



World Blind Union
Union Mondiale Des Aveugles
Unión Mundial de Ciegos

**World Forum for Harmonization of Vehicle Regulations
(WP.29)
168th session, 8-11 March 2016**

The World Blind Union (WBU) wishes to commend the United Nations Economic Commission for Europe for developing a Regulation requiring a minimum sound alert standard for quiet road transport vehicles (QRTV), under the 1958 Agreement. The WBU appreciates the Commission's attention to the safety concerns of blind and visually impaired individuals and other vulnerable road users and believes the proposed regulations will provide an important step forward in providing all pedestrians essential information by means of an Acoustic Vehicle Alert System (AVAS).

The WBU participated in the deliberations of the Working Party on Noise (GRB) through the Informal Working Group (IWG-QRTV). Throughout the process, the concerns of the WBU have been given serious and respectful consideration.

While the WBU is encouraged by the adoption of a uniform minimum sound alert standard, we continue to believe that: 1) the proposed minimum sound standard is too low for safety; 2) the AVAS should remain on while the QRTV is active but stationary; and 3) the regulation should prohibit manufacturers from providing a means of pausing the alert sound.

The WBU thanks WP.29 for extending the charge of the QRTV IWG so that further consideration of our issues can progress. It is the belief of the WBU that, through the IWG, recommendations for amending the AVAS regulations can be developed and offered to WP.29. We believe that further research will help address the question of the appropriate sound level for the AVAS and whether the AVAS should be required to remain on while the QRTV is stationary and active. We do not believe further research is needed or justified to prohibit a pause function.

Our concerns relate to the Terms of Reference. Section B, established four criteria for the AVAS system:

“... to aid visually-impaired and other vulnerable pedestrians in detecting the presence, direction, location, and operation of those vehicles.”

1. Adequate minimum alert sound level: The WBU believes that the AVAS must be loud enough to enable blind and partially sighted pedestrians to detect the presence and direction of movement of an approaching quiet vehicle at a distance that is sufficient to ensure a safe crossing decision. The proposed Regulation requires the AVAS to emit an overall sound level of 50 DBA at a speed of 10 KPH, and 56 DBA at 20 KPH respectively; however research conducted by Louisiana Tech University showed that there was no statistical difference in the ability of test subjects to hear the quiet vehicle with or without the AVAS.
2. Sound at stationary: Awareness of the presence of a vehicle that may begin moving at any moment is essential for the safety of blind and partially sighted pedestrians and is required under the terms of reference. As cited above, the terms of reference require in part that the AVAS: "...aid visually-impaired and other vulnerable pedestrians in detecting the presence, direction, location, and operation of those vehicles." The WBU believes that allowing QRTVs to be silent at stationary is contrary to the requirement that the AVAS alert pedestrians to the "presence, direction, location, and operation" of QRTVs.
3. Prohibition of a pause function: The proposed Regulations permit manufacturers to install a function by which the driver can temporarily turn off the alert sound. The AVAS is a safety device and drivers should not be able to disable the alert function at will. This point was tragically demonstrated last October in Japan when a blind man and his guide dog were struck and killed by a dump truck that was backing up. The driver had turned off the backup alert sound. As a result, at the last QRTV IWG meeting in February 2016, the Japanese representatives introduced a recommendation to prohibit a pause function for the AVAS. The WBU supports and appreciates the Japanese recommendation and encourages GRB and subsequently WP.29 to adopt the prohibition of the pause function.

Again, the WBU appreciates the work of the Commission in establishing a minimum alert sound standard for QRTVs and appreciates the Commission's serious attention to our continuing concerns by extending the charge of the IWG to gather additional information and to propose research to address our ongoing concerns.

Sincerely,



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