Public consultation on specifications for Cooperative Intelligent Transport Systems

Fields marked with * are mandatory.

Introduction

** NOTE: You can change the language of this form in the menu on the right **
The 2016 EU Strategy on Cooperative Intelligent Transport Systems foresees in particular the need to amend and supplement the ITS Directive 2010/40/EU for aspects where legal certainty is needed, through the preparation of a delegated regulation on C-ITS. It will be focused on the following list of services which are technologically mature, highly beneficial and ready for large scale deployment. Hazardous location notifications:

- Slow or stationary vehicle(s) & traffic ahead warning;
- Road works warning;
- Weather conditions;
- Emergency brake light;
- Emergency vehicle approaching;
- Other hazards.

Signage applications:

- In-vehicle signage;
- In-vehicle speed limits;
- Signal violation / intersection safety;
- Traffic signal priority request by designated vehicles;
- Green light optimal speed advisory;
- Probe vehicle data;
- Shockwave damping.

Transparency and confidentiality

*Please let us know in which language you are replying.

English

Please note that contributions received from this survey, together with the identity of the contributor, will be published on the European Commission's website, unless the contributor objects to publication of the personal information. In this case, the contribution will be published in anonymous form.

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*Note that, whatever option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N°1049/2001

- ⦿ **can be published with your personal information** (I consent the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- ○ **can be published provided that you remain anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication)

*May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

- ⦿ Yes
- ○ No

*Please provide your email address

gelin@insuranceeurope.eu

Information about the respondent

*1. Are you replying as / on behalf of:

- ○ A citizen in your own personal capacity
- ○ A public authority (ministry, agency, other form of public administration, at national, regional or local level)
- ○ A private company
- ○ A start-up
- ⦿ An association
- ○ A non-governmental organisation
- ○ Other (please specify)

2. Please provide, if applicable, the name of the entity on whose behalf you are replying
500 character(s) maximum

Insurance Europe

3. Is the entity on whose behalf you are replying registered in the EU Transparency Register?

- ⦿ Yes
- ○ No

2

3.a. If so, please indicate the registration number in the Transparency Register

> 33213703459-54

* 4. Please provide your first name

> Thomas

* 5. Please provide your last name

> Gelin

6. Please specify your country of residence

> Belgium

7. Please specify which interests you (the organisation on behalf of which you respond) represent:
- ○ National public authorities (transport ministries, agencies)
- ○ Regional or local public authorities
- ○ Road authorities
- ○ Road operators
- ○ (Public) transport operators
- ○ Vehicle and equipment manufacturers/ suppliers
- ○ ITS service providers
- ○ Telecommunications providers
- ○ Research/Academia/Consultancies
- ○ Logistics companies and integrators
- ○ Societal interests and/or consumer rights
- ● Other (please specify)

7.a. Please specify "Other"
100 character(s) maximum

> Insurers

8. What is the size of the organisation on behalf of which you respond?
- ○ Large (≥ 250 employees)
- ○ Medium (50-249 employees)
- ● Small (10-49 employees)
- ○ Micro (1-9 employees)
- ○ Micro (self-employed)

9. In addition to this general consultation, targeted follow-up will be organised with key professional stakeholders on certain topics. If you are a professional stakeholder, would you be interested in participating in this targeted consultation?
- ● Yes

◉ No

Questionnaire

1. How familiar are you with cooperative intelligent transport systems?
- ◉ Very familiar
- ◎ Somewhat familiar
- ◎ Not at all familiar

2. How familiar are you with the ITS Directive and the EU actions to support the deployment of intelligent transport systems?
- ◉ Very familiar
- ◎ Somewhat familiar
- ◎ Not at all familiar

3. How familiar are you with the following initiatives in the area of cooperative, connected and automated mobility?

	Very familiar	Somewhat familiar	Not at all familiar
C-ITS Platform	◉	◎	◎
C-ROADS Platform	◎	◉	◎
GEAR2030	◉	◎	◎
Horizon 2020 research activities	◎	◉	◎
Letter of Intent on the testing and large scale demonstration of Connected and Automated Driving	◉	◎	◎
EATA Roundtable	◉	◎	◎

