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

Joe

*1.1.b Please enter your last name

McNamee

*1.1.c Please enter your email address

joe.mcnamee@edri.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
- ○ An individual organisation
- ◉ An association representing other organisations

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

European Digital Rights

*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

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Executive Director
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*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

*1.5.b Please specify Other Organisation

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Non Governmental Organisation
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*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

	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), 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

*2.4.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 emmissions

☐ 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

*2.4.b Please clarify for which other reason you believe broadcasting of a minimum dataset to enable C-ITS should be mandated by law

200 character(s) maximum

> I believe the use of C-ITS should not be enforced through legislation

*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

☐ 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

> The person to whom the personal data belongs

*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

2.7.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	●	○	○	○	○

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

200 character(s) maximum

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.

4. Additional questions

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

- ☐ 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

Useful links

Europa page about this consultation
(http://ec.europa.eu/transport/themes/its/consultations/2016-c-its-initiative_en.htm)

Final expert report of the C-ITS platform (http://ec.europa.eu/transport/themes/its/c-its_en.htm)

Contact

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