



July 10, 2015

Sam Macleod  
Superintendent of Motor Vehicles  
RoadSafetyBC

Dear Mr Macleod:

On behalf of ICBC, I would like to thank you for inviting us to provide input regarding the penalties for distracted driving in British Columbia. Distracted driving is an important issue for ICBC. First and foremost, we care about the safety of our customers. We support measures that will reduce crashes and injuries and increase the safety of our communities. We are also seeing an increase in claims involving distracted driving which results in increased pressure on insurance premiums. This is an issue for all of our customers.

Distracted or inattentive driving has always existed, and has long been a top contributing factor in crashes. However, rapidly advancing changes in the design and functionality of personal electronic devices (PED) such as smartphones, combined with societal changes in how we communicate with one another, has elevated the risk of having a crash while engaging in this behaviour.

Distracted driving has similar outcomes to other risky driving behaviours such as speeding and impaired driving, but differs in that there are many forms of distraction and is an evolving issue, making it challenging to keep pace with the change. You would already be aware that British Columbia has the highest rate of cell phone use by drivers among all Canadian provinces and this behaviour can become deeply entrenched in social norms and personal habits in spite of drivers recognizing the risks. Surveys of British Columbian drivers have found that 74 per cent believe talking on a phone while driving is risky, yet 29 per cent admit to having done so in the previous six months and 88 per cent believe texting while driving is risky with 26 per cent admitting to having done so in the past six months.

When British Columbia introduced legislation to prohibit the use of hand-held PEDs by drivers in November 2009, smartphones accounted for only a small part of the mobile device market. Wearable technology, such as smartwatches and Google Glass, had yet to be introduced to the public at that time. Today, 80 per cent of phones BC drivers bring into their cars are smartphones, and wearable technology is becoming increasingly mainstream. In-vehicle infotainment systems integrate with smart devices in ways not imagined six years ago. The depth of engagement we have with smart devices, as a result of social media, mapping and myriad other applications, is significantly deeper than it was when our options were only *talk* or *text*.

Distracted driving killed more people than impaired driving in British Columbia between 2011 and 2013. In fact, research suggests the relative crash risk of distracted driving is similar to that of impaired driving, with distracted driving having the potential to cause even more serious harm on our roads due to the pervasive and entrenched nature of PED use.

.../2

Conservative estimates from available literature suggest that about 25 to 33 per cent of casualty crashes (those resulting in injury or death) are caused by some form of distraction. Given ICBC receives over 50,000 new injury claims per year, at a cost of over \$2 billion, the cost of distracted driving and its impact on insurance rates is a major concern and those who are responsibly leaving their phone alone are unfairly subsidizing those who do not.

At ICBC, we are seeing an increase in injury-producing rear-end crashes while the total number of rear-end crashes has remained stable. We are still trying to understand the reasons for this but one potential explanation could be increased speed of impact arising from failure to brake, and more intense inattention/distraction from smartphone use.

British Columbia is well-positioned to take action. All the levers recommended by the World Health Organization, that have proven successful for changing other entrenched driving behaviours, such as impaired driving and seat belts, exist in British Columbia:

- Legislative authority to introduce meaningful sanctions that provide a sufficient deterrent to dangerous driving behaviours.
- An enhanced enforcement MOU with the Ministry of Justice and ICBC that guarantees sustained, visible, targeted enforcement.
- Shifting social norms through education and awareness programs through ICBC and our partners including government, police, WorksafeBC and others. Activities currently include support for two annual enforcement campaigns, community campaigns including distractions simulators and distraction obstacle courses, cell watch volunteers who remind drivers in high crash locations to leave their phone alone and distribution of ICBC "not while driving" window decals.

Additionally, there is continued strong public, media, and stakeholder interest, including from the mobile telecommunications industry, to address the issue of driver distraction.

ICBC supports government in its review and potential increase in penalties for distracted driving as part of the overall solution to this difficult problem. We see a range of options available including increasing the fine and/or penalty points to be more in line with excessive speed and impairment, to introducing escalating penalties to discourage repeat offenders or offenders who are driving heavy commercial vehicles which can cause considerably more harm to other road users. Increasing penalty points, from the current three points, would result in drivers having a more-immediate insurance impact, relative to their insurance risk. Of course a strong approach to penalties need not be excessively harsh, but should be swift, sure and of a severity appropriate to the sanctioned behaviour.

As a road safety partner, we are committed to continuing to work with government to address the problem of distracted driving including doing our part to help promote any new sanction or penalty.



building trust. driving confidence.

Sam Macleod  
Superintendent of Motor Vehicles  
RoadSafetyBC  
Page 3

Again, we thank you for asking for our views.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Matthews', is positioned below the 'Sincerely,' text. The signature is fluid and cursive.

Lindsay Matthews  
Director, Road Safety Programs

M250503