FCAI Submission in response to National Roadmap on Driver Distraction

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EXECUTIVE SUMMARY

The Federal Chamber of Automotive Industries (FCAI) is the peak industry organisation representing the importers of passenger vehicles, light commercial vehicles and motorcycles in Australia. The FCAI welcomed the opportunity to participate in the workshop that was undertaken in Queensland earlier this year with various stakeholders and we appreciate the opportunity to comment on this National Roadmap on Driver Distraction.

FCAI agrees that driver distraction is a difficult issue and one that, if reduced, has the potential to contribute to road safety. Road safety is however a complex phenomenon, involving a combination of various factors and stakeholders, interacting with each other. These factors and stakeholders include road user training, education and behaviour, road and repair infrastructure, road traffic rules and their enforcement, progress in the analysis of accidents' causation and their consequences, vehicle fleet age and composition, vehicle design, etc. Isolating one of these factors, while neglecting the others, will not yield the hoped-for benefits: road safety calls for an "integrated approach", involving all stakeholders.

FCAI strongly supports an integrated approach for road safety, involving all factors (road safety management, road infrastructure, road user behaviour, traffic rules' enforcement, and safer vehicles). Such an integrated approach must not be contradicted by attempts to single out individual factors.

Driving is a complex task that requires constant attention and coordination between mind and body. It is very easy for a driver to become distracted. Passengers (including children), pets, mobile phones, infotainment systems and roadside advertising can all distract drivers' attention from the task of driving. Drivers always have a responsibility to ignore distractions, give driving their full attention which involves anticipating and avoiding hazards on the road requiring drivers to concentrate on the driving task.

However, when considering driver distraction, it should be recognised that many such accidents will be reduced by technological solutions already in-place such as autonomous emergency braking (AEB), lane departure warning (LDW) and lane keep assist (LKA) systems to name a few. At the same time, AEB will prevent or reduce the severity of frontal and side crashes. Regrettably with an average vehicle age in Australia of just over 10 years and increasing, adoption of these technologies is a slow process that will take some time to have a meaningful effect on road crash statistics. Therefore, any actions that can be undertaken to encourage earlier introduction of vehicles fitted with these existing automated driver assist system (ADAS) technologies will have a positive effect on incidents where distracted driving is a factor.

Australia represents 1.1 million sales out of an estimated global production volume of 95 million vehicles in 2018, it is essential that we harmonise with overseas regulations. Global regulators and OEMs are working to create standards and timeframes for development of in-vehicle technologies that can either minimise distraction or monitor driver attention with the aim of raising driver’s attention back to the task of driving. This harmonisation allows Australia to benefit from the advances occurring as a result of substantial global research and development into this challenging and most difficult area. By harmonising our Australian Design Rules with UN regulations, Australia will benefit from the global economies of scale allowing these

technologies to be adopted across borders. This will also mean that Australian drivers continue to enjoy the benefits of considerable competition that occurs through having one of the most open automotive markets in the world.

STRATEGY 1 - DESIGNING FOR A SAFER INTERACTION

The design of vehicles on the road is one of the important factors in road safety. Modern vehicles are much safer than the ones they have replaced over time. Under similar accident conditions, occupants or other road users are much more effectively protected with modern vehicles compared to older models. This improvement is due to various advances in research that have led to changes in design from the vehicle structure as a whole, enhancing energy absorption capabilities, to specific occupant protection systems such as increasingly sophisticated safety belts and airbags, etc. Not only do modern vehicles perform much better in case of an accident, they are also much better equipped to avoid the accident altogether. Through advances in crash avoidance technology vehicles are increasingly able to effectively brake, remain in a lane and provide effective lighting of roadways to help reduce the risk of an accident.

