



Submission to the National Transport Commission

Government access to vehicle-generated data

3 July 2020

Introduction

1. The National Road Transport Association (NatRoad) is pleased to make comments on the discussion paper entitled *Government access to vehicle-generated data* (Discussion Paper)¹ released by the National Transport Commission (NTC) in May 2020.
2. NatRoad is Australia's largest national representative road freight transport operators' association. NatRoad represents road freight operators, from owner-drivers to large fleet operators, general freight, road trains, livestock, tippers, car carriers, as well as tankers and refrigerated freight operators.
3. This submission responds to most of the questions set out in the Discussion Paper. Obviously, the NatRoad perspective reflects the point of view of heavy vehicle operators. We note that the Discussion Paper also encompasses potential light vehicle regulation. That regulation should be separated from heavy vehicle regulation.
4. Whilst in relation to some specific proposals coming from the terms of the Discussion Paper, NatRoad's response may be viewed as negative, we reinforce that the development of appropriate telematics and educating members about their use are high priorities for NatRoad. Indeed, we have established a partnership with Teletrac Navman to pursue those ends.
5. We also note that the recently released Consultation Regulation Impact Statement issued in respect of the Heavy Vehicle National Law (HVNL) review² contains consideration of issues such as whether there should be an overarching data framework that is incorporated in the HVNL. NatRoad will respond in due course to these proposals.

Purpose of the Discussion Paper and Project Scope

6. The Discussion Paper outlines a number of purposes at paragraph 1.2. The first dot point at paragraph 1.2 is the most important from NatRoad's perspective because it outlines the opportunity presented by the process but also acknowledges two difficulties that members have previously expressed. It states that the purpose of the Discussion Paper is to:
outline current problems and opportunities relating to government access to vehicle generated data including:
 - *the opportunity to enhance road safety outcomes through the exchange of safety related data between government agencies and industry*
 - *the current lack of incentive to exchange data with governments*
 - *the current lack of trust in exchanging data.*
7. The Discussion Paper at paragraph 1.6 also notes linkages to other projects. In particular the link to the review of the HVNL is noted. The outcome of the review in relation to the use of technology as a data generator as it relates to compliance, enforcement and assurance is an integral consideration in the current context. The two difficulties isolated, especially the lack of trust in providing data to governments, were raised by members, inclusive of being reiterated by members who were consulted on a draft of this submission. The main concern is that the data would be used for enforcement rather than other purposes. Trust is not high.
8. Accordingly, we underline that the manner in which data is shared should be set out in a clear data provision framework that is part of the revised HVNL and which is surrounded by

¹ <https://www.ntc.gov.au/sites/default/files/assets/files/NTC%20Discussion%20Paper%20-%20Government%20access%20to%20vehicle-generated%20data.pdf>

² https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.ntc-hvnlawreview.files/5715/9304/9833/HVNL_RIS_25_June.pdf

safeguards concerning its use in enforcement. It is essential that the framework provides certainty to operators about the permitted collection and use of data and that proscribes its use for enforcement. We will elaborate on this issue when responding to the regulation impact statement mentioned earlier in this submission.

9. Our main point about the scope and purpose of the project therefore is that de-identified data and aggregated data should be used wherever possible to meet the aims of better informed decision making. We reinforce this point because there are many aspects of the current HVNL that require information to be provided by heavy vehicle operators in the context of enforcement of the HVNL which are burdensome, administratively rather than substantively driven, and in need of urgent reform.
10. The issue that is of concern has been captured by the NTC in the Discussion Paper as follows:

*The vehicle industry is also reluctant to share data with governments due to concerns over the breadth of purposes it could be used for, particularly because many agencies hold roles both as regulators and transport system operators. **Industry reluctance is founded on valid concerns of government use of data detrimentally impacting on them or their customers.** This could include enforcement or compliance action, inadvertent release of commercial intellectual property and customer privacy.³*

Problems and Opportunities

11. Against this background the NTC has narrowed the focus of data sharing to the purposes of assisting road safety, an aim supported by NatRoad. The NTC then frames an opportunity statement and three problem statements which we set out in full given that they underpin the work that the Discussion Paper does:

Opportunity statement. There is an opportunity for stakeholder collaboration on exchange or sharing of vehicle data for road safety purposes to understand: ▫ what vehicle-generated data can be used to support road safety in Australia ▫ what an appropriate framework and forum might look like to support such an exchange.

