



European Commission
 Directorate-General for Mobility and Transport
 Unit C4 – Road Safety
 DM24 4/100
 Rue de Mot 24
 B – 1049 Brussels

Friday, 15 June 2012

Dear Sir/Madam,

Re: DSE response to the European Commission's public consultation on an EU strategy to reduce injuries resulting from road traffic accidents

Sharing the Commission's view on the importance of increasing road safety and moving towards a long term "vision zero" of no deaths on Europe's roads, Drive Safely Europe (DSE) is pleased to provide its response on the *Consultation response on EU strategy to reduce injuries resulting from road traffic* to the European Commission.

DSE is a technology company whose primary focus is to bring an end to distracted driving through the use of technology. Significantly reducing the instance of distracted driving will reduce road deaths and injuries in the European Union. As such, DSE welcomes the opportunity presented by the European Commission's consultation to emphasise the importance of addressing some of the main causes of road accidents, including distracted driving. In line with the European Parliament report on "European Road Safety 2011-2020", DSE strongly supports the necessary role of governments, through EU-wide legislation, to ban the practice of texting, emailing and web browsing while driving a motorized vehicle. In addition to creating a huge economic cost, distracted driving, notably the practice of texting while driving, is deemed responsible for thousands of deaths annually in the EU and over an estimated €26 billion is spent each year in the EU on distracted driving-related motor vehicle incidents.

Accordingly, DSE wishes to highlight here the key priorities we believe should form part of the 2010 *Policy Orientations on Road Safety*, placing more emphasis on the issue of distracted driving via political objectives such as increasing compliance with road traffic rules or promoting the use of modern technology to help achieve such aims. DSE provides its full response in the pages which follow and looks forward to ongoing dialogue with EU policymakers as we work together to improve the safety of Europe's roads.

Yours sincerely,

Ciaran Hynes

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DSE Draft Consultation response - EU Commission consultation on EU strategy to reduce injuries resulting from road traffic accidents

Q: How do you rank the following threats to society? (1=most important and 9=least important) – additional comments

The damage that results from road traffic accidents in the EU not only includes the obvious enormous social cost but also gives rise to substantial economic cost. One of the main causes of road traffic accidents which DSE believes is not sufficiently addressed at EU level, is the problem of distracted driving. Texting while driving is deemed responsible for thousands of deaths annually in the EU and it is estimated that over €26 billion is spent each year in the EU on distracted driving-related motor vehicle accidents. A drunk driver is 8 times more likely to be involved in a traffic accident, however a distracted driver is 23 times more likely. The success of new technologies such as e-call and alcolocks show the effectiveness of technology to deal with road-dangers and DSE believes that to achieve the “vision zero” and address what the Commission calls the “emerging challenges and concerns in road safety” EU Member States and mobile phone operators need to be equipped with an enforcement tool to deal with distracted driving.

Notwithstanding the horrific cost to the safety and wellbeing of EU citizens, the financial cost of distracted driving has a considerable negative impact on the EU’s competitiveness and economic growth. As indicated in the European Parliament Own Initiative report on road safety, the way to tackle this problem is EU wide regulation of rules applicable to distracted driving and the proper implementation of said rules EU wide whereby this implementation is made possible through the use of technology. This technology already exists, in the form of anti-messaging technology (AMT) which can virtually eliminate texting, e-mailing, viewing multi-media files and browsing on your mobile phone while driving and which cannot be disabled by the phone user. This technology can make an immediate impact and save thousands of lives.

DSE is of the view that the disparity in regulations and implementation thereof across EU Member States regarding mobile phone use while driving has created a disjointed system of road safety legislation across the EU. Bans on texting while driving, while in force in most Member States, are rarely enforced and there is no cross-border element to their enforcement. An EU-wide ban on the practice of texting, coupled with robust use, for example, of anti messaging technology could address this. Arguably EU-wide regulation of the rules applicable to distracted driving will also allow for a stronger and wider public campaign centred on the dangers of distracted driving. In the interim, joint EU-Member State and industry initiatives should be promoted to help strengthen and develop already existing legislation. Increased cross-border harmonisation is of course a key aspect of addressing this problem and the harmonisation of transport regulations, such as those relating to dangerous driving, would allow for new transport technologies to be more easily implemented across borders and contribute greatly to EU target of a ‘vision zero’ for road deaths.

