

23 November 2018

Our Reference: CCF/196 DOC18/53860

Mr Geoff Allan  
Acting Chief Executive Officer  
National Transport Commission  
Level 3 600 Bourke Street  
MELBOURNE VIC 3000

Dear Mr Allan

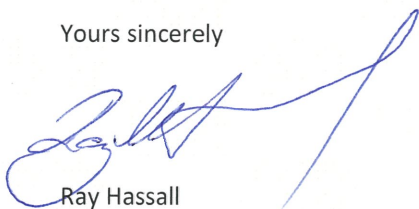
Thank you for the opportunity to provide feedback on the NTC's Regulating Government Access to C-ITS and Automated Vehicle Data Discussion Paper September 2018.

It will be critical to balance appropriate privacy protections in relation to C-ITS and automated vehicle data against the need for government agencies, law enforcement bodies and regulators to have access to the data so they can effectively perform their regulatory functions and provide better outcomes for the community.

The National Heavy Vehicle Regulator (NHVR) considers that developing broad, guiding principles around government collection, use and disclosure of the data will provide flexibility for future development of the regulatory framework for these technologies whilst ensuring that beneficial uses of the data are not inadvertently restricted.

The NHVR also agrees that a nationally consistent approach would be preferable. However, the NHVR considers that it is too early in the development of the technology, and that further work is needed around the specific privacy challenges associated with the data, to determine if additional privacy protections are needed and whether there is any need for legislative change.

Yours sincerely



Ray Hassall  
**Executive Director**  
**Regulatory and Legal Services**