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Submission for the NTC Developing Technology Neutral Road Rules For Driver Distraction

Submission by Adflow

Adflow is a wholly owned subsidiary of P2P Transport, Australia's largest owner and operator of taxis. Adflow is tasked with selling media space across our transport network on a variety of different formats. These formats include in vehicle digital entertainment systems, taxi boot panels, wrapped vehicles and digital rooftop signage.

Advertising on taxis and other vehicles have been prevalent since the 1960's overseas and for at least the last 20 years in Australia. Digital internal advertising started to take off in the early 2000's worldwide and digital rooftop advertising has steadily grown for the last ten years. Currently our Digital Rooftop Network is distributed across three states and is one of the largest in the world.

Our submission is based on the issues paper and how proposed language changes can influence outdoor advertising via suggested changes to Australian Road Rule 299.

Distracted Driving

P2P Transport has 1000's of professional driver as its main client base. Taxi drivers are travelling on average 2,500 km's per week, almost ten times the weekly average of private road users. We are aware of the risks of distracted driving and have agree that updates need to be made to regulations to better represent the current and future landscapes. However, the definition, regulation and enforcement of distracted driving is fraught with contradictions if strictly prescribed.

External distraction regulation and enforcement would be extremely difficult to quantify as the visual landscape is a dynamic environment with so many forms of distractions for drivers. Without specific research to include not just advertising products but the impact of road signs, shop fronts, vehicle signage, building design and the dynamic nature of the roadside environment it would be hard to see how regulation could be proposed to combat distraction. Visual and cognitive distraction is very subjective. For, what distracts a teenage and elderly driver might not distract a middle-aged driver.

Furthermore, the distraction from within the vehicle is equally hard to define as attention required for the driving task is always changing as is the mental state of the driver. The task of driving on a deserted straight stretch of road while taking a phone call on handsfree is quite easy, whereas driving on a winding road, in adverse weather condition and at high speed, the threshold between not distracted to distracted is easily crossed making regulation and enforcement incredibly difficult.




In this same scenario what if the phone call was replaced by a crying child or the car stereo? These are all forms of distraction and the regulation of these would be nearly impossible. How do we reach the level of comfort to say that a conversation with a passenger in the vehicle is less distracting than someone who is the other end of a telephone?

Technology and vehicle design are the two main areas where we see regulation and enforcement can have the greatest impacts. Not only do they provide the greatest gains available in reduction in distraction they are also controllable. Mobile phone blocking technology, automated safety systems, vehicle HMI designs and the increasing accuracy and use of voice control systems all offer great opportunities to remove the largest percentage of current and future distraction scenarios.

Conclusion

We are open to any improvements for documented, well researched and definitive regulation changes that make our road safer. P2P Transport and Adflow are happy to participate in further discussion when the discussion paper is released and encourage well researched changes that improve the road safety of all.

Yours sincerely



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