Q: Should road safety in your opinion be a top priority at all political levels (EU, national, local authorities)?

DSE believes that transport policy at all levels (EU, national, local) needs to focus first and foremost on road safety, as it is this fundamental aspect of transport policy that has the greatest/largest effect in terms of social cost. In this context DSE feels it is vital that drivers are aware of the risks they take when they become distracted by mobile phones, in the same way that drivers are aware of the risks associated with drink-driving. In order to ensure that the public are properly informed of these dangers, it is necessary that the Commission, Member State Governments and local governments

emphasise the dangers and statistics associated with distracted driving and encourage the use of existing technologies which essentially prevent a driver from texting while driving. The support of governments is vital in order to ensure that such technologies are implemented in collaboration with all other EU Member States. DSE welcomed the 2011 European Parliament report on Road Safety which called for EU-wide legislation to ban the practice of texting, emailing and web browsing while driving a motorized vehicle. However the policies addressing distracted driving remain sorely underdeveloped and fragmented across EU Member States. The Commission can play an important role in this regard through policies that should focus on (1) education (2) awareness raising (3) joint industry government efforts and (4) appropriate EU regulation. The 2010 Policy Orientations on Road Safety offer the appropriate opportunity to put more emphasis on the issue of distracted driving through Policy Objectives no.2 on Increasing compliance with road traffic rules and Objective no.5 on Promoting the use of modern technology to increase road safety.

DSE believes that the Objectives of the Road Safety Action Plan need to look closely at addressing this fragmentation rules applicable to texting while driving across the EU and the potential for technology to tackle the problem itself. Accordingly, we would welcome and encourage any EU Road safety policy that looks to:

- Address new and emerging safety and security issues such as texting while driving;
- Integrate road safety technology into future transport policy;
- Harness the potential of anti-messaging and browsing technologies;
- Encourage the development of, and deployment of existing, road safety technology;
- Conduct studies and research for statistics on the effect of texting while driving in the EU.

Q: Do you see EU added value in setting up a strategy to reduce injuries from road accidents?

The EU has a clear and important role to play in reducing injuries from road accidents and there is clear added value in the creation of an EU wide strategy to tackle this problem given poor implementation at national level of existing legislation. In setting up any strategy to reduce injuries arising from road accidents it will be important to tackle the problem at the root, which will involve addressing the key road safety issues that lead to accidents. The European Commission must be commended on the good work already done in this regard with the publication of the Policy Orientations on road safety and DSE welcomed the subsequent European Parliament report on Road Safety from MEP Dieter Lebrecht Koch in 2011. Continuing along these lines in road safety policy DSE believes the shift from passive to active safety is of paramount importance. Whilst education of course plays a key role in reducing road traffic accidents, as can be seen in the case of drink-driving, the focus on innovation needs to continue as it is not feasible to wait for the longer term benefits of education.

Education, awareness raising and investment in new technologies need to be part of a multi-faceted approach to improving EU road safety and should form an integral part of any strategy to reduce injuries from road accidents as only by first addressing the fundamental causes of road accidents can the EU create a holistic and effective strategy to reduce road injuries. In this regard, DSE emphasises the importance of addressing some of the main causes of road accidents, including distracted driving. A drunk driver is 8 times more likely to be involved in a traffic accident, however a distracted driver is 23 times more likely. The success of new technologies such as e-call and alcolocks show the effectiveness of technology to deal with road-dangers and DSE believes that to achieve the "vision zero" and address what the Commission calls the "emerging challenges and concerns in road safety." DSE would support any Commission strategy to reduce injuries from road accidents and would encourage this strategy to look at first at the root causes of traffic accidents, in particular new and emerging dangers such as texting while driving and the technological solutions which already exist to address these causes.