



10 September 2012

Mr Bjarne Nordin
Inquiry Manager
Driver and Road User Distraction
Joint Standing Committee on Road Safety (Staysafe)
Parliament of NSW
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Dear Mr Nordin

I write in response to your letters of 29 August 2012 to me and my colleague Cecilia Warren, outlining a series of questions from the Joint Standing Committee on Road Safety ('Staysafe') inquiry into *Driver and Road User Distraction*.

I attach a response to the questions taken on notice during our appearance of 17 August 2012, and also to the subsequent questions of interest to the Committee.

I would like to take the opportunity to thank you and the Staysafe Committee for your interest in this matter.

Please do not hesitate to contact me on 9292 6841 or robert.mcdonald@iag.com.au in relation this.

Yours sincerely



Robert McDonald
Head of Research Centre
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QUESTIONS ON NOTICE

In response to the questions below that refer to 'the NRMA', our answers represent the views of NRMA Insurance. The answers are provided on behalf of both Ms Cecilia Warren and myself, Robert Mc Donald.

1. The submission lists a number of other research projects which the NRMA has conducted specifically into the impact of mobile devices on driver distraction. The results of the surveys referred to indicate that a significant number of drivers use mobile phones while in charge of a motor vehicle and continue to do so despite the imposition of penalties (pp5-6).

- **The survey results you have quoted in your submission indicate that NSW drivers use mobile phones at a higher rate than the national average. Why do you think this is the case?**

We are unable to provide an explanation for the higher rates of mobile phone usage in NSW based on our data. Our data is limited to quantitative data rather than qualitative, and as such we are unable to ask participants open-field questions. This means we rely on numerical data only and as such, have been unable to explore the reasons for state-based differences.

- **You also state that educational campaigns to discourage mobile use while driving are not as effective as they could be. How do you suggest such campaigns could be improved?**

As stated in our submission, NRMA Insurance suggests that awareness and education efforts could be made more effective by ensuring advertising campaigns are directed at making distracted driving socially unacceptable. These types of campaigns have previously proven to be effective, for example in relation to drink driving and smoking.

We also suggest messages around driver distraction would achieve greater penetration if the focus of awareness campaigns was on the potential safety consequences of combining driving with other activities, rather than the risk of getting caught. This is particularly the case for non-technology based activities where drivers may be less likely to take the potential consequences seriously.

Effectiveness of campaigns could also be enhanced by targeting programs at those most at risk of engaging in distracted driving such as younger drivers.

- **Do you participate in any collaborative educational programs with the NSW Centre for Road Safety or other agencies?**

NRMA Insurance is currently providing support to the P Drivers Project in collaboration with Transport NSW. The P Drivers Project focuses on building awareness of risks on the road, the importance of effective decision making and developing safe driving behaviour.

2. The NRMA stresses that the incidence of crashes involving the use of electronic devices is underreported and that additional research needs to be undertaken to provide better data.

- **You suggest in your submission that data currently available from police and insurance companies cannot provide an accurate picture of how distraction contributes to collisions and that anonymous surveys need to be conducted. Who should be responsible for carrying out such research and what would be the source of this data?**

We suggest that data obtained by insurance companies and police may not be accurate as individuals are less likely to admit to committing an offence to these organisations given the possible perceived consequences of such an admission. Our submission notes on page 5 that 'Some respondents will be reluctant to admit breaking the law even when a survey is anonymous.'

Research conducted by an independent organisation with experience in motor accident related research such as the Monash University Accident Research Centre (MUARC) or the Centre for Accident Research and Road Safety - Queensland (CARRS-Q) may produce more valid results.

- **What kinds of distractions do you think constitute the greatest threat to road safety?**
NRMA Insurance considers any distraction that takes the driver's normal attention and vision away from the road to be a threat to road safety. Due to the limited data available it is not possible to distinguish a specific distraction as having a greater threat to road safety. Distractions capable of contributing to a collision range from smoking, driving and eating, mobile phone and GPS use.
- **How is this factored into your insurance policies?**
Driver distraction is not a specific underwriting factor in insurance policies as there is simply not enough reliable data nor ability to quantify the extent of the problem at an individual level. Drivers rarely admit to participating in a distracting activity at the time of a collision. Generally speaking, anything that increases the risk of a collision broadly links back to insurance premiums which reflect the risk of a collision or claim. Greater risk at a community level will be factored in through other statistical data such as collision rates.

3. The submission suggests that current road rules should be changed to make distraction prohibitions device neutral, to include all electronic devices.

