Position Paper

Brussels, 15 September 2016

ORGALIME RESPONSE TO THE COMMISSION'S PUBLIC CONSULTATION ON THE EUROPEAN C-ITS INITIATIVE

GENERAL COMMENTS

Orgalime represents European technology manufacturers of key enabling technologies, including those needed to build Intelligent Transport Systems (ITS), such as in the domain of transport and connected and automated mobility systems. Our industries are eagerly anticipating the upcoming Commission Communication "A Master Plan for the Deployment of Interoperable Cooperative Intelligent Transport Systems (C-ITS) in the EU" against the background of the Commission's headline priorities of Jobs and Growth, Digital Single Market and Energy Union, including the objective of further decarbonising the transport sector.

In our recent position paper on C-ITS, we reasoned what should to be tackled by the Masterplan Communication.

We urge the Commission not to lose momentum and use this opportunity to lay out an ambitious and long-term European-wide strategy for investments in ITS deployment for Member States. More specifically, Orgalime has the following recommendations:

- send a clear investment signal to all actors involved: Member States, users, industry, public and private investors to drive significant deployment and encourage the further development and manufacturing of the relevant technologies.
- set a coherent roadmap for deployment across the EU, including an ambitious target to deploy the available ITS technologies and services by 2019.
- propose specifications through adopting delegated acts under the ITS Directive to foster the deployment of available ITS, such as Day 1 C-ITS services.
- fully implement and enforce the ITS Directive and ITS Action Plan in Member States.
- support the development of international and EU harmonised standards.
- recognise that deployment of connected and automated vehicles and the deployment of C-ITS technologies, services and infrastructures should be complementing each other and be mutually reinforcing.
- ensure that public data is provided by public services and municipalities to allow for users and business to fully reap the benefits of ITS systems.
- acknowledge that the usage of in-vehicle data for the aftermarket must be made possible. At least, there should be a clear structure proposed about how in-vehicle data can be used by all market players, provided the data subject consents.
- coordinate Member States' efforts with a common European vision based on existing strategies and initiatives to ensure interoperability and facilitate cross-border deployment.

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What this consultation is about

This public consultation of the Commission aims at collecting the opinions of stakeholders and interested parties, including EU citizens and private and public organisations, with regard to possible actions at EU level to support the accelerated and interoperable deployment of Cooperative Intelligent Transport Systems (C-ITS) in the EU.

The replies submitted to this public consultation will be analysed and taken into consideration during the development of the C-ITS Master Plan, a Communication by the European Commission that is foreseen for the second half of 2016, and the first non-legislative step of a roadmap for the deployment of C-ITS across Europe.

The public consultation on the European C-ITS Initiative has been launched by the Commission, by DG MOVE, and runs until 16 September. The consultation asks stakeholders' opinion regarding possible actions at EU level to support the accelerated and interoperable deployment of Cooperative Intelligent Transport Systems (C-ITS) in the EU.

The results of the consultation may be fed into the Masterplan Communication, and will assumingly guide the Commission in the aftermath of the Communication. Orgalime C-ITS position paper allowed us to provide already consolidated view from our industries' expectations for the Communication. Our position paper helps us to feed in our views in to the response for this public consultation.

For more information, visit the web page of this public consultation for more information and background documents: http://ec.europa.eu/transport/themes/its/consultations/2016-c-its-initiative_en.htm

Please find below Orgalime's response to the public consultation that must be answered through an online survey. The online survey could be found here https://ec.europa.eu/eusurvey/runner/C-ITS_Public_Survey. To facilitate your commenting, we have converted it to draft the response into this word document.

Public Consultation on the European C-ITS Initiative

Fields marked with * are mandatory.

Publication

Date   **24 June 2016**
Duration   **12 weeks**

Objective

This public consultation aims at collecting the opinions of stakeholders and interested parties, including EU citizens and private and public organisations, with regard to possible actions at EU level to support the accelerated and interoperable deployment of Cooperative Intelligent Transport Systems (C-ITS) in the EU.

Guidance

Please note that the questionnaire consists of mandatory (marked by an asterisk *) and non-mandatory questions. The non-mandatory questions are rather technical in nature and it is therefore not expected that everybody would answer them, depending on your profile and expertise you are free to answer these questions either in full or partially.

The length of answers to some open questions has been restricted to facilitate a balanced analysis. The final question of the questionnaire allows for further elaboration on these topics.