Problem statements 1. Vehicle-generated data is currently not provided to transport agencies for purposes that may have publicly beneficial outcomes. This is due to current vehicle capabilities or a lack of incentive or reason for industry and road users to provide the data (the exception to this being heavy vehicles enrolled in a current regulatory access or compliance schemes).

Problem statements 2. There is a lack of a data access framework to provide the necessary trust, data exchange systems, data standards/definitions, understanding of data needs, and governance to establish data access and use (the exception to this being heavy vehicles enrolled in a current regulatory access or compliance schemes).

Problem statements 3. The level of uptake and penetration of connectivity across the Australian vehicle fleet may delay the benefits of vehicle-generated data, particularly related to safety-critical events.

12. The NTC then asks as Question 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?

³ Id at p 19 our emphasis

13. NatRoad commends the NTC for focusing the opportunity at this stage on enhancing road safety. We would intend to have discussions with the NHVR as outlined in this submission to advance road safety objectives. As the CEO of NatRoad recently said:

*There is a great deal that can be done to improve road safety. As road users, we need to work together to make Australian roads a safer place. Until the number of fatal accidents involving trucks in Australia is zero, there is always more that we can do as an industry.*⁴

14. We agree that the problems set out in the three statements are real and are barriers to the greater sharing of vehicle generated data.

Vehicle Generated Data: Meaning

15. The Discussion Paper then sets out the meaning of vehicle generated data as well as some recent Australian and overseas developments.
16. For the purposes of the Discussion Paper, vehicle-generated data is defined as any data generated by the vehicle itself that is about the vehicle, the road environment, or the use of the vehicle. It does not include driver generated data and, although not stated, we do not believe it would cover fatigue logbook entries, albeit these are required to be provided to enforcement officers.
17. The Discussion Paper indicates that there are broadly three methods by which governments might access data which are discussed at length:
- *received via an ad hoc broadcast or unicast of messages;*
 - *sent via a private cellular network; or*
 - *accessed by physical connection to the vehicle such as the on-board diagnostics.*
18. Table 1 in the Discussion Paper has then been compiled to show what data is currently available through existing collection and access powers. Question 2 then asks:
- In our table, have we accurately captured all the regulatory and legislative mechanisms government could currently use to access vehicle-generated data?*
19. Table 1 is very broadly expressed and does not capture the many bases on which authorities require heavy vehicle operators to keep records and to have them available for government agencies, particularly for enforcement. This applies particularly to fatigue regulated heavy vehicles, primarily defined as a vehicle or combination with a gross vehicle mass (GVM) of more than 12 tonnes. These vehicles are not in the category of restricted access vehicles as shown in the first column of the table. In other words, fatigued regulated vehicle can be general access vehicles.⁵
20. As explained in the NatRoad submission on fatigue management⁶ made in the current HVNL review process to the NTC, the administrative requirements that are imposed on the heavy vehicle industry represent a powerful disincentive to workers because whilst they are required to keep logbooks and to make the data recorded available to enforcement agencies, it is possible to comply with all of these administrative requirements but to still drive whilst fatigued. Further, whilst there are a number of electronic fatigue monitoring systems in place,

⁴ NatRoad media release 25/5/20 *Road safety for all road users* <https://www.natroad.com.au/news/road-safety-all-road-users>

⁵ For categories of heavy vehicles see <https://www.nhvr.gov.au/road-access/mass-dimension-and-loading/classes-of-heavy-vehicles#:~:text=Restricted%20Access%20Vehicle,that%20is%20not%20a%20GAV.>

⁶ https://www.ntc.gov.au/submission_data/628

electronic work diaries have not yet been approved for use.⁷ The manner in which this area of the law is administered and the manner in which it is pedantically applied and enforced shows the problems with enforcement under the HVNL that NatRoad emphasised at the outset of this submission.

21. Table 1 does not cover a matter we submit represents inefficient practice and poor enforcement. That is the requirement to physically carry and produce in hard copy form permits granted for a range of purposes under the HVNL, many of which are obtained electronically.⁸ This is data sharing with governments but sharing information that government agencies already possess.
22. Requiring the retention and production of written permit documents goes against efficiency of operation in that offences of some magnitude apply for merely administrative matters, as with the problematic offences in the fatigue management area. All permits issued under the HVNL should be permitted to be accessible via an electronic link rather than being required to be physically available.

