



ADVOCATES  
FOR HIGHWAY  
& AUTO SAFETY

September 21, 2023

The Honorable Wayne Langerholc, Jr.  
Chair  
Senate Transportation Committee  
Pennsylvania General Assembly  
Harrisburg, Pennsylvania 17120

The Honorable Marty Flynn  
Minority Chair  
Senate Transportation Committee  
Pennsylvania General Assembly  
Harrisburg, Pennsylvania 17120

Dear Chair Langerholc and Minority Chair Flynn:

Advocates for Highway and Auto Safety (Advocates), an alliance of consumer, safety, law enforcement, medical and public health groups, and insurance companies and agents working to advance laws proven to prevent crashes, deaths and injuries on our roads and contain related costs, thanks you for holding a hearing on Senate Bill (SB) 748 and House Bill (HB) 1284. SB 748 would make permanent the existing and successful automated speed enforcement (“AE”) pilot programs on federal-aid highways under PennDOT and the Turnpike Commission as well as on Roosevelt Blvd. in Philadelphia. HB 1284 would also make permanent the Roosevelt Blvd. AE program while expanding its eligibility to other designated Philadelphia roads and create a 5-year pilot program for AE in designated active Philadelphia school zones. We urge you to advance both SB 748 and HB 1284 to implement this proven, lifesaving technology.

In 2021, 1,230 people were killed in traffic crashes in Pennsylvania, a 16 percent increase since 2019.<sup>i</sup> During the same time frame, the number of people seriously injured in the Keystone State increased by 10 percent to 5,122.<sup>ii</sup> Additionally, Pennsylvania incurred \$7 billion in economic harm due to motor vehicle crashes.<sup>iii</sup> Traffic safety is a serious issue in urgent need of proven solutions.

Greater adherence to speed limits saves lives and prevents injuries. Speeding was a factor in 29 percent of U.S. motor vehicle fatalities in 2021.<sup>iv</sup> The impact of speeding is even higher in Pennsylvania where 41 percent of motor vehicle deaths in 2021 involved speeding.<sup>v</sup> Crash tests show that speed upticks of even five to ten miles-per-hour (mph) greatly increases the driver’s risk of injury or death.<sup>vi</sup> Speed immensely impacts pedestrians and other vulnerable road users (VRU). The average risk of death for a pedestrian is 10 percent at an impact speed of 23 mph, 25 percent at 32 mph and 50 percent at 42 mph.<sup>vii</sup> Further, drivers who speed have been shown to exhibit additional deadly driving behaviors; more than half (51 percent) of speeding passenger vehicle drivers in fatal crashes were unbuckled, compared to 23 percent of non-speeding drivers.<sup>viii</sup>

AE works to curb speeding and its impact. Research finds speed cameras resulted in a 19 percent reduction in the likelihood of crashes leading to serious injury or death.<sup>ix</sup> Similarly, the U.S. Department of Transportation found that AE reduces fatalities and injuries by 20-37 percent and is particularly effective in school and construction zones.<sup>x</sup> Furthermore, changes resulting from the enactment of the Infrastructure Investment and Jobs Act (Pub. L. 117-58) now permit use of certain federal funds for AE programs in school and work zones.

AE pilot programs in Pennsylvania have proven their worth. The work zone AE pilot program reduced overall speeding by 38 percent, excessive speeding by 47 percent, and crashes by 15-50 percent.<sup>xi</sup> The

Roosevelt Blvd. AE pilot program reduced crashes on that road by 36 percent from 2019-2021 compared to six percent for Philadelphia overall.<sup>xii</sup> Moreover, crashes attributable to speeding declined 17 percent on Roosevelt Blvd. while increasing in other parts of the city.<sup>xiii</sup>

Law enforcement risk their lives when performing their duties on the roadways every day and are very effective in deterring speeding. However, it is implausible for law enforcement officers to be everywhere and catch every violation. Properly executed AE augments traditional enforcement without requiring a traffic stop.

Five national safety organizations, Advocates, Insurance Institute for Highway Safety, AAA, National Safety Council and the Governors Highway Safety Association, jointly released the Automated Enforcement Program Checklist to convey our support for the technology and assist states and localities in launching or updating AE programs to improve safety, ensure transparency and public support, include equity considerations, and generate successful AE programs. Advocates urges you to support SB 748 and HB 1284 to employ this proven technology to curb speeding and save lives.

