



Australian Government

Department of Infrastructure, Transport, Regional Development and Communications

Submission to National Transport Commission

Discussion Paper: Government Access to Vehicle Generated Data

August 2020

The Department of Infrastructure, Transport, Regional Development and Communications (Department) thanks the National Transport Commission for progressing this important piece of the Transport and Infrastructure Council's transport technology reforms, and for the opportunity to make a submission.

The Department has prepared its submission in consultation with several Australian Government agencies including: the Treasury; the Department of the Prime Minister and Cabinet; the Department of Home Affairs and the Department of Industry, Science, Energy and Resources. This submission outlines the Department's position on the proposed options along with suggestions to help develop the proposals further. The Department's views on the Australian Government's existing privacy regime are outlined in a 2019 submission to the NTC's Regulating government access to Cooperative – Intelligent Transport Systems and Automated Vehicle Data [discussion paper](#).

Data feeds into good government decision making in investment, policy, regulation and program management. For example, vehicle generated data could inform: the national direction for road safety; developing and administering national standards for vehicle safety; supporting a nationally-consistent approach to emerging transport technologies; and engaging in international standards forums to ensure Australian regulations are aligned with global best practice.

The Department's views on the options

The Department supports a pilot data exchange approach (Option 2). A pilot approach allows governments and industry to work together from the outset to identify priority use cases, and develop arrangements that support efficient and secure data exchange. Such arrangements may include an overarching framework to govern and support data exchange. This work could also help identify the financial and strategic value of data and the types of vehicle-generated data with the greatest public benefit.

Importantly, it avoids locking in a pathway that may impose unnecessary costs on industry that are ultimately passed on to consumers. The Department does not support legislative changes (Option 3) at this stage, and considers that a business-as-usual approach (Option 1) may miss potential opportunities.

Considerations for a pilot data exchange

This section of our Submission outlines issues that should be considered in developing a pilot approach. The Department can play an active role in facilitating and participating in any data pilot.

Discussions about government access to vehicle generated data are at an early stage. There is time to scope any pilot exchange in a holistic way. Further work is also required to inform a pilot data exchange including identifying the data needs of governments at both a technical and policy level.

The Department recommends engagement with existing transport data forums such as the Australian Transport Data Action Network and the National Freight Data Hub (being developed over the next two years). These mechanisms can provide valuable insights on access to transport data and mechanisms to share data.

The Department also supports road safety as the priority use case for a pilot data exchange with industry. Sharing and reporting of traffic safety events such as crashes or near misses

could assist in warning occupants about dangerous road conditions. In addition to the safety use case, the Department also considers that vehicle generated data could help inform government decision-making on infrastructure investment and planning, maintenance and network operations. Therefore, we recommend the NTC consider these use cases as it progresses this work.

The Department also considers consumer acceptance as a key enabler of government access to vehicle generated data. In designing pilot exchanges, ways to build consumer confidence in the benefit of sharing vehicle generated data should also be considered. For example, a use case such as Intelligent Speed Adaption – an advanced driver assistance system that provided real time data about speed limits to drivers could demonstrate the tangible benefits of exchanging vehicle data to consumers.

In developing any such pilot data exchange between industry and government, the security of the data collection and storage must not be compromised. Early discussions between government and industry on security needs will help ensure that all access points to vehicle generated data are protected, secure and adhere to Australian privacy laws.

Past consideration of Automatic Crash Notification and recent emergency call service upgrades

The discussion paper proposes that the Australian Government and the Australasian New Car Assessment Program consider the costs, benefits and system requirements to require vehicles to have an Automatic Crash Notification (ACN) capability, similar to the European *eCall* system. This is proposed on the basis that ACN may be a stepping-stone to vehicle connectivity.

There are a number of challenges to implementing ACN systems in Australia including high deployment costs, variable network coverage (particularly on regional roads) and compatibility issues with telecommunications systems. While these challenges remain for ACN deployment, the Department is currently implementing arrangements to support Advanced Mobile Location (AML) for mobile phones in Australia.

AML allows emergency services to locate the position of a mobile device calling Triple Zero with much higher precision. The technical feasibility of AML to support widespread ACN in Australia requires further analysis. Understanding this technical feasibility would be a useful first step towards achieving the safety benefits of ACN. The Department will consider ACN amongst other technologies to improve the safety of Australian roads as part of its work underway on preparing a new National Road Safety Strategy for 2021-2030.

Australian Design Rules as a potential next step

The NTC propose that ACN capability could be made mandatory in new vehicles through the Australian Design Rules (ADRs) and related regulatory changes in state and territory rules as a measure to increase connectivity of the Australian vehicle fleet. Regulatory intervention through an ADR must deliver a net benefit to the Australian community, and be compared against other potential solutions or interventions.

The Department considers it unlikely that the potential data capability and connectivity benefits of ACN would significantly improve the safety business case for introducing an ADR. In the short term, the Department is open to considering an ADR that would set requirements for ACN, and apply to vehicles in which manufacturers have chosen to install the technology. For example, similar arrangements are in place for ADRs that cover items such as towbars.

This would not mandate the integration of ACN in light vehicles but would signal to industry the future expectations of the Department in relation to ACN technology, without placing substantial cost on manufacturers, consumers and infrastructure providers at this point in time. This approach would also be dependent on the technical feasibility of public ACN systems and any required upgrades to the supporting communications infrastructure.

The Department looks forward to continued discussions with the NTC and partners on this project. We view this project as key element of the wider focus on data use to improve government services, transport safety and productivity. The Australian Government is supportive of coordinated government effort on emerging transport technology as set out in the National Policy Framework for Land Transport Technology.