Local and International Developments

23. The Discussion Paper then sets out in Table 2 (wrongly labelled as Table 1) a summary of United Nations proposals for vehicle standards that if adopted in this country would then permit governments to access various crash data from vehicles.

24. Question 3 is then asked as follows:

Are there other major local or international jurisdictional developments providing further access powers or arrangements for vehicle-generated data?

25. The answer is yes that the National Heavy Vehicle Regulator (NHVR) intends to use GPS tracking data as a tool to assist with access decisions. The NHVR has draft proposals in play which, amongst other things, propose partnerships with road managers and industry to establish an agreed framework for sharing and interpreting GPS tracking data to enable greater access and productivity.⁹
26. NatRoad has endorsed this move. Members tell us that they are eager to adopt new technology to further enhance safety and productivity outcomes. They need the unfettered right to explore the adoption of new technologies, as the pace of technological change accelerates. In addition, there should be a clear statement that the “network optimisation possibilities” that would be an outcome of increased data sharing will not involve a trade-off between the provision of data and additional access to the network. Access should not be based on mandated telematics.
27. We are aware, however, as is the case in the European Union, that common protocols are essential:

On vehicle-to-vehicle communications, the Commission follows a technology-neutral approach in line with the EU Strategy on Cooperative Intelligent Transport Systems and has not proposed mandatory deployment of specific technologies at this stage. However, for certain applications such as platooning ... there is an expressed need for regulation to

⁷ [https://www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/electronic-work-diary#:~:text=An%20Electronic%20Work%20Diary%20\(EWD,Framework%20and%20Standards%20has%20closed.](https://www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/electronic-work-diary#:~:text=An%20Electronic%20Work%20Diary%20(EWD,Framework%20and%20Standards%20has%20closed.)

⁸ Discussed in this NatRoad submission in the HVNL review https://www.ntc.gov.au/submission_data/704

⁹ <https://www.nhvr.gov.au/files/201912-1127-draft-heavy-vehicle-productivity-plan-2020-2025.pdf> esp at p 14

*ensure data standardisation of vehicle communication protocols across different brands and ensure proper response from the vehicles.*¹⁰

28. It is NatRoad's policy position that governments should not mandate a specific technological solution, particularly in an area as complex as vehicle telematics. The answer lies in introducing technology neutral laws that permit operators to use technology to meet performance-based targets. Accordingly, we support the NHVR's indication that it will establish data-sharing protocols. We underline the importance of those protocols in the development of policy in the current context.

Connectivity Options

29. The Discussion Paper then contains material on levels of connectivity in the light vehicle fleet with related forecasts.
30. The discussion indicates that aftermarket commercial telematics is a common feature in heavy vehicle fleets. In our understanding, the sorts of technology described are not currently embedded in new heavy vehicles at the point of manufacture.
31. The Discussion Paper then poses question 4 to which the prior discussion relates and to which we answer yes:

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?

Heavy Vehicle Regulatory Developments

32. The Discussion Paper then contains a summary of regulatory developments in Australia which have, to date, been limited to heavy vehicles. The discussion clearly shows the emphasis on compliance and enforcement with other applications an exception. There is then an extensive discussion of overseas developments.
33. The international examples encompass discussion of the 'extended vehicle concept' (ExVe). ExVe is intended to reduce 'attack surfaces' to the vehicle by 'extending' the vehicle onto the vehicle manufacturer's server and controlling access only through this server.¹¹ The European vehicle industry argues ExVe is the best way to secure vehicle-generated data while maintaining user privacy.
34. Question 5 relates to issues flowing from the adoption of ExVe in Australia:
- What issues do you believe will be created if ExVe is adopted and that would need to be considered in Australia?*
35. At the heart of the ExVe is a so-called neutral server which enables third parties, including governments, to access data from the manufacturers. But it does appear that some parties question why the manufacturers should be the "gatekeepers" of the process.
36. This is a matter where NatRoad would note that the arrangements in Australia regarding truck manufacture are unique. In this country trucks are manufactured by three entities including NatRoad's partner Paccar Australia which manufactures Kenworth and DAF trucks at Bayswater, Victoria. The three local plants in total produce about 50% of all heavy duty trucks sold in

¹⁰ *On the road to automated mobility: an EU strategy for mobility of the future* <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52018DC0283&from=EN>

¹¹ Above note 1 at p46

Australia.¹² The balance of the market is imported from Asia, Europe, and the United States of America.