Problem definition

Today some C-ITS are already technically mature: the technological capabilities among market parties are increasing, and vehicle manufacturers intend to launch series of vehicles with selected C-ITS technology on board by 2019. However, the Commission considers that deployment is being delayed due to several barriers and uncertainties, and Europe risks seriously falling behind other regions in the world if it fails to act soon. Without a clear legal framework, C-ITS deployment is expected to remain slow and fragmented, resulting in interoperability issues and hindering continuity of services.
This in turn will hinder the deployment and uptake of C-ITS and the realisation of their full benefits, in particular with regards to road safety and traffic efficiency.

4. Do you agree with the assessment above?
- ◉ Strongly Agree

○ Agree

○ Neither Agree nor disagree

○ Disagree

○ Strongly Disagree

○ No opinion / I don't know

5. Please elaborate on your answer to the previous question.

2000 character(s) maximum

Insurance Europe agrees about the need for a clear legal framework at European level for the deployment of C-ITS. One major issue which should urgently be addressed by the European Commission is (in-vehicle) access to vehicle data. The deployment of C-ITS in general, and connected and automated driving in particular, is bound to be slow and fragmented, unless decisive action is taken at EU level in favour of in-vehicle technology, allowing all stakeholders to be on an equal footing when it comes to in-vehicle access to vehicle data. This means access free from any interference by vehicle manufacturers, and solely based on the consent of drivers/consumers. Insurance Europe therefore echoes the call for a legislative proposal on this topic which is currently found in the EP Transport Committee (TRAN) draft report on a European strategy for C-ITS.

In this respect, Insurance Europe would urge the European Commission to build on the work achieved in the C-ITS Platform and the extensive and comprehensive discussions which took place in the Working Group 6 on access to in-vehicle data and resources in particular. Insurance Europe also urges the European Commission to give due consideration to the conclusions of the TRL study on access to in-vehicle data and resources, which was published in August 2017 and which offers a valuable assessment of the various technologies available for such access.

The Commission has identified a number of drivers underlying the problem of slow and fragmented C-ITS deployment.

6. From your point of view, how important is the contribution of these drivers to the overall problem?

	Very important	Moderately important	Of little importance	Not at all important	No opinion / I don't know
The costs of C-ITS remain too high due to the **fragmented deployment of separate C-ITS services** and ecosystems	○	●	○	○	○
Failure to establish confidence in the **cyber-security of C-ITS communications**	○	●	○	○	○

Public acceptance remains limited due to unclear principles related to **privacy and protection of personal data**	●	○	○	○	○
Incompatible communication technologies and frequency spectrum allocation	○	●	○	○	○
Uncertain minimum requirements for **interoperability of C-ITS services**	●	○	○	○	○
Uncertain minimum requirements for **compliance assessment for C-ITS services**	○	●	○	○	○

7. Do you consider that any drivers underlying the problem are missing? Please elaborate.

2000 character(s) maximum

The lack of decisive and concrete action at EU level on in-vehicle access to vehicle data is one of the major factors preventing a successful deployment of C-ITS technologies. The necessary measures should be taken to ensure a healthy competitive market for vehicle data based services, to the benefit of consumers. If the proprietary approach currently taken by vehicle manufacturers is allowed to carry on, the full potential of C-ITS will simply not be realised.

8. The Commission has established the following objectives for this initiative. From your point of view, how important is it to achieve these objectives?

