

Position Paper

Draft Act - Delegated Directive Specifications for the provision of cooperative intelligent transport systems (C-ITS)

2019-February-7

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Background

The Commission has recently published a Draft Act for the 'Delegated Directive Specifications for the provision of cooperative intelligent transport systems (C-ITS)' for public consultation. In particular, with a view to future autonomous driving and a corresponding traffic control, the delegated act will define how the communication between vehicles and with the surrounding infrastructure should be carried out. Bitkom has continuously commented¹ on this important topic and would like to share its views on the current draft Delegated Act:

Comments

Bitkom supports the Commission's objectives to use a delegated act to optimize the safety, efficiency and environmental impact of future traffic flows through the use of intelligent digital technologies. However, Bitkom would like to point out some important points that should be taken into account in order to ensure a future proof legislation enabled by a technology neutral approach:

1. Safeguarding a technology neutral approach

Under the C-ITS Directive (Directive 2010/40 / EU), the envisaged delegated act should not prescribe any single concrete communication technology². Based on day-1 / day 1.5 use cases, it should rather focus on the communication requirements between participating road users (vehicles, infrastructure, other road users, etc.). With regard to the draft act especially the followings provisions need to be amended to achieve a technology neutral regulation:

- The objectives "continuity, compatibility and interoperability" as in particular referenced within Article 33 (3) should be applied in a way, that technology

¹ See Bitkom's position paper "Upcoming Delegated Act on 'Cooperative Intelligent Transport Systems' – C-ITS" (2018-August-30).

² Some member companies of Bitkom are supporting the draft Delegated Act as it represents a step forward towards enabling mobility. The draft Delegated Act provides legal certainty to ensure interoperability, compatibility and continuity of services. They support the draft Delegated Act regarding technology development as it allows a prompt deployment today while it leaves the door open for further innovation in Europe.

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neutrality regarding these objectives can be achieved, for example on use-case or application level.

- The annex with the list of 802.11p specifications should be accompanied by a similar list of specifications for LTE-V2X in another annex. Alternatively the list of specifications could be deleted from the act and requirements for communication and interoperability formulated, leaving the concrete specification details to standardisation bodies.

2. Ensuring comprehensive connectivity

Care should be taken to ensure that the delegated act does not only refer to short-range communication, but also considers network-based communication. The compatibility of the required communication technologies (for example LTE, LTE-V2X and ETSI ITS-G5) should be ensured. To achieve this goal special attention should be given to amend the following provisions:

- Introduce the understanding of “mutual” to the requirement of compatibility and interoperability (refer to article 33)
- Extend the definitions of a C-ITS station (Article 5, requirements of an C-ITS station) by long range communication in OBU's and RSU's (in addition to 2- bullet under 1)

3. Allowing technology innovation

The specifications could be set according to the model of the New Legislative Framework through harmonized standards. This would make it easier to adapt to new technical developments without having to amend the regulation.

Bitkom represents more than 2,600 companies of the digital economy, including 1,800 direct members. Through IT- and communication services alone, our members generate a domestic annual turnover of 190 billion Euros, including 50 billion Euros in exports. The members of Bitkom employ more than 2 million people in Germany. Among these members are 1,000 small and medium-sized businesses, over 400 startups and almost all global players. They offer a wide range of software technologies, IT-services, and telecommunications or internet services, produce hardware and consumer electronics, operate in the digital media sector or are in other ways affiliated with the digital economy. 80 percent of the members' headquarters are located in Germany with an additional 8 percent both in the EU and the USA, as well as 4 percent in other regions of the world. Bitkom promotes the digital transformation of the German economy, as well as of German society at large, enabling citizens to benefit from digitalisation. A strong European digital policy and a fully integrated digital single market are at the heart of Bitkom's concerns, as well as establishing Germany as a key driver of digital change in Europe and globally.