



Manifesto for fair digitalisation opportunities

**Broad industry coalition calls upon EU decision makers to ACT NOW
to ensure a genuine digital level-playing field for remote access to in-vehicle data**

**Competition, innovation and consumer interests must be
at the heart of the EU Digital Single Market**

The undersigned coalition of automotive industry and mobility services operators, insurers, motorist consumers and SME representatives are united in their concern that effective competition, innovation, and free consumer choice are currently not being placed at the centre of the discussions around technical solutions to fair and equal access to in-vehicle data and functions remotely.

What is the problem?

In an increasingly digitalised automotive sector, competition starts in the vehicle where the data quality determines the service quality. In order to be able to continue offering the high level of competitive services demanded by their customers, all independent operators within the whole automotive supply chain must be able to compete on an equal footing with vehicle manufacturers by accessing the vehicle, its data and functions in an independent and undistorted way.

This requires three key abilities:

- Direct real-time access to time-critical in-vehicle generated data,
- the bi-directional communication with the vehicle and its functions, and
- the ability to safely and securely interact with the driver (via the dashboard or voice commands) to fulfil their service offers.

This interoperable access will allow the development of new competitive digital products and services, which will result in true choice for consumers.

However, all these three capabilities would not be possible with the model put forward by vehicle manufacturers, the so-called 'Extended Vehicle'. It merely channels all future communication and data access through the vehicle manufacturer's proprietary backend server. Only part of the data generated by the vehicle would be sent to independent service providers, either directly or via a B2B 'neutral' server platform (the "NEVADA" concept).

Initial 'reality' checks of ExVe have shown that it does not allow direct and real-time communication with the vehicle/the functions/the driver, which is increasingly needed for time-critical operations or prognostics and as an asset in improving road safety and fostering the 'green digital economy'. Instead, it gives vehicle manufacturers full control to decide arbitrarily how, when and to whom (mainly aggregated and already diagnosed/processed) data access will be granted.

As such, 'Extended Vehicle/NEVADA' would prevent all other service providers 'around the car' from offering competing services to consumers, as consumers are only able to authorise a small part of their vehicle generated data to be shared with independent service providers, compared to the data available to the vehicle manufacturers. Additionally, the latency, cost and contractual conditions imposed by ExVe further limits competing services.

What is the solution?

We believe that an 'in-vehicle interoperable, standardised, secure and open-access platform' and its interfaces is the right way forward, as presented in the Commission's [TRL Study Report](#) and supported by independent studies (e.g. the [Oversee report](#)). This solution would ensure the same high level of safety, security, liability and data protection as the vehicle manufacturers use themselves, whilst safeguarding true consumer choice, competition, innovation and road safety. It is an in-vehicle telematics system that allows applications to be safely and securely implemented in the vehicle and that makes decentralised communication to/from the vehicle with alternative service providers possible upon direct consumer consent.

Fact: Many automobile manufacturers already allow selected third parties to operate their own systems and applications in their vehicles today. This demonstrates that safe and secure direct access is possible without interfering with the vehicle's functions.

Time is running out: Call for Action!

The clock is ticking. B2B talks either between the vehicle manufacturers and original parts suppliers or independent operators in the ISO Standardisation group have failed to deliver any meaningful results. Even an independent backend 'neutral' B2B server platform cannot remedy the profound system failures of the Extended Vehicle concept. In markets of unbalanced power with one party, the vehicle manufacturers, being in privileged control of the data, legislation is needed to ensure a level playing field.

It is crucial *to start the work now* so that a solution is in place when the magnitude of connected vehicles, fostered by the introduction of eCall, will hit the automotive service and mobility markets in a few years. This is what the European Parliament had in mind in March when it adopted the EP TRAN Committee Report on Cooperative Intelligent Transport System (C-ITS), which calls on the European Commission to publish a legislative proposal on access to in-vehicle data and resources by the end of the year.

What are we asking for?