	Absolutely essential	Very important	Moderately important	Of little importance	Not at all important	No opinion / I don't know
Ensure **continuous availability** of C-ITS services for users across the EU, by clearly defining a set of priority C-ITS services	●	○	○	○	○	○
Ensure **security** of C-ITS communications by establishing common rules	●	○	○	○	○	○
Ensure the practical application of **Data Protection** in the area of C-ITS	●	○	○	○	○	○

Ensure a forward looking **hybrid communication** approach (combining complementary communication technologies, e.g. WiFi and cellular)	◉	○	○	○	○	○
Ensure **interoperability of C-ITS services** by establishing common rules	◉	○	○	○	○	○
Ensure **seamless deployment of C-ITS** service by establishing a compliance assessment framework (which allows services to be checked against EU-wide requirements)	◉	○	○	○	○	○

9. Please elaborate on your answers to the previous question. Do you consider that any objectives are missing?

2000 character(s) maximum

The European Commission should also include the following objective: establishing a legal framework for in-vehicle access to vehicle data to ensure consumers are in control of who has access to their (vehicle) data and for what purposes, and to ensure a level-playing field for all stakeholders (service providers) in the data-based services market.

10. From your point of view, how important is it to achieve these objectives through action at the EU level (as opposed to action only at the national level or international standardisation)?

	Absolutely essential	Very important	Moderately important	Of little importance	Not at all important	No opinion / I don't know
Ensure **continuous availability** of C-ITS services for users across the EU, by clearly defining a set of priority C-ITS services	⦿	○	○	○	○	○
Ensure **security** of C-ITS communications by establishing common rules	⦿	○	○	○	○	○
Ensure the practical application of **Data Protection** in the area of C-ITS	⦿	○	○	○	○	○

Ensure a forward looking **hybrid communication** approach	◉	○	○	○	○	○
Ensure **interoperability of C-ITS services** by establishing common rules	◉	○	○	○	○	○
Ensure **seamless deployment of C-ITS** service by establishing a compliance assessment framework	◉	○	○	○	○	○

11. Please elaborate on your answers to the previous question.

2000 character(s) maximum

> The objectives rated as absolutely essential should be regulated at EU-level to ensure the commitment and common understanding required for C-ITS to function properly across Europe. This reflects the reality that road traffic occurs across European border.

12. To achieve the above objectives, different types of action could be foreseen.

12.a. For the objective "**Ensure continuous availability of C-ITS services for users across the EU, by clearly defining a set of priority C-ITS services**", please rank the types of action from most appropriate (1) to least appropriate (3) to achieve the objective.

	1	2	3
Industry-led approach (e.g. through Memoranda of Understanding)	○	○	●
Soft legislation (e.g. EU guidelines and recommendations, enhanced standardisation)	●	○	○
Legally binding EU specifications on C-ITS	○	●	○

12.b. For the objective "**Ensure security of C-ITS communications by establishing common rules**", please rank the types of action from most appropriate (1) to least appropriate (3) to achieve the objective.

	1	2	3
Industry-led approach (e.g. through Memoranda of Understanding)	○	○	●
Soft legislation (e.g. EU guidelines and recommendations, enhanced standardisation)	○	●	○
Legally binding EU specifications on C-ITS	●	○	○

12.c. For the objective "**Ensure the practical application of Data Protection in the area of C-ITS**", please rank the types of action from most appropriate (1) to least appropriate (3) to achieve the objective.

	1	2	3
Industry-led approach (e.g. through Memoranda of Understanding)	○	○	●
Soft legislation (e.g. EU guidelines and recommendations, enhanced standardisation)	○	●	○
Legally binding EU specifications on C-ITS	●	○	○

12.d. For the objective "**Ensure a forward looking hybrid communication approach**", please rank the types of action from most appropriate (1) to least appropriate (3) to achieve the objective.

	1	2	3

	1	2	3
Industry-led approach (e.g. through Memoranda of Understanding)	○	○	●
Soft legislation (e.g. EU guidelines and recommendations, enhanced standardisation)	○	●	○
Legally binding EU specifications on C-ITS	●	○	○

12.e. For the objective "**Ensure interoperability of C-ITS services by establishing common rules**", please rank the types of action from most appropriate (1) to least appropriate (3) to achieve the objective.

