



## ECTRI INPUT

### *“Public Consultation on the evaluation of the Intelligent Transport Systems (ITS) Directive”*

**July 2017**

The European Conference of Transport Research Institutes (ECTRI) is an international non-profit association that was officially founded in April 2003. It is the first attempt to unite the forces of the foremost multimodal transport research centres across Europe and to thereby promote the excellence of European transport research.

Today, it includes 28 major transport research institutes or universities from 21 European countries. Together, they account for more than 4,000 European scientific and research staff in the field of transport. ECTRI as the leading European research association for sustainable and multimodal mobility is committed to provide the scientifically based competence, knowledge and advice to move towards a green, safe, efficient, and inclusive transport for people and goods.

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ECTRI launched its Thematic Groups (TGs) in September 2007 as a means to facilitate exchanges among ECTRI researchers interested in similar research fields and in order to promote joint initiatives and positions.

The **Thematic Group on Traffic Management** is composed of 21 experts from 17 institutes, including 16 from ECTRI & TUC<sup>1</sup>. The scope of this TG is traffic modelling, traffic control, communication and positioning technologies; and cooperative systems. The ECTRI Members are: AIT, BAST, CDV, CENIT, DEUSTO, DLR, FhG, HIT, IFSTTAR, TRL, UNEW, UNIZA, UPM, UVEG, VGTU and VTI.

TG Traffic Management have attentively followed the implementation of the ITS Directive and Action Plan and have provide inputs to the questions raised on the Public Consultation on the provision of EU-wide multimodal travel information services under the ITS Directive 2010/40/EU<sup>2</sup> in September 2016. Following up on previous contributions, the TG Traffic Management would like to provide some inputs to the questions raised on the evaluation of the Intelligent Transport Systems (ITS) Directive (Directive 2010/40/EU).

For more information on their contribution, please consult **[ECTRI Traffic Management Thematic Group webpage](#)**.

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## **Objective of the consultation**

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With this public consultation, the European Commission is inviting all interested stakeholders to express their opinion on the general functioning of the Directive and the need for continued EU action in this field. Relevant aspects of the Action Plan and of standards and non-binding measures to facilitate the deployment of ITS in road transport will also be addressed.

The evaluation will provide an up-to-date overview of the implementation the Directive and of the benefits and costs created. It will also assess if the current scope is still relevant and in line with technological developments and other EU policy.

The evaluation will cover the full scope of the Directive, including the delegated acts adopted under the Directive, the Directive's working programme and guidelines for reporting, and the functioning of the ITS Committee and ITS Advisory Group. The evaluation will also take into consideration relevant aspects of the Action Plan and of standards and non-binding measures to facilitate the deployment of ITS in road transport.

Based on the evaluation, it will be determined if improvements to the Directive are necessary, which would then provide the basis for a possible impact assessment for revision of the Directive.

Consultation page: [https://ec.europa.eu/transport/themes/its/consultations/2017-evaluation-its-directive\\_en](https://ec.europa.eu/transport/themes/its/consultations/2017-evaluation-its-directive_en)

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<sup>1</sup> Under a cooperation agreement with HIT

<sup>2</sup> **ECTRI answer to the EC PUBLIC CONSULTATION on the EUROPEAN C-ITS INITIATIVE – September 2016**

## A. Information about the respondent

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### 1. Are you replying as / on behalf of

An association

### 2. Please provide, if applicable, the name of the entity on whose behalf you are replying

ECTRI, the European Conference of Transport Research Institutes, is the leading European research association for sustainable and multimodal mobility. It is an international non-profit association that was officially founded in April 2003. It is the first attempt to unite the forces of the foremost multimodal transport research centres across Europe and to thereby promote the excellence of European transport research. Today, it includes 28 major transport research institutes or universities from 21 European countries.

### 3. Is the entity on whose behalf you are replying registered in the EU Transparency Register?

Yes

#### 3.a. If so, please indicate the registration number in the Transparency Register

54191854341-51

### 4. Please provide your first name

Wolfgang

### 5. Please provide your last name

Ponweiser

### 6. Please specify your country of residence

Austria

### 7. Please specify which interests you (the organisation on behalf of which you respond) represent:

Research/Academia/Consultancies

### 8. What is the size of the organisation on behalf of which you respond?

Micro (1-9 employees)

### 9. In addition to this general consultation, targeted follow-up will be organised with key professional stakeholders on certain topics. If you are a professional stakeholder would you be interested in participating in this targeted consultation?

