

To: "Ruth.Gore@eastriding.gov.uk" <Ruth.Gore@eastriding.gov.uk>

From: Idris Francis <idrisfrancis@fightbackwithfacts.com>

Subject: Re: PERSONAL ATTENTION RUTH GORE ONLY Re: Utterly absurd claims for speed cameras in Humberside

Cc: alex.wood@ypn.co.uk,Carl...snip... Michael.Harris@humberside.pnn.police.uk

13 April 2012

Dear Ms. Gore,

Thank you at least for responding this time, albeit that the basis of your reply seems to be "We are only following orders".

While I have found in reading your annual report that you claim to have followed DfT guidelines in your calculations, the problem is that those **guidelines are very seriously flawed indeed**, in the ways I have already pointed out - not least because they completely ignore one of the most important factors in accident reduction at sites, **regression to the mean**. Incidentally I have proved the DfT wildly wrong on other subjects too, and more than once - see for example <http://www.fightbackwithfacts.com/how-the-figures-were-skewed/>

Further, regardless of what methods and arithmetic were used, the plain fact is that **there is that there is no way on earth that the modest reductions in speeds your report identifies could possibly result in the large percentage falls in casualties you also identify**, given that speeds above the limit are not even partly responsible for anything like that proportion of accidents in the first place. Quarts and pint pots, as I have pointed out. If even that simple old phrase is too complex for you, let me put it to you again in the plainest possible terms (using KSI data, though much the same applies to all severities.)

Police and DfT causation analysis shows that only some **10% of KSI accidents involve or might involve speeds above limits**. Because the Stats20 rules for completing Stats19 forms require that the "speeding" box be ticked if speeding was **probably** involved, or **might have been**, even that **10% figure is bound to be overstated**.

Further, even if speeding were involved, it is almost always as **only one of several causal factors** in that accident - others being for example drunk, drugged, lack of attention, tailgating, pulling out without looking etc and even the DfT **admit that even if all speeding were eliminated on all roads, KSI would not fall by anything like that 10%** because the other causal factors would remain. In other words, the proportion of KSI accidents that involve speeds above limits as the primary cause **must be in low single % point figures**.

It follows that your organisation's claim to have brought by use of your cameras KSI reductions of 50/60/70%, far greater than the 10% figure (and greater still than the figure relating to accidents where speeding was the primary causal factor) is SELF-EVIDENT GARBAGE. IT CANNOT HAPPEN, IT IS PALPABLE NONSENSE.

In other words, a reduction in average speed from (say) 34 to (say) 32 mph cannot possibly bring about a 60% reduction in KSI - the very idea is preposterous.

Of course I do not dispute the raw data (except that as the DfT admits that with reporting levels of SI accidents estimated at 1 in 3.5, no one knows or will ever know what the numbers really are, or how reporting levels are changing). My point is that, as Sherlock Holmes said, once you have eliminated the impossible, what remains must be the answer - and the real causes of the observed falls include regression to the mean (selection bias), falling trend, traffic diverting to avoid cameras (your volume figures show an overall fall of 5.3%) and as the BMJ reported in 2006 and since, falling reporting levels.

Pain and Suffering "Values" ARE NOT CASH

I must also take issue with you over the way in which your report claims the notional values of pain and suffering avoided as if it were real cash saved for the State and taxpayer. **THEY ARE NOT!** Even the DfT - in their more rational moments, few and far between as they are - concede that these are notional figures used for evaluating and comparing road policies, but **NOT ARE NOT IN THE LAST RESORT CASH THAT OCCURS IN ANY KNOWN LEDGER.**

In that respect at least, you may be using the DfT's numbers, but you are very seriously misrepresenting those numbers as real cash - which they are NOT. Anyone who did what your organisation is doing in that respect in a real company with real customers and shareholders would find themselves **charged with false accounting, serious fraud or issuing a false prospectus.**

"Lost Output" that is not in fact lost

If as your MBA implies, you know anything at all about business, you must know that output is determined by demand, not by availability of labour. To put that in day-to-day terms, no businessman in this country, on hearing that an employee had been killed or injured and would not be returning to work for some time if at all, says to himself "Oh dear.... that's X% of our output gone for good". **OF COURSE HE DOESN'T!** He picks up the phone to arrange **more overtime, hire another person, improve efficiency or whatever**, to ensure that his **output matches demand** he is able to achieve for it. And if he fails to do so, **his competitors who do, take the business away from him. OUTPUT IS NOT LOST** (except in the case of a fatality, where lost output is cancelled out on average by lost demand)

You will find my more detailed analysis of these points at <http://www.fightbackwithfacts.com/bogus-dft-values/> and I can confirm that the DfT are at last reviewing their analysis, having confirmed to me when I complained that I "**do seem to have a point**". Of course I do - its absolutely basic.

Yet your organisations' claim of cash benefits you provide include this utter nonsense!

Finally, the Nuremburg trials ruled that "**I was only following orders**" is **not a defence** - you and your colleagues have a **statutory duty of care to the public to do your job properly, present facts and figures accurately and carry out the best possible policies regardless of nonsense issued by the DfT**, another Department that is clearly "Not Fit for Purpose".

This is not the end of my complaint, just the beginning

Sincerely

Idris Francis