



RAC response to the CCAV consultation "Remote control parking and Motorway assist – proposals for amending regulations and the Highway Code"

This response has been written by Nicholas Lyes, RAC Public Affairs Manager, on behalf of RAC Motoring Services

About the RAC

With more than eight million members, the RAC is the oldest and one of the UK's most progressive motoring organisations, providing services for both private and business motorists. As such, it is committed to making driving easier, safer, more affordable and more enjoyable for all road users.

The RAC, which employs more than 1,600 patrols, provides roadside assistance across the entire UK road network and as a result has significant insight into how the country's road networks are managed and maintained.

The RAC is separate from the RAC Foundation which is a transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and their users.

The RAC website can be found at www.rac.co.uk.

In September 2017, the RAC published its latest [Report on Motoring](#).

RAC Response

We are proposing 3 possible options for remote control parking, which is your preferred option?

- **Option 0:** Change nothing ☐
- **Option 1:** Change regulation with use of statutory instrument ☐
- **Option 2:** Change with use of SI and make appropriate changes to the Highway Code - X

(No explanation required for why as consultation document is not seeking additional comments)

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?

x Yes

☐ No

(If no) Why not?

The RAC understands the need for changes to draft amendments in relation to using a mobile device outside of a vehicle to instigate a parking manoeuvre, however inside the vehicle it is more than likely the manufacturer will have installed software/functionality to activate remote parking with an in-built control.

We believe that encouraging phone use in the car, even for remote controlled parking purposes, may create some serious problems. Primarily, a driver using their phone to command the vehicle to park, may be tempted, at the same time, to check/send messages or log into social media sites. Even if drivers don't do this, it may also be difficult for police officers to initially establish whether the phone is being used for commanding a vehicle to park or for other purposes. While drivers may be able to retrospectively prove that they were using their phone to park their vehicle, we believe there is still grounds for confusion for police officers.

Highway Code

ADAS guidance

Question 2 In addition, should we make changes to the Highway Code to reflect this regulatory change?

☒ Yes

☐ No

(If no) If the regulations are changed, it makes sense to change the guidance in the Highway Code.

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?

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- ☐ Yes
☒ No

The RAC would use the following text (Our additions in red):

“You **MUST** exercise proper control of your vehicle at all times. You **MUST NOT** use a hand-held mobile phone, or similar device, when driving or when supervising a learner driver, except to call 999 or 112 in a genuine emergency when it is unsafe or impractical to stop. Never use a hand-held microphone when driving. Using hands-free equipment is also likely to distract your attention from the road. It is far safer not to use any telephone while you are driving or riding - find a safe place to stop first or use the voicemail facility and listen to messages later.

You can park your vehicle via remote control, using a legally compliant parking application or device in an appropriate way which does not endanger others. **Where there are other means to command a vehicle to park aside from a mobile phone or device, these should be used instead. At no stage during this process if you are inside your vehicle should you use your mobile phone for other activities.”**

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?

☒ Yes

☐ No

(If no) Why not?

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?

☒ Yes

☐ No

(If no) Why not?

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?

☒ Yes

☐ No

(If no) Why not?

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?

Yes, we believe this is an important measure.

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?

The RAC believes manufacturers and the SMMT are better placed to respond to this question.

Question 5: Any other comments?

No further comments other than the concerns we have already raised.

Please address any comments or further contact to:

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