We call on EU policymakers, and in the first instance the EU Commission, to include the following 'High-level Principles and Requirements' into the Data or Third Mobility Package (e.g. EU Strategy on Connected and Automated Driving (CAD)) so that future legislative activities lead to an interoperable telematics platform and its interfaces providing:

1. Equal ability for all providers to effectively offer a service to the vehicle owner/driver for subsequent selection and authorisation, ensuring free consumer choice, whilst respecting all legal requirements (e.g. GDPR, avoidance of driver distraction).
2. Direct real-time access to in-vehicle generated data and functions through an in-vehicle interoperable, standardised, secure and open-access platform for remote bi-directional communication with the 3rd party service provider.
3. The scope and quality of the data/functionalities shall be at least the same as the vehicle manufacturers uses for its own remote services.

4. Access to the vehicle display and/or voice commands must be established to enable direct safe communication with the driver.
5. No monitoring by the vehicle manufacturer of the data and communication used by independent applications.

As a further concrete step we call upon the Commission to adopt a sound definition of Remote Diagnostic Support....

Following the adoption of the new Vehicle Type-Approval Regulation, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) started discussions with independent operators and vehicle manufacturers to define Remote Diagnostic Support (**RDS**) in greater detail. In this context, we call upon the European Commission to make sure that the definition of RDS allows us to remotely communicate bi-directionally and directly with the vehicle via a standardised in-vehicle interface to conduct a remote diagnostics analysis and support communication with the driver. We strongly refute attempts by the vehicle manufacturers to have their anti-competitive Extended Vehicle concept being enshrined into EU legislation (by referencing ISO 20080 which is based on Extended Vehicle).

....combined with an interim solution:

In the shorter term and to ensure a basic “right to do business” with some basic abilities to access the vehicle and its data for independent operators within the whole automotive supply chain, we propose an ‘interim solution’:

“Vehicle manufacturers shall provide as from 1.1.2020 non-discriminatory access for independent service providers to the in-vehicle telematics systems as used by themselves, and to those in-vehicle systems and interfaces which they grant to other third party service providers for access to in-vehicle generated data and in-vehicle functions in terms of data depth, quality and functionality. Independent service providers shall respect the security and safety access specifications as set by the vehicle manufacturer for its own in-vehicle telematics system or as used for existing third parties”.

* * * *

The path forward is clear and achievable in a short timeframe. The EU can live up to its legislative and overarching policy commitments for true consumer choice, independent entrepreneurship, effective competition, road safety and encouraging innovation for all services “around the car” by:

- enshrining High Level Principles into the Data or Third Mobility Package for an ensuing longer term target to establish the interoperable telematics platform;
- adopting now a sound definition of Remote Diagnostics Support;
- and in the meantime, by guaranteeing a non-discriminatory access to the existing in-vehicle telematics systems used by vehicle manufacturers or their selected third parties.

Brussels, 19th of April 2018

Undersigned Industry, Consumer and SME Associations:

