



July 17, 2015

Mr. Sam MacLeod
Superintendent of Motor Vehicles
Road SafetyBC

Dear Mr. MacLeod:

Thank you for the invitation to provide feedback on the issue of distracted driving. As chief coroner, I am keenly interested in measures that support public safety and commend your efforts to reduce the numbers of those injured and killed on British Columbia's roads. Any efforts to reduce the number of motor-vehicle related fatalities due to distraction are laudable and will be supported by the Coroners Service.

To be effective, it is important that measures aimed at reducing the risk of injury and fatality are based on accurate, clear, and reliable data. Current definitions and inconsistencies in motor vehicle mortality data collection make this challenging. Adding additional clarity to the issue will help support prevention efforts. To this end, the BC Coroners Service is working on a revised Motor Vehicle Investigation protocol that will assist coroners with capturing detailed contributing factor data.

In addition, for your consideration, the following recommendations are submitted to the consultation process:

- 1. A common definition for the term “distracted driving” should be adopted by all agencies focused on road safety in BC.** Current ICBC statistics encompass both distracted driving and general “driver inattention” numbers in the distracted driving figures. There is no requirement that a distraction be identified and supported by evidence in order for a collision to be attributed to “distracted driving”. Distraction should be distinguished from inattention which may be caused by fatigue and is often undetermined.
- 2. Efforts must be made to clearly identify the distraction.** While most of the public attention is focused on hand-held devices, many other in-vehicle distractions (other occupants, adjusting controls) and outside- vehicle distractions (people, signage) contribute to fatalities. Better data collection tools will assist with identifying specific types of distractions. Of the 1,220 motor vehicle fatalities investigated by the Coroners Service between the years 2010-2013, we have been able to link 53 deaths to a specific distraction; 20 of these involved a hand-held device, the others related to distractions both internal and external to the vehicle. Focusing public attention on a broader range of distractions will assist in reducing further risk.

3. **A common data standard should be adopted by all agencies focused on road safety in BC.** A positive finding of distraction should be made only after careful review of all relevant evidence, including autopsy and/or toxicology reports, collision analyst reports, witness statements, and scrutiny of device data where indicated. Current statistics that rely on initial road-side determinations of contributory factors without reconciling additional investigative information pose risks for reliability.
4. **Clarity with respect to contributory factors is required.** Currently, a fatality caused by a speeding, alcohol-impaired driver who misses a curve, may also be attributed to driver inattention and captured in the distracted driving statistics. While impairment clearly significantly impacts driving judgement and driving ability, also classifying this death as due to “distracted driving” inflates those statistics and obscures both the true problem and appropriate prevention measures.

There is no doubt that a percentage of motor vehicle fatalities are due to distracted driving activities. What is less clear is which of those activities present the highest risk for fatalities. Clarification of terms and definitions, and improved data collection, will enable more effective analysis of risks and more meaningful prevention strategies.

I look forward to working with you and our Road Safety colleagues in support of the safety of all British Columbians.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Lapointe', written in a cursive style.

Lisa Lapointe
Chief Coroner