Transport Certification Australia Limited
ABN 83 113 379 936

Level 6, 333 Queen Street
Melbourne VIC 3000
T: +61 3 8601 4600
www.tca.gov.au

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Dr Gillian Miles
Chief Executive Officer
National Transport Commission
Level 3, 600 Bourke Street
MELBOURNE VIC 3000

Dear Dr Miles

GOVERNMENT ACCESS TO VEHICLE GENERATED DATA

Please accept this letter as Transport Certification Australia's (TCA's) submission regarding the NTC's discussion paper on government access to vehicle generated data.

As you know, TCA is a national organisation that provides assurance services relating to transport technologies and data to enable improved public purpose outcomes from road transport. A key role of TCA is to provide assurance, administration, advisory and data services for vehicle telematics, which is firmly within the scope of the NTC's project.

TCA is supportive of the NTC's discussion paper, including the challenges and barriers raised, and the proposed high-level policy approach to address these. This letter responds to some of the key issues and questions raised in the discussion paper, along with providing some additional information for further consideration. Please note that Austroads plans to provide a separate submission, which will complement TCA's input and address matters that are in addition to those raised in this letter.

Governance and data exchange framework

The NTC discussion paper presents three framework options to address the identified challenges with government access to vehicle-generated data. TCA supports the NTC recommendation to adopt Option 2, being a 'Government and industry data exchange partnership'.

As per previous correspondence from TCA, there are elements of the National Telematics Framework (NTF) that could be readily leveraged and built upon when establishing the proposed approach. This includes elements such as legal agreements, consent forms, data dictionaries, data standards, exchange protocols, database systems, and analysis and reporting capabilities. The NTF is a proven data exchange platform that is flexible and scalable, is already utilised by road transport authorities, and is not restricted to any vehicle types or data formats.

The NTF also enables not just the ingestion of vehicle data from industry, but also the provision of data to industry. Mechanisms are in place to coordinate the ingestion and aggregation of data from road authorities and then provide this data to industry via a centralised national service. This model enables the opportunity

to explore options to achieve a return in value for industry participants, which will be critical to ensure their active involvement in a partnership arrangement.

TCA would welcome the opportunity to participate on the proposed Data Taskforce, and to undertake the proposed role of the national data aggregator. These would fit firmly within TCA's current role and would complement data sharing arrangements already in operation through the NTF.

National data aggregator

TCA appreciates the NTC referring to TCA in its paper as a possible entity to be the proposed national data aggregator and can confirm that it is well place to do this role. There are a range of reasons why TCA would be an appropriate entity, not least of which being that it has strong government oversight yet is appropriately separated from policy and regulatory bodies. This separation is a key reason why industry has trusted TCA with receiving and managing its data for a range of purposes.

While there is a strong case for a centralised national data aggregator, this should not preclude the consideration of alternative models, and it is possible that this role might not result in all data being under its management. For example, there may be some aspects of this role that facilitates data exchange in a nationally consistent way but is separate to the function of storing and managing the data itself. These details can be worked out as the proposed framework is established and progressed.

A key focus will be the standards and protocols to exchange data between industry and government stakeholders. The NTC discussion paper raises the topic of the Extended Vehicle (ExVe) suite of standards that are being adopted by some automotive companies. Out of interest, TCA manages – on behalf of road transport authorities – a Telematics Data Exchange (TDE) to facilitate the ingestion of data from telematics service providers. The TDE uses a REST Application Programming Interface (API) approach that is consistent with the relevant ExVe standard, which enables data to be exchanged between a service provider and TCA dynamically in near real-time or in periodic batches. It is anticipated this could be leveraged as part of the proposed proof-of-concept.

Data in scope

The types of vehicle-generated data listed in the NTC discussion paper appear to be appropriate categories. It is important to note that each of the listed data types can be used for a range of purposes and outcomes, with none limited to just road safety. Thus, it might be wise to not use the term 'road safety data', and instead refer to 'data for road safety'. It is noted that the European Data Task Force also uses the term 'data for road safety'.

Further, it is understood why data for road safety may be given a priority with this policy initiative, and in principal that is supported. However, care should be taken not to inadvertently limit the use of any data received to just road safety purposes, or to any specific use cases. TCA's experience has shown that some of the more valuable uses of vehicle data have been identified over time, and not when a data initiative was first conceived. It is of course important to have agreements in place that clarify the rights to access and use data, but this should be done in a way that does not restrict potential future insights from the data being identified and leveraged in an appropriate way.

Commercial arrangements

The NTC discussion paper proposes adopting a policy principle of 'non-commercial sharing or exchange' of data. While this may be appropriate as a default position for data that is of high-priority for road safety, it should not be assumed that this position could be maintained across all vehicle-generated data. In some

instances, it is likely that a commercial return will be necessary to fund vehicle data initiatives, which otherwise may not be financially feasible. In these instances, potential road safety and public purpose benefits could be missed. Thus, it would be wise to support flexibility with such a policy principle.

Commercial arrangements will also need appropriate consideration if the proposed data exchange platform and national data aggregator role are to be progressed. There will be several funding model options that can be explored to establish and maintain these, but it is important to note that even if the digital infrastructure and resourcing exists with key stakeholders, there may be costs that need to be covered in some way.

Next steps

TCA looks forward to this project being progressed to a final policy paper and stands ready to participate in and support any proposed data exchange initiatives that arise.

Please don't hesitate to contact John Gordon, Manager Strategic Development at johng@tca.gov.au or myself if you or your team have any queries or would like further information.

Yours sincerely

Stuart Ballingall
Executive General Manager
Transport Certification Australia