AmCham EU
SPEAKING FOR AMERICAN BUSINESS IN EUROPE

Position statement

# Principles for leveraging connected and automated mobility in Europe

AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled more than €2 trillion in 2017, directly supports more than 4.7 million jobs in Europe, and generates billions of euros annually in income, trade and research and development.

**American Chamber of Commerce to the European Union**
*Speaking for American business in Europe*

Avenue des Arts/Kunstlaan 53, 1000 Brussels, Belgium • **T** +32 2 513 68 92
info@amchameu.eu • amchameu.eu • European Transparency Register: 5265780509-97

# Importance of Connected Mobility & ITS

The American Chamber of Commerce to the European Union (AmCham EU) has long highlighted the importance of a sound policy framework to deploy connected and automated mobility and Intelligent Transport Systems (ITS) in Europe. Connected and automated driving can improve – or even revolutionise – how vehicles interact with each other, with road infrastructure and other third operators. It has the potential to increase the efficiency of road use and improve both the safety and the environmental performance of vehicles.

AmCham EU welcomes the Commission's move to publish a Strategy on the future of Cooperative, Connected and Automated Mobility (CCAM) in Europe within the framework of the Third Mobility Package. We look forward to a fruitful collaboration on the future of EU Mobility and we believe that we can bring a valuable contribution to the policy making by combining the views of car manufacturers, components suppliers, service providers and road infrastructure and IT service providers.

# Connected Mobility & the role of digital technologies

Vehicle-to-everything (V2X)[1] interaction will offer great potential for transport efficiency and safety. The digital infrastructure promoted by ITS (V2V, V2I and I2V) can also significantly reduce emissions and increase the efficiency of transport systems for both fleets and privately-owned vehicles. The market penetration of new systems is gradually rising, but further comprehensive deployment requires mutual investment in physical and digital infrastructure by both industry and road authorities to ensure the safety of road users. The success of these new technologies will depend on the right legal framework[2].

Privacy, security, competitiveness, trust and liability must be a priority in order to allow the digital ecosystem to thrive. Security by design must be central to all ITS technologies, supported by a voluntary, market-driven and risk based cybersecurity certification framework to protect road users. Companies are also in the process of implementing the GDPR which provides a robust legal framework for processing personal data. To support innovation, AmCham EU supports flexible and technology neutral rules for processing. Rules on consent cannot be 'one-size-fits-all', and consent-only models such as that put forward in the Commission's proposal for an ePrivacy Regulation are impractical.

Care should be taken to avoid unnecessary regulatory burden in the Internet of Things. Any rules on electronic communication services need to be targeted. Certainty is needed around applicable rules on machine-to-machine communication in the context of the Electronic Communications Code and in particular the proposal on e-Privacy. Only the "pure" transmission part should be covered in a machine-to-machine communication context. Finally, as stated above, the key ruling principle relating to ITS radio spectrum should be that of technology neutrality, however it is not clearly guaranteed at the C-ITS policy level. Regulatory intervention should be avoided in order to allow for rapid take-up of short and long range communication technologies and within CCAM in Europe.

Furthermore, the Commission raises important questions about the data economy[3], such as the parties that will have 'access' to such data produced by connected vehicles. The data economy, and its benefits, requires significant and sustained private and public sector investment and innovation. We urge the Commission to bear in mind the need to incentivise this investment and innovation as a priority. Given the sheer variety and complexity of scenarios involving technical data, policymakers should exercise caution when developing rules in

[1] Vehicle-to-everything (V2X) interaction encompasses both vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) interaction.

[2] Declaration of Amsterdam on Cooperation in the field of connected and automated driving, April 2016, https://www.government.nl/topics/mobility-public-transport-and-road-safety/question-and-answer/what-is-the-declaration-of-amsterdam-on-selfdriving-and-connected-vehicles

[3] European Commission, Communication on, "Building a European Data Economy", January 2017, https://ec.europa.eu/digital-single-market/en/news/communication-building-european-data-economy

the mobility sector. For any new technology that is installed in vehicles there is a legal requirement for official certification by OEMs, i.e. to ensure safety when vehicles are being put into circulation, thus safe and secure access to in vehicle data with a view to foster road safety, innovation and growth through fair competition should be ensured.

Some of these issues should be addressed on an international level to avoid conflicting policy approaches, e.g. in the cybersecurity domain. To ensure a global scale in intelligent transportation, the development and use of global standards should be promoted on both sides of the Atlantic. The European Commission must involve all stakeholders in the discussion to safeguard the competitiveness of the European automotive industry.

## Forward-looking infrastructure

Innovation, creativity and competition already deliver progress in Information and Communications Technology (ICT) and ITS. These are important instruments to make transport more efficient, provided they are developed in parallel with the modernisation of infrastructure.

In fact, EU infrastructure – both transport and digital – needs an increase in investments in order for Europe not to be left behind other leading economies. Strong support from the EU and Member States will not only improve transport's environmental footprint but also create smarter infrastructure.

In order to ensure a smooth deployment of connected & automated mobility, it is fundamental to invest in high-quality physical road infrastructure which should be complemented by digital infrastructure[4]. High-quality standards for both should be developed to ensure the highest safety for road users. High quality standards for the mobility sector should also become mandatory for Member States and local authorities when issuing public tenders with the aim of ensuring interoperability.

Technology neutrality and a market driven approach are important instruments to stimulate further the take-up of innovative technologies, while benefiting from the economies of scale offered by forward looking technologies. 5G and CCAM, in parallel with the modernisation of the infrastructure, based on synergies between the Road side unis/C-ITS and cellular infrastructure, will help achieve the goals of the EU 5G Action Plan and EU ITS Masterplan, placing the EU in a frontrunner position in the wake of fierce global competition.

[4] Digital infrastructure refers here to both traditional infrastructure able to communicate with connected & automated vehicles (e.g. vertical road signs equipped with QR codes) *and* the underlying network & telecommunications infrastructure essential for the functioning of the data economy (e.g. broadband and cellular networks)