

Position Paper

Upcoming Delegated Act on 'Cooperative Intelligent Transport Systems' – C-ITS

2018-August-30

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Background

The Commission is currently preparing a delegated act for 'Cooperative Intelligent Transport Systems' - C-ITS. 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.

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. Bitkom would like to point out an important point that should be taken into account in the preparation of the delegated act in order to enable future developments:

Under the C-ITS Directive (Directive 2010/40 / EU), the envisaged delegated act should not prescribe any single concrete communication technology¹. Based on day-1 / day1.5 use cases, it should rather focus on the communication requirements between participating road users (vehicles, infrastructure, other road users, etc.).

The objectives “continuity, compatibility and interoperability” should be formulated in a technology neutral way in order to achieve these objectives at the use-case or application level.

¹ Some member companies of Bitkom argue that, if implemented, the above position on technology neutrality and its lack of reference to the essential principle of backwards compatibility together with often unresolved technical conditions of additional communication technologies, would hinder the already agreed EU-wide C-ITS rollout. These companies explicitly support the position of the German Federal Government. Their core argument is that the potential improvements in traffic safety based on previously tested and marketed technologies would be significantly delayed. In addition, European industry would fall behind other regions in international competition in the area of connected and automated driving.

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Care should be taken to ensure that the delegated act currently being processed 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.

— 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. Technology neutrality should be emphasized in the delegated act.

— 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.