Disclaimer

Please note that this document has been drafted for information and consultation purposes only. It has not been adopted or in any way approved by the European Commission and should not be regarded as representing the views of the Commission. It does not prejudge, or constitute the announcement of any position on the part of the Commission on the issues covered. The European Commission does not guarantee the accuracy of the information provided, nor does it accept responsibility for any use made thereof.

1. Respondent

*__1.1.a Please enter your first name__

Adrian

*__1.1.b Please enter your last name__

Harris

*__1.1.c Please enter your email address__

adrian.harris@orgalime.org

*__1.2 May the European Commission contact you at this address in case further details on the submitted information in this questionnaire are required?__

◉ Yes

○ No

Respondent details

If you are speaking on behalf of an organisation, please note that as part of the European Transparency Initiative, organisations are invited to use the register of interest representatives to provide the European Commission and the public at large with information about their objectives, funding and structures.

Visit the register of interest

If you are a registered organisation, your contribution will be considered as representing the views of your organisation. If your organisation is not registered, your contribution will be considered as an individual contribution. You have the opportunity to register now by clicking on the above link.

*__1.3.a I speak on behalf of__

○ Myself

The European Engineering Industries Association

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○ An individual organisation

◉ An association representing other organisations

*1.3.b Can you please identify which organisation or association you represent?

Orgalime – The European Engineering Industries Association

*1.3.c Please indicate if your organisation is registered in the Transparency Register of the European Commission

◉ Yes

○ No

*1.3.d Please enter your registration number in the Transparency Register and check the validity of your entry via the search function in the Transparency Register. Please note that invalid entries will by default be regarded as unregistered.

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*1.3.e Please state your Job Title

Director General

*1.4.a Please indicate your country or region of residence (if answering as an individual) or the seat of your organisation (if answering on behalf of an organization)

Austria	◉ Belgium	○ Bulgaria	○ Croatia	○ Cyprus	○ Czech Republic
○ Denmark	○ Estonia	○ Finland	○ France	○ Germany	○ Greece
○ Hungary	○ Ireland	○ Italy	○ Latvia	○ Lithuania	○ Luxembourg
○ Malta	○ Netherlands	○ Poland	○ Portugal	○ Romania	○ Slovak Republic
○ Slovenia	○ Spain	○ Sweden	○ United Kingdom	○ Norway	○ Switzerland

○ Other

*1.5.a What type of organisation do you represent or work for?

☐ Self employed

☐ Application developer / Travel information service provider

☑ C-ITS Systems supplier

☐ Automotive Industry

☐ Telecommunication service provider

☐ Insurance company

☐ Drivers' association / Consumer rights organisation

☐ Public administration

☐ Standardisation organisation

☐ Transport / Road authority

☐ Transport operator / company

☐ Academic institution / Research institute

☐ Consultancy

☐ Other

*1.6 What is the principal geographical focus of your organisation?

○ Local

○ Regional

○ National

◉ European

○ Global

Confidentiality

Contributions received to this consultation, together with the identity of the contributor, may be published by the Commission, unless the contributor objects to the publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case, the publication may be published in an anonymous form.

The contributor may also object to the publication of his contribution, but should be aware that he may later be requested to provide justification in accordance with the exceptions provided under **Regulation 1049/2001** regarding public access to European Parliament, Council and Commission documents.

Read more about access to documents

*1.7 Do you object to the publication of your personal data and/or your contributions?

◉ My contribution can be published including my personal information / name of my organisation

○ My contribution can be published anonymously

○ My contribution cannot be published

2. Questionnaire

2.1 Please indicate your level of agreement with the following statement

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	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
*It is important to take action NOW to support the accelerated and interoperable deployment of Cooperative Intelligent Transport Systems (C-ITS) in the EU	●	○	○	○	○	○

2.2 Please indicate your level of agreement that the EU should take the following possible actions for accelerating C-ITS deployment

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
*Adopting an EU-level strategy on C-ITS	●	○	○	○	○	○
*Facilitating dialogue, exchange of technical knowledge and cooperation at EU level	●	○	○	○	○	○
*Funding C-ITS development and deployment projects	●	○	○	○	○	○
*Setting standards and specifications for the deployment of selected C-ITS services	●	○	○	○	○	○
*Mandating deployment of selected C-ITS services	○	○	○	○	○	●
*Mandating in-vehicle (communication) equipment	○	○	○	○	○	●

Sharing of personal data

Cooperative systems rely on the sharing of data which, when generated by the driver / customer / user's vehicle, is considered personal data, because of the potential of indirect identification of users. C-ITS equipped vehicles would broadcast such data continuously, thus warning other vehicles, cooperating and creating great benefits for road safety. Furthermore, when also communicating with the infrastructure additional benefits through smarter traffic management can be achieved. This data will be anonymised and limited to the correct functioning of the service, e.g. the vehicles location, speed and direction of travel. Data that enables the direct identification of a C-ITS user, such as make and model of the car, its number plate, owners or drivers name or number of occupants will not be broadcast.