	1	2	3
Industry-led approach (e.g. through Memoranda of Understanding)	○	○	●
Soft legislation (e.g. EU guidelines and recommendations, enhanced standardisation)	○	●	○
Legally binding EU specifications on C-ITS	●	○	○

12.f. For the objective "**Ensure seamless deployment of C-ITS service by establishing a compliance assessment framework (which allows services to be checked against EU-wide requirements)**", please rank the types of action from most appropriate (1) to least appropriate (3) to achieve the objective.

	1	2	3
Industry-led approach (e.g. through Memoranda of Understanding)	○	○	●
Soft legislation (e.g. EU guidelines and recommendations, enhanced standardisation)	○	●	○
Legally binding EU specifications on C-ITS	●	○	○

13. Please elaborate on your answers to the previous question. In particular, if you favour EU action, please indicate what this needs to cover and what form it should take. Please also indicate if you think other (types of) action(s) should be considered to achieve the objectives.

3000 character(s) maximum

> EU action is indispensable on in-vehicle access to vehicle data given the unfair advantage vehicle manufacturers have over other stakeholders. The lack of action at EU level will allow the current proprietary approach to be entrenched, meaning consumers will not have access to the full range of services and service providers available for vehicle data based services. EU rules should be adopted to define the conditions for in-vehicle access to vehicle data, ideally via an on-board application platform (or an in-vehicle interface) so that all service providers can have the same access to this data and be on an equal footing with car manufacturers in terms of competition.

The main objective of this initiative is to establish appropriate and clear framework conditions to improve the interoperability and continuity of C-ITS across Europe. However, the deployment of C-ITS exhibits strong positive network effects and economies of scale & scope (as many different services can use the same hardware). Further accelerating C-ITS deployment can thus make or break the business case for early investments into C-ITS.

14. Please indicate if you agree with the following statements on accelerating deployment of C-ITS (when services are fully functional and EU-wide specifications are in place)

	Strongly Agree	Agree	Neither Agree nor disagree	Disagree	Strongly Disagree	No opinion / I don't know
Enabling conditions such as exchange of best practice and funding instruments are sufficient, thus there should be **no mandatory deployment** of C-ITS.	○	○	○	○	●	○
C-ITS equipment should be **mandated in new vehicles**	●	○	○	○	○	○
Retrofitting C-ITS equipment in existing vehicles should receive financial support	○	●	○	○	○	○
C-ITS roadside equipment should be mandated on **core interurban transport routes** (i.e. those in the core trans-European network (TEN-T))	●	○	○	○	○	○

C-ITS roadside equipment should be mandated on **all main interurban transport routes** (i.e. those in the comprehensive trans-European network (TEN-T)	●	○	○	○	○	○
C-ITS roadside equipment should be mandated on **all main interurban transport routes AND urban nodes** (i.e. those in the comprehensive trans-European network (TEN-T)	○	●	○	○	○	○

15. Please elaborate on your answers to the previous question.

2000 character(s) maximum

> C-ITS roadside equipment is of utmost importance on main interurban transport routes where traffic is dense, as these roads are of high importance for the transport of people and goods in Europe.

16. From your point of view, are there actions missing that should be considered at the EU level?

2000 character(s) maximum

> As explained throughout this survey, EU action is needed on in-vehicle access to vehicle data, and more specifically to promote the technology allowing such access on an equal basis for all stakeholders.

Impacts

The Commission has made a preliminary assessment of the most relevant impacts of substantial deployment of C-ITS (assuming that C-ITS equipment will be progressively deployed up to 2030 to eventually cover all new vehicles types/segments, all highways of the TEN-T core network and select other roads and urban nodes).

