Executive Summary

ECF is concerned that the draft implementing legislation for the General Safety Regulations will allow cascading alarm as the sole assisting function of the Intelligent Speed Assistance system. We believe that this will not be an “...appropriate and effective” feedback for maintaining speed limit. This will weaken the whole GSR, it was based on a hierarchical system of safety measures, with speed reduction at the top, followed by AEB, and then final passive safety if all else fails. But reducing speed was the number one important measure that enables the proper functioning of all the other safety measures.

The Original Commission draft text;

- Auditory warnings have been shown in many studies to be the most annoying warning for drivers
- Given that the system can very easily be switched off (even within the same movement as the master switch)
- Given the annoyance of the system it will be turned off almost automatically by the driver
- Therefore, if the driver is compelled to turn off the system more than she/he is compelled to use the system to reduce the speed, then it is not an effective system
- The ISA system should encourage drivers to use the system as much as possible. Encouragement and ‘pleasantness’ of use should be the key to appropriate and effective feedback rather than “annoyance” and harassing the driver

The updated draft text;

- The latest September draft with changes document from the Commission then goes the other way and puts forward an ISA which is too weak. A visual light when over the limit and a light ‘bong’ sound 70-100 metres along an urban road is not an effective ISA
• Speed Control Function (SCF) assistance systems have been shown to be 'effective' and 'pleasant' to use, and should therefore suffice as the 'appropriate and effective' alternative system

Other recommendations;

• For explicit speed limit signs: the correct speed limit should be determined for ≥99% of sign passing events.
• For implicit speed limit signs: the correct speed limit should be determined for ≥95% of sign passing events
• The distance-based performance requirements should also require higher performance, at ≥95%, in line with the suggested event-based performance requirement for the implicit speed signs