- **Have you raised your suggestion to include all devices in the current prohibitions applying to mobile phones in the Road Rules with the NSW Government?**

We have not directly raised this issue with the Minister responsible. NRMA Insurance recently made a submission to the NSW Road Safety Strategy 2012-2021 on 7 September 2012 with the following recommendation:

'While we commend the NSW Road Safety Strategy's key focus to 'Develop a strategy to address mobile phone use, inducing strengthening enforcement and communication about its danger' we believe the scope of this initiative should be broadened to incorporate a range of technology

based distractions.....MP3 players, smart phones and GPS devices are all technology based distractions that have been shown to have a detrimental effect on a number of safety-critical driving measures. We consider that a comprehensive education program should be developed that factors in driver distraction issues and focuses on promoting safe use of devices such as mobile phones, GPS and other devices as well as on board equipment. '

- **Suncorp has suggested in their submission that a new 'distracted driver' offence be introduced to cover the full range of activities which can contribute to driver distraction. What is your response to the suggestion that a new driver offence be specifically legislated for?**

NRMA Insurance considers that the 'distracted driver' offence may be difficult to enforce on a practical level. The broad nature of this recommendation is that 'any activity that diverts the driver's attention from the road should be restricted' could be interpreted as including listening to the radio or talking to passengers. Substantial investigation would be required to ascertain which activities do actually present a distraction that could have an impact on road safety.

As stated in our submission, NRMA Insurance believes banning an inventory of activities is undesirable as this may have limited effectiveness. NRMA Insurance believes any additional regulation of driver behaviour to discourage distracted driving should be carefully and cautiously considered, as in our view the best way to encourage safe driving behaviour is through education and vehicle design rather than trying to legislate for common sense.

As referred to in our submission, our 2006 research demonstrates that a significant proportion of drivers continue to use mobile phones while driving even though it is illegal to do so.

4. The NSW Government submission states that there is a lack of consensus about which technological countermeasures to distraction are the most effective and lists a number of devices and applications engineered to assist the driving task, including voice activation, disabling devices, phone blocker, driver monitoring and intelligent speed adaptation.

- **As a vehicle insurer, what is your view about the range of technology remedies attempting to reduce the impact of distraction in new vehicles and which do you think are most promising from a safety point of view?**

NRMA Insurance is aware of a number of potential technological mechanisms for reducing unsafe driver distraction. Most are aimed at discouraging unsafe driving behaviour by monitoring the driver and their vehicle. NRMA Insurance believes that consideration should be given to the benefits and risks of relying on technological countermeasures to distraction. A number of concerns are associated with the use of technological solutions to manage driver distractions including:

- the risk of engaging in 'technology catch up' given the current rate of technological advancements
- the intrusive nature of many technological solutions such as telematic vehicle tracking and in-vehicle cameras

- the impact on the rest of the community eg. mobile phone blocking technology has the potential for interference to other radio communications services and may have implications for emergency services vehicles
- the effectiveness of the solutions eg voice activation may still present an element of distraction

Additionally, as listed in our submission, the effectiveness of technological measures is inhibited by a number of factors including:

- the practicality of implementation on a large scale and across jurisdictions,
- cost to consumers of retro-fitting cars with equipment,
- the additional cost to vehicle manufacturers and consequently consumers for fitting vehicles with distraction minimising equipment, and
- the fact that vehicle manufacturers operate out of a number of jurisdictions and will not necessarily have a commercial or legal imperative to incorporate distraction minimising technology into their vehicles.

Of the range of technological remedies available, early research on telematic vehicle tracking (referred to on page 12 of our submission) suggests potential to reduce the likelihood and severity of collisions, however further research is required to confirm the benefits of this technology.

NRMA Insurance supports the exploration of potential technological mechanisms to address driver distraction however we reiterate that technological measures should form part of a comprehensive strategy with driver education and awareness as its primary focus.

- **Do you agree with the claim that hands free systems can in fact give the driver a false sense of improved safety over hand held devices?**

NRMA believes that a hands free system eliminates some, but not all risk. While the need to look at the phone is reduced, voice activation may still pose a potential distraction. More information is required to determine the extent of this distraction.

5. The City of Sydney submission makes a case for reduced speed limits in order to provide greater margins of safety for drivers who may be momentarily distracted.

- **Do you think there is merit in reducing speed limits in areas such as the CBD, where drivers may experience more external visual distractions?**

NRMA Insurance considers there is some merit in specifying speed limits of 40km/hour or lower in built up areas of the CBD, while weighing up the benefits and implications for road users and pedestrians. However more effort in educating pedestrian behaviours and compliance with road rules could also be considered.

- **The City of Sydney also supports the general reduction of signage on roads as means to reduce the cognitive load on drivers and promotes the notion of shared spaces, where all road users utilise the roads more co-operatively. What is your response to this suggestion?**

NRMA Insurance supports reducing street 'clutter' including minimisation of sign duplication. We also support the removal of sign posts with no signs attached which can pose a threat to bicycle riders and motorcyclists. Consideration could be given to a simpler parking signage system such as the colour coded gutter system utilised in Europe and the United Kingdom to reduce road signage.

6. Reference has been made to a number of submissions, such as that from the Transport Worker's Union to the number of roads with variable speed limits and its distraction impact on drivers.

