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Motorcycle Front Number Plate and
Frontal Identification (FNP/FI)
Policy position and FAQ Sept 2014

Position Statement:

The Victorian Motorcycle Council does not support any local and/or unique change to the rules governing the displaying of, type, quantity, or location of a motorcycle's or scooter's vehicle registration. There is no compelling road safety or other argument that justifies the continuing calls for Front Number Plates / Frontal Identification (FNP/FI). Turning the cameras around will address all motorcycle identification criticisms raised by Speed Camera proponents.



A small sample of the myriad of motorcycle designs and styles...



...demonstrating very clearly...



...that there is no common location for Front Number Plates and/or Frontal Identification (FNP/FI).

FREQUENTLY ASKED QUESTIONS AND MYTH BUSTING::

Q: *The Road Safety Camera Commissioner says frontal identification is as simple as modifying one clause in Victoria's Road Safety Vehicle Regulations.*

A: This is a blinkered, simplistic and uninformed proposal. It is exactly this regulation change that VicRoads spent millions of dollars exploring last decade, concluding that FNP/FI was not practically achievable - a result widely shared with all agencies. The Camera Commissioner is therefore either asking tax payers to fund another go at the same research hoping for a different answer or leaving it up to the market to respond to the proposed regulation change. Neither appears particularly astute. In the absence of a safe and researched FNP/FI design, it is very unlikely that the market will be able to comply in a way that would meet the needs of the camera system – the primary objective of the recommendation. Further, the proposal wishes to deliberately create a regulatory inconsistency between states without a prima facie genuine benefit. This goes against the considerable efforts underway to harmonize regulations and remove such regulatory conflicts in overlapping state responsibilities.

The unique requirement also comes with significant economic risks. It would put Victoria at odds with the rest of Australia and the world, imposing a significant barrier for importers delivering motorcycles into the Victorian market. This could lead to considerable economic damage and job losses for the local motorcycle industry. It would also render illegal all visiting interstate motorcycles thus shutting down motorcycle based tourism worth hundreds of millions of dollars annually. It would also place a compliance onus on owners and impose barriers on the second-hand market, ultimately leading to a significant contraction of motorcycling in Victoria. The impact of such a contraction would be increased traffic, congestion and environmental damage in already congested urban areas. This short sighted proposal is the epitome of a very small tail trying to wag a very huge dog and would not be required if speed cameras were simply turned around.

Q: *Is the VMC's position against FNP/FI an anti road safety stance?*

A: No. There is no evidence that FNP/FI would make motorcycling safer. The VMC believes that genuine, widespread and lasting improvements in safer motorcycling are rooted in better roads, better trained riders and a better trained and aware road user population sharing the same road space.

Q: *Frontal identification is essential to slow motorcycles down.*

A: The Camera Commissioner's own 2014 report rejects this assertion given the recorded 13% reduction¹ in detected speeding motorcycles over the last five years - achieved without any FNP/FI. Over this same timeframe, motorcycle registrations in Victoria grew by about 18%² and the camera system experienced significant expansion. This combination of factors clearly defines a strong real terms reduction in detected speeding motorcycles. Further, when read in conjunction with vehicle registration figures², proportionally there are 3 times

¹ Determined by prorating the provided 10mths of 2013/14 figures to 12months and then comparing to the full 2009 provided figures. The prorated number is expected to overstate the number of detections since it likely overestimates detections in the low riding months of May and June. In all likelihood, the percentage reduction is higher than quoted.

² Australian Bureau of Statistics, Motorvehicle Census 31st January 2014, Catalog 9309.0

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more motor vehicles/cars detected speeding than motorcycles³. These results clearly reject any perception of endemic misbehaviour and suggest that as a road user group, riders are leading the way.

Q: *Motorcycle frontal identification is essential for improved motorcycle road safety.*

A: The Victoria Police put this claim to the 2011/12 all party Parliamentary Inquiry into Motorcycle Safety. The claim was investigated by the Road Safety Committee however the Inquiry's 500+ page report made no mention of frontal identification as an effective road safety countermeasure. The two possible conclusions from this omission are that the Inquiry got it wrong (as has been publicly intimated by the Road Safety Camera Commissioner) or that there was no genuine road safety case to be found. Since the Camera Commissioner has not put a case forward to justify his assessment of the Inquiry, the latter is the only plausible conclusion.