37. A key feature of the Australian truck industry is that trucks sold require a second manufacturer to fit the truck with the equipment required by the operator. The vehicle is generally not suitable for on-road use until this second stage of manufacture is completed locally.
38. For heavy vehicles, a “neutral” server could be established through the NHVR, for example, where high security arrangements could be put in place and other government agency access mediated by the NHVR. That function would then be funded by the governments which wished to access the data, rather than being a cost of the NHVR funded via the current industry based mechanism.
39. In other words, currently, as shown in the NHVR accounts¹³, the majority of that agency’s funding comes from what is labelled as “regulatory income.” As expressed by the NHVR “Regulatory income is provided to the Regulator from participating state and territory government agencies, representing the regulatory component of heavy vehicle registration charges.”¹⁴ But the industry should not be required to fund the provision of data from a neutral server administered by the NHVR. That should be funded by government.

Potential Uses for Vehicle Generated Data

40. Amongst other things the Discussion Paper in Chapter 4 next proposes priorities for government access to vehicle-generated data. We agree that the best way to proceed is for data access to be planned where public benefits can be clearly demonstrated.
41. In the context of compliance, we support aggregated data being used as proposed here:
*Aggregated data to identify areas of undesirable behaviour – such as roads with high incidence of driver fatigue or speed behaviours – may be used to make changes to roadway design and safety infrastructure countermeasures but also more visible police presences to deter high-risk behaviours.*¹⁵
42. As well as road safety improvement, another area relevant to heavy vehicle operators is the discussion of freight planning. We are very interested in better information on heavy vehicle impacts on road assets such as pavement and bridge wear, although how that data might be targeted (e.g. separated from the accumulated wear from light vehicles) is not traversed. As this is an issue that directly impacts heavy vehicle charging, how the data would assist to inform an outcome should be better explored. This is said having regard to the Discussion Paper’s own caveat that the case studies are “foundational” only.¹⁶
43. Given that the utilisation of data could benefit heavy vehicle productivity, it is recommended that consideration of heavy vehicle priorities be assessed by the NHVR in consultation with industry and that considerations relating to light vehicles be separately advanced.

Challenges, Issues and Barriers

44. Chapter 5 deals with challenges and barriers. To reinforce the point made by NatRoad in the last paragraph, the Discussion Paper speaks of centralising capabilities. It notes that

¹² Truck Industry Council - National Truck Plan: Modernising the Australian Truck Fleet (2019) p 8

¹³ <https://www.nhvr.gov.au/files/201811-0926-nhvr-annual-report-2017-18.pdf> from page 47

¹⁴ Id at p 50

¹⁵ Above note 1 p 49

¹⁶ Id p 54

“centralised or national interfaces are used for telematics data through TCA and registration and licensing data through Austroads and its NEVDIS function.” In respect of the latter the NHVR is already using heavy vehicle registration data provided through NEVDIS and it makes sense for heavy vehicle data applications to be centralised through the NHVR.

45. The Discussion Paper sets out a case study of the way that Transport Certification Australia (TCA) operates and that it is viewed as a data “safe harbour.”¹⁷ Question 6 is then posed:
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?
46. As is evident from the prior discussion in this submission, we believe that the NHVR could act as an appropriate “trust broker” and could utilise agreed protocols for the provision of data in a manner similar to that currently adopted by TCA. NatRoad believes that there should be fewer road transport agencies in operation for cost and policy consistency reasons. That is why we suggest that the NHVR act as the heavy vehicle national data aggregator, a path which it has already taken to some extent.
47. For heavy vehicles, the solution of having the NHVR undertake the collection and dissemination of data and its outputs also solves the question of whether data will be collected by transport agencies or through a commercial entity that would be bound to the Australian Privacy Principle obligations. Suitable protocols around heavy vehicle data collection and use could build in safeguards around data protection and assurances about the data not being able to be used for enforcement purposes save for at a highly generalised level.
48. The Discussion Paper then sets out a number of issues which limit the current capacity of the NTC or others to analyse the cost and benefits of various scenarios. Question 7 asks stakeholders whether at this stage they are able to provide more information on the costs and benefits of the use cases set out in Appendix B of the Discussion Paper. At this stage we are unable to comment. We would be only too pleased to assist specific proposals relating to increasing heavy vehicle road safety, for example, but the proposal would need to be much more tightly drawn than the generalised cases in Appendix B. Plus, the costs would need to be considered against, for example, any incentives that might be provided to encourage participation, a question raised in the Discussion Paper.¹⁸
49. Chapter 5 also contains a discussion about the need to ensure standardisation of data across government agencies in particular. This factor further reinforces the NatRoad position that the NHVR should be the agency which co-ordinates policy for heavy vehicles in this space and which collects the required data for particular issues management. The Discussion Paper asks question 8 in this context:
Are there relevant international standards that should be adopted for vehicle-generated data? Are there any standards that could be locally developed?
50. The Discussion Paper recognises that Australia is largely a technology taker. This is the case despite the establishment of local heavy vehicle truck assembly, as discussed earlier. There should be careful consideration of the issue of technology that might be used for data generation when Australia updates the Australian Design Rules (ADRs) relating to heavy vehicles. It is at this point that the need to capture or modify overseas standards should be considered.

