Monday, 29 June 2020

National Transport Commission
Level 3/600 Bourke St
Melbourne VIC 3000

Dear Sir/Madam

Re: 'Government access to vehicle-generated data – May 2020'

The Transurban team is pleased to respond to NTC's Discussion Paper: Government access to vehicle-generated data,' dated May 2020.

We responded to the previous discussion paper on this topic, issued by NTC in September 2018. We are pleased to see that considerable progress has been made in the development of a potential framework for the management of government access to data. In our previous submission, we supported the development of a pragmatic approach that avoids the need for new privacy legislation. The Option preferred by NTC in the new discussion paper, based on a government – industry partnership for the management of vehicle-generated data is consistent with that philosophy and we support the broad direction of the paper.

Many of the questions in the new discussion paper relate to the practicalities of generating, exchanging and managing vehicle data. We only have responses to three of the specific questions. Before turning to those, we would like to express high level comments on the relevance of the work to a non-government road operator as well as expressing support for the preferred direction.

In our response to the September 2018 discussion paper, we made the point that many of the incentives for use of vehicle-generated data that exist for government also apply to private operators, such as Transurban. These include the extraction of information that will improve the safety, operational efficiency and longer-term planning of road infrastructure. We suggested that further examination of the issues and potential solutions should recognise the role of private operators and explicitly consider the ways in which they may be involved in a future framework.

The updated Discussion Paper has not clarified this situation. While early sections refer to 'road agencies,' in a general sense, once specific options are considered for managing access to vehicle-generated data, the language reverts to 'government access.' We recognise that NTC is guided by the framing of specific tasks by the National Transport Council and that, in this case, the charter does refer to government access. However, we

don't see any reason for NTC to limit its analysis and recommendations to the government arena, when there are private operators with closely aligned operations and potential needs.

This becomes increasingly important when actual solutions are being proposed. In our opening, we expressed support for the overall direction of the paper. However, we do see that the actual wording of the preferred Option 2 appears to exclude any role for operators, such as ourselves, in potential future arrangements:

> *Option 2: Establish a data exchange partnership between industry and government that will identify opportunities for exchanging vehicle-generated data as well as develop standards and consider proof of concept.*

One way to easily broaden the scope would be to maintain the use of 'road agencies' in place of 'government' in areas such as Option 2, and to then make it clear in the Glossary that road agencies include private operators.

We emphasise the point that we do support the overall direction of the paper and believe that a partnership is the best approach for generating a way forward. We simply wish to have the opportunity to be included in future arrangements that will facilitate the effective and responsible generation of vehicle data.

Responses to Questions:

Question 6: Is there value in establishing a national data aggregator or trust broker? Could good data definitions, practices and cooperation between entities achieve the same outcome?

Our view is that another level of data aggregation would create further complexity. Similar developments in other agencies, such as PSMA (Public Sector Mapping Agency) and NHVR (National Heavy Vehicle Regulator), have identified some best practices for data aggregation and exchange. Our view is that an agreed data and data access standard or specification (especially a quality and exchange standard) with government coordination and incentives for industry participation will add siginificant value. We see such a trust brokerage role as a better approach than formation of a separate data aggregator entity.

Question 8: Are there relevant international standards that should be adopted for vehicle-generated data? Are there any standards that could be locally developed?

We understand the general comment made in Section 5.3 (Page 67), that Australia adopts vehicle standards from Europe and the United Nations such as those developed in the United Nations Working Party 29 for vehicle standards (Department of Infrastructure, Transport, Regional Development and Communications, 2018). However, we are concerned about the suggestion, in this case, that the European Union's data taskforce model or the DATEX II standards may serve as a model for adoption in Australia.

Major road operators in Australia (VicDoT, TfNSW and QLD-TMR) and private road operators such as Transurban, have already adopted the American Standard of NTCIP (National Transportation Communication for Intelligent Transportation Systems Protocol) or a localised version of NTCIP (RTA or TSI-SP-003)mainly for Centre to Centre and Centre to Field data dissemination. As a result, any departure from NTCIP standard (to other standards, such as European DATEXII), will not be easy and will involve a significant change management. NTCIP (and RTA) is also being adopted by industry (such as Road Side Equipment device manufacturers) as a preferred data exchange protocol in Australia. In this particular case, we recommend that NTCIP be considered as preferred option.

Question 11: What are the key data needs of transport agencies beyond those already identified?

We support the focus on road safety as the primary focus for data access and the recognition that real-time information will be a priority. Our comment relates to the question of data latency in this process, an issue that is not directly addressed in the paper, except by reference to 'real-time' applications.

Data latency plays a significant role in the feasibility of different use cases of vehicle-generated data. Especially in road safety applications, low latency data will create significant value and provide a wide range of high-value use-cases for road operators. This includes timely incident response and emergency management. We recommend that future policy recognises the value of processes and standards that support low latency data

exchange that can be considered real-time. The policy framework should provide
a pathway towards realising such a future.

I hope these comments are helpful to your further development of data access arrangements and I would be
happy to arrange a discussion on the points raised if you would like any further clarification.

Yours sincerely

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