It must be recognised that both regulatory (e.g. ADRs) and non-regulatory (e.g. ANCAP) approaches are encouraging the fitment of Advanced Driver Assistance Systems (ADAS), such as autonomous emergency braking (AEB), Lane Departure Warning (LDW) Lane Keep Assist (LKA) and Speed Assistance Systems (SAS). In addition, Original Equipment Manufacturers (OEMs) are continuously developing and deploying other driver assistance and warning systems (e.g. adaptive cruise control, following distance warning, blind spot monitoring) that are intended to operate in the background as well as to attract the attention of the driver. In some instances, this could be considered to be driver distraction, however, this type of warning is beneficial in diverting an otherwise inattentive or distracted driver back to the task at hand.

Modern vehicles are better equipped to avoid and reduce the severity of accidents whilst providing far better occupant protection in the event of an accident.

STRATEGY 1 - VEHICLE MANUFACTURER GUIDELINES

Whilst the driver must remain responsible for the operation of the vehicle, vehicle manufacturers recognise their responsibilities to provide systems that will operate and provide the correct information to the driver at the right time to assist the driver to make the most appropriate decisions. All OEM vehicle brands undertake extensive development programs prior to introduction of any new technology to comply with global regulations, standards and guidelines ensuring that the information provided to the driver is at the correct time and in the necessary priority in order to allow the driver the opportunity to undertake necessary actions in the safest manner.

Australia must align and harmonise with International guidelines

Vehicle designers recognise the importance of supporting a driver to keep their eyes on the road and driving environment including monitoring of in-vehicle displays and operating the

vehicle controls. With the introduction of both integrated and portable (nomadic) communication and entertainment systems, the automotive industry and government agencies around the world have responded to concerns on driver distraction with guidelines covering the visual-manual driver vehicle interface associated with both vehicle integrated systems and docked (or tethered) portable (nomadic) devices.

The integration of a portable electronic device into vehicle systems enables the vehicle to manage access to these devices in a manner appropriate for the driving environment. If standards for portable electronic devices are not implemented simultaneously with those for integrated systems, the risk is that drivers will continue to use portable electronic devices they carry into cars which have not been engineered for use in the driving environment, leading to increased risks of driver distractions.

Most vehicle manufacturers have developed systems to automatically pair (i.e. wirelessly tether) portable (nomadic) devices (e.g. smart phones) to the vehicles integrated system. This allows the in-vehicle integrated system to utilise the vehicle's controls to manage the content and presentation of information from both the vehicle and portal device to the driver in accordance with established industry guidelines.

The international association of vehicle manufacturers (OICA) has developed a recommended policy position on driver distraction in 2015 (link below). This paper also includes a list of the current guidelines that exist in Japan, Europe and the USA;

Recommended OICA Worldwide Distraction Guideline Policy Position http://www.oica.net/wp-content/uploads//OICA-Position-Paper-Driver-Distraction-Final-2015-03-03.pdf

STRATEGY 1 - HUMAN MACHINE INTERFACE EVALUATION

FCAI is fully supportive of suitably qualified authorities evaluating Human Machine Interface (HMI) to develop our knowledge enabling input into global vehicle regulation development through the UNECE World Forum for Harmonisation of Vehicle Regulations (WP.29) with the aim of reducing the complexity of HMI with a consequent reduction in levels of driver distraction.

HMI research can inform global standards development benefitting all road users

However, FCAI is not supportive of any action in this area that results in unique Australian or localised rules being developed. Should this be the case, it would only limit vehicles made available for sale in Australia with a consequent reduction in consumer choice and potentially less-safe vehicles being made available.

STRATEGY 1 - NOMADIC DEVICE AND SOFTWARE TECHNOLOGY

It is vital that mobile, wearable devices as well as software designed to operate in automotive environments e.g. Apple Car Play™ / Android Auto™ etc. are developed embodying the same principles that are applied and used in developing vehicle designs to eliminate or minimise the potential for driver distraction when used in a vehicle application.

FCAI supports any activities that improves mobile, wearable devices and software designed to operate in automotive applications and facilitates safer interactions through standards development processes. Currently these devices and software solutions are largely unregulated from an automotive perspective.