¹⁷ Id at p60

¹⁸ Id at p 66

51. There is then a discussion of commercial sensitivities impacting industry's willingness to share vehicle generated data and the low penetration of connected vehicles in the Australian market. Question 9 is then posed to which we answer yes to the first part:

Have we accurately described the key barriers to accessing vehicle generated data? Are there additional barriers?

52. In regard to the second part of the question, the discussion of cost/benefit considerations raises the issue of: who pays? Given the general social benefits of improved road safety outcomes, in order to reduce the barriers to facilitating greater access by government of heavy vehicle data, we recommend that the costs of the initial uses for this purpose be met by governments and the outcome measured against the social cost/benefits from the particular project, e.g. cost and benefits of monitoring the deployment of Autonomous Emergency Braking systems (AEB) where fitted in heavy vehicles along particular highways/road systems. These initial trials could pave the way for greater cost/benefit analysis and act as "demonstration" projects.

Key Opportunities for Access

53. Chapter 6 has the purpose of outlining the key opportunities for access to vehicle-generated data and how the opportunities could be achieved.
54. The NTC makes it clear that at this stage it is unable to define "the priority data needs of transport agencies."¹⁹ This led the NTC to place vehicle-generated data into a framework based on the use of the vehicle or its capability to produce data.
55. Separately from the categorisation, the NTC records that achieving road safety objectives was the most important aim of collecting vehicle-generated data. As was made plain from the outset of this submission, we agree with this objective. We note that the conclusion reached is, however, that road safety could be "the logical starting point for initial access arrangements to be made for data from the light vehicle industry."²⁰ This conclusion is then followed by a case study of the European experience involving real-time traffic safety events. The NTC then poses three questions which we set out and respond to in the next three paragraphs.

Question 10: Do you agree that road safety data should be considered the priority purpose for which we seek to exchange data with industry?

Yes, every effort should be made to increase road safety and this at first can be targeted at light vehicle drivers. The costs and benefits of an Australian study based on the European model could then be used to design a study for heavy vehicles co-designed by industry and the NHVR.

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

We find this question difficult to answer particularly as the NTC points out in the Discussions Paper that the agencies views are not yet "fully formed." In respect of heavy vehicles, consultation with the NHVR and linking proposals that assist to support the aims of its Draft Productivity Plan²¹ would be the best approach to answering the question for the heavy vehicle sector.

Question 12: What further benefits from vehicle-generated data should be considered?

¹⁹ Id at p72

²⁰ Id at p77

²¹ Above note 9

These benefits will arise for the heavy vehicle sector from the finalisation of the NHVR productivity plan and, hopefully, from the finalisation of the HVNL review.

56. The Discussion Paper then talks about the impact of the COVID-19 pandemic, indicating that the timing of its research did not enable NTC consultation on changing priorities or needs as a result of the pandemic on transport agencies. The current consultation therefore seeks feedback on the effects of COVID-19. The following three questions which are then asked are answered in the next three paragraphs.

Question 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?

This approach is supported for light vehicle applications. The approach can then be refined for heavy vehicles following a study of the cost/benefit of the light vehicle initial work, the outcome of the NHVR productivity planning process and the finalisation of the HVNL review.

Question 14: Do you agree with the analysis presented in Table 7? What other opportunities are there for vehicle-generated data, and why?