Q: *The percentage of failed identifications proves that riders are speeding with impunity.*

A: The level of failed identifications is no measure of the rate of speeding. It primarily reflects a fault in the camera system, not one of motorcycle design. "Impunity" suggests that riders have a callous disregard for speed limits and that speeding is endemic amongst motorcyclists, both of which are clearly contradicted by the Commissioner's own report.

Q: *Riders are getting away with speeding.*

A: The VMC does not condone speeding nor is our stance on FNP/FI an attempt to encourage speeding. The VMC and motorcycle advocates have long argued for the cameras to be turned around to take advantage of universal "rear of vehicle" identification. The "getting away with it" claim is a thinly veiled emotive argument suggesting that riders have done something deliberately - apart from slowing down - to escape being infringed. Whilst motorcycle design and technology has progressed significantly over the years, bikes are still identified in *exactly* the same location they were when speed cameras were first trialled in 1986, almost thirty years ago. Rear identification is the safest and most convenient location to attach a registration plate. The camera system needs to properly account for all legitimate and road legal vehicles and so it is the system that must be fixed.

Q: *The rising percentage of bikes escaping identification signifies a speeding epidemic.*

A: No it does not. The level of failed identifications does not measure the number of detected speeding motorcycles nor can it be used to characterise the behaviour of a road user class. Given that there's been a clear reduction in speeding motorcycles, any suggestion of an epidemic is either disingenuous spin or demonstrates a very poor grasp of the camera data. Rather, what this apparently "alarming" rise points to is that more cameras are operating for more hours shooting more often towards the front of oncoming vehicles (mobile road side cameras cover oncoming and receding vehicles) thus resulting in a rise in failed identifications of "front on" detected speeding motorcycles. It is clearly disingenuous to lay

³ After prorating the provided 10months of car and bike data to 12months, the equivalent of 9% of the registered motorcycle fleet was detected speeding compared to the equivalent of 30% of the "all other registered vehicle" fleet. Referring to the overestimating concern raised in footnote 1, 9% is likely to be an overestimate thus the ratio would be expected to be higher than quoted.

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the blame on riders when the root cause is the forward bias of the camera system. We can expect the percentage to rise again next year since more cameras and hours have been budgeted. The solution to addressing this rise is simple; turn the cameras around.

Q: The Camera Commissioner reported that 87% of all motorcycle fatalities occurred at over 120km/h, 46% at over 150km/h.

A: These figures appeared in the Commissioner's 2011/12 report and were completely at odds with all Australian motorcycle accident research and statistics available from the TAC, VicPol and other public sources. They apparently came from a 2007 Police study that was never made available despite direct requests and four FOI investigations. The final FOI response admitted that the study could not be found, leading the VMC to conclude that the study no longer existed, possibly never did exist given the outrageous statistics and left the VMC asking the Minister for Police why the report tabled in Parliament was left to stand as is? The validity of these Police study figures has never been corrected nor addressed by the Camera Commissioner despite using them to publicly call for changes to road safety policy. Tellingly, today's motorcycle crash data does not reflect such alarming statistics, which either suggests that massive behaviour change occurred without the need for FNP/FI, or that the data was in fact false or misrepresented in the first place. Riders could be forgiven for concluding that the use of such figures was a shoddy attempt to create a case for FNP/FI.

Q: If they can put a man on the moon, it can't be that hard to mount a front number plate?

A: This kind of mocking argument demonstrates a significant lack of knowledge. The multimillion dollar VicRoads research effort last decade comprehensively confirmed that it was indeed "that hard". The myriad of motorcycle configurations and continuing design refinements makes it practically impossible to arrive at a universal bracket design allowing safe fitment of FNP's to motorcycles. The question should really be then: If they can put a man on the moon, it can't be that hard to turn the cameras around?

Q: The cost of fitting a front number plate wouldn't be very high, why resist it?

A: It is correct to resist any additional cost imposts that have no sound basis and that provide no nett gains. Figures provided in conclusive research by Emeritus Professor M Wigan⁴ show that in today's dollars the imposition on the motorcycling community would be some \$30M with an ongoing \$1M+ annually plus the cost of a yet to be determined suitable FNP design. This is a significant impost on any community and such a cost imposition for no nett benefit should categorically rule out the proposal.