Sincerely,



Catherine Chase  
President

Encl.: Automated Enforcement Program Checklist

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- <sup>i</sup> State Highway Safety Report (2021) – Pennsylvania, available at <https://www.fhwa.dot.gov/tpm/reporting/state/safety.cfm?state=Pennsylvania>.
- <sup>ii</sup> *Ibid.*
- <sup>iii</sup> NHTSA. 2023. The Economic and Societal Impact of Motor Vehicle Crashes, 2019 (Revised), available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813403>.
- <sup>iv</sup> NHTSA. (2023). Overview of Motor Vehicle Crashes in 2021. U.S. Department of Transportation, available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813435>.
- <sup>v</sup> NHSTA State Traffic Safety Information for Pennsylvania, accessible at <https://cdan.dot.gov/stsi.htm>.
- <sup>vi</sup> Impact of Speeds on Drivers and Vehicles – Results from Crash Tests, AAA Foundation for Safety, Humanetics, and IIHS, Jan. 2021, available at <https://www.iihs.org/api/datastoredocument/bibliography/2218>.
- <sup>vii</sup> Impact Speed and a Pedestrian's Risk of Severe Injury or Death, AAA Foundation for Traffic Safety, Sep. 2011., available at <https://aaafoundation.org/wp-content/uploads/2018/02/2011PedestrianRiskVsSpeedReport.pdf>.
- <sup>viii</sup> Traffic Safety Facts 2021 Data: Speeding, NHTSA, Jul. 2023, DOT HS 813 473, available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813473>.
- <sup>ix</sup> Effects of Automated Speed Enforcement in Montgomery County Maryland on Vehicle Speeds, Public Opinion and Crashes, Insurance Institute for Highway Safety, August; available at <https://www.iihs.org/topics/bibliography/ref/2097>.
- <sup>x</sup> Speed Safety Camera Program Planning and Operations Guide, available at [Speed Safety Camera Program Planning and Operations Guide](#).
- <sup>xi</sup> 2023 PennDOT Annual Report on Automated Work Zone Speed Enforcement, available at [https://workzonecameras.penndot.gov/wp-content/uploads/2023/04/2023PennDOT-AWZSE-Report\\_033023.pdf](https://workzonecameras.penndot.gov/wp-content/uploads/2023/04/2023PennDOT-AWZSE-Report_033023.pdf).
- <sup>xii</sup> 2023 Roosevelt Boulevard Automated Speed Camera Annual Report, available at <https://philapark.org/wp-content/uploads/2023-Speed-Camera-Report-Final-32023.pdf>.
- <sup>xiii</sup> *Ibid.*



# AUTOMATED ENFORCEMENT PROGRAM CHECKLIST

For red light cameras and automated speed enforcement

Automated enforcement is an effective tool to make roads safer. Research shows that red light cameras reduce violations and injury crashes, especially the violent front-into-side crashes most associated with red light running. Speed cameras have been shown to reduce vehicle speeds, crashes, injuries and fatalities. Both types of programs should be designed, implemented and administered properly. Poorly run programs are less likely to be durable and may undermine support for automated enforcement generally.

Speed and red light camera programs augment traditional enforcement to improve traffic safety by deterring dangerous driving behaviors. Automated enforcement does not require traffic stops, and well-designed programs can improve safety for all road users in a neutral manner.

Successful programs are transparent and have a strong public information component. Communities should take into account racial and economic equity when making decisions about camera placement and fines. Automated enforcement programs should be data-driven and should prioritize safety, not revenue. In fact, communities should expect that revenue will decline over time as fewer drivers run red lights or violate speed limits.

This checklist assumes your community is already legally authorized to set up a program. It provides a minimum list of considerations to help you follow best practices. The goal is to operate a successful program that reduces crashes and prevents deaths and injuries while maintaining strong public support. Automated enforcement can be integrated into broader efforts to discourage unsafe driving that includes optimizing speed limits for safety and improving roadway design.



