



DriveRisk Australasia
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14 February 2019

National Transport Commission
Attn: Luis Gutiérrez
Level 3/600 Bourke St
Melbourne VIC 3000

Submission: Developing technology-neutral road rules for driver distraction

Dear Luis Gutiérrez,

This submission is from DriveRisk Australasia. We are a risk management business that assists commercial fleets with managing and improving their on-road risk, focussing mainly on driver behaviour. We utilise in-cab sensor technology including road and driver facing video to capture, classify, score and organise anomalous driving events. This video and associated meta-data are used to help commercial fleets understand their risk and take steps to proactively coach drivers to mitigate future situations.

As we see our primary goals as making the roads safer and saving lives, we are very interested in this area of research and the regulatory changes resulting from it. As we primarily deal with commercial drivers, we will be answering from this point of view rather than the general public.

We have access to significant amounts of additional real-world data to assist and would be happy to be part of future analysis and discussions.

Best regards,

A handwritten signature in blue ink that reads 'Owen Neochi'.

Owen Neochi
Chief Operating Officer
DriveRisk Australasia

Answers to Questions

Defining the driving task

1. Does the proposed definition include all the key functions required to safely perform the driving task?

Yes, we agree that this proposed definition is a complete and is relevant for commercial drivers.

A common definition of driver distraction

2. Does the proposed definition capture all the behaviours that lead to driver distraction and a reduction in driving performance?

Yes, we agree that this proposed definition is a complete and is relevant for commercial drivers.

Types of driver distraction

3. How could a distinction between manageable and unmanageable levels of driver distraction be used to inform the way distraction is regulated? What evidence-based distinctions could be considered?

The number of individual distractions could be used as a guide, but this is a grey area. We have always considered each individual distraction in isolation. The manageable vs unmanageable is a judgement call that is viewed in each individual situation when coaching drivers.

Clear and consistent approach in the Australian Road Rules

4. Should conventional and technology-based causes of distraction be treated equally in the Australian Road Rules? Why?

Yes. Any distraction causes the driver to focus on a non-driving task. In a commercial fleet sense, we view all distractions to be collision leading behaviour – whether food and drink, or a mobile phone. We have data to demonstrate the link between various types of distractions and their collision or near collision outcomes.

As a specific case, we have always found the exception for 2-way radios to be out of step with general road safety thinking and needs to be addressed.

Responsibility for distraction

5. Can you provide examples of effective non-regulatory approaches to driver distraction that assist drivers to self-regulate their behaviour in a dynamic driving environment?

We provide companies with a proactive driver behaviour management and coaching system using DriveCam™ – a non-regulatory approach for commercial fleets. This has a minor component of self-regulation, but is largely based on proactive risk management and coaching by the organisation.

Shared responsibility

6. Can you provide examples of strategies successfully implemented by other international jurisdictions and industries (for example, aviation) that could be applicable to driver distraction?

The DriveCam system has been successfully implemented around the world, with the largest user base in North America (500k vehicles and 850k drivers)

The concept of chain of responsibility

7. Are there other parties besides the vehicle driver who can influence the risk of driver distraction? If so, are there mechanisms to ensure those parties are doing all that is reasonably practicable to ensure safety?

Yes. The company that employs the driver is often the direct cause of the distraction with communications or notifications, such as calling the driver to change task or new job information on an in-cab tablet. Hands free equipment can be used to mitigate this to a certain extent or so in-cab systems have lock-out mechanisms to prevent notification when the vehicle is in motion.

The company normally has to make safe driving a priority from a policy and procedure standpoint and then take this as a holistic approach to the job of driving and when the driving is in progress. Allowing rest breaks and timepoints (stops) to access systems and acquire new information is a step many fleets take. We assist companies to manage, monitor and enforce these policy and procedures.

Technologies that can assist with (and distract from) the driving task

8. Can you provide examples of effective strategies for ensuring that new in-vehicle technology and mobile apps minimise driver distraction?

We provide commercial solutions for fleets that address this type of problem. The DriveCam system is designed around the company being made aware of the distractions happening so they can make the company drivers aware and coach them to minimise (and completely stop) this behaviour.

Transition towards automation

9. Can you provide examples of strategies to ensure that users of partially automated vehicles are fully informed about their responsibilities, and the limitations of their vehicle's technology?

No. This is not within the scope of our experience.

Prescriptive and performance-based approach to regulation

10. What evidence is available in support of a performance-based approach or a prescriptive approach for managing the risks of driver distraction?

We are in favour of a performance-based approach. We have access to a large amount of driving and driver behaviour data from Australia and other parts of the globe and we see the positive effect a performance-based approach has. We can provide more information but did not want turn out submission into product advertising. Please feel free to contact us for further information.