

I have recently learned that the [redacted] is considering a (proposal/ordinance/text amendment) to permit digital billboards in commercially and industrially business areas.

On behalf of the Outdoor Advertising Association of America (OAAA), I urge you to (adopt/approve) this (ordinance/amendment).

OAAA is the leading trade association representing the outdoor advertising industry. Founded in 1891, OAAA is dedicated to promoting, protecting, and advancing outdoor advertising interests in the US. With nearly 800 member companies, OAAA represents more than 90 percent of industry revenue.

I realize that there is a lot of misleading information being disseminated regarding digital billboards, so I am providing this letter to set the record straight.

Research says digital billboards are safe

Digital billboards have been extensively studied by the outdoor advertising industry and others. The research falls into three major categories: human factors, traffic accident, and anecdotal studies. The results of all three categories indicate digital billboards are safe.

The outdoor advertising industry's foundation (Foundation for Outdoor Advertising Research and Education) has pioneered research on digital billboards and traffic safety, commissioning top experts at the Virginia Tech Transportation Institute (VTTI) to study driver behavior. The initial study, released in 2007, was based on the "human factors" approach i.e. measuring drivers' eye glances and reactions in the presence of digital billboards.

This study determined that people look at digital billboards slightly longer than conventional billboards, but well under the threshold for being distracted. In 2006, VTTI released a study commissioned by the federal government called the 100 Car study. It used "eye-glance" tracking to determine where a driver's eyes were looking while they were driving. The study found when a driver takes their eyes off the road for longer than two seconds, there is a cause for concern. VTTI used this same methodology to look at digital billboards, and the study found the mean glance towards digital billboards was less than one second. The researchers said that digital billboards safety neutral.

Anti-billboard activists like to tout the 2006 VTTI study and discredit the 2007 VTTI industry sponsored study. Nevertheless, it is important to note that the two research projects were performed by the same researchers using very similar methodologies. If the 2006 study is accurate and the two second threshold is valid, the 2007 study showing digital billboards to be well under that threshold must be accepted as well. Furthermore, it should be noted that the pending Federal Highway Administration (FHWA) study relies on the same eye-glance methodology used in the 2006 and 2007 VTTI studies.

Meanwhile, engineering experts have analyzed accident reports provided by state and local authorities in jurisdictions across the country. The engineering firm Tantala Associates has examined traffic accidents near digital billboards on highways and surface streets in:

- Cleveland, OH (2007 and updated in 2009)
- Rochester, MN (2009)
- Albuquerque, NM (2010)
- Reading, PA (2010)

- Richmond, VA (2010)

Using a peer-reviewed methodology developed for the New Jersey Turnpike, these studies in sum reviewed over 150,000 accident records around 69 digital billboards (approximately 3% of the total number of digital billboards) spanning over 300 years of data. **The results were unequivocal: there is no correlation between digital billboards and traffic accidents.** These studies also examined older drivers, younger drivers, driving at night, and driving during the day and found no subset of drivers where the presence of a digital billboard was associated with an increase in accidents. If digital billboards were distracting, researchers say the numbers would undoubtedly show some sort of relationship between the presence of digital billboards and traffic accidents. However, the numbers clearly don't support such a relationship.

Finally, law enforcement and state departments of transportation have examined digital billboards anecdotally, trying to determine if digital billboards were causing accidents. Government agencies in Massachusetts, Minnesota, Pennsylvania, Texas, Virginia, West Virginia, South Carolina, and Wisconsin have looked at sites near off-premise digital billboards and found there to be no increase in accidents near them. Accordingly, as a result, 42 of the 46 states with billboards and more than 350 communities have taken steps to allow digital billboards.

Those critical of digital billboards often cite a literature review commissioned by the American Association of State Highway and Transportation Officials (AASHTO) as proof that there is an adverse relationship between digital billboards and traffic safety. However, a closer reading of this report reveals that while dozens of studies have examined driver distraction, the body of research is primarily comprised of reports not specifically focused on off-premise digital billboards. In fact, in a companion research project, FHWA's literature review of these same studies has determined that these studies are "inconclusive." It is also interesting to note that the AASHTO report **does not call for a ban, but rather says digital billboards should be regulated** as a means of protecting the public interest and calls for the regulation of spacing and duration of message, placement near interchanges, curves, and official roadway signs, and lighting brightness. The industry is also supportive of reasonable regulation digital billboards and has conducted research resulting in industry guidelines regarding lighting brightness.