Where personal data is used there must be compliance with all existing legislation, such as Directive 95/46/EC and the newly adopted General Data Protection Regulation. However, misuse can never be totally excluded as broadcasting means there is no control of who is listening.

As C-ITS will not work when nobody is prepared to cooperate and share (even anonymised) data, and not all benefits would be achieved when only a minority of road users is prepared to share data, public authorities could investigate mandating (i.e. obliging through legislation) the installation of C-ITS equipment in new vehicles and enabling broadcasting of a minimum dataset in order to enable certain C-ITS services. In the past systems that increase road safety have been mandated (e.g. ABS – anti-lock brakes, ESP – electronic stability programs and eCall – automatic emergency call),

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however of these examples only eCall uses personal data and only <u>after</u> an accident has occurred.

*2.3.a Would you, as a driver/customer/user be prepared to consent to C-ITS systems broadcasting data?

☐ YES – to get (free) access to C-ITS services and benefit from increased road safety, for myself and for others.

☐ YES – to get (free) access to C-ITS services and benefit from smarter traffic management and reduced congestion

☐ YES – when there are adequate safeguards this data will only be used for C-ITS services and not for other purposes (e.g. not to enforce traffic violations)

☐ YES – when offered a financial incentive (e.g. to benefit from better insurance rates or reduced road tax)

☐ YES – provided I have the possibility to opt-out at any moment

☐ NO

☑ OTHER

☐ Don't know

*2.3.c Please clarify for which other reason you would be prepared to consent to C-ITS systems broadcasting data

200 character(s) maximum (20 characters left)

> It is important for the aftermarket to be able to use data generated by the vehicle, if the data subject agrees.

*2.4.a Should broadcasting of a minimum dataset to enable C-ITS be mandated by law?

☑ YES – road safety is of critical importance and these systems will save lives

☐ YES – to reduce fuel consumption and emissions

☐ YES – to help reduce traffic congestion

☐ YES – but an opt-out option must always be included

☐ NO – I believe the use of C-ITS should not be enforced through legislation

☐ OTHER

☐ Don't know

2.5.a Assuming the vehicle is equipped with broadcasting capability and the equipment can be turned off, who should give permission to broadcast data for C-ITS services?

☑ The owner of the vehicle gives permission, the driver however should be properly informed when the vehicle has active C-ITS broadcasting equipment

☑ The driver has the possibility to opt-out at all times, in which case the owner of the vehicle is properly informed of this choice

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☐ The driver of the vehicle gives consent every time the vehicle is started and prior to broadcasting any C-ITS data, the owner of the vehicle is not informed about this choice.

☐ Don't know

☑ OTHER

*2.5.b Please clarify which other person or mechanism should give permission to broadcast data for C-ITS services

200 character(s) maximum (20 characters left)

> It is important for the aftermarket to be able to use data generated by the vehicle, if the data subject agrees.

*2.6.a What geographical scope do you think C-ITS deployment should focus on most / first when investing in C-ITS?

☑ Motorways

☑ Extra-urban (non-motorways)

☑ Urban areas

☑ Service dependent (e.g. Green Light Optimal Speed Advisory)

☐ Don't know

☐ OTHER

2.6.b Please clarify which other geographical scope you think C-ITS deployment should focus on most / first when investing in C-ITS

200 character(s) maximum (200 characters left)

2.7.a What user group do you think C-ITS deployment partners should focus on most / first with their efforts to increase public acceptance (please order from 1 to 5, with 1 being the most important, and 5 being the least important)?

	1	2	3	4	5
*Road infrastructure Owners / Managers	○	○	●	○	○
*Fleet Owners	○	○	○	●	○
*Professional drivers	○	○	○	○	●
*Private drivers	○	●	○	○	○
*General Public	●	○	○	○	○

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2.7.b Which other user group do you think C-ITS deployment should focus on most / first when increasing public acceptance?

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Public Authorities

3. Expert Questionnaire

In order to answer the next part of the questionnaire, the final expert report of the C-ITS platform is useful background information.

