-button dialling and technological solutions to reduce risks of drivers taking their eyes off the road when making and receiving calls.
 - Providing consistent messages to drivers to make them aware of what they can and cannot do with their legal hands-free kit and when it is appropriate to use it. AMTA makes it clear that legal hands-free use is not appropriate in all road and traffic situations.
 - Adopting a strategy of telling drivers how they can use their mobiles in a safer manner instead of overstating the risk of talking and listening on

mobiles, which according to the last naturalistic research methodology is manageable and not as risky as other common practices, such as reaching for objects in cars, handling a CD or eating.

- Being aware of unintended consequences of bans, which would result in some drivers disobeying the law and using mobiles on their laps to avoid detection. This would increase the risk of a crash or near crash compared to drivers using mobiles in cradles in a safe and responsible manner.

About 12 months later AMTA was approached by a senior traffic policeman from the Northern Territory, who was acting on behalf of ANZPAA, to develop a brochure to inform motorists on how to reduce the risks using their mobile phones. It was based on the principles outlined above.

AMTA worked with the senior traffic policeman and produced a draft brochure with joint messaging (see attached), which was finalised late in 2011 on a tight timetable to meet the requirements of the police. This brochure (which is attached) was distributed to the Joint Standing Committee on Road Safety when we appeared before it on 24 August, 2012.

We heard no more of this issue for four months and AMTA wrote to ANZPAA's Chief Executive Officer, Jon White, and was informed in April, 2012, that the work of AMTA and the Northern Territory Police (on behalf of ANZPAA) had been presented to a meeting of the ANZPAA Road Policing Forum (ARPF) in February.

We were told that the work of AMTA and the Northern Territory Police on the brochure was only one approach and ANZPAA would have to consult with all jurisdictions (not just through ARPF) and their respective media departments before approval was sought from the ANZPAA Board.

AMTA was told on April 13 it would be advised in "due course" on any developments on this matter. We have not heard anything for the past five months since the advice in the letter dated 13 April, 2012.

We note that AMTA presented to the ARPF on 31 August, 2010, and more than two years later there has been no action on this issue although we were told in April that "ANZPAA is currently considering in conjunction with the Board ways to communicate safety messages".

AMTA has worked with several individual traffic policemen in different jurisdictions throughout Australia with the brochure. The feedback has been very positive and in at least one jurisdiction it has been issued to traffic offenders who have been stopped and fined for illegal mobile phone use.

The policeman involved said he thought it was important to hand out the brochure in conjunction with the fine for illegal mobile phone use because it provided important information and practical advice to drivers on how they could use their mobile phones legally and reduce the risks of taking their eyes off the road.

5. AMTA has relied on the naturalistic studies undertaken by the Virginia Tech Transportation Institute (VTTI) to underpin our evidence-based approach to driving safety and mobile phones.

We believe that naturalistic studies offer new insight into driving risk and shed new light on conditions in real-world driving conditions that have hitherto not been provided by studies undertaken in laboratories using driving simulators.

The VTTI Director, Dr Tom Dingus, has talked about the “disconnect between naturalistic and simulator research”. He said on July 27, 2009:

*“It is important to keep in mind that a driving simulator is **not** (his emphasis) actual driving. Driving simulators engage participants in tracking tasks in a laboratory. As such, researchers that conduct simulator studies must be cautious when suggesting that conclusions based on simulator studies are applicable to actual driving. With the introduction of naturalistic driving studies that record drivers (through continuous video and kinematic sensors) in actual driving situations, we now have a scientific method to study driver behaviour in real-world driving conditions in the presence of real-world daily pressures. As such, if the point of transportation safety research is to understand driver behaviour in the real-world (eg increase crash risk due to cell phone use), and when conflicting findings occur between naturalistic studies and simulator studies, findings from the real-world, and not the simulator-world, must be considered the gold standard.”*

We agree with Dr Dingus, who says that the naturalistic scientific method which is giving findings from the real world and not the simulator world must be considered the “gold standard” for scientific research.

Dr Dingus says research is required to explore reasons why simulator studies sometimes do not reflect the findings of studies conducted in actual driving conditions.

He says controlled investigations cannot account for driver choice behaviour and risk perception as it occurs in real-world driving. “If this assessment is accurate, the generalizability of simulator findings, at least in some cases, may be greatly limited outside of the simulated environment” (New Data from VTTi Provides Insight into Cell Phone Use and Driving Distraction, July 27, 2009).

