

NTC Discussion Paper – Government Access to Vehicle Generated Data

Discussion Paper Questions

3rd July 2020

No.	Question	Answer
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?	<p>Support there is an opportunity for stakeholder collaboration on potential exchange or sharing of data for “road safety” purposes. Vehicle development through the use of technology now enables the automotive industry to enter a new era of connectivity and to provide benefits to parties involved with the vehicle transport. It is appropriate to further explore these opportunities for the use of road safety and the vehicle occupants.</p> <p>The problem statements are true in that vehicle generated data is not generally provided directly to transport agencies for purposes that may have publicly beneficial outcomes, a lack of data access framework and level of uptake and penetration of connectivity across Australia.</p> <p>However, these problem statements are only a summary of many more challenging statements that would be uncovered after the proposed Data Taskforce is formed and assigned with fully detailing the requirements to implement VGD. It is the opinion that these problem statements should not be limited to and form basis of a starting point.</p>
2	In our table, have we accurately captured all the regulatory and legislative mechanisms government could currently use to access vehicle-generated data?	Respective jurisdictions are most appropriate to answer this in view of industry feedback.
3	Are there other major local or international jurisdictional developments providing further access powers or arrangements for vehicle-generated data?	No comment.
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?	Yes, the adoption of these technologies is low and will take several years before there is an acceptable level across all vehicle manufactures. Access arrangements for government or industry bodies is non-existence, a major challenge will be how data is accessed and stored.
5	What issues do you believe will be created if ExVe is adopted and that would need to be considered in Australia?	Don't foresee major issues with ExVe, a preferred method that will safeguard vehicles and owners. Proposed access to ExVe and the exchange of data should be a partnership between industry and government.
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?	<p>Yes, as there are many unknowns about how data will be accessed, stored, defined and shared amongst industries and governments. Without a centralised accepted approach between parties, this would be difficult to achieve this.</p> <p>A shared data aggregator/trust broker partnership ideally be set up between industry and government. Manufactures would represent the industry side with coordination from the FCAI, preference to not having a third party which may benefit from commercialisation of data and impose extra costs on vehicle manufactures.</p> <p>Assigning the responsibility to entities may lead to non-standardisation of data and poor data quality.</p>

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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?	Providing cost information on the use cases is too early at this stage, however it is predicted to be a major infrastructure costs on all parties. Further analyses and cost examples from countries should be consideration before any legislative decisions are made. There are major benefits of the six uses cases for several parties and not only government, industry and vehicle owners also benefit greatly.
8	Are there relevant international standards that should be adopted for vehicle-generated data? Are there any standards that could be locally developed?	Australia should seek to adapt standards already defined in other countries than developing it's own. Standards from Europe or the United Nations should be adopted. Australia also should investigate to adopt the introduction of eCall that is already established in Europe. Further learnings can be taken from the European Union Data Task force on data for road safety.
9	Have we accurately described the key barriers to accessing vehicle-generated data? Are there additional barriers?	It is too early in the concept phase to identify all barriers to connected data, further discoveries would be required from various stakeholder views.
10	Do you agree that <i>road safety data</i> should be considered the priority purpose for which we seek to exchange data with industry?	Yes, road safety should be seen as the greatest benefit from the vehicle owners perspective. Although government and industry also benefit, the view is that owners ultimately have the first benefit. However, the definition of "road safety" is not clearly defined and there was much divide between states and other government bodies in the workshops to what it really meant. Alternatively, introduction of eCall is a clearly defined method demonstrating the benefits which can develop a path to further connected data.
11	What are the key data needs of transport agencies beyond those already identified?	Respective jurisdictions are most appropriate to answer this in view of industry feedback.
12	What further benefits from vehicle-generated data should be considered?	There are many other benefits beyond government access to vehicle data. However, the NTC should reconsider the scope and take a boarder view of vehicle data. Government access in the name is viewed one-way, ideally be "Exchange to Vehicle Generated Data" and define the potential interested parties from which the benefits can then be identified.
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?	The NTC should take the European Union Data Task force data for road safety (proof of concept) as a basis in approaching VGD. There is also eCall method that can be established as a starting point for future VGD.
14	Do you agree with the analysis presented in Table 7? What other opportunities are there for vehicle-generated data, and why?	Table 7 is a high level summary of the potential VGD that can be shared. However, until detailed trail studies are conducted between the industry and government it is too early to determine if the table is true to all the statements listed. Trails will exposure the true availability, readiness to use and industry support for the various categories.
15	Have priorities changed for land transport policy and for data access from vehicles with the onset of COVID-19?	Respective jurisdictions are most appropriate to answer this. However, it should be noted that vehicle manufactures experienced a huge reduction in sales with added pressure on cost management. VGD and the proposed framework should not add extra costs to manufactures in developing and managing VGD.

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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?	Propose a collaborative approach between government and manufacturers in developing a framework of what and how VGD will be set up. Road safety is important to all parties, however still an area that is not clearly defined. Furthermore, VGD should not be just for government access and be a shared partnership with government and manufacturers. Europe has demonstrated this well with the Data Task force.
17	Can data other than for the purposes of road safety be exchanged on non-commercial terms?	Non-commercial terms first requires further analyses between government and manufacturers, the amount of data should also be limited and used for critical road safety benefits and again road safety requires a clear definition. Developing and managing VGD will have a cost on all parties and the commercialisation of data should be explored and properly managed to off-set the cost of operating VGD.
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?	<p>NTC's option 2 is supported as preferred.</p> <p>Propose the data exchange partnership be a legally formed body equally represented by industry manufactures, FCAI and the government. A memorandum of understanding (MOU) similar to Europe is also required with focus on road safety.</p> <p>NTC has suggested a third-party data aggregator to support in the administration of the data exchange, it's proposed that the data aggregator not be a third party and a reasonability of the newly formed data exchange partnership body.</p>
19	Does the NTC's proposed approach best address the problems we have identified? If not, what approach would better address these problems?	<p>NTC's proposed approach to develop a data exchange partnership between industry manufactures and government is generally supported. The forming of this partnership (body) and all associated elements should be further explored and addressed by the Data Taskforce that first needs to be established.</p> <p>The taskforce will then propose the overarching governance model of the partnership, with how VGD will be managed in Australia and parties associated in accessing vehicle data. Specific framework regarding use cases, benefits and commercialisation of managing data defined with a clear roadmap to how VGD will be developed and implemented in Australia over the coming decades.</p>

Contact:

Elie Issa
 elieissa@hotmail.com