17. Please indicate your level of agreement with the following statements

	Agree	Disagree	No opinion / I do not know
Investment costs for **in-vehicle C-ITS equipment** will be **very substantial** (i.e. the major part of overall costs)	○	○	●
Investment costs for **roadside C-ITS equipment** will be **substantial** (but a minor part of overall costs)	○	○	●
Investment costs for **central C-ITS equipment** (e.g. integration to national traffic management centres, software development) will form a **small part of overall costs**.	○	○	●
The deployment of C-ITS will **make a strong contribution to improving road safety**	●	○	○
The deployment of C-ITS will **make a strong contribution to reducing congestion**	●	○	○
The deployment of C-ITS will **make a significant contribution to more efficient** use of road infrastructure	●	○	○
The deployment of C-ITS will **deliver a small reduction in the expenditure needed for road infrastructure** (both expansion and maintenance)	○	○	●

The deployment of C-ITS will **make a small contribution to reducing pollutant and CO2 emissions**	○	○	◉
The deployment of C-ITS will have a **positive impact** on **international competitiveness of EU companies**	◉	○	○
The deployment of C-ITS will have a **positive impact** on **research and innovation**	◉	○	○
The deployment of C-ITS will **support** bringing new services and products to the market and thus creating **new jobs**	◉	○	○

18. Please elaborate on your answers to the previous question.

3000 character(s) maximum

> Most of the benefits listed above will not come to fruition unless the necessary steps are taken at EU level to promote fair and equal in-vehicle access to vehicle data for all stakeholders, conditional only on consumers' consent rather than any condition imposed by vehicle manufacturers. C-ITS will only bring new services and products to the market (and jobs to society at large) if these services and products can be sold freely to consumer inside their vehicles, without any interference from vehicle manufacturers.

19. From your point of view, are there any missing impacts that should be considered?

2000 character(s) maximum

The Commission considers that common specifications for C-ITS will help ensure that progress is made by all actors across the value chain in a consistent and harmonised manner. This in turn is expected to reduce administrative burden and to broaden the C-ITS market and make it more accessible, in particular for Small and Medium enterprises.

20. Please indicate your level of agreement with this statement.
- ◉ Strongly Agree
- ○ Agree
- ○ Neither Agree nor disagree
- ○ Disagree
- ○ Strongly Disagree
- ○ No opinion / I don't know

21. Please elaborate on your answer to the previous question.

2000 character(s) maximum

> SMEs in particular will be blocked from the C-ITS market unless access to information and data is not enabled through standardisation. Legally enforced transparency can balance information advantages that would otherwise favour the big players.

The Commission expects that the deployment of C-ITS will have significant benefits in increasing road safety and reducing congestion. At the same time it is seen as an important stepping stone towards connected, cooperative and automated mobility, and it will significantly contribute to improved traffic and travel information. As a result, the deployment of C-ITS could considerably influence people's travel choices in the future.

22. What do you expect to be the main **benefits to you** / **your organisation** of substantial deployment of C-ITS? If possible, please include **quantifiable examples**.

3000 character(s) maximum

> These technologies have a significant road safety potential. This is especially true of applications which warn the driver about critical accident-prone situations through real-time communication. Such communications can be used to directly improve vehicle functions (e.g. emergency breaking). The implemented safety functions should focus on real-world accident scenes and cover more than just cars. Powered two-wheelers (PTW) and rescue vehicles should be covered by the technology from the outset.

23. What do you expect to be the main **costs and burdens to you** / **your organisation** of substantial deployment of C-ITS? If possible, please include **quantifiable examples**.

3000 character(s) maximum

> No costs or burdens are expected for the insurance industry.

Additional comments

24. Do you have any additional comments regarding this consultation questionnaire?

3000 character(s) maximum

25. Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report. You may also upload relevant files below.

3000 character(s) maximum

> Insurance Europe would once again urge the European Commission to give due consideration to the report it has ordered itself from TRL on access to in-vehicle data and resources. In particular, the recommendations supporting standardised in-vehicle access to vehicle data should be implemented as part of the upcoming legislative process.

26. Please upload any relevant file

The maximum file size is 1 MB

Contact

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