If you are not very familiar with C-ITS, you may skip these questions. Alternatively you are also free to partially answer these questions and only skip those outside your field of expertise.

*3.1 How familiar are you with the C-ITS topic?

- ⦿ I am familiar with or already use C-ITS. I will proceed to the questions.
- ○ I am somewhat familiar with C-ITS. I will proceed to the questions.
- ○ I am not familiar at all with C-ITS. I will skip this part.

3.2.a Please indicate how you would rate the potential impact of C-ITS on the following societal trends, problems or statements.

	Very Positive	Positive	Neutral	Negative	Very Negative	Don't know
*Increasing Road Safety [1]	⦿	○	○	○	○	○
*Reduce fuel consumption, Greenhouse Gas and other pollutant emissions, as well as dependency on fossil fuels from transport	○	⦿	○	○	○	○
*Reducing congestion	⦿	○	○	○	○	○
*Attracting more traffic, possibly negating the positive benefits for GHG emissions, air pollutants and/or congestion	○	○	○	○	○	⦿
*Increasing the competitiveness of the European industry	⦿	○	○	○	○	○
*Facilitating uptake of low or zero emission vehicles (e.g. electric cars, e-bikes, etc.)	⦿	○	○	○	○	○
*Facilitating multimodal transport, strengthening the trend of reduced vehicle ownership	⦿	○	○	○	○	○

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[1] Currently 70 road fatalities in the EU every day, a multitude of serious and minor injuries, and the share of Vulnerable Road Users is increasing

3.2.b Which other potential impact do you think C-ITS could have?

200 character(s) maximum (5 characters left)

Creating major business opportunities for Europe. Increasing health and convenience for passengers and drivers. Managing efficiently growing traffic demand in existing transport infrastructures such as cities.

3.3.a Please indicate to what extent you think the following issues are barriers for the large scale deployment of C-ITS.

	Strong barrier	Moderate barrier	No barrier at all	Don't know
*C-ITS developments risk being fragmented across Member States and industries	○	◉	○	○
*Lack of Interoperability hinders cross-border continuity of services	○	◉	○	○
*Insufficient link between large scale tests, demos and pilot projects, and standardisation efforts	◉	○	○	○
*Gaps and possible inconsistencies in the regulatory framework and policy	◉	○	○	○
*Deployment of C-ITS is slow and full benefits are not realized	◉	○	○	○
*High investment risk or first-mover disadvantage	◉	○	○	○
*Uncertainty regarding proven business cases	◉	○	○	○
*Lack of public acceptance	○	◉	○	○
*Lack of public funding and investments	○	○	○	◉
*Lack of private investments	◉	○	○	○
*Lack of support for innovative projects up to (pilot) deployment	○	○	○	◉
*Lack of support for basic research	○	○	◉	○
*Lack of focus on social and behavioural aspects	○	○	○	◉
Lack of international cooperation to build global solutions	○	○	◉	○

3.3.b Which other barriers do you see for large scale deployment of C-ITS?

200 character(s) maximum (200 characters left)

In the short term, there are a few beneficiaries, a really low penetration is expected (specially in some Day 1 – Signage services in which a devise is needed in the car) and a relatively high investment (for example, infrastructure deployment in a junction for GLOSA service)

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Day 1 and Day 1.5 services

The C-ITS platform experts identified a list of services as prime candidates for deployment. Day 1 services are considered fully mature and very relevant for realising the societal benefits of C-ITS in terms of road safety and reduced emissions through optimised traffic management. Day 1.5 services follow closely, in the sense that they are somewhat less mature, but equally relevant and therefore equally fit for (pilot) deployment.

Many services generate greater benefits faster when uptake rates increase and with the aim of achieving continuity of services and maximising benefits all deployments activities should focus on this list. It should also be the goal to deploy as many services on the list as soon as possible. However, few deployment initiatives will be able to deploy all identified services at once so some prioritisation might still be required.
Regardless of your answer you are always invited to answer part F of this question, and indicate whether (a) service(s) is/are missing from this list

*3.4.a Do you believe additional prioritisation is required?

◉ No additional prioritisation is required, all services should be deployed as soon as possible
○ Some additional prioritisation would be useful, I will answer part B of this question

3.4.f Which services do you think are missing from this list (that are prime candidates for early deployment)?

200 character(s) maximum (200 characters left)

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Do you agree that the following issues need to be addressed at EU level to facilitate large scale deployment of C-ITS?

