



*Association Européenne des Concessionnaires
d'Autoroutes et d'Ouvrages à Péage*

**POSITION PAPER
ON THE C-ITS DELEGATED ACT**

C-ITS is under deployment already: a Delegated Act will give certainty to all stakeholders

ASECAP members are deploying short range C-ITS using IEEE 802.11p aka ITS-G5 in order to improve road safety and traffic efficiency. We kindly request the European Commission to adopt a C-ITS delegated act that creates certainty for the operation of C-ITS now, prevents from fragmentation of C-ITS and assures tolling incomes for financing the European road network.

C-ITS requires interoperability: every C-ITS enabled vehicle ought to be able to communicate with any other C-ITS enabled vehicle, with C-ITS along Europe's roads and with C-ITS stations as specified in the C-ROADS specifications.

C-ITS compatibility: The usage of radio spectrum between 5875 MHz – 5905 MHz (and potential extensions) is harmonised for ITS safety related applications. All technologies in this band have to be able to operate on the complete band and should be interoperable and compatible. Designating subsets of the band for certain technologies would, in addition to wasting spectrum, induce coexistence issues between these technologies, jeopardize C-ITS interoperability, and potentially hamper the deployment of future C-ITS applications. The Day 1 Use Cases of C-ITS, when fully deployed, will already occupy a certain radio spectrum. The implementation of use cases such as Platooning and Automated Driving support must not be hampered by the lack of radio spectrum for ITS-G5. Derogating the principles of C-ITS interoperability and compatibility would be irresponsible. This would set a precedent with an impact on efficiency of C-ITS and credibility/acceptability of C-ITS from a user point of view, to meet safety requirement. A spectrum split would remove any incentive to develop technologies that support sharing and co-existence within the same band.

C-ITS has to be backward compatible (Directive 2010/40/EU Annex II): investment in road infrastructure is long-term, future technologies have to be backward compatible, since roads and vehicles cannot be re-equipped every few years.

C-ITS and radio interference: Radio interference is a threat to electronic tolling and can cause loss of toll income. It questions the fair implementation of the user and polluter pays principles. Tolling technology and frequencies are mandated in Directive 2004/52/EC and 2009/750/EG. Coexistence between tolling technology, on one hand, and all current and future C-ITS technologies, on the other hand, has to be assured. ASECAP has together with the automotive industry implemented a coexistence method for ITS-G5 (geolocation database and ITS G5 messages). Any future technology has to use the implemented solutions. ITS-G5 messages should be understood by any new road C-ITS technology.

We kindly request the European Commission to adopt a C-ITS delegated act that:

- Guarantees C-ITS interoperability and compatibility, including backward compatibility w.r.t. existing C-ITS deployments
- Guarantees that C-ITS does not cause radio interference to electronic tolling in order to safeguard the income of the Members States
- Ensures that all new C-ITS technologies allow fair sharing and interoperability and are thoroughly tested before deployment



- Considers future use cases (Day 2 etc.) such as Platooning and Automated Driving
- All C-ITS technologies should be able to work on the complete ITS frequency band of 5875 MHz – 5905 MHz (and potential extensions)

Fair sharing, responsible behaviour and politeness mechanisms should be a prerequisite to using ITS spectrum. We kindly request stakeholders to act and ensure that new C-ITS technologies guarantee fair spectrum access and interoperability before using the ITS band at 5875 MHz – 5905 MHz. We believe in an inclusive approach as implemented in the European standardization and frequency regulation.

ASECAP members are already using long-range communication via existing cellular networks for traffic information. This hybrid approach is a complement of the C-ITS delegated act.

The short-range technology ITS-G5 has been developed and standardised under EC mandate (M/453). It has undergone more than 10 years of intensive testing and continuous improvement involving road operators, OEMs, ITS industry, chip manufacturers etc. ASECAP believes that the expected positive benefits of C-ITS and interoperability among the different players have to be harvested now.

Road safety is our priority and will only be served if the requirements above are fulfilled. ASECAP is committed to cooperate with all partners. ASECAP is a cooperation partner of C-ROADS. We share the deployment principles of the Amsterdam Declaration, the 5G Action Plan and the C-ITS Strategy of the EC.

ASECAP

ASECAP is the European Association of Operators of Toll Road Infrastructures, whose members' networks today span more than 51.456 km of motorways, bridges and tunnels across 24 countries.

ASECAP's purpose is to defend and develop the system of motorways and road infrastructure in Europe applying tolls as a means to ensure the financing of their construction, maintenance and operation.





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