	<p>ADPA – the European Independent Data Publishers Association aims to ensure fair access to automotive data and information and to provide competitive framework conditions for independent data publishers. This will allow the publishers to be able to design and provide competitive, innovative and multibrand products and services to operators of the automotive aftermarket. Contact: Laurence Eeckhout – EU Affairs Manager – laurence.eeckhout@adpa.eu – tel: +32 2 761 95 16.</p>
	<p>CECRA - the European Council for Motor Trades and Repairs- is the European Federation representing the interests of the motor trade and repair businesses and European Dealer Councils on behalf of vehicle dealers for specific makes. Its main aim is to maintain a favourable European regulatory framework for the enterprises of motor trade and repair businesses it represents. Contact: Bernard Lycke – Director General – Bernard.lycke@cecra.eu – tel: +32 2 771 96 56.</p>
	<p>CITA is the international association of public and private sector organisations actively practicing compulsory inspection of in-service motor vehicles and their trailers, or with responsibility for authorising and supervising inspection organisations. CITA has defined its vision as enabling its members to play an influential role in the development and implementation of policies for safe and sustainable road usage. This vision will be supported by CITA's Mission to provide the forums to create, assess and promote best practice, ensuring safe and compliant vehicles throughout their life cycle. Contact: Eduard Fernandez - Executive Director - e.fernandez@citainsp.org - +32 2 469 06 70.</p>
	<p>EGEA - the European Garage and test Equipment Association represents both manufacturers and importers of tools and equipment for the repair, servicing and technical inspection of vehicles, as an integral part of supporting the automotive industrial value chain. Its role is to ensure that its associations' members can provide the best equipment and service to the automotive aftermarket by striving to keep members up-to-date concerning new vehicle technologies and legislative and standardisation requirements and thus be competitive in the garage and test equipment supply, service and calibration industry. Contact: Eléonore van Haute – Secretary General – Eleonore.vanhaute@egea-association.eu – tel: +32 2 761 95 15.</p>
	<p>ETRMA is the voice of tyre and rubber goods producers to various European institutions. ETRMA activities focus on the following key interdependent areas: representation, co-ordination, communication, promotion and technical liaison. The primary objective of ETRMA is to represent the regulatory and related interests of the European tyre and rubber manufacturers at both European and international levels. ETRMA is the sole interlocutor, specifically designated by the European tyre and rubber producers to carry out this critical task. Contact: Fazilet Cinaralp - Secretary General - f.cinaralp@etrma.org and Marianna Faino - Coordinator Environment & Transport - m.faino@etrma.org – tel: +32 2 218 49 40.</p>
	<p>FIA Region I is a worldwide federation of Motoring and Touring Clubs. FIA Region I represents the interest of these members as motorists, public transport users, pedestrians and tourists in Europe. Its primary goal is to secure a mobility that is safe, affordable, sustainable and efficient. Contact: Chris Carroll – Policy Director – ccarroll@fia.com – tel: +32 2 282 08 18.</p>
	<p>FIGIEFA is the international federation of independent automotive aftermarket distributors. Its members represent retailers and wholesalers of automotive replacement parts and components and their associated repair chains. FIGIEFA's aim is to maintain free and effective competition in the market for vehicle replacement parts, servicing and repair. Contact: Sylvia Gotzen – CEO – Sylvia.gotzen@figiefa.eu – tel: +32 2 761 95 10.</p>

	<p>Insurance Europe is the European insurance and reinsurance federation. Through its 35 member bodies — the national insurance associations — Insurance Europe represents all types of insurance and reinsurance undertakings, e.g. pan-European companies, monoliners, mutuals and SMEs. Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers generate premium income of €1 200bn, directly employ over 975 000 people and invest nearly €9 800bn in the economy. Contact: Thomas Gelin - Policy Advisor - Tel: +32 2 894 30 48 - Gelin@insuranceeurope.eu.</p>
	<p>Leaseurope - the European Federation of Leasing Company Associations- represents both the leasing and automotive rental industries in Europe. The scope of products covered by Leaseurope members' ranges from hire purchase and finance leases to operating leases of all asset categories (automotive, equipment and real estate). It also includes the short-term rental of cars, vans and trucks. Contact: Richard Knubben - Director – r.knubben@leaseurope.com – tel: +32 2 778 05 68.</p>
	<p>UEAPME is the employers' organisation representing the interests of European crafts, trades and SMEs at EU level. UEAPME is a recognised European Social Partner. It is a non-profit seeking and non-partisan organisation. As the European SME umbrella organisation, UEAPME incorporates 67 member organisations from 34 countries consisting of national cross-sectorial SME federations, European branch federations and other associate members, which support the SME family. UEAPME represents about 12 million enterprises, which employ around 55 million people across Europe. Contact: Dieter Grohmann – Director Communication and Media - d.grohmann@ueapme.com - +32 2 285 07 05 and Véronique Willems - Secretary General - v.willems@ueapme.com - +32 2 285 07 22.</p>
	<p>UEIL (the Union of the European Lubricants Industry) represents the interests of the lubricants industry in Europe, with a special focus on SMEs and independent companies that produce lubricants and metal processing fluids essential for the automotive and industrial sectors. Contact: François Guegan - Competition Committee Vice-Chairman - francois.guegan@cipelia.com - +32 2 761 66 85.</p>