Q: Isn't the argument that FNP's are an injury risk to pedestrians just a smoke screen?

A: No. If such considerations are intrinsic to motor vehicle design, why then is it a smoke screen for motorcycle design? This type of argument is another example of disingenuous spin. In Australia and most of the world, modern motor cars must comply with a host of UN ECE frontal design requirements that are completely focussed on minimising and mitigating injury risk to pedestrians. Some of these requirements are repeated in Australian Design rule 42/04 section 11. If such considerations are valid and necessary for motor vehicles, then it is

⁴ Oxford Systematic, 2002 "Visual Front Motorcycle Number Identification suitable for photographic camera detection"

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an entirely valid consideration for motorcycles. Front number plates were removed globally from motorcycle design for several excellent reasons, one of which is a completely legitimate road safety concern regarding pedestrian injury.

Q: In reality, riders don't want a bracket or number plate because of the aesthetics.

A: An objection on the grounds of aesthetics is a perfectly valid objection. For example, planning and development permits regularly face objections on aesthetic grounds without any derision being levelled. We suspect that drivers would turn to a similar objection if for example all cars were required to be modified in a less than aesthetically pleasing way – such as fitting a 6'x4' sized roof rack mounted number plate to accommodate a new aerial drone speed camera system. It is just an aesthetic change after all...

Q: What about a sticker attached to the front of a motorcycle?

A: Again this was researched by VicRoads. With some 17 market segments and a myriad of motorcycle designs in each, there is no common mounting place for a sticker and no common sticker size. Most bikes do not have a sufficiently flat screen or frontal body surface area for a reliable image to be taken and any other remaining locations are highly curved (e.g. forks, mud guard etc.) thus providing significant challenges for camera optical character recognition. The research concluded that stickers provided a possible way forward; however there was very little likelihood of identification accuracy improving to reliable levels.

Q: Riders don't want stickers because of aesthetic reasons.

A: Again, objections on the grounds of aesthetics are completely valid, but stickers also generate concerns about damage the motorcycle's paint coating. To better demonstrate a few of the issues with stickers, let's discuss this from a driver's point of view. Would drivers accept without objection the aesthetic appearance of colour clashing stickers placed on various panels of their cars? What about concerns over the adhesive effecting/damaging the duco? What if the registration plate needed to be changed – how would removing and replacing stickers be managed? What if an owner kept the plates after selling the car – who has responsibility to remove/update the stickers? What would be the risk of damage to paintwork when removing stickers, particularly aged ones? How well would stickers age in the environment and who bears the responsibility should their appearance deteriorate? And so on. Clearly, there are some significant downsides to the deceptively simple "sticker" idea that are not immediately obvious to non-riders until framed in their perspective.

Q: It is not fair that bikes and cars are identified differently.

A: This is a popular but none the less disingenuous and totally nonsensical argument. In point of fact, cars and bikes globally are identified where it is safest to do so and where they are legally required. Just as a squash racket isn't used to play tennis despite looking similar and serving a similar purpose, bikes and cars are clearly different road vehicles serving a similar purpose. Any differences between them which are intrinsically consistent with their use, purpose and design, are not indicative of an inequity between vehicle classes. As such, it is a total nonsense to draw on the identification difference as a justification for FNP/FI, just

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as it would be nonsense for riders to call for removal of car doors and roof tops from cars to bring them into closer alignment with motorcycles.

Q: *Bikes should be identified from the front like everybody else.*

A: This is just another form of inequity argument that has already been discussed and whilst it appears sensible at first blush, it overlooks many things, least of which is that the root cause of the problem is the design of the camera system.

Q: *Anything that slows motorbikes down is a good thing and improves motorcycle safety.*

A: The VMC does not condone speeding and it is worth restating that the figures already show that motorcycles are leading the way with a clear reduction in speeding numbers. The “slowing down” assertion seems to make intuitive sense however the kinds of small speed reductions being sought would **not** provide any improvement in safer motorcycling or rider injury extent. This counterintuitive statement is supported by Department of Justice literature showing that for any speed over 59km/h⁵, the risk of serious injury or death for a vulnerable road user is 100%. In other words, a motorcycle rider faces the exact same serious injury risk at 99km/h versus 104km/h, or 59km/h versus 64km/h or indeed 59km/h versus 104km/h. Riders accept and manage this risk by utilising their skill, superior road craft and to some degree by wearing protective gear. It is clearly a furphy then to call for FNP/FI on the basis of improved road safety from expected small reductions in average speed.

