

Department for Transport
Centre for Connected and Autonomous Vehicles
Consultation: **Remote Control Parking and Motorway Assist:
Proposals for Amending Regulations and the Highway Code**

Response from:
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COLLECTIVE VIEW

The Motor Schools Association of Great Britain (MSA GB) makes the following response to the Centre for Connected and Autonomous Vehicles Consultation: Remote Control Parking and Motorway Assist: Proposals for Amending Regulations and the Highway Code.

WHO WE REPRESENT

MSA GB is the national trade association for driving instructors and schools founded in 1935. Members of the association are in the main Driving Standards Agency Approved Driving Instructors (DVSA ADIs). We also have a partnership with the Institute of Large Goods Vehicle Driving Instructors and represent their interests together with those of potential driving instructors and a number of bus/coach instructors and motorcycle instructors. MSA GB is the voice for around 7,500 driver/rider trainers.

HOW WE GATHERED VIEWS

To gather the views of MSA GB member's details of the consultation were circulated, via the relevant chairs, to all the nine MSA GB committees of the regions and nations of Great Britain. Details of the consultation were published on the associations' web site at www.msagb.com. In addition, the information was transmitted to followers of MSA GB on various social media sites. A draft response was also prepared and circulated and comments received.

PUBLICATION OF MSA GB COMMENTS

We are content for our response to this consultation to be published.

QUESTIONS

By way of a caveat on our general acceptance of all the questions posed in this consultation we would like to answer the last question first.

Question 5

Any other comments?

MSA GB Response

All these changes make it clear that the driver or operator of a vehicle is responsible for the safe handling of that vehicle. As trainers we are concerned that there is no requirement for anyone to be trained in any aspect of the new technology.

If a driver does not know or fully understand how to operate a particular aspect of an advanced driver assistance system (ADAS) whose responsibility is it to provide that information?

Anecdotal evidence suggests that neither those responsible for car sales or those handing out keys in vehicle rental businesses fully understand the technological developments behind the vehicles they are supplying or have the skills needed to pass on that information.

Clearly the vehicle supplier should have a duty of care to the person driving off in a vehicle. It cannot be entirely the responsibility of the driver who may not even be aware of the developments or equipment in any particular vehicle.

Question 1

Are you content with the draft amendments to Regulation 110 (not using hand-held mobile phones while driving) to enable remote control parking?

MSA GB Response

Yes

Question 2

In addition, should we make changes to the Highway Code to reflect this regulatory change?

MSA GB Response

Yes

Question 2A

Are you content with the text amendments of the Highway Code in a way that would clarify rule: 149, related to use of use of a mobile phone and in-vehicle technology?

MSA GB Response

Yes

Question 2B

Are you content with the text amendments of the Highway Code in a way that would clarify rule: 150, related to use of driver assistance systems and distraction?

MSA GB Response

Yes

Question 2C

Are you content with the text amendments of the Highway Code in a way that would clarify rule: 160, relating to driving with both hands on the wheel?

MSA GB Response

We are unsure about the suggested change to this rule. Clearly this rule needs to be amended. However, we do not think the proposed wording is clear. The wording needs to perhaps provide some examples of where "hands free" steering is appropriate.

Question 2D

Are you content with the text amendments of the Highway Code in a way that would clarify rule 239, relating to parking technique?

MSA GB Response

Yes. However, we are concerned that there is no advice about parking in a way that does not inconvenience other road users particularly when parking remotely. We are concerned that with remote parking it may be possible to park too close to another parked vehicle thereby restricting access to that vehicle particularly if a remotely parked vehicle was parked on both sides of a vehicle not fitted with that facility.

Question 3

Should we include a recommendation within the Highway Code that vehicle operators confirm with the manufacturer if the remote-control device/app they plan to use is compliant with the international standard?

MSA GB Response

Yes

Question 4

What other advanced driver assistance systems or automated vehicle technologies that are likely to come to the UK market in the next 2-4 years should we be considering? What are these systems?

MSA GB Response

We are not aware of any other advanced driver assistance systems or automated vehicle technologies that are likely to come to the UK market in the next 2-4 years.