

GOVERNMENT ACCESS TO VEHICLE-GENERATED DATA

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FOREWORD

The Australian Automotive Dealer Association (AADA) is the peak industry advocacy body exclusively representing franchised new car Dealers in Australia. There are around 1,500 new car Dealers in Australia that operate more than 3,000 dealerships.

The automotive retail sector in Australia is one of the most competitive in the world. Around 67 brands offer over 350 models for sale in a relatively small market of about one million units annually (less than 1.5 per cent of global demand). Data from the Australian Bureau of Statistics reveals that the average age of the nearly 20 million registered vehicles in Australia is currently 10.4 years, while passenger and light commercials are 10.1 years old.

The AADA recognises that there are many societal advantages to government having access to vehicle-generated data. Many of these benefits are currently still coming to light as further consideration is given to the opportunities available and a better understanding of current and emerging technologies is developed.

Safety and efficiency of the roads networks stand out as immediate opportunities for improvement and vehicle-generated data provides the ability for better roads planning and a reduction in the number of potentially high-risk environments which will inevitably result in lower accident rates. Equally, vehicle-generated data captured at the time of an accident, could be very useful in re-creating a crash scene to more quickly and accurately determine the circumstances surrounding the event.

While the AADA supports government access to vehicle-generated data, we believe that the access should be facilitated by existing rather than bespoke infrastructure and networks, wherever possible. While this may require the establishment of relationships with commercial ICT providers, we believe it will prove to be a more cost effective and practical way of gaining access to vehicle data.

With regards to the options considered in the consultation paper, the AADA believes that Option 2, also favoured by the NTC, is the most appropriate in addressing the first two of the problems identified. The issue concerning the level of uptake and penetration is one that will take some time to resolve. Given the age of the Australian vehicle fleet which on average is more than 10 years old, uptake and penetration will be partially dependant on fleet renewal.

Renewal of the fleet will result in more cars having technology capable of capturing, recording and transmitting or facilitating the transfer of vehicle-generated data. Consequently, care should be given to ensure that barriers to the purchase of new motor cars should be minimised. A critical element to this for consumers is the price of motor vehicles and it would be counterproductive to force changes which might lead to more expensive vehicles. Government access to vehicle data therefore, should be managed carefully and not lead to the introduction of additional expenses that could flow through to the price of the car.

In the answer to the questions that follow, we have limited our responses to only those questions that are relevant to our industry and the issues as they affect us.

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James Voortman Chief Executive Officer



AADA ANSWERS TO QUESTIONS

Q1: 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 AADA believes the problem and opportunity statements appropriately describe the issues.

While access to vehicle-generated data will deliver positive benefits, some of the data generated by a vehicle is not currently stored and would be of little value to external recipients. For example, while steering angle and throttle position may be useful in understanding a crash scene, injector timing and coolant temperature are unlikely to be of much use and in most cases will not be recorded by the vehicle. For this reason government agencies seeking vehiclegenerated data should set out to clearly define what data is being sought and work with stakeholders to ensure that vehicles are able to capture, record and potentially transmit the information required.

The appropriate framework and data standards required for recording and transferring vehicle data should be agreed to by a working group of industry and government stakeholders. Where possible, the priority of this group should be to harmonise the C-ITS framework and protocols with those of the major overseas vehicle markets. Q4: 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 available evidence suggests that assumptions about current arrangements for government access are very limited. The age of the Australian fleet is also a hindrance to the adoption and implementation rate as older vehicles lack the level technology required to store and make available vehiclegenerated data. This situation will improve as the vehicle fleet is renewed over time and provided that stakeholders can agree on a framework and data protocols for recording, transferring and transmitting data.

Q5: What issues do you believe will be created if ExVe is adopted and that would need to be considered in Australia?

The AADA supports the concept of ExVe as it provides a secure access point for authorised government agencies, regulators and third parties. Vehicle Manufacturers naturally have the right to control the flow of information to neutral servers as they build the vehicle containing the technology that captures, stores and enables data to be provided. Governments role is to work with stakeholders to develop standards and set direction as to what data Manufacturers will make available, through the neutral servers, to authorised external parties.

Section 2

Q6: 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?

The AADA does not believe there is a need for establishing a data aggregator which we think would add a layer of cost, complexity and administrative burden to those seeking to store data and for those seeking access.

Q8: Are there relevant international standards that should be adopted for vehicle-generated data? Are there any standards that could be locally developed?

The AADA supports harmonising the Australian framework and requirements with those being developed internationally and in alignment with vehicle Manufacturers who build vehicles with integrated technology capable of capturing, storing and transferring data.

Q10: Do you agree that road safety data should be considered the priority purpose for which we seek to exchange data with industry?

The AADA agrees that road safety provides the highest priority for government access to vehicle data. Putting aside the immeasurable human costs, the expenses incurred in implementing a framework for access to data will be more than offset by the savings achieved through a reduction in road accidents.

Q12: What further benefits from vehiclegenerated data should be considered?

In addition to those already identified, vehicle-generated data could be useful in determining other types of infrastructure planning such as charging infrastructure for EVs and for town planning purposes.

Q13: 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?

The AADA agrees with the approach taken to classify data by type rather than by needs, which are still being defined.

Q14: Do you agree with the analysis presented in Table 7? What other opportunities are there for vehiclegenerated data, and why?

The AADA agrees with this analysis.

Section 2

Q15: Have priorities changed for land transport policy and for data access from vehicles with the onset of COVID-19?

There appear to be two significant factors effecting road use changes resulting from the pandemic. These factors should be considered, along with any data available, in future planning of land transport. It remains unclear how long these changes will remain in effect, but many experts predict the new normal will be different from the old normal, meaning some of the changes are likely to be permanent.

- In major cities people are using public transport less. Some of this is due to people working from home, however, there is also a concern about the cleanliness of the public transport system and the associated risk of infection.
- For commercial reasons and due to increased border restrictions, the airlines have significantly reduced the number of available flights. Even as these factors gradually diminish, people will still have concerns about the risk of infection associated with flying. The outcome of this could be that an increasing number will choose driving holidays.

Q16: 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?

As per Question 10.

Q18: Does the NTC's preferred approach (option 2) best address the problems we have identified? If not, what approach would better address these problems?

The AADA supports the adoption of Option 2 which is to 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.

Q19: Does the NTC's proposed approach best address the problems we have identified? If not, what approach would better address these problems?

The AADA agrees with the NTC approach.

CONCLUSION

We would be happy to meet with NTC staff to further discuss the submission above. If you have any questions, please contact me at the following:

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