

3 July 2020

Re: NTC Discussion Paper – Government Access to Vehicle Generated Data

Ford Australia writes in response to an invitation for feedback on issues raised in the National Transport Commission's Discussion Paper, *'Government Access to Vehicle Generated Data'* as part of its public consultation process. Ford Australia has also worked closely with the peak automotive industry body, the Federal Chamber of Automotive Industries (FCAI) on this important issue. It is a strong supporter and a key contributor to the submission made by the FCAI in response to this paper.

Specifically, Ford Australia wishes to emphasize the following points:

- As a relatively small – by global standards – new vehicle market, Australia should seek to align wherever possible with international regulations to facilitate the adoption of new technologies. Unique requirements may put at risk the introduction of these new technologies to the local market as the associated investment can be difficult to justify relative to its likely return.
- The capabilities required for, and costs associated with, the retrieval and provision of VGD should not be underestimated, even as connected vehicles are increasingly introduced by the automotive manufacturers. Ford Australia supports and encourages the development of a clear and robust definition of 'road safety' to help direct and inform the strategy, aspiration and scope of proposed regulation in this area.
- The privacy and rights of vehicle owners / drivers/ users must be rigorously observed and given appropriate consideration in all aspects of this discussion.
- Ford Australia considers the emerging area of connected vehicles and VGD to be in its early stages across the globe. It therefore advocates a measured approach be taken to developing regulation in this area, with regulation then moving in accordance with advancing and maturing capabilities.

Ford Australia thanks the National Transport Commission for the opportunity to provide feedback to its Discussion Paper on this emerging area.

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