Distraction Enquiry

Responses to additional Questions on Notice from STAYSAFE

Responses from Soames Job, Executive Director, National Road Safety Council.

Summary of Question 1:

- What kind of research method should be employed to vealuate distraction of in car electronic devices?
- Are existing guidelines and rules on placement of electronic devices adequate?
- Are you in favour of sensors monitoring driver alertness?

Research methodology: There are several research methodologies which could be applied to this issue, including laboratory research, case control methods, epidemiological analysis, and naturalistic driving studies. I suggest that as a first point of analysis laboratory studies are useful. They have the advantage that various forms of device can be directly assessed without waiting for them to occur in vehicles in sufficient frequency to allow for analysis of safety effects on the road. These also allow analysis prior to allowing devices into cars.

Naturalistic studies are perhaps the best available for these types of questions. However, they rely on having people who use the relevant devices included in the study.

Existing rules: My understanding is that current regulations prohibit screens which are in the drivers view. However, in reality this is not being applied. Many screens exist in vehicles in the view of the driver: navigation aids, and taxi and delivery/dispatch information screens, and other screens added by car owners in view of drivers. These present complex issues. First, while these devices may distract, the counter argument is that without the navigation screen the driver would be looking at a map or otherwise distracted in navigation. I have a number of comments:

1. I do not find these claims of alternative dangerous behaviours compelling, in that the driver may stop to read a map, may get better directions before heading off, or may enlist a passenger to navigate in the absence of the screen.
2. Voice directions are commonly available, and greater use of these rather than screens to aid navigation may be safer.
3. There is very little viable evidence on the safety impacts of these devices, but we do know that the combined effects of taking the eyes form the road and cognitive demand are harmful to road safety.
4. Broadly, in the arena of driver distraction, I suggest that for the sake of safety over commercial interests, we should adopt a "do no harm" approach. In other areas of health risk, there is an obligation on the manufacturer of the product to prove it does not cause harm (e.g. pharmaceutical industry, regulation of foods, etc.), not the strange approach being pushed on regulators in this arena, that the manufacturer should be able to produce whatever product or advertising, unless and until the government can prove its unsafe. This is a return to out-dated naïve process obliging the expenditure of government resources in effect for product development for narrow sectors of the community.

Monitoring driver alertness: Monitoring of driver behaviour and state is a growing area of technology. I support this direction, which is already able to identify fatigued drivers reasonably accurately. However, I have a few critical caveats:

1. Reliance on these devices with the information going only to the driver is risky. The risk is that the driver may rely on these devices and thus continue to drive and perform other tasks (distractions or continuing to driver while feeling tired) up to the point where the device detects a problem. Thus, lower levels of risk not detected by the device may become much more common, yielding a net safety problem.
2. The alternative use of such devices for prohibition of driving or for regulatory purposes is potentially valuable to road safety, but will be much more challenging. For example, these devices could be used to switch the car off. However, with these uses, the technology will not be driven by market forces. Market forces work for some behaviour related devices where the consequence is more information to the driver, who can use discretion on what to do with the information. Once the device will limit the driver, its market value generally becomes negative, and there is no incentive for the vehicle industry to pursue it, despite road safety benefit which can be achieved without huge commitments to police enforcement and accusations of fines as revenue raising.
3. Government have to date been extremely reluctant to regulate for vehicle technology which limits driver behaviour. The most valuable road safety technology of this form is speed limiting and yet no government has been prepared to introduce it.

Summary of Question 2: Following the TARS submission referring to "workload managers", what is your view of systems to limit distraction and provide real time warnings, when the driver is not fully engaged in the driving task?

These are interesting pieces of technology, which may deliver benefits. However, these will depend on the precision with which the system can detect distraction- it will need to be extremely accurate and not miss instances. I believe that the benefits anticipated for such devices (those which rely on detection of a driving problem before the limitations are activated) may be inaccurate. My key concerns are:

1. These types of limitations allow the driver the view that every distracting action is fine until the device cuts in. Thus, the driver may come to rely on the device as the determiner of what cannot be done. In fact, with such a device, this is a very likely human reaction.
2. Drivers may come to, consciously or unconsciously, find ways to behave which prevent the device's detection of their distraction. This adds to risk for safety, and must be considered carefully.

Summary of Question 3: re other sources of distraction (eating, grooming, smoking:

- How large is their contribution to distraction of drivers?
- Does this need greater monitoring and policing?

I have no sound evidence basis for determining the extent of the problem of these behaviours. Like most drivers I see people grooming and other extraordinary behaviours.

I understand that Police may apply offences such as not being in proper control of a vehicle for behaviours which impair control, such as these.

Summary of Question 4: Following the submission's claim that current enforcement is failing and additional education will be ineffective

- Are current enforcement and education effort a waste of resource?
- If, so, what do you propose instead?

The current approach has failed to reduce the levels of mobile phone use we see and detect on the roads each year. This implies that the combination of the perceived probability of detection and the consequences are not sufficient to deter drivers from this behaviour. However, this does not mean they are a waste in that we cannot know what level of these behaviour we would have without any deterrence.

I would suggest three alternative approaches to the problem of mobile phone use:

1. That companies and businesses large and small adopt a policy of no phone use while driving (including hands free). This helps a company meet its OH&S obligations, and reduces the demand for employees to be available at all times on the phone. The acceptance that it is reasonable to reply to a message when finished driving, will reduce the demand to be available. I would recommend that the NSW Government adopts this policy across all agencies. If all businesses adopted this approach, the claim that each individual business is unable to survive would be circumvented, because all competing businesses would be in the same position. [While working for the RTA, I noticed that my driving was not as safe when on the phone (hands free) and I stopped using it.]
2. That we push for technology in vehicles which prevents reception on mobile phones, ideally limited to the area of the driver though this may not be possible.
3. A social disapproval process based on a groundswell of aware opposition to distraction while driving may help. While this is not simple to achieve, beginning a dialogue with the community on this may help. Social approval and disapproval are very powerful, and have

the advantage over enforcement that there are usually people around even if there are no police. Thus social disapproval has a greater potential reach than police. Drivers do respond to the approval of others, and many otherwise pointless but expensive aspects of vehicles (regarding their look and status) are proof of the importance of the fleeting approval of strangers to many car owners.