The C-ITS Platform final report identified many expert recommendations to help facilitate the large scale deployment of C-ITS.
The list of issues below is largely based on these. For clarity they have been grouped in 6 domains. Please indicate whether you agree with these recommendations. Note that because of the sometimes detailed or technical nature of some of these issues you are free to answer or skip issues depending on your expertise in the matter.

3.5.a PRIVACY & DATA PROTECTION

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know

Ensure broadcasted C-ITS messages are not (or only temporarily for functional reasons) stored	○	○	●	○	○	○
Implement practical solutions for respecting data privacy and data protection legislation, including privacy by design and anonymisation of data	○	●	○	○	○	○

3.5.b SECURITY

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
Deploy common security and certificate policy for C-ITS in Europe allowing secure interoperable C-ITS communication for cross-border C-ITS services	○	●	○	○	○	○
Define clear roles, responsibilities and financing schemes for security management at EU level	●	○	○	○	○	○
Set up EU compliance assessment process for C-ITS systems and services	●	○	○	○	○	○

3.5.c PUBLIC AWARENESS & ROAD SAFETY

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
Develop principles for non-distracting Human Machine Interfaces	○	●	○	○	○	○
Ensure co-existence with non-C-ITS equipped users during the (likely long) transition period	●	○	○	○	○	○
Increase awareness on the benefits and possibilities but also limitations of C-ITS	●	○	○	○	○	○

3.5.d INTEROPERABILITY & FAST DEPLOYMENT

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
Deploy first and exclusively agreed Day 1 & 1.5 C-ITS services to accelerate cross-border continuity of services	●	○	○	○	○	○
Consider mandating deployment of safety critical C-ITS services	○	●	○	○	○	○
Ensure functional interoperability for C-ITS services to guarantee cross-border and cross-brand continuity of services	○	●	○	○	○	○
Develop model for Cost Benefit Analysis & Business Models at local/regional level to stimulate investment	○	●	○	○	○	○
Cross-testing for all deployment pilots to verify and ensure interoperability	●	○	○	○	○	○
Impose use of harmonised standards and development of implementation guidelines	●	○	○	○	○	○

3.5.e COMMUNICATION

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	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
Promote hybrid communication to cover all services (i.e. direct short range and cellular/long-range)	○	○	○	○	○	●
Use IEEE802.11p/ETSI ITS-G5 for Direct Short Range Communication	○	○	○	○	○	●
Seek international harmonisation of spectrum allocation	○	○	○	○	○	●
Protect (and possibly extend) designated frequency bands for safety critical C-ITS services	●	○	○	○	○	○
Seek International cooperation for additional (designated) spectrum for C-ITS services	○	○	○	○	○	●
Ensure good functioning of safety critical services through high signal predictability from ITS-G5 communication, also under high channel load (e.g. many C-ITS devices in urban areas)	●	○	○	○	○	○
Support multi-channel ITS-G5 to increase capacity and support future service and users (e.g. Vulnerable Road Users)	○	●	○	○	○	○
Increase geographical coverage for communication	●	○	○	○	○	○
5G mobile networks should in the long-term cover all communication needs, including direct short range and thus replace not only 3G/4G but also ITS-G5	●	○	○	○	○	○

3.5.f STANDARDISATION & INTERNATIONAL COOPERATION

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
Create a common technical framework and minimum list of standards for all C-ITS stakeholders	●	○	○	○	○	○
Bridge standardisation and harmonisation gaps	●	○	○	○	○	○
Seek security interoperability with non-European users (i.e. mix non-EU and EU vehicles)	●	○	○	○	○	○
Link with and learn from 3rd country deployment pilot implementation issues	●	○	○	○	○	○
Learn from international implementation policies	●	○	○	○	○	○
Develop / carry out international compliance assessment for C-ITS	●	○	○	○	○	○

4. Additional questions

*4.1.a Would you, as a driver / customer / user, be prepared to pay for C-ITS services?

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- ☐ Once, when buying the vehicle
- ☐ Periodically, based on subscription model for safety related services
- ☐ Periodically, based on subscription model for traffic management services
- ☐ Periodically, based on subscription model bundled with 'infotainment' services
- ☐ Never
- ☑ Don't know
- ☐ Other

*4.2.a Are there any additional issue you wish to raise in the context of C-ITS? Is there any data, study or document that are of relevance to C-ITS (e.g. successful deployment activities of C-ITS) that you would like to share?

- ○ No
- ⦿ Yes

4.2.b Please clarify any additional issue you wish to raise in the context of C-ITS.

Link to Orgalime position Paper