

STATEMENT

OF

THE ALLIANCE OF AUTOMOBILE MANUFACTURERS

BEFORE THE:

**SUBCOMMITTEE ON
COMMERCE, TRADE AND CONSUMER PROTECTION
&
SUBCOMMITTEE ON
COMMUNICATIONS, TECHNOLOGY AND THE INTERNET
OF THE**

**COMMITTEE ON ENERGY & COMMERCE
U.S. HOUSE OF REPRESENTATIVES**

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PRESENTED BY:

Robert Strassburger
Vice President of Vehicle Safety & Harmonization

Thank you, Mr. Chairman and members of the Subcommittee. My name is Robert Strassburger and I am Vice President of Vehicle Safety and Harmonization at the Alliance of Automobile Manufacturers (Alliance). The Alliance is a trade association of eleven car and light truck manufacturers including BMW Group, Chrysler Group LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz, Mitsubishi Motors, Porsche, Toyota and Volkswagen. The Alliance members consider safety to be a top priority.

Alliance members implement cutting-edge technology as a part of our efforts to prioritize safety in vehicle designs. We are committed to advancing motor vehicle safety and we take concerns about driver distraction seriously. From program initiation, we engineer new vehicle systems taking into consideration how these systems will be used in the real-world driving environment. We design these systems to help drivers perform their primary task – safely operating their car or truck which includes helping them to keep “eyes on road.”

The most recent and comprehensive studies involving real world driving experiences – such as Virginia Tech’s “100 Car Study” demonstrate that visual distraction is the primary concern when driving. In that study, looking away from the road scene for extended periods was found to be the principle contributor to crashes and near misses. There is also significant research that shows hands-free technology provides a safer alternative to hand-held cell phones and texting devices because it keeps drivers’ hands on the wheel and eyes on the road.

Recent polling data suggest that drivers will be more likely to obey hand-held bans if they are given the option of using a safer alternative -- hands-free technology. We are concerned that overly-broad bans of advanced communications technologies and features in the name of reducing driver distraction will not improve real world safety, but simply force drivers to use hand-held devices surreptitiously. Therefore, we support improving safety with a realistic and workable solution that combines prohibiting hand-held texting and calling with encouraging the development and use of hands-free, voice-activated technologies.

Alliance members have long recognized that in-vehicle information and communications systems – also known as telematics systems – have the potential to distract drivers if not properly designed. For nearly a decade, Alliance members have worked to ensure that vehicle-integrated telematics systems are designed to help drivers keep their eyes on the road.

Challenged by NHTSA, the Alliance initiated development of its Driver Focus – Telematics Guidelines in July 2000. The first full iteration of the Guidelines was completed in early 2002 at which time Alliance members committed to NHTSA to engineer new vehicle telematics systems in accordance with the Guidelines. The Guidelines are now in their third iteration and the Alliance is committed to updating them or developing new modules as scientific understanding of driver behavior continues to evolve.

The Guidelines are a “best practices” document that addresses essential safety aspects of driver interaction with visual-manual interfaces. They consist of 24 principles that address the design, use, and installation of telematics systems with the goal of maximizing “eyes on road.” The Guidelines provide criteria and verification procedures for use by automotive manufacturers and telematic device manufacturers during product development. Each individual Guideline has associated with it:

- ❖ Rationale
- ❖ Criterion / Criteria
- ❖ Verification Procedure(s)
- ❖ Examples (as appropriate)
- ❖ Cites to supporting peer-reviewed research

The 24 guidelines are divided into five groups:

- ❖ Installation (5 Principles)
- ❖ Information Presentation (4 Principles)
- ❖ Interactions with Displays and Controls (6 Principles)
- ❖ System Behavior (3 Principles)
- ❖ System User Information (6 Principles)

The Guidelines assume manufacturers will follow rigorous process standards when developing telematics systems. Let me highlight two key principles:

❖ *Principle 1.4 – Addresses the positioning of visual in-vehicle telematics displays*

The proper positioning of displays close to the driver's normal line of sight allows drivers to continue to monitor the roadway peripherally while looking at the display.

❖ *Principle 2.1 – Sets visual demand limits*

Eyes-off-road time is limited because functions or features must not exceed specified visual demand or driving performance criteria.

The Guidelines are just one example of how Alliance members build and sell cars every day, cars that are safer than they have ever been. We take the information learned through research and design new and ever safer products to the market. Let's look at the numbers, and I realize that they do not tell the whole story, but they are important to review.

Motorists in the United States have never been safer. In 2008, the nation recorded its lowest traffic fatality rate: 1.28 fatalities per 100 million vehicles miles traveled. Some of this decline is a result of a reduction in vehicle miles traveled, or VMT. But not all of it. Traffic fatalities actually fell three times more than VMT. The reasons are clear – more people are using their safety belts, traffic laws are being enforced, and automakers are equipping vehicles with more advanced safety technologies.

Further reducing traffic fatalities will require a cooperative effort of vehicle manufacturers, government and non-government stakeholders to address each element of vehicle safety including roadway infrastructure, driver behavior and vehicle design.

Every day the industry is engaged in high-tech research and implementation of new safety technologies with real-world safety benefits, such as autonomous braking systems and vehicle safety communications systems for crash avoidance. Automakers are working on important safety advancements right now that rely upon wireless communications. For example, wireless communications serve as the backbone for many new safety technologies including

automatic crash notification, road hazard notification and real-time road navigation.

Additionally, future technologies such as the Department of Transportation's IntelliDrive program will rely heavily on vehicles sharing information through wireless communications. So what should be our roadmap from here?

First, we need appropriate laws with high-visibility enforcement. The Alliance supports a ban on hand-held texting and hand-held calling, while driving, to accelerate the transition to more advanced, safer ways to communicate. The Alliance supports the use of a texting ban like those that have been proposed by Representative McCarthy and Senator Schumer to combat unsafe behavior, and is working with Congress and other stakeholders to ensure that the legislation passed allows for innovative technologies to be included on the cars of the future.

Second, we need consumer education so that drivers know that, even with the cutting-edge technology found in today's cars – driving distractions remain a risk. Not just hand-held texting and hand-held calling, but eating, drinking, searching for a CD – anything that prolongs a driver's "eyes off road" presents a risk.

Finally, we need continued research so that we can further understand driver behaviors and to evaluate alternative means of addressing the concern.

This three-pronged approach has worked for 0.08 blood alcohol limits and "Click it or Ticket" safety belt usage campaigns. It can work here as well if we all work together.

So in conclusion, ban hand-held texting and hand-held calling while driving, but don't sever the wireless link to cars, which is the backbone of future safety technologies.

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