What does the federal government say about digital billboards?

In 2007, FHWA issued guidance to states on how to regulate digital billboards. FHWA said the states could authorize digital billboards as long as they don't flash or scroll. Further, FHWA told states to regulate:

- spacing (defers to states)
- dwell time (recommends eight seconds)
- lighting (avoid glare)
- malfunction (industry adopted guidelines)

FHWA is currently studying whether or not digital billboards are a potential driving hazard. In preparation for the actual research, FHWA conducted a literature review and found that "[t]he conclusion of the literature review is that the current body of knowledge represents an inconclusive scientific result" In this same report, FHWA laid out the process to further study this matter. The often discussed FHWA study was expected to be released in early 2010, but its release has been delayed many times and currently no date has been set for its release.

Furthermore, the federal government is using digital billboards to convey important messages to the public. In 2010, Transportation Secretary Ray LaHood launched a highly-visible enforcement campaign against distracted driving in two test markets (Syracuse and Hartford). In Hartford, the government funded campaign included digital billboards. The pilot is working. Texting and hand-held cell phone use while driving dropped significantly, according to the National Highway Traffic Safety Administration.

Digital billboards are an effective public service messaging tool. The FBI and other police agencies use digital billboards to help find fugitives, such as the East Coast Rapist. Furthermore, since June 2008, the National Center for Missing & Exploited Children (NCMEC) has transmitted more than 550 AMBER Alerts to digital billboards and digital billboards are being used to inform the public about weather warnings, evacuation routes, and safety-related information during emergencies.

Digital billboards are regulated

Digital billboards are heavily regulated as to location, brightness, and static message lengths. Please know that the outdoor advertising industry is committed to responsible implementation of digital billboards. Accordingly, it has strict self-regulations which prohibit moving video, animation, or excessive brightness, and to safeguard against hacking.

Critics have claimed that digital billboards “are brighter than the sun.” However, in reality, billboards use the minimum amount of light necessary to provide safely legible copy. Digital billboards are equipped with light sensors that adjust brightness to surrounding conditions. The industry standard requires limiting lighting to 0.3 foot candles over ambient light conditions. This standard is derived from recommendations developed by Dr. Ian Lewin, the former President of Illuminating Engineering Society of North America (IESNA). These standards meet the FHWA lighting guidelines. Furthermore, in the aforementioned AASHTO report, the author stated, “[t]he good news is that regulatory bodies and billboard companies seem to reach similar conclusions about maximum luminance.” (See page 157 of the AASHTO report).

Energy consumption

Examination of actual monthly electricity consumption data reveals that claims of “enormous energy consumption” are vastly overstated. In a recent analysis conducted by the Louis Berger Group (LBG), it concluded that the manufacturer’s specifications, which are often used as a proxy for electricity consumption, are typically 25% or more than the actual consumption.

For example, according to billing data from 2010, the average annual electricity consumption for a 14’ x 48’ digital billboard was about 43,200 kilowatt hours, meaning that the actual rate of energy consumption as reported in “Illuminating the Issues: Digital Signage and Philadelphia’s Green Future” was overstated by 2.5 – 3.5 times in at least one case.

Furthermore, digital billboards are becoming more efficient as new models are released. According to an independent analysis of meter readings by engineers at LBG, digital billboard energy consumption has dropped dramatically in the last four years. LBG determined that energy consumption by a 14’ x 48’ digital billboard has declined on average 61 percent in the last four years. While energy use by a digital poster (12’ x 24’) has dropped on average 40 percent in the same period. Additionally, manufacturers expect further efficiencies as the technology evolves.

In conclusion, I strongly urge you to review the attached information supporting the aforementioned points for yourself and make your own decision regarding the safety of digital billboards. Thereafter, I am confident you will have the true information regarding the safety of digital billboards.

Please don't hesitate to contact OAAA if we can be of any further assistance in refining (proposal/ordinance/text amendment) to allow digital billboards in commercially and industrially developed areas.

Thank you for your consideration.

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