



Dear GRB Members:

We are writing to you on behalf of the world's 285 million blind and low-vision citizens with an urgent plea.

The World Blind Union (WBU), as a UN-accredited NGO, has been following the work of UNECE to develop a Regulation on quiet road transport vehicles (QRTV) developed by the Informal Working Group (IWG-QRTV) under the 1958 Agreement.

On 1 to 3 September 2015 the Working Party on Noise will consider a draft of this Regulation. Crucially, when the working party has concluded its work, you will have the responsibility of helping to make the roads a safer place for the world's blind and low-vision citizens and for many millions of other vulnerable pedestrians. This letter urges you to do the right thing by those people.

WBU and its regional member, the European Blind Union (EBU), appreciate your commitment in devising and adopting uniform provisions concerning the audibility of quiet road transport vehicles. However, we are concerned that the proposed standard would clearly fall short of the following three essential requirements for an AVAS system, which we feel need to be met to enable the pedestrian to make a safe crossing decision:

1. A minimum clearly audible sound level of an AVAS which enables blind and partially-sighted pedestrians to detect the presence of an approaching quiet vehicle and to identify its navigation at a distance which is sufficient to ensure a safe crossing of the road.

The draft Regulation you will be considering proposes an overall sound level of 50 DBA at 10 km/h, respectively 56 DBA at 20 km/h. However, in the light of recent research conducted by Louisiana Tech University, there is every reason to doubt that the proposed AVAS standard will ensure sufficient audio warning to prevent a collision between a quiet car and the pedestrian, because the results of the study showed that there was no statistical difference in the ability of test subjects to hear the quiet vehicle with or without AVAS (see Annex I).

2. Sound at stationary. Awareness of the presence of a vehicle that may begin moving at any moment is essential for the safety of the pedestrian. We note with concern that the draft Regulation will only permit the manufacturer to equip the car with such a sound, but currently does not require him to do so. Stationary vehicles, e.g., when stopped at a traffic light or in a parking lot, are not moving,

but may indeed start to move at any time and might cause pedestrian behavior that increases the probability of a collision. Besides, a blind pedestrian needs to have full information about any cars standing near to him or her to be able to cross the street in a straight line.

Again, there is evidence from research that a warning sound at stationary is essential for the pedestrian's safety. A study carried out by the University of Duisburg-Essen, Germany, concluded that "(...) there are special problems for blind people at crossings without signals, because standing cars (BEV, HEV or ICE with automatic start/stop) cannot be heard."

For this reason, WBU strongly believes that all quiet vehicles must be equipped with an alert sound at stationary to ensure pedestrians' safety.

3. Prohibition of the "pause function": The draft Regulation permits the manufacturer to install a function by which the driver can temporarily turn off the warning sound. Obviously, the AVAS is a safety device just like airbags or brake lights. However, safety devices can only fulfill their proper function if they work automatically and cannot be manipulated by the driver. A driver cannot really know at what moment he or she may encounter a pedestrian and when it might theoretically be "safe" to dispense with the warning sound. The installation of a pause function must be prohibited to ensure a constant operation of the AVAS range as an alerting and safety device within the defined speed range specified by the draft Regulation.

Again, our concerns are well justified by recent research undertaken in the United Kingdom which shows that electric and hybrid cars are much more likely to injure or kill pedestrians than the usually more audible internal combustion vehicles they are increasingly replacing on the roads.

The UK-based TAS Institute has examined accident data for electric and hybrid cars and compared this to the respective numbers of accidents for internal combustion engine cars. The study found that accidents where pedestrians were injured by quiet vehicles increased by 54 percent from 2012 to 2013. Numbers of accidents were weighted to make a meaningful comparison of different car types. The observed difference in accident rates was statistically significant, attesting that quiet vehicles are much more likely to be involved in collisions with pedestrians than conventional cars (see Annex II).

In the light of this research we hope you will reconsider the proposed DBA levels and agree with our concerns about sound at stationary and the pause function.

For the safety of millions and millions of pedestrians all over the world, we urge you to suspend the voting process for the UN Regulation to allow time for further research and a serious consideration of our essential requirements for an AVAS system (see Annex III).

Leaving the installation of a warning sound at stationary and the pause function at the discretion of manufacturers will lead to a confusing and dangerous patchwork situation which will only increase insecurity among all road users and might hinder rather than boost the market share of EVs and HEVs all over the world.

Blind and partially-sighted people across the world are relying on you and your colleagues to ensure their concerns and safety are fully taken into account.

Yours faithfully,



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