- **What is your view of the distraction impact of variable speed and messaging signs on roads in NSW?**

NRMA Insurance believes speed limits should be consistent according to the quality of the road, the level of risk and visibility, and the surrounding environment. We believe a consistent and practical system of speed limits based on the nature of the road and surrounding environment should ensure that awareness of the speed limit of an area is almost intuitive to the road user.

- **Do you have any views about the distraction impacts of road side advertising and the proposed introduction of electronic roadside advertising?**

The location and positioning of signs should factor in possible risks posed to drivers and pedestrians (who may be forced to walk closer to the roadside and by blocking pedestrians from the view of motorists).

- **Do you think other driver behaviour, such as eating and drinking while driving, constitutes an equivalent safety risk to other forms of distraction?**

NRMA Insurance believes that any activity or object that competes for the driver's attention may cause them to lose focus on the primary driving task and undermine their ability to drive safely. Eating, drinking, applying make-up and even talking to a passenger all encourage drivers to take their eyes off the road and create a higher risk of having a collision. Ongoing research into the impact, incidence and motivators for unsafe driver distraction is required.

I have also provided answers to questions taken on notice during the Staysafe Committee public hearing as follows:

1. Clarification was requested regarding the following statement on page 10 of our submission:

'We are encouraged that the Strategy recognises the need to address these issues on a national basis but continue to advocate for the development and implementation of a national education campaign. In the meantime we would encourage the NSW Government to develop and implement

its own broad-ranging state-wide campaign on driver distraction similar to those in Queensland and Victoria.'

Information was requested on the types of campaigns referred to in Queensland and Victoria. Details of these campaigns are provided below:

Victoria

In 2007 the Victorian Transport Accident Commission (TAC) launched a public education campaign informing motorists of the dangers of being distracted whilst driving. Mobile phone use whilst driving was specifically targeted in the campaign.

The campaign was launched through a number of mainstream media including television, radio and outdoor signage. The television component of the 'Distractions' campaign featured commercials depicting everyday scenarios which can lead to driver inattention on the road such as talking on a hand held mobile phone, changing a CD, distraction from other passengers and text messaging on a mobile phone. Radio commercials on distractions and mobile phone use were also aired during the campaign, in a number of languages including Cantonese, Arabic, Vietnamese and Mandarin.

The TAC leveraged its AFL sponsorship during the campaign period to further reinforce the 'Distractions' campaign messages. This included the use of large screen activity, signage and broadcast advertising during key AFL games.

Further details of this campaign can be found on the TAC website, www.tacsafety.com.au.

Queensland

The Queensland Department of Transport and Main Roads launched a campaign in 2010 to remind drivers about the dangers of common distractions while driving and encourage drivers to eliminate these behaviours when driving. The campaign discouraged motorists from talking or reading or sending a text on a mobile phone, changing the radio station or CD or attending to children in the backseat while driving. The campaign utilised television, radio, print and outdoor signage advertisements specific to each form of distraction.

Further details of this campaign can be found under Safety Campaigns, Driver Distraction on the website, www.tmr.qld.gov.au.

2. NRMA Insurance also offered to provide details regarding You Tube videos on driver distraction while texting.

The link to this video is provided below or can be found by searching *You Tube* for "NRMA Insurance" and "Texting" :

The Dangers of Texting and Driving NRMA You Tube video

http://www.youtube.com/watch?v=ykKWk5gj_gw

3. NRMA Insurance was requested to provide further information on the 'P Drivers' project.

NRMA Insurance has contributed to a jointly funded \$10 million project with the Australian, Victorian and NSW Governments in partnership with the Federal Chamber of Automotive Industries (FCAI) and the Royal Automobile Club of Victoria (RACV).

The program, which was launched in 2011, provides young provisional drivers with eight hours of behaviour change-oriented driver education, rather than simply teaching vehicle control skills. A key performance indicator for the project is to see whether a minimum 10 per cent reduction in crashes can be achieved between the program and control groups. This national project is the largest research trial of its type ever undertaken in the world.

Full details of the P Drivers project can be obtained from:

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Senior Media and Communications Adviser
P-Drivers Project
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4. Information was requested regarding NRMA Insurance's experiences with complaints of police enforcement of mobile phone usage.

I would like to reiterate that my comments in relation to this question at the Staysafe Committee public hearing were based on anecdotal evidence provided by a personal acquaintance. The NRMA Insurance Motor Claims department has been contacted and I have been advised that they were unable to provide specific examples of such complaints.

Thank you for your interest in this matter. On behalf of Ms Cecilia Warren and myself we advise that there are no corrections required to the transcript of the oral evidence given at the hearing.

Please do not hesitate to contact me on (02) 9292 6840 or Robert.McDonald@iag.com.au if I can be of further assistance.

Kind Regards,



Robert McDonald

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