We believe that it would be better for a similar table to be prepared between industry and the NHVR which better reflects the technological status of the heavy vehicle industry and the different legal regimes that apply to heavy vehicles. For the heavy vehicle industry, there should also be a listing of current data requirements used in compliance/enforcement and how that data might be better used for road safety objectives. There should also be a discussion and categorisation of information that is systemically collected for road safety purposes that could offset roadside enforcement requirements.

Question 15: Have priorities changed for land transport policy and for data access from vehicles with the onset of COVID-19?

There is a greater need for traditional roadside enforcement to be replaced with other methods of enforcing the law given the emphasis on reducing human contact. There is also a need to continue to support policies that assist supply chain efficiencies such as the lifting of heavy vehicle curfews in urban areas. Those policies should prioritise heavy vehicle movements given the essential nature of those movements that was made clear to the public, especially in the early stages of the pandemic when panic buying occurred. There should also be moves to stop anticipated increased congestion from affecting heavy vehicle movements with any proposals to institute, say, a congestion tax/charge, exempting heavy freight vehicles. There should be a greater focus on measuring and reducing congestion with consideration of such matters as dedicated freight lanes on motorways (akin to bus lanes) as opposed to reducing the number of lanes that freight vehicles can access.

57. During the course of preparation of this submission, a member commented on the need for the changing land transport policy priority needs as follows (comments which NatRoad endorses):

The application of curfews to last mile retail deliveries adversely affects both productivity and congestion. Whilst I can sympathise with residents close to shopping centres, it is far safer and efficient for re-stock operations to occur outside normal trading hours rather than when car parks and roads are full of shoppers and commuters. Roads are 24/7 assets and must be available for use 24/7 without artificial 'pick and choose' access imposed by local authorities.

Policy Options for Gaining the Benefits of Vehicle-Generated Data

58. Chapter 7 sets out some policy proposals to address the opportunities and problems addressed in the Discussion Paper.
59. We refer to our earlier support for advancing road safety and reiterate that we are prepared to work with government on identifying opportunities for exchanging road safety data. We would intend holding discussions with the NHVR.
60. The Discussion Paper then poses two related questions:

Question 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?

Road safety as a priority is supported. In respect of heavy vehicles other policy considerations are generated by the NHVR's draft productivity plan and we would hope to develop further policies with that organisation, policies which are tailored to heavy vehicle regulation. They should not be further advanced in the current context.

Question 17: Can data other than for the purposes of road safety be exchanged on non-commercial terms?

It is too early in the process to answer this question. But already the heavy vehicle industry is burdened with the collection of, maintenance and disclosure to government of a range of data, especially in relation to fatigue management. Most of this data is collected and not used for any broader purposes other than to demonstrate heavy vehicle driver/operator compliance. As the regulatory environment is reformed over the next 18 months the data collection, dissemination and publication requirements will become clearer.

61. The Discussion Paper then sets out three options to improve government access to vehicle-generated data and establish standards and governance frameworks. In this context, question 18 asks:

Does the NTC's preferred approach (option 2) best address the problems we have identified? If not, what approach would better address these problems?
62. Option 2 is preferred because it presents a model for collaboration. Certain of its elements could be developed with the NHVR to make arrangements suitable for the heavy vehicle industry and which mesh with the legislative reforms underway in the HVNL review. Legislation to deal with access (option 3) would be premature given the status of all of the other work that impinges on the subject of data generation, access and application.
63. There is then a discussion of the European eCall system and a recommendation that a RIS be developed for making installation of eCall mandatory along the lines established in the EU.²² In NatRoad's understanding eCall is mandated for cars and light commercial vehicles. The RIS should not include heavy vehicles. Accordingly, we do not propose to comment on the issue other than to say that we would be happy to comment on a RIS if the proposal is taken up by government and the application of the proposal is preceded by appropriate trials of the technology in this country. We have therefore not answered question 19.

²² As set out in Chapter 6 of the Discussion Paper and as explained here https://ec.europa.eu/transport/themes/its/road/action_plan/ecall_en

Conclusion

64. With an initial focus on road safety, NatRoad and the NHVR could identify new ways to maximise the potential benefits of vehicle-generated data.
65. We would propose an early discussion with the NHVR to implement any measures separately from how this issue affects light vehicle regulation.