ASECAP STATEMENT TO THE EC CONSULTATION

Call for evidence for the creation of the common mobility data space

ASECAP welcomes the initiative of the Commission related to the call of evidence to issue a communication on the creation of a common mobility data space. Safe mobility for people and goods is a key priority to foster the economy.

As motorway operators we are strongly supporting:
- The European Commission's orientations pursuing the digitalisation of Society
- The 'Vision Zero' as a road safety goal in its transport policy.
- "Green deal" focusing on the decarbonisation of transports aiming at eliminating CO_2 emissions and addressing climate issues. Innovation efforts allow to optimise the efficiency of the network and new mobility services (carpooling, electro-mobility, autonomous driving …).

ASECAP is convince that the new era based on data will allow to reach the ambitious political goals.

ASECAP would like to point out some issues and propose some recommendations.

Data sharing to enhance real time information in terms of traffic and 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 provision 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. Data exchange should not rely on a single direction but has to be considered for all stakeholders
- 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 right information to know where to stop during their journey when travelling on the TEN-T network and other roads.

Traffic safety and optimisation require for information to be qualified and validated, 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.

Cyber security:

*Security of data remains of high importance in order to secure both **the infrastructure** and the private data **from cyber criminal activities.*** It is essential for the functioning of the tunnel management and safety, for traffic management systems, for instance. A cyber attack can stop the functioning of the safety equipment in a tunnel, stop the red lights, or shut down tolling stations.…

The question of financing 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.

ASECAP would like to recall that the cost must be recognised and acknowledged 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).

A S E C A P s t a t e m e n t t o t h e E C c o n s u l t a t i o n - C a l l f o r e v i d e n c e f o r t h e c r e a t i o n o f c o m m o n m o b i l i t y d a t a s p a c e

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An obligation to provide information 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 ones 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 without being sure that the data will be used for road safety purposes and to improve mobility solutions
- All sectors including automotive industry, telecom operators, traffic information providers should be committed to have the same obligations to provide their mobility data. The obligation should not only be for road operators or public transport organisations.
- Requests should be the same for all sectors
- 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
- Cyber security remains of high importance
- Data protection compliant with GDPR regulation

About ASECAP:

ASECAP is the European Association of Operators of Toll Road Infrastructures across 19 member countries representing 128 companies employing more than 50.000 direct jobs and 200.000 indirect jobs. They operate, maintain, manage a network of more than 82.000 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. ASECAP members are shouldering their responsibility as mobility providers linking inter-urban and metropolitan areas, playing a major role by moving people for their daily trips to go to work, school, hospital….

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