There are no industry or government guidelines currently in effect. However, FCAI understands that the National Highway Transportation Safety Authority (NHTSA) in the United States is attempting to develop such guidelines which may provide some guidance.

Standards for automotive environment software and portable nomadic devices used in vehicles need to be developed and implemented.

STRATEGY 2 - MAPPING OUT THE ADOPTION OF IN-VEHICLE DISTRACTION METHODOLOGY

FCAI strongly supports working with DITCRD in conjunction with the UNECE World Forum for Harmonisation of Vehicle Regulations to ensure international regulation development can be incorporated into Australian Design Rules (ADR) in a timely fashion. This work at an international level will ensure that Australian motorists are not denied the opportunity to benefit from international vehicle distraction minimisation technological developments.

FCAI does not support the Australian New Car Assessment Program (ANCAP) simply prioritising driver distraction minimisation technologies into safety ratings.
ANCAP safety ratings are determined based on a series of internationally recognised, independent crash tests and safety assessments – involving a range of destructive physical crash tests, an assessment of on-board safety features and equipment, and performance testing of active collision avoidance technologies. If ANCAP were to diverge from its current alignment with Euro NCAP, the ability for manufacturers to utilise international testing results (where appropriate) would be compromised. This would result in less vehicles being made to Australian consumers as the costs incurred in obtaining an ANCAP safety rating that is uniquely Australian may become more prohibitive.

ANCAP does play a significant role in not only informing consumers of the differences in safety performance of new vehicles entering the Australasian vehicle fleet, it also advocates for improved vehicle safety design and specification through public education campaigns, advocacy activities and engagement with governments, corporate fleets, the media and consumers.

FCAI suggests that ANCAP should advocate for technologies that improve safety based on an evidence basis whilst also considering a rigorous cost / benefit analysis.
This should be considered in conjunction with the UNECE World Forum for Harmonisation of Vehicle Technologies (WP.29) roadmap which should then be adopted into Australian Design Rules.

Australia must harmonise ADRs with UNECE and promote timely legislative introduction alignment.

STRATEGY 2 - AFTERMARKET TECHNOLOGY

FCAI members do not approve of the fitment of aftermarket devices to vehicles due to the considerable complexities associated with ensuring compatibility and operability without understanding the original vehicle design intent and engineering protocols. All manufacturers have strict accessory design, development and operational guidelines to assure the integrity and quality of the vehicle and accessory is maintained whilst ensuring that the ADR compliance of the vehicle is not compromised. It is essential that these design protocols and production standards which can vary between brands and models are adhered to. This would be extremely difficult for any aftermarket provider to cater for across a multitude of vehicles.
Members advise that they experience many issues where aftermarket products have been fitted with numerous, unintended consequences ranging from poor quality products through to interference with other safety systems. Occasionally this has resulted in vehicle destruction typically from poor quality electrical components or substandard fitment processes. Aftermarket accessories are made in a vast range of quality levels usually sold at a price advantage. FCAI is extremely concerned at this workstream that does not adequately consider the level of engineering that is expended on new vehicles and the testing required to robustly assure consumer safety which could very easily be compromised by unregulated aftermarket products.

FCAI members do not approve of the fitment of aftermarket devices to vehicles.

STRATEGY 2 – PRODUCT ROADMAPS

Australia has one of the most competitive automotive markets in the world with around 68 brands and 380 vehicle models competing for 1.1 million sales. Additionally, within the membership group there are 28 brands retailing less than 4,000 vehicles annually.
With the competitiveness of the Australian automotive environment in mind, product roadmaps are considered “commercial-in-confidence” that brands use to advantage. In this way, there is a continual adoption of various technologies including those that provide enhanced safety benefits. FCAI would be pleased to work with various agencies in this area to assist them in understanding the commercial limitations in this areas’ scope.

