



July 20, 2010

Honorable Peter DeFazio
Transit and Highways Subcommittee
House Transportation and Infrastructure Committee
B 370A Rayburn House Office Building
Washington DC 20515

Dear Chairman DeFazio:

In response to the June 30 Subcommittee hearing on the effectiveness of automated enforcement, the Governors Highway Safety Association (GHSA) would like to submit comments. GHSA is the non-profit association that represents state highway safety agencies. Its members administer federal behavioral highway safety grant funds.

GHSA strongly supports automated enforcement and believes that it is an important tool in any state or local effort to reduce motor vehicle-related crashes, fatalities and injuries. We concur with the National Highway Traffic Safety Administration (NHTSA) and the Insurance Institute for Highway Safety (IIHS) that the preponderance of research shows that automated enforcement is effective. Some studies, such as the one conducted by the Federal Highway Administration, indicate that while side impact collisions are reduced, rear end collisions increase. It is important to note that the rear end collisions may increase because the second vehicle is likely following too closely. In other words, the red light cameras are not necessarily the cause of increased rear end crashes; rather, the poor driver behavior of following too closely may be.

Automated enforcement has been implemented broadly in Europe and Australia with favorable results. GHSA strongly believes that automated enforcement, along with many other types of technology, will be a key countermeasure in the effort to halve fatalities by 2030 and ultimately move toward zero deaths.

We also concur with NHTSA and the Partnership for Advancing Road Safety (PARS) that automated enforcement is not the panacea for solving the problems of speeding and red light running – both extremely serious driver behavior problems. Automated enforcement is intended to supplement engineering solutions and traditional enforcement of speeding and red light running laws. Law enforcement agencies are downsizing, enforcement personnel are retiring at rapid rates and many are being deployed for homeland security purposes. Automated enforcement helps fill the gaps by providing 24/7 coverage, often at high risk locations for traditional law enforcement.

GHSA strongly supports automated enforcement programs that maximize safety. Our current policy addresses the implementation of red light running programs and recommends that:

Cameras should be used at high crash sites or in situations where traffic law enforcement personnel cannot be deployed safely. There should be a traffic engineering analysis of each site before traffic cameras are installed and citations issued.

Cameras are not to replace traditional law enforcement personnel or to mitigate safety problems caused by deficient road design, construction or maintenance.

Use of red light cameras should be preceded by a public information campaign. The campaign should continue throughout the life of the automated enforcement program.

Cameras should not be used as a revenue generator. Compensation paid for an automated traffic law system should be based on its value and not on the amount of revenue it generates nor the number of tickets issued. Revenues derived from the automated enforcement program should be used solely to fund highway safety functions.

The implementing jurisdiction should undertake an evaluation of the red light enforcement program within three years of the program's initiation. If reductions in red light running do not occur, then the program should be terminated.

These same principles could easily be applied to automated speed enforcement programs.

Since automated enforcement programs are local and self-supporting, few federal funds are used to implement them. In Maryland, for example, which has an extensive program of red light and speed cameras in Montgomery and Howard Counties and the City of Baltimore, no federal behavioral funds and \$100,000 in Sec. 148 Highway Safety Improvement Program (HSIP) funds were used for startup purposes. In California, in which an extensive number of local jurisdictions have red light programs, no federal behavioral or safety infrastructure funds were used for automated enforcement programs. Hence, your proposal to condition federal funds on the implementation of "appropriate" automated enforcement programs may not be feasible or yield the desired results.

A more suitable federal role would be to support further federal research on automated enforcement, including updating the U.S. Department of Transportation (DOT) best practice implementation guidelines, identifying and documenting best practice state and local programs and further evaluating program effectiveness.

In addition, GHSA recommends that DOT, in cooperation with organizations such as GHSA and the American Association of State Highway, Transportation Officials (AASHTO), the National Association of County Engineers (NACE) and the National Local Technical Assistance Program Association (NLTAPA), PARS, the Campaign to Stop Red Light Running and others, more aggressively market the best practice guidelines and other research findings to states and local communities.

DOT could also develop model state laws. As part of that effort, DOT should examine state legislation such as that recently enacted by the Florida legislature and highlighted at the June 30 hearing.

As the Howard County representative indicated, DOT is currently working with the International Association of Chiefs of Police (IACP) to develop technical standards for implementing an automated enforcement program once a state or locality has made decisions about the policy parameters of the program. The federal government could test those standards, document state and local best practices and support an ongoing effort to periodically review and update the standards. Further, training could be developed for law enforcement to ensure that the standards are being administered appropriately.

Finally, DOT could develop template public education programs (as has been done on the topic of speeding) that state and local governments could customize as needed. Federal funding would be necessary to support the development and dissemination of such public education programs.

GHSA applauds the Subcommittee for raising the visibility of this important issue and encourages members to incorporate the ideas delineated herein into the next reauthorization proposal. Barbara Harsha, the GHSA Executive Director and I would be glad to discuss them with you at your convenience. Thank you for the opportunity to submit GHSA's recommendations on issues of importance to the Association.

Sincerely,

A handwritten signature in black ink, reading "Vernon F. Betkey Jr." with a stylized flourish at the end.

Vernon F. Betkey Jr.
Chairman
Governors Highway Safety Association

Cc: Rep. James Oberstar, Chairman, House Transportation and Infrastructure Committee
Rep. John J. Duncan Jr., Transit and Highways Subcommittee, House Transportation
and Infrastructure Committee
David Strickland, Administrator, National Highway Traffic Safety Administration