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## FIRST STEPS

- Identify problem intersections and roadways.
  - Assess violation and crash data.
  - Conduct field observations.
  - Collect resident and roadway user input.
- Consider what role automated enforcement should play as part of a comprehensive traffic safety strategy.
- Make any engineering or signage changes needed to improve drivers' compliance with the law.
  - Ensure the road geometry conforms with guidelines from the American Association of State Highway and Transportation Officials, National Association of City Transportation Officials guidance or state road design manuals, as appropriate.
  - Remove sightline obstructions of signals and signage.

### For red light cameras:

- Ensure that yellow light timing conforms to the Manual on Uniform Traffic Control Devices and Institute of Transportation Engineers guidelines.

### For automated speed enforcement:

- Ensure the speed limit is appropriate and accounts for all road users. Follow guidance and use tools from the Federal Highway Administration, Institute of Transportation Engineers, and the National Association of City Transportation Officials.
  - Ensure the speed limit is appropriate for special conditions, such as work zones and school zones.
  - Assess whether engineering changes could be made to promote compliance with the speed limit.
  - Ensure adequate posting of speed limits.
- Establish an advisory committee comprised of stakeholders.
    - Consider including law enforcement, transportation department employees, victim advocates, equity and civil rights advocates, school officials, community residents, first responders, health officials and the courts.
    - Outline the committee's role. This may include developing guiding principles related to safety, equity, and transparency, as well as other aspects of the program.
    - Ensure committee meetings are open to the public and deliberations are transparent.
  - Meet with the media, including newspaper editorial boards, to build support and educate the public.



## SECOND STEPS

- Make program design decisions, consulting with the advisory committee as appropriate.

### Program design considerations

Target violations with the greatest safety consequences. For example, you might decide not to ticket for right-turn-on-red violations when pedestrians, bicyclists, and oncoming vehicles are not present or to limit violations in work zones to when workers are present, provided the road configuration has not also been altered for construction.

Establish a reasonable fine structure. Create options for indigent violators such as payment plans or other alternatives.

Establish a threshold that must be crossed before a vehicle is photographed for a violation of red light running or speeding (i.e., a period after a light turns red or a certain mph over the posted speed). The point is to target flagrant, rather than marginal, infractions.

Programs should include a process for evidence review by appropriately trained personnel to determine if a violation occurred and issue a citation if warranted.

Establish clear procedures for contesting an alleged violation. Consider options to contest online or by mail.

When possible, red light camera violations should be recorded in real time video, and videos of the offense should be made available to the vehicle owner for review via the Internet.

Fines in excess of program costs should be allocated to transportation safety programs.

- Use safety data gathered in the first steps to determine camera locations, ensuring that particular neighborhoods are neither overlooked nor overrepresented.
- Publicize the extent of the safety problem and the need for innovative solutions.
- Secure a vendor and establish payment based on the vendor's actual costs, not the number of citations.
- Publicize procedures for contesting an alleged violation.
- Create a website and social media plan to publicize program details, such as how to pay and dispute tickets. Establish a method for answering questions accurately and in a timely manner.
- Develop an emergency action plan for handling problems, such as system malfunctions.

## IMPLEMENTATION

- Hold a kickoff event with advisory committee members. Introduce a well-developed and sustained public education campaign focused on improving safety by changing driver attitudes and behavior.
- Connect the program to overall roadway safety in the community and identify the goal of zero tickets resulting from changes in driver behaviors.
- Install prominent warning signs.
- Start with a probationary period during which only warnings are issued.
- Follow current guidance from the U.S. Department of Transportation for implementation and operation of automated enforcement devices.
- Allow for due process. Minimize the number of days between the violation and citation issuance.

## LONG TERM

- Publicize changes, including new camera locations. Reinstate the probationary period before ticketing begins at new locations.
- Monitor program operation and publicize results. Undertake periodic reviews and ensure racial, economic and other equity issues and public concerns are addressed.
- Require regular field reviews. Verify monthly camera calibration and synchronization with signals.
- Require regular evaluations of the traffic safety benefits of the program by collecting crash and infraction data. Before-and-after comparisons must use control intersections and roadways. Include control intersections and roadways that are not subject to spillover effects.
- Regularly meet with the advisory committee and media to review program status and sustain public support.
- Continue to improve programs based on new and updated guidance and best practices and look for opportunities to expand automated enforcement use.
- Consider other changes, including roadway design improvements, in order to reduce opportunities for unsafe driving.