STRATEGY 3 – RECOGNISING THE VEHICLE AS A WORKPLACE

FCAI does not consider that there is a significant role for the members in this area outside of the design elements in vehicle manufacture. Occupational Health and Safety (OH&S) requirements remain the responsibility of individual employers.

STRATEGY 4 – ENCOURAGING GREATER COMPLIANCE THROUGH ENFORCEMENT

FCAI does not consider that there is a role for our members in this area, however we would encourage proactive engagement where systemic issues are identified.

STRATEGY 5 – DRIVE CHANGE THROUGH EDUCATION AND CAMPAIGNS

Whilst the FCAI would be pleased to assist in the development of a national narrative for driver distraction, we do not agree with the concept that industry and manufacturers should lead public educational campaigns. Public safety campaigns are a key role that governments need to lead. We are also of the opinion that to change driver behaviour requires a long-term strategy to be developed such as that that was developed and implemented for driving under the influence of alcohol. The education campaign for alcohol went well beyond just driver education and resulted in significant cultural change across the population – it is now largely socially unacceptable to drive a motor vehicle above the prescribed level of alcohol intoxication across Australia. The education undertaken to create this cultural change was significant and broad based not just focussing on drivers alone. Consideration should be given to the notion of being a good driver and what driving behaviours might contribute to that. Family (including children) and friendship group pressure will progressively influence driver behaviours positively.

Road user education is an essential component of changing behaviour.

STRATEGY 5 – EXPLORE THE USE OF INFRASTRUCTURE AS A NUDGE TOOL

FCAI is supportive of this approach although we do not consider we have a role to play.

STRATEGY 5 – LEVERAGE OPEN DATA AS A NUDGE TOOL

FCAI does not agree with the concept of “Open Data” being freely available to everyone to use without restrictions, patents or other mechanisms of control.
FCAI contends that insurance products are a contract between the owner/operator and the insurer. Insurance products currently exist that use technology to ascertain a driver’s risk profile over several risk parameters and it is possible that parameters could be enhanced to include driver distraction elements. However, insurers should evaluate the benefits and weighting of risk profiles accordingly in line with their risk management and insurance business practices. It is worth noting that, for most of these products, the driving data being measured occurs regardless of which driver is driving the vehicle unless some form of driver log is utilised.

CONCLUSION

The FCAI supports the approach of developing a National roadmap to investigate the challenge of driver distraction on Australian roads in the context of a National roadmap on road safety.

Australia represents just over 1 percent of global sales and right-hand drive vehicles are certainly the minority from a global perspective which means that vehicles will not be developed to meet uniquely developed Australian requirements. FCAI supports research into driver distraction and recommends that these learnings are formalised into the appropriate international forums in order to better inform vehicle design and vehicle regulation development. Harmonisation with UNECE regulations is essential if Australians are to enjoy the benefits of an

open marketplace and be able to be protected by some of the latest automotive technological advances. FCAI certainly does not support the concept of unique Australian or state-based regulations or standards.

Aftermarket technology being added to vehicles post-production is fraught with many dangers and unintended consequences that may outweigh any perceived benefits. Then we must consider how to convince consumers to expend finances to adopt aftermarket technologies to prevent actions that they believe that the reward/risk equation rationalises their actions as meeting an acceptable threshold.

Software and mobile device standards require review to ensure that they operate in a driving environment in line with the same protocols that have been developed for vehicle manufacturers to follow.

Road safety is a complex phenomenon, depending on lots of different factors and interactions. Vehicle technology is just one piece of the puzzle. Equally important factors are the behaviour of drivers and other road users, the maintenance and design of road infrastructure, traffic rules and their enforcement, as well as vehicle fleet age and composition, to name a few.

Focusing on one of these factors in isolation while neglecting others, will not yield the greatest benefits to society. Road safety requires an integrated strategy that focuses on a safe system encompassing – safe vehicles driven by safe drivers on safe roads.

FCAI looks forward to working with stakeholders as we work through the various work streams and thanks TMR for convening this activity.

Kind regards

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