ASECAP statement on EU consultation of the provision of the Delegated regulation supplementing Directive 2010/40/EU

On October13th, the European Commission has launched a consultation in the provision of the Delegated regulation supplementing Directive 2010/40/EU with regard to the provision of EU-Wide Real Time Traffic Information Services. The ITS Directive 2010/40/EU sets a solid framework for ITS deployment. ITS concerns road safety, traffic management and the environmental performance of Europe's road transport.

ASECAP members would like to reaffirm their willingness to support the ambitious goals of the European Commission to reach Vision Zero accident for a sustainable road infrastructure. Road safety is the priority of the motorway operators both for their custumers and also for the patrol working to make the network safe.

As motorway operators we are also strongly supporting The European Commission's orientations described in the "Green deal" focusing on the decarbonization of transports aiming at eliminating $CO2$ emissions and addressing climate issues. Innovation efforts allow to optimize the efficiency of the network.

ASECAP members have been very much committed to implement the ITS Directive and would like to take the opportunity of this consultation to submit some comments and suggestions.

European cities are increasing in size and the population is concentrated in urban and peri urban areas. Time for commuting, congestion, air pollution and noise are increasing in our cities. Fostered by digitalization, new mobility needs are emerging asking for new services. Society is changing and there is new way of consuming mobility services: like carpooling, car sharing, multimodality, electromobility, alternative fuel network to comply with the climate change objective.

ASECAP members are already preparing to welcome those new usages, to adapt to those new needs and to develop what will be required to make those new services available and working properly.

There is efficient system implemented to better use the infrastructure specifically in urban area where high occupancy vehicle lanes could be introduced. Indeed, tolling/charging could be also a key mechanism to manage the traffic demand, boosting the transition to cleaner, safer, connected and automated vehicles by placing the right incentives to our mobility. The deployment of managed lanes to prevent solo drivers and foster the use of mass public transport (bus) or carpooling or car sharing could be considered. Dynamic management lane

will be done according to traffic situation. This lane will be also used for the autonomous shuttle or vehicle. Automated driving is considered as the major technological advancement that will shape the future of mobility in Europe.

ASECAP fully supports Automated driving, believing that connected and automated driving contributes to enhancement of road Safety, efficiency and environmental objectives and accessibility, comfort & social inclusion to all users.

Data sharing to enhance real time information in term of traffic, services is of high importance for road operators. ASECAP members already provide to their grantor the requested data to enhance road safety. Additional data aiming at improving citizens experiences as well as information on alternative fuel location are of high importance too.

In view of the consultation, ASECAP would like to raise attention to the fact that furniture and access to data should satisfy the following two points:
- The control of the quality of the information throughout its production, from the source to the final form in which it is delivered to the user, the traveller, or the carrier of goods.
- The homogeneity of the security and information services on all journeys made on the Trans-European transport network.

- <u>Control of the quality of traffic information:</u>
- The quality of information is measured by its ability to improve safety by avoiding accidents and to optimise traffic both for light and heavy vehicles. The risk of information contrary to the measures taken by road operators must be prevented.
- Among the essential information for safety, there is the alert on incident (accidents, breakdown, construction site, object on the road, special weather conditions,…), and alerts on traffic management, such as speed limits, overtaking bans on heavy goods vehicles.....
- Essential information for network optimisation includes calculations of real times travel time in congestion situations, route management measures that are adapted to the capacities of road networks and considering the time needed to return to normal after an accident situation....
- To foster the use of clean vehicles, customers may have all relevant and right information to know where to stop during his journey when travelling on the TEN-T network and other roads.

Traffic safety and optimization require that information be qualified and comply with road operators' management measures when it is produced. Poor quality information might be against the general objectives of safety and traffic flow as well as mobility services.

A qualification of the data from the source to the final production must be introduced to check the reliability of the information provided. This requires compliance with rules to be defined throughout the production chain, involving the various stakeholders as well as responsibilities of parties disseminating information.

The question of the production cost and qualification/ check of traffic & service information:

The production of quality information has a cost that includes the cost of collecting data at the source, processing large amounts of data, creating information adapted to drivers, as well as the media for editing, disseminating, and receiving data.

National Access Point (NAP)

The consultation of the provision of the Delegated regulation supplementing Directive 2010/40/EU is making a specific emphasis on the NAP to foster its deployment by members states.

ASECAP would like to recall that the cost must be recognised within an open market for traffic information and mobility services, combining where appropriate at one stage or another in the production chain, both:

- a public policy (information paid by the public budget)
- a private policy (information paid by the user to allow a return on investment of producers).

An obligation to provide free of charge is a hindrance if the responsibility for its financing is not ensured simultaneously as well as the quality of its dissemination.

In conclusion, ASECAP would like to highlight the following points:

- New organisational models will be required involving the different stakeholders the one providing mobility data and information on services and the ones who will be using them to make business
- As road operators, there are sensitive data that require specific processing and cannot be shared
- There should be clear rules on how the data will be put at disposal
- Clear rules on who will access the data
- Responsibility of each stakeholder will also need to be defined and clarified

About ASECAP:

ASECAP is the European Association of Operators of Toll Road Infrastructures across 20 member countries representing 135 companies employing more than 50.000 direct jobs and 200.000 indirect jobs. They operate, maintain, manage a network of more than 86.000 km with a long-term vision that ensures highest quality standards to make the road infrastructure safest thank to the user/payer principle providing sustainable financing.

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