

The President

Brussels, 10 December 2012
ITS/AS/2012/2

To: Mr. Matthias Ruete
Director-General
DG MOVE
European Commission
B-1049 Brussels

Subject: Consultation of the European ITS Advisory Group on the draft specifications for ITS Directive priority actions (c) and (e)

Dear Sir,

In response to your letter dated 21 November 2012, ASECAP recognizes the time constraints indicated in the ITS Directive but regrets that its views (as well as those of the other members of the European ITS Advisory Group) have not been considered by the Commission in a coordinated way.

However, as ASECAP and its members are main stakeholders for ITS applications on roads, they have already examined the related matters in detail and would like to share with you the general and specific observations enclosed in annex to the present letter.

I trust, dear Sir, that the Commission will duly consider the enclosed reflections on both the process and substance of the ongoing implementation of the ITS Directive, so as to ensure that the final goal of more harmonized deployment of ITS in the EU can truly be achieved.

Yours sincerely,



Klaus SCHIERHACKL

Copy: F. Karamitsos (DG MOVE Deputy Director-General);
K. Dionelis (ASECAP Secretary-General).



ANNEX

ASECAP comments on the working documents regarding specifications for the ITS Directive's priority actions (c) and (e)

1. Introductory remarks

- a. In general, the proposed priority actions have the best of intentions and are fully accepted as basic objectives. Moreover, ASECAP supports the general aim of the specifications to harmonize ITS applications.
- b. However, the documents submitted for comments appear in a fragmented way, and a comprehensive and coherent roadmap complementing the succinct Working Programme for the implementation of the ITS Directive seems to be lacking.
- c. Yet, the major and extremely sensitive fields in question should be addressed thoroughly by the main stakeholders, under the proper ITS structures, within a clear time horizon. The Commission should thus lead at the proper levels detailed discussions aimed at obtaining the agreement/involvement of the public and private sectors in order to build clear business models that describe what the end service/product will be, what its main characteristics will be, by whom it will be provided and at what cost (to be covered either by the users as such, or by society as a whole as a tax). Only where a market appears, road operators will invest in ITS.
- d. Only after the identification of the main frameworks by the bodies formally established under the ITS Directive, should the Commission take action (and use its Framework Contracts for consultancy assistance) in order to prepare the final draft of the delegated acts, favoring a market driven implementation strategy. Furthermore, these draft delegated acts should be sent in due time to the proper stakeholders for comments, rather than presenting the draft final version of the specifications to the European ITS Advisory Group after they have been elaborated with the Member States.
- e. It is regrettable that the above-mentioned process was not followed, not least because there are issues that call for additional reflection and discussion in order to find a solution suitable for all major stakeholders. These issues are listed below separately for both draft specifications.

2. Specific considerations

Transversal comments regarding the impact assessments

- a. The impact assessments related to the two specifications cannot be verified as some of the slides in the presentations are not self-explanatory.
- b. It would be preferable to dispose of the full impact assessments or have an appropriate forum to discuss the results.

Draft specifications on road safety related traffic information (action c)

- a. The “service”, for the purposes of this Delegated Act, is to provide confirmed road safety related minimum universal traffic information free of charge to users. The production of the service, as defined, requires a well-managed entity (either public or private), which will undertake this task at a certain cost (either for the users/end-users or for society as a whole).
- b. Moreover, ASECAP would like to make the following detailed technical comments on the working document submitted for consultation:
 - Paragraph 2.m: the meaning of “confirmed” in this framework is not clear;
 - Paragraph 3: some categories of events are mentioned, although it is not clear what is understood under „e.g. extreme weather conditions“ due to lack of clear specification;
 - Paragraph 5: “The provision of the service relies on good quality” although the specification and measurement procedures of the quality of traffic information services are not established fully among all partners of the value chain;
 - Paragraph 6: It is our understanding that not all road safety related categories have to be implemented at once, in order to allow partners to undertake a stepwise implementation process according to market needs and requirements;
 - Background, point 9: Member States should work further and share their experiences on the definition of quality targets, but it is not clear what the platform for this could be.

**Draft specifications on information services for safe and secure parking places
(action e)**

- a. ASECAP has already informed the Commission about its reflections on the sensitive question of safe and secure parking places. Among the priority actions identified in the ITS Directive, action (e) deals with the provision of information services for safe and secure parking places for trucks and commercial vehicles, but is closely linked to action (f) on the provision of reservation services for such parking places.
- b. ASECAP has already indicated that actions (e) and (f) should not be addressed separately. While the provision of any information (even static) is always welcome (in case a State or a private company would miraculously appear to provide accurate, reliable and liable information on hundreds of thousands of parking slots across all relevant networks of the 27 Member States), trucks and commercial vehicles do not need information for information's sake but are to use such information to dynamically guide them and reserve available parking places according to their needs – which is where ITS should make a real difference.
- c. Bearing in mind that the European ITS Advisory Group has not met since March 2012 and is likely to be convened a second time one year later, end of February 2013, ASECAP would like to reiterate its request to the Commission to coordinate an inner team of the Advisory Group members to examine the characteristics of how a “service provider” will provide a service to the haulage industry, i.e. information leading to reservation of available parking slots” (statically -as a first step- and dynamically in the longer term). Such a “service” will be produced at a certain cost and logically will be provided at an appropriate price by the service provider.
- d. ASECAP does not wish to make detailed comments on the working document regarding specifications on information services in isolation to action (f) on reservation services.