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Dedicated to a better Brisbane

30 June 2020

Dr Gillian Miles
Chief Executive Officer and Commissioner
National Transport Commission
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Dear Dr Miles

Thank you for the opportunity to provide a submission on the Discussion Paper, *Government access to vehicle-generated data*. Brisbane City Council's (Council) responses to the questions that you raised in your discussion paper are attached.

Access to vehicle-generated data presents a significant opportunity for Council to more effectively manage congestion across its road network, improve safety and assist in asset management.

The key challenges will be in how a common standard will be achieved and developing a mechanism to incentivise vehicle manufacturers to provide this data to road authorities without resorting to legislated mechanisms, although some regulatory and legislated oversight may be necessary. Council, therefore, welcomes the National Transport Commission's steps in opening the discussion across government and industry.

If you have any further questions regarding Council's submission, please contact Ms Marie Gales, Manager, Transport Planning and Operations, Brisbane Infrastructure, on (07) 3178 1418.

Yours sincerely

Colin Jensen
CHIEF EXECUTIVE OFFICER

Responses to National Transport Commission's Discussion Paper, *Government access to vehicle – generated data*

No.	Question	Response
1	Do our problem and opportunity statements accurately define the key problems to be addressed, and do they capture the breadth of problems that would need to be addressed?	The problem and opportunity statements satisfactorily reflect the key problems to be addressed. A key issue is that many government agencies do not have the means to store and process data and there is no common standard.
2	In our table, have we accurately captured all the regulatory and legislative mechanisms government could currently use to access vehicle-generated data?	The table reflects Council's situation with respect to data collection. Most commonly data is collected from other agencies (Queensland Government's Department of Transport and Main Roads, Queensland Police Service) however, this data is often historical. Limited data is collected on emergency vehicles through detection but this has only been achieved through cooperation with the emergency service agencies. The other data that Council collects is travel time data from Bluetooth detection devices, but no additional regulatory mechanisms were needed to be enacted as the data collected is within existing privacy legislation.
3	Are there other major local or international jurisdictional developments providing further access powers or arrangements for vehicle-generated data?	There are no local or international jurisdictional developments that Council is aware of. All work at both local and international levels has been through cooperative working groups with voluntary membership.
4	Do you agree with our assumptions on the currently low uptake and limited availability of technology that supports the generation of vehicle data and that there are few and limited current government access arrangements for vehicle-generated data?	The assumptions are correct.
5	What issues do you believe will be created if ExVe is adopted and that would need to be considered in Australia?	Issues from an Australian perspective would be: • the ability to access data held in databanks that are all outside of Australia • issues with ExVe operating in remote areas where real time download of data may not be always possible.
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?	A national data aggregator would only be effective if it is adequately resourced and established under a legislative mandate. Good data definitions, practices and cooperation between entities would achieve the same outcome but is dependent upon the motivation and goodwill of the entities. Objectives may take significantly longer to be achieved under this model.
7	Can you provide us with more information on either the costs or benefits for government access to vehicle-generated data for the use cases listed in Appendix B?	As a major road authority in its own right, Council is involved in all of the use cases outlined in Appendix B. However, many of the costs and benefits are not easily or readily quantified.
8	Are there relevant international standards that should be adopted for vehicle generated data? Are there any standards that could be locally developed?	As the Discussion Paper points out, international standards are still evolving. As the majority of new vehicles are now imported, there is only scope in developing new standards where: • these could be easily adopted by manufacturers of vehicles destined for the Australian market • they address specific Australian problems. The relatively small size of the Australian vehicle market needs to be considered.

No.	Question	Response
9	Have we accurately described the key barriers to accessing vehicle generated data? Are there additional barriers?	The document correctly identifies the key barriers of low market penetration, no standardisation and no incentives. Council sees that these are the principal barriers.
10	Do you agree that *road safety data* should be considered the priority purpose for which we seek to exchange data with industry?	Safety should always be the highest priority in managing the transport network, followed by congestion management and asset management. The graph in Figure 6 of the Discussion Paper reflects Council's priorities.
11	What are the key data needs of transport agencies beyond those already identified?	A distinction needs to be made between real time data and historical data as they address two different types of end need and require different approaches to data management.
12	What further benefits from vehicle-generated data should be considered?	The key benefit from vehicle generated data is the ability to manage and optimise the network in real time and inform machine learning algorithms to predict traffic conditions.
13	We contend that a prioritised starting point should be established from which data for other purposes can be further developed. Are there other approaches that could achieve this?	Council agrees that a staged approach from a prioritised starting point and working outwards is the best model. Other approaches could be to assign each jurisdiction to focus on a particular project and develop in parallel. However, a strong central authority would be required and resourced to effectively coordinate the work.
14	Do you agree with the analysis presented in Table 7? What other opportunities are there for vehicle –generated data, and why?	Council considers the analysis as presented to be robust. Other opportunities that need to be highlighted is the data feedback to vehicles from Intelligent Transport System (ITS) infrastructure owned and managed by road authorities.
15	Have priorities changed for land transport policy and for data access from vehicles with the onset of COVID-19?	The key change in land transport policy since COVID-19 is a greater focus on active transport infrastructure. As the economy is re-opening, the most rapid mode growth is private vehicle travel, resulting in the same focus on safety and congestion management as prior to COVID 19.
16	Should road safety be adopted as the priority for developing use cases for government use of vehicle generated data? If not, what other approach should Australia take?	Consistent with the response to Question 10, road safety should be the priority of developing use cases. This area is also likely to be where the greatest benefits will arise from.
17	Can data other than for the purposes of road safety be exchanged on non-commercial terms?	Any data could be exchanged on non-commercial terms if backed by a suitable regulatory environment. However, without incentives, managing non-compliance will be an issue.
18	Does the NTC's preferred approach (option 2) best address the problems we have identified? If not, what approach would better address these problems?	Council considers that a combination of Options 2 and 3 would be the most effective approach by providing incentives but backed up by a suitable legislative framework to mandate standards and ensure a minimum level of compliance.
19	Does the NTC's proposed approach best address the problems we have identified? If not, what approach would better address these problems?	Council considers that the NTC's overall approach is satisfactory given that this is an evolving industry.