

Dr Gillian Miles
Chief Executive Officer
National Transport Commission

3rd June 2020

Dear Dr Miles,

Thank you for the opportunity to give input into this process. Intelematics sees a big future in the applied use of connected vehicle data for making mobility both safer and more efficient. Intelematics has been a long-standing provider of services surrounding the connected vehicle for the past 2 decades. In this time we have been the trusted provider of services including:

- Vehicle telematics systems
- eCALL and safety service triage
- Realtime in-vehicle traffic and incident updates

We continue to support various vehicle manufactures deliver connected programs and services to their customers as well as support road authorities with road network information as part of their program management. Essentially, we provide a vital connection that delivers scale across many vendors in Australia / NZ.

Our following response to the discussion paper highlights a number of areas. In principal we support the recommendations of the NTC to reduce the barriers to vehicle connectivity in Australia. With deep experience in providing eCALL services in Australia and being an active member of the intelligent transport data community, we know firsthand the barriers to adoption of connected vehicle technology. While many of the use cases listed can be approached with data collected from different sources there will be further applications or improvements that emerge with higher levels of data availability.

We hope our comments provide constructive and helpful notes in being able to refine the recommendations to be as good as they can be in implementation.

Regards,

David McKeown
Manager - Industry and Strategy
Intelematics Australia

Key Comments

Government and industry data exchange partnership (addressing problem 1 & 2)

Leveraging a collective group to establish up a standard framework and method for exchanging data with government would reduce the costs and complications from integrating with multiple providers.

The value that can be provided back to government in services that are able to deliver insights, tackle the use cases and leverage the scale of commercial data infrastructure would be profound.

As is noted in the discussion paper, for governments to tackle the use cases outlined in Appendix B this will require a combination of data collected from multiple sources. These use cases for the most part will require systems that are designed and delivered with industry best practice and global application of the technology. In this way the improvements and lessons learned in any commercial implementation can be shared with all clients both local and global.

The standardised data protocols through any intended data exchange partnership should enable 3rd parties to develop common solutions for both local and international markets.

eCALL (addressing problem 3)

As an established supplier of eCALL triage services in Australia Intelematics can provide a perspective based on our experience operating these programs. As a method to improve both safety outcomes as well as the level of uptake of connected vehicles in Australia Intelematics endorses the recommendation of making eCALL mandatory across the Australian market.

eCALL is a highly effective method for achieving greater safety outcomes for road accidents however the detail on implementation is important for the service to be as effective as it possibly can be. Intelematics recommends the following for any implementation in Australia:

- While the discussion document refers to the minimum set of data, this data must include the vehicle location. Other data from the vehicle can also be highly relevant, for example: The number of engaged seatbelts can give an indication of the number of vehicle occupants. The extra elements of data are highly important when the vehicle occupant(s) are unresponsive over the voice line following an impact.
- A vehicles location can change from the point of an impact, an operator being able to access updates to the vehicle information can be critical for guiding emergency services to where the vehicle has ended up.

Further implications of eCall services

While vehicles with embedded connectivity will have an effective range (coverage) that differs based on the technology that is used, we have noted the use of high gain antennas in embedded hardware typically associated with high signal sensitivity. Furthermore, having the antenna mounted on the outside of the vehicle will in general provide greater coverage and reception when compared to a mobile handset. The implications of this may mean that in areas that have limited coverage the vehicle would have a higher network signal than handsets, In regional areas this may allow emergency services calls/notification where this may not have been possible from a handset.

eCALL services are frequently rolled out with an SOS button inside the vehicle, this allows an occupant to begin a call with emergency services simply by pushing this button. With the possibility of having some extra coverage through the vehicle embedded connectivity this may allow emergency calls where they were not possible from a handset. However, from previous program operations these SOS buttons add a layer of accidental calls that will need to be triaged appropriately.

Reducing barriers

We understand there are a range of technical barriers for eCALL when services are being linked directly to emergency services. However we note the range of services that have either previously been operational or are currently operational in the Australian context, JLR and BMW currently have these services operational, with General Motors and TOYOTA also previously having eCALL services as part of their connected programs. These manufacturers have shown the successful delivery of these services through third party providers, ensuring the burden does not fall completely onto our emergency operators but instead are triaged and expertly handed over to emergency services with all the relevant information when there is a need. The consideration of 3rd party tailored software and services for eCALL and connected vehicles should also be assessed for ensuring services can be rolled out sooner at the minimal cost to the Australian taxpayers and with the highest quality of service delivery to drivers or vehicle occupants.

Response to individual questions

Selected questions for response

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?*

Yes, we believe you have captured the key issues to be addressed

Question 5: *What issues do you believe will be created if ExVe is adopted and that would need to be considered in Australia?*

ExVe will introduce the costs of data infrastructure and transfer into the costs of the vehicle, raising prices. With the small market size in Australia data will likely be held with global infrastructure which when transferred will then incur costs of transferring between regions. Keeping data transferred to as small amounts as possible (aggregated prior to transfer) would reduce although not remove some of these costs.

Question 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?*

Intelematics Australia doesn't see a case for a national data aggregator like the TCA. Adding in such a role may have the unintended consequence of reducing industry innovation in tackling any government use cases of the data. A wide range of the use cases will require data from sources beyond just the vehicles. Creating a national aggregator may reduce the collaboration between government and non-government bodies making advances less likely.

Question 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?*

While connected vehicle data will no doubt improve any solutions to the mentioned use cases. A number of these cases can in some way be tackled with existing data sets, or by leveraging data with additional ways of communicating to drivers.

At Intelematics we understand the complexities of urban mobility, we know that in the future there will be derived benefits from the data collected from vehicles, however we should also be looking for solutions with the data that is currently available.

Question 9: *Have we accurately described the key barriers to accessing vehicle-generated data? Are there additional barriers?*

Yes, the barriers have been accurately described.

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, road safety should be the top priority for data exchange. Providing a safe driving experience is beneficial to all parties, vehicle manufacturers, road authorities and also drivers.

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?*

We support a prioritised starting point for road safety applications. Beyond road safety, providers should be given the opportunity to develop commercial options for any de-identified data to assist with long term commercial sustainability.

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?*

Yes, road safety should be the top priority. However, the overall benefits of using aggregated data in road network optimisation will also be significant and should also be considered a priority for use case development.

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

All data comes with a cost to collect, store and transfer, as a telematics provider we would look at the overall picture of dealings with an agency and make exchange decisions on a case by case basis.

Question 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?*

Yes, Intelematics backs the recommendation

Question 19: *Does the NTC's proposed approach best address the problems we have identified? If not, what approach would better address these problems?*

Yes, Intelematics backs the recommendation