

Mandating vehicle safety technologies in GB type approval

Your information

Q1. What is your name?

Robert Pellow

Q2. What is your email address?

rob.pellow@ciht.org

Q3. Are you responding on behalf of an organisation?

Yes

Organisation details

Q4. What is the name of your organisation?

The Chartered Institution of Highways and Transportation (CIHT)

Q5. How many people work for your organisation?

1 to 49 employees

Q6. How would you describe your organisation?

Another organisation:
Membership body

Vehicle safety technologies

Q7. Do you support or oppose mandating these vehicle safety technologies in GB type approval?

	Support	Oppose	Neither support nor oppose	Don't know
Advanced distraction warning	X			
Blind spot information systems	X			
Drowsiness and attention warning	X			
Direct vision	X			
Emergency braking for cyclists	X			
Emergency braking for pedestrians	X			
Emergency braking for vehicles	X			
Event data recorder	X			
Emergency lane keeping system	X			
Emergency stop signal	X			
Frontal full-width impact	X			
Frontal off-set impact	X			
Intelligent speed assistance	X			
Moving off information system	X			
Pole side impact	X			
Pedestrian windscreen impact	X			
Reversing motion awareness	X			
Tyre pressure monitoring system	X			

Why?

All evidence based *BUT* there is already inconsistency between the application of these systems (ADAS elements already widespread on newer vehicles, each element with divergent application in practice). Drivers regularly using multiple vehicles e.g. within a family or a business will find each behaves differently in a given situation e.g. urban road without centrelines and with advisory cycle lanes. Some will alert but not over-ride, some will recognise the 2-lane road without markings, some will pull the vehicle into the middle of 'the lane' i.e. into head-on risk with opposing vehicles.

Similarly multiple superseded markings and studs from different lane configurations in the past are causing unpredictable and often unsafe 'protective' action by vehicles.

Autonomous Emergency Braking (AEB) on Heavy Goods Vehicles (HGVs) is reported as 'over-reacting' to inclined bridge abutments and piers with complex 3-D geography resulting in AEB deployment when no potential for impact exists, resulting in drivers deactivating.

Poor public understanding, misplaced perception of drivers' own skills/reactions and inconsistent systems between models and manufacturers is undermining public trust leading to many drivers deactivating systems that are a net benefit but are either misunderstood or are unreliable

Alcohol interlock installation facilitation

Q8. Do you agree or disagree with our proposal not to mandate AIIF technology at this time?

Neither agree nor disagree

Suggested approach

Q10. Do you agree or disagree with mandating these technologies at this time solely for mass-produced vehicles under GB type approval?

Don't know

Technical requirements

Q14. Do you support or oppose the proposed technical requirement for:

	Support	Oppose	Neither support nor oppose	Don't know
advanced distraction warning	X			
blind spot information systems	X			
drowsiness and attention warning	X			
direct vision	X			
emergency braking for cyclists	X			
emergency braking for pedestrians	X			
emergency braking for vehicles	X			
event data recorder	X			
emergency lane keeping system	X			
emergency stop signal	X			
frontal full-width impact	X			
frontal off-set impact	X			
intelligent speed assistance	X			
moving off information system	X			
pole side impact	X			
pedestrian windscreen impact	X			
reversing motion awareness	X			
tyre pressure monitoring system	X			

Why?
Subject to previous observations about consistency and public understanding

Vehicles built in multiple stage

Q15. Do you agree or disagree with retaining existing provisions for multi-stage builds?

Don't know

Special purpose vehicles

Q17. Do you agree or disagree with retaining the current technical requirements for special purpose vehicles?

Don't know

Effect of vehicle safety technologies on casualty reduction

Q19. If the safety technologies were mandated for GB type approval what effect, if any, do you believe each technology would have on casualty reduction?

	Very positive	Positive	Neither positive nor negative	Negative	Very negative	Don't know
Advanced distraction warning		X				
Blind spot information systems	X					
Drowsiness and attention warning		X				
Direct vision	X					
Emergency braking for cyclists	X					
Emergency braking for pedestrians	X					
Emergency braking for vehicles		X				
Event data recorder						X
Emergency lane keeping system						X
Emergency stop signal		X				
Frontal full-width impact		X				
Frontal off-set impact		X				
Intelligent speed assistance	X					
Moving off information system		X				
Pole side impact	X					
Pedestrian windscreen impact	X					
Reversing motion awareness	X					
Tyre pressure monitoring system		X				

Explain why?

Biggest effects where greatest disparity e.g. motor vehicle v pedestrian or cyclist. Dependant on detail of application (see previous notes regarding inconsistency in practical application and poor public understanding). Also depends on extent to which data recorder content available for investigation and enforcement which seems unclear at present.

Other regulations

Q20. What, if any, other domestic regulations, beyond those already specified, do you believe will require amendment to align with these proposals?

None

Implementation timing

Q21. Do you agree or disagree with the proposed timings for implementing these safety technologies?

Don't know

Sale of remaining non-compliant vehicle stocks

Q23. Should, in your view, manufacturers be allowed to sell their remaining stocks of non-compliant vehicles for a specified period after introduction of these proposals?

Don't know

Maintaining standards

Q25. After implementation if evidence showed that these vehicle safety technologies are not consistently maintained, should we make it mandatory for operators to maintain these technologies?

Don't know

Other considerations

Q27. What, if any, other further measures exist that you wish to highlight regarding these proposals?

None

Final comments

Q28. Any other comments?

None