Yes

## B. General questionnaire

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"Intelligent Transport Systems" means applying Information and Communication Technologies (ICT) to transport. ITS applications and services can be very diverse, including e.g. journey planners, travel information services, intelligent message signs and traffic lights, safety applications (automatic 112 calls, advanced cruise control), traffic management and more.

**1. In a personal context, please tell us about your use of intelligent transport systems (for instance which ones do you use, how frequently and why?)**

Personally, I use real time information of public transport and road transport conditions. At the public transport side I use web pages, smartphone apps and road/station side displays on a daily basis. For individual motorized transport I use in-car navigation devices as well as web based services for actual traffic conditions and route planning.

**2. In a personal context, do you have reasons for not making use of (some) intelligent transport systems, even if they are available?**

The systems are not easy to use/access

**2.a. Please elaborate**

In many cases the information and services are mainly designed from a provider perspective. Optimal usage in terms of seamless integration in my daily practise and other information channels (like calendar, clock, ...) are time consuming and require a lot of experience - you have to get familiar - are not 'self-explaining'. Even if the single tool or app is easy to handle, the integration with other tools/apps/.. is difficult and usually error prone.

**3. From your point of view, how does the availability and use of intelligent transport systems impact the following objectives at present?**

|  | Very positive | Positive | Neutral | Negative | Very negative | No opinion/I don't know |
|--|---------------|----------|---------|----------|---------------|-------------------------|
| Improving the functioning of the transport system          | ●             |          |         |          |               |                         |
| Increasing road safety                                     |               | ●        |         |          |               |                         |
| Improving accessibility (ease of reaching destinations)    | ●             |          |         |          |               |                         |
| Improving integration between different modes of transport |               | ●        |         |          |               |                         |
| Reducing pollutant and CO2 emissions                       |               |          | ●       |          |               |                         |
| Reducing congestion  |               | ●        |         |          |               |                         |
| Increasing employment in the EU                            |               | ●        |         |          |               |                         |

|                                      |  |   |  |  |  |  |
|--------------------------------------|--|---|--|--|--|--|
| Increasing competitiveness of the EU |  | ● |  |  |  |  |
|--------------------------------------|--|---|--|--|--|--|

**4. The availability and use of more advanced intelligent transport systems is expected to increase over time. From your point of view, how will this impact the following objectives in the future?**

|  | Very positive | Positive | Neutral | Negative | Very negative | No opinion/I don't know |
|--|---------------|----------|---------|----------|---------------|-------------------------|
| Improving the functioning of the transport system          | ●             |          |         |          |               |                         |
| Increasing road safety                                     |               | ●        |         |          |               |                         |
| Improving accessibility (ease of reaching destinations)    | ●             |          |         |          |               |                         |
| Improving integration between different modes of transport | ●             |          |         |          |               |                         |
| Reducing pollutant and CO2 emissions                       |               | ●        |         |          |               |                         |
| Reducing congestion  | ●             |          |         |          |               |                         |
| Increasing employment in the EU                            |               | ●        |         |          |               |                         |
| Increasing competitiveness of the EU                       |               | ●        |         |          |               |                         |

The ITS Action plan (COM(2008)886 final) and the ITS Directive (Directive 2010/40/EU) were adopted to accelerate and coordinate the deployment of ITS in road transport, including interfaces with other transport modes. The ITS Directive establishes the legal framework in support of the coordinated and coherent deployment and use of Intelligent Transport Systems (ITS) within the Union, in particular across borders.

**5. How familiar are you with intelligent transport systems?**

Very familiar

**6. How familiar are you with the ITS Directive and the EU actions to support the deployment of intelligent transport systems?**

Very familiar

To ensure a coordinated and effective deployment of ITS within the Union, the ITS Directive defines the following four priority areas for the development and use of specifications and standards:

- Optimal use of road, traffic and travel data
- Continuity of traffic and freight management ITS services
- ITS road safety and security applications
- Linking the vehicle with the transport infrastructure

**7. Please rephrase the question as such: "From your point of view, how important is further action in these areas?"**

|   | Very positive | Positive | Neutral | Negative | Very negative | No opinion/I don't know |
|---|---------------|----------|---------|----------|---------------|-------------------------|
| Optimal use of road, traffic and travel data              |               | •        |         |          |               |                         |
| Continuity of traffic and freight management ITS services | •             |          |         |          |               |                         |
| ITS road safety and security applications                 | •             |          |         |          |               |                         |
| Linking the vehicle with the transport infrastructure     | •             |          |         |          |               |                         |

