



July 16, 2015

Sam McLeod  
Superintendent of Motor Vehicles  
Road Safety BC

Dear Mr. MacLeod,

Thank-you for the opportunity to contribute to this important dialogue on distracted driving in British Columbia.

We would like to offer the following comments and recommendations on this critical issue:

1. Given the significant impairment of driver ability caused by distraction, we support increasing administrative sanctions for distraction to match those for speed and alcohol. However, local and international experiences with legislative countermeasures for MVC indicate that these measures are only effective in the context of rigorous, highly visible enforcement measures, and widespread public awareness. We therefore recommend the legislative change be accompanied by a strong, visible enforcement campaign, equivalent to the highly effective Immediate Roadside Prohibition program. In addition to enforcement, further efforts to change driver attitudes and behaviours towards distracted driving are needed. This would include a comprehensive public media and social marketing campaign, and a progressive employer engagement program to target work-related electronic device use, which has been shown to be a major motivator for self-reported driver distraction.
2. The wealth of experimental research shows that driving performance is impaired by both hands-free and hand-held phone use, and that the cognitive interference of being engaged in conversation causes significant driver impairment. In addition, hands-free technology reduces, but does not eliminate visual and manual interference. Research indicates that drivers using mobile phones experience impairment in their visual search patterns, reaction times and decision-making processes to an extent that poses significant crash risk, regardless of whether the phone is hand-held or hands-free. We recommend that the current ban on any electronic device use, including hands-free technology, be expanded from Graduated Licensing Program drivers to the general population.

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3. Cell phone use constitutes only one component of distraction.

As defined by the Australian Road Safety Board:

*Driver distraction is the voluntary or involuntary diversion of attention from the primary driving tasks not related to impairment... where the diversion occurs because the driver is performing an additional task (or tasks) and temporarily focusing on an object, event, or person not related to the primary driving tasks. The diversion reduces a driver's situational awareness, decision making, and/or performance resulting, in some instances, in a collision or near-miss or corrective action by the driver and/or other road user.*

Observational studies report the most common forms of in-vehicle distraction are conversation with another passenger, followed by grooming, use of a hand-held cell phone, and eating or drinking. In-vehicle navigational and audio systems have become accepted secondary activities. However research indicates that reaching to tune the radio or operating a CD player can be more distracting than cell phone use. In addition, in-vehicle and personal electronic technology is evolving rapidly, with the advent of new technology such as the Apple Watch adding to sources of distraction in the in-vehicle environment.

We recommend the adoption of legislation which prohibits any activity not related to the actual operation of a motor vehicle in a manner that interferes with the vehicle's safe operation. Such legislation has already been adopted by the State of Connecticut, a recognized leader in the battle against distracted driving. Along with strong enforcement, it would send a clear message to the public that this government has a zero-tolerance approach to distraction in driving.

British Columbia would also do well to take its cue from the aviation industry, which maintains highly rigorous safety standards throughout the system. The U.S. Federal Aviation Administration has prohibited any activity during critical phases of flight which may interfere with safe operation of the aircraft, and also prohibits the use of a personal wireless communication device at any time that the aircraft is in flight.

4. While the research base on distracted driving is growing, there remain important gaps. There is limited empirical data on the effectiveness of legislation on distraction-related crash outcomes, and on the optimal weight of fines and penalties for distracted driving.



Additionally, when evaluating crash risk, attribution of crashes to cell phone use can be difficult. We recommend careful monitoring and evaluation of the effectiveness of additional measures and sanctions you undertake in this area. In doing so, we encourage methodology that accurately captures cell phone use, such as the utilization of administrative cell phone data.

We applaud you for opening up this public discussion on distracted driving and cell-phone use, and urge you to take this opportunity to be an international leader in road safety. Through a full suite of legislative, enforcement and social engagement strategies, we can create the conditions necessary to cultivate a culture of safety, and effectively combat distraction on our roads.

We look forward to working with you towards this vision.

Yours Sincerely,

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