AMTA has been involved in preliminary meetings to establish a naturalistic study in Australia. The study has been proposed by Professor Michael Regan, Transport and Road Safety (TARS) Research School of Aviation, University of New South Wales.

We also see a need for a body such as the WHO – or perhaps the WHO - to assess the range of studies on driving issues, particularly those related to mobile phone use, and provide a weight of evidence summation, such as it does with its fact sheets on radio frequency electromagnetic energy (RF EME).

AMTA is involved in a range of issues that impact on the use of mobile telecommunications technology. One of these issues is mobile health and safety and questions of whether RF EME emitted by mobile phones, wireless devices, radio, television and radar are carcinogenic to humans.

The scientific process in this field of study is to rely on scientific consensus and the weight of science approach. This means that bodies such as the WHO assess all scientific evidence and arrive at a position based on its assessment of the studies. AMTA relies on the expert judgment of public health authorities for assessments of safety and health impacts.

There is now a large body of research into the health effects of radiofrequency emission available to health and regulatory bodies around the world, which is being continually reviewed.

AMTA does not see a similar approach in the field of road safety. It appears to us that all studies, regardless of the methodology and assessment by a recognised expert body, are given the same weight, depending on who presents such studies to back their particular claims.

6. AMTA fails to see the relevance to the issue of driver distraction of the NSW Taxi Council's opposition to *passengers* using applications to make direct cab bookings using their mobile phones. AMTA is concerned with drivers' use of mobile devices and efforts to ensure that they use them within the law.
7. Research undertaken for the US Department of Transportation in September 2010 commented on findings that drivers of commercial trucks and buses who were talking and listening on a mobile phone did not increase the odds of involvement in a safety-critical event.

"More specifically, both (studies) found that talking/listening on a hands-free phone significantly decreased the odds of involvement in a safety-critical event (0.65 and 0.44 respectively) and talking/listening on a hand-held phone had no impact on the odds of involvement in a safety-critical event (0.90 and 1.04 respectively)," says the study titled, "Distraction in Commercial Trucks and Buses: Accessing Prevalence and Risk in Conjunction with Crashes and Near-Crashes".

The study went on to say that the decrease in the odds of involvement in a safety-critical event regarding talking and listening had sparked controversy in the academic community and traffic safety organisations because it contradicted some results from simulator and closed track studies.

There has been a large amount of naturalistic research that shows tasks that engage commercial truck drivers, such as having a passenger, using a CB radio and talking and listening on a hands-free mobile phone, significantly reduces crash risk because these tasks reduce driver fatigue and maintain alertness.

The research clearly shows that the risk is not with the conversation (the talking/listening sub-task) but the sub-tasks that require the driver to take his or her eyes off the road.

For this reason we believe it is important that truck drivers are subject to the same road rules as other drivers that require use of hands-free kits and cradles to ensure that they do not reach for mobile devices and keep their eyes on the road.

HOW TO REDUCE THE RISK USING YOUR MOBILE WHEN DRIVING

Drivers can take some simple steps to reduce the risks:

Never Text – it's very dangerous and illegal

Texting drivers take their eyes off the road for 4.6 seconds over a 6 second interval. This means that at 60kph a driver is not watching the road for 75 metres or half the length of the SCG! It's also illegal to text when stopped at traffic lights because although your car is stationary it's not legally parked.

Always keep your eyes on the road

The clear lesson from the latest research is that keeping your eyes on the road is critical to reducing driving risks from mobile phone use. Talking and listening are not too dangerous in light traffic and good driving conditions, but taking your eyes off the road to dial or answer a mobile is risky.

Reduce the risks of mobile phone use, avoid fines, and follow the law:

Buy and install a cradle and Bluetooth Hands-free kit

Buy, install, and use a cradle for your phone

The Australian Road Rules require drivers to place their mobiles in approved cradles affixed to the dashboard so they are looking at the road ahead and not glancing down. Drivers can touch their handset in a cradle to make or receive voice calls only. They cannot text, send emails, web browse, engage in social media or, in some States, use their phone-based GPS. Drivers can also use Bluetooth provided they do not touch the handset. Study the road rules for hands-free mobile use in your State or Territory. Using the handset's speaker is allowed only when it's in a cradle.