**8. From your point of view, how important is further EU action under the ITS Directive in these areas?**

|   | Very positive | Positive | Neutral | Negative | Very negative | No opinion/I don't know |
|---|---------------|----------|---------|----------|---------------|-------------------------|
| Optimal use of road, traffic and travel data              | •             |          |         |          |               |                         |
| Continuity of traffic and freight management ITS services |               | •        |         |          |               |                         |
| ITS road safety and security applications                 | •             |          |         |          |               |                         |
| Linking the vehicle with the transport infrastructure     |               | •        |         |          |               |                         |

**9. Please elaborate on your answer to the previous two questions. Should any priority areas for ITS be changed, removed or added?**

Besides basic and voluntary (optional) data exchange between the vehicles, the infrastructure and the user it becomes important that focus is spend on such information exchange that provides societal benefit. This can happen by a) creating standards and simple to use guidelines for data exchange (technical, legal and organizational), b) creating the framework for according business cases and c) by setting up strict rules and regulations.

**10. From your point of view, how important are the following EU actions to support the deployment of continuous and interoperable intelligent transport systems?**

|  | Very positive | Positive | Neutral | Negative | Very negative | No opinion/I don't know |
|--|---------------|----------|---------|----------|---------------|-------------------------|
| Providing a strategic framework (e.g. the ITS action plan)   |               | •        |         |          |               |                         |
| Providing a general legal framework (e.g. the ITS Directive)                                       | •             |          |         |          |               |                         |
| Providing a coordination and governance framework (defining roles, responsibilities and platforms) | •             |          |         |          |               |                         |
| Facilitating communication & cooperation between stakeholders                                      |               | •        |         |          |               |                         |
| Providing funding for development and deployment of intelligent transport systems                  | •             |          |         |          |               |                         |
| Adopting guidance and other non-binding measures   |               | •        |         |          |               |                         |
| Developing standards for interoperability  |               | •        |         |          |               |                         |

|   |   |  |  |  |  |  |
|---|---|--|--|--|--|--|
| and continuity  |   |  |  |  |  |  |
| Adopting legally binding specifications for interoperability and continuity | ● |  |  |  |  |  |
| Other   |   |  |  |  |  |  |

**11. From your point of view, how have the following EU actions impacted the deployment of continuous and interoperable intelligent transport systems until now?**

|  | Very positive | Positive | Neutral | Negative | Very negative | No opinion/I don't know |
|--|---------------|----------|---------|----------|---------------|-------------------------|
| Providing a strategic framework (e.g. the ITS action plan)   | ●             |          |         |          |               |                         |
| Providing a general legal framework (e.g. the ITS Directive)                                       |               | ●        |         |          |               |                         |
| Providing a coordination and governance framework (defining roles, responsibilities and platforms) |               |          | ●       |          |               |                         |
| Facilitating communication & cooperation between stakeholders                                      |               | ●        |         |          |               |                         |
| Providing funding for development and deployment of intelligent transport systems                  |               | ●        |         |          |               |                         |
| Adopting guidance and other non-binding measures   |               |          | ●       |          |               |                         |
| Developing standards for interoperability and continuity   |               | ●        |         |          |               |                         |

|   |  |  |   |  |  |  |
|---|--|--|---|--|--|--|
| Adopting legally binding specifications for interoperability and continuity |  |  | • |  |  |  |
|---|--|--|---|--|--|--|

**12. From your point of view, could the objectives of the Directive have been better accomplished through further action at national and local level and only non-legislative tools at EU level (i.e. without the ITS Directive)?**

Maybe

**13. From your point of view, could the objectives of the Directive have been better accomplished through further action at international level and only non-legislative tools at EU level (i.e. without the ITS Directive)?**

Quite likely

**14. Please explain your answer to the previous two questions**

As ITS rely on technology and technology development is too expensive to consider national and local regulations. Hence an international solution has to be found. This solution has to consider several, sometimes contradicting challenges like seamless, efficient and low energy (low emission) transport as well as competitiveness.

**15. Do you have any general comment on the functioning and/or impact of the ITS Directive (or intelligent transport systems in general) that you would like to share?**

The key for achieving both seamless/efficient/safe mobility and leadership of European industry is to early set out a clear legal framework that ensures the goal achievement for the social challenges and provides the economy a reliable framework for their developments as well as national and local authorities’ reliability for their investments.

### C. Detailed questionnaire

This section of the consultation is open to all participants but seeks particularly expert views and more detailed, technical input from key stakeholders