

Comment

Revision of the ITS Directive

Proposal of the EU Commission



#weareready

Berlin, March 2022

The VDA position

In general, the ITS directive primarily represents a work program for the Commission by creating a legal basis for the adoption of delegated acts¹. A final evaluation of the directive is therefore only in principle possible once these acts are available. In the future, the EU Commission should involve such stakeholders as the industry even more closely in the development of specifications and the creation of regulations based on the ITS directive.

The VDA comments on individual points in the present proposal below. These are mainly questions about the details and further procedure, the timely concretization of which would be helpful for an evaluation of the proposed measures.

¹ DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport (14.12.2021)

Re: Availability of Data

While the VDA welcomes the increasing availability of data in principle, it also shares the Commission's assessment that the ITS directive has yet to lead to comprehensive, EU-wide provision of infrastructure data, for example. To what extent the the new version of the directive will lead to improvements in this regard cannot yet be conclusively assessed. Thus, the specifications regarding the data sources and the question of how the data is to be made available to all those involved (Member States, infrastructure providers, industry) such that new ITS services can be developed on this basis are still vague. Much will also depend on the Commission's revision or creation of new specifications and/or delegated regulations, but also on their concrete implementation and application among the Member States.

Cf. p. 14 (10):

"...The increased availability of data should for example lead to the development of new ITS services, and vice-versa innovation should identify the needs for future specifications...."

Re: C-ITS

In the View of VDA the area of application of C-ITS needs to clarified, especially to C-ITS, especially concerning the definition of C-ITS stations and the EU C-ITS security credential management system (Art. 10a).

cf. p. 14 (11):

"C-ITS use technologies that enable road vehicles to communicate with each other and with roadside infrastructure including traffic signals. C-ITS services are a category of ITS services based on an open architecture that enables a many-to-many or peer-to-peer relationship between C-ITS stations. This means all C-ITS stations should securely exchange messages with each other, and should not be limited to exchanging messages with pre-defined stations...."

Therefore, one common European C-ITS trust model should be created to establish a relation of trust between all C-ITS stations, regardless of communication technologies used. That trust model should be implemented by the adoption of a policy on the use of a Public Key Infrastructure (PKI). The highest level of that PKI should be the European certificate trust list, consisting of entries of all trusted root certification authorities in Europe. ..."

Further points:

- There is a need concretize further details of the C-ITS trust model with regard to compliance with standards (e.g., data quality).
- Further concretization of the trust model should be extended in particular to cover trust in data quality and security and/or also consider these aspects.
- Further developments need to be harmonized with those activities on a UNECE level.

Re: Artificial Intelligence Act

From the viewpoint of the VDA the planned AI regulations should apply without any separate/ additional requirements arising from the ITS directive

Cf. p. 17 (19):

“When the deployment and use of ITS equipment and software include artificial intelligence systems, the relevant provisions of the forthcoming Artificial Intelligence Act should be taken into account”

Further point:

- p. 17 (18) states that vehicle registration is not affected by the ITS directive. How does this work with a view to the planned AI regulations?

Re: National Access Points

It is fundamentally correct that the Commission’s proposal envisages adopting regulations to the NAPs in the ITS directive itself. However, it is the VDA’s view that a greater harmonization is necessary. The National Access Points should be further developed correspondingly.

Cf. p. 20 Article 4 (22/23):

“‘National Access Point’ means a digital interface set up by a Member State that constitutes a single point of access to data, as defined in specifications adopted pursuant to Article 6;..”
“accessibility of the data” means a possibility to request and obtain data in a digital machine-readable format via National Access Points;”

Further point:

- Does the EU COM already have more concrete plans as to how this is to be implemented within the Member States and how a greater harmonization/standardizing may be achieved?

Cf. p. 20 Article 5 (3.):

“Member States shall also cooperate, where necessary with relevant stakeholders, on operational aspects of the implementation of and compliance with the specifications adopted by the Commission, such as standards and EU harmonised profiles, common definitions, common metadata, common quality requirements and aspects related to the interoperability of National Access Points’ architectures, common data exchange conditions, as well as common training and outreach activities.”

Further point:

- The interaction and cooperation between the NAPs with national mobility data spaces (e.g., Mobility Data Space, Germany) and at EU level (European Mobility Data Space) is not further specified. The VDA proposes a more intensive integration and utilization of these initiatives.

Re: Addition of further Data Points

It is the view of the VDA that the ITS directive should be limited to the government to business (G2B) relationship, since the Data Act, inter alia, already contains horizontal regulatory proposals.

cf. p. 21 Article 7:

“1a. Following a cost-benefit analysis and an impact assessment including appropriate consultations, the Commission is empowered to adopt delegated acts in accordance with Article 12 to amend the list of data types in Annex III, including the date of implementation and the geographical coverage for each data type. Those amendments shall be consistent with the data categories set out in the latest working programme adopted in accordance with Article 17(5).”

Further points:

- What is the (empirical) basis for extending these data points? (Annex III); what is the (empirical) basis for supplementing the list of the obligatory provision of certain services in the Member States? (Annex IV).
- In addition, it is the VDA's view that the Parliament and Council reassess in a subsequent step as to whether delegated acts or a regular co-decision procedure is the appropriate way to extend Annexes III and IV

Concluding Remarks:

- The VDA points out that in particular the urgent further development of eCall and Safety Related Traffic Information (SRTI) has not yet been sufficiently taken into account. There is a need to guarantee interoperability with other ITS services.
- If vehicle-generated data is to be collected (as part of delegated acts); if the technical access is to be uniform at EU level: the VDA has published the ADAXO concept in this context, describing secure access to vehicle data according to FRAND principles.
<https://www.vda.de/vda/en/News/publikationen/publication/adaxo--automotive-data-access--extended-and-open>
- As envisaged in Art. 6, in drawing up specifications the Commission should in general follow existing standards.

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