Use your smartphone's features

Smartphones provide voice-activated dialling and automatic answering features to reduce the effort of making and receiving a call and allow drivers' eyes to remain on the road at all times. You can also install apps that limit a phone to calling and voice activation. Smart drivers use their handsets' technology to reduce driving distractions.

Don't always answer your phone

Hands-free mobiles in cars are legal in all States and Territories. However, this does not mean it's appropriate for drivers to use them at all times. Drivers should not make calls in heavy traffic, at intersections or in bad weather or poor road conditions. If a call is unnecessary or you consider it unsafe to answer at the time, don't answer the call. Let it divert to voicemail or an answering service. Pull over safely if you stop to make a call and don't stop where you could be a hazard to other vehicles.



KEEP YOUR EYES ON THE ROAD

How to reduce risk when driving and using a mobile phone



Australian Mobile
Telecommunications Association

KEEP YOUR EYES ON THE ROAD

Driving is a complex task that requires all your focus to minimise potentially dangerous distractions.

Drivers face a range of distractions when behind the wheel, such as: interacting with mobile phones; iPods and navigation devices; looking and reaching for objects; reading maps and newspapers; looking at signs and billboards; adjusting radios and CD players; noisy children; passengers; and eating and drinking.

One of the most common driver distractions is mobile phone use. However, drivers need to be aware of and know how to reduce the impact of all distractions they face.

Recent research based on real world driving conditions found that the key to reducing accidents from distractions is to **keep your eyes on the road**.

JUST HOW RISKY ARE MOBILE PHONES WHILE DRIVING?



TEXTING

Recent international research using sophisticated in-car cameras, eye trackers, and sensors shows that texting is very dangerous. This also applies to reading emails and engaging in social media.

Drivers taking their eyes off the road to write or read text messages have up to a 23 times greater risk of crashing or having to take evasive action to avoid a crash.



DIALLING

The research, which involved nearly 3 million kilometres or 43,000 hours of real-life driving data, found that looking down to dial a handheld mobile phone substantially increases the risk of drivers having a crash or near crash by 2.8 times.

Reaching for a moving object, such as a mobile phone, increased the risk of a crash or near crash by 8.8 times.



NOVICE

Some risks were much higher for inexperienced novice drivers who were six times more likely to crash or near crash when dialling.

They were also more than three times at risk when texting or looking at the internet on their phones.

Novice drivers are also at four times the risk of a crash overall which further increases the risk of dialling and texting.

Learner and P1 drivers are banned from using all mobile devices, including hands-free kits.

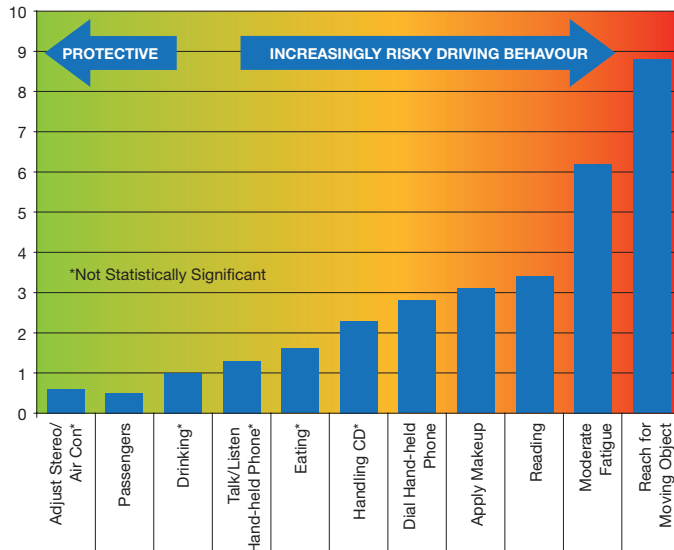


WHAT TO DO

Reaching for moving items, such as mobile phones, dialling and texting are all much riskier tasks than talking on or listening to a mobile phone call.

Therefore, the most effective action you can take to reduce the risks is to put your mobile phone in a cradle or use a Bluetooth hands-free kit to make calls when driving. Use single button dialling functions or voice activated calling so you can keep your eyes on the road ahead.

Relative Risk Estimate for Crash or Near Crash - Adult Drivers



Relative Risk Estimate for Crash or Near Crash - Teen Drivers