Q: *What about stickers on helmets?*

A: All the same sticker issues apply, namely optical issues with curved surfaces, aesthetics, changing vehicles and removal of aged stickers. In addition, any time the visor is raised the sticker is likely to be obscured. Irrespective of those matters, this proposal fails purely on practicality grounds in that a separately stickered helmet would be required for each bike ridden, whether owned or borrowed. In short, it is another nonsensical proposal.

Q: *Riders should wear Hi Viz vests printed with license plate identification front and rear.*

A: AS4602 vests are neither compatible nor consistent with good motorcycle protective gear design. Leaving that aside, the identification would in many cases be obscured by forward riding postures, windscreens, luggage, pillions, back packs and rendered unreadable both front and rear any time the vest is unfastened and flapping behind the rider. It's simply unworkable.

Q: *What about electronic identification and tagging?*

A: Motorcycles are harsh environments fully exposed to atmospheric conditions and they experience substantial road and engine vibration. This is the reason that eTags cannot be mounted reliably and be expected to operate reliably. Assuming these technicalities could be overcome, the specific tagging of motorcycles represents the height of hypocrisy given the loud appeals for equal identification between vehicle classes. In order for tagging to work

⁵ <http://www.audit.vic.gov.au/publications/2011-12/20110831-Road-Safety-Cameras/20110831-Road-Safety-Cameras.html> and <http://www.camerassavelives.vic.gov.au/home/road+trauma/speed+and+road+safety/>

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however, every camera would have to be upgraded with tag detectors at some considerable expense to the tax payer. These costs would most likely far exceed the claimed lost fine revenue and the effort would be out of proportion to the size of the apparent problem. To be consistent, an upgraded camera network would result in irresistible pressure to tag all Victorian vehicles. This would open up the spectre of significant civil liberty and privacy concerns for all Victorian road users and would also open up a much larger regulatory inconsistency issue. When this tagging proposal is weighed up against the alternative of simply turning the cameras around, it becomes self-evidently nonsensical.

Q: With the Government announcement of Supercams, isn't this all a moot point?

A: Yes. Replacing existing cameras with ones that photograph vehicles in both directions is the single biggest admission that the camera system was flawed to begin with and renders moot the argument for FNP/FI.

Q: The case for FNP/FI isn't compelling, why is it being pursued?

A: Beyond blame shifting to correct a design error in the camera system by making motorcyclists out to be the "bad guy", the VMC can only speculate as to the other reasons behind the incessant call for FNP/FI.

Q: What are some of the other reasons FNP's were removed from motorcycles?

A: The mounting of FNP's either vertically on a mudguard or horizontally below the headlight required compromises in the design of the front end of motorcycles. This resulted in motorcycles that were less stable and hence less safe at speed. Also, the mountings would fatigue crack causing plates to become detached and either flick back into passing pedestrians, cyclists, other road users or the rider causing injury, or into the engine causing damage. FNP's can also have significant impact on aerodynamics, airflow and cooling, all of which have become critical aspects in motorcycle design. Since FNP's were removed, motorcycle crash statistics have shown a clear and sustained actual and real terms decrease consistent with improving motorcycle technology and design. The call for FNP's presents a throwback to an era long gone and a potential reversal of motorcycle safety.

Q: What does the VMC propose as the way forward for improved safer motorcycling then?

A: Whilst the VMC doesn't agree with every aspect of the 2011/12 Parliamentary Inquiry into Motorcycle Safety report, it does represent the best place to start. Filtering, training, community awareness, agency cooperation, better data collection, better off road safety focus etc., were all key recommendations from the Inquiry. In addition, the VMC believes that better trained riders, wearing their choice of better gear, on better roads with better trained and more aware road users sharing those roads, are the key elements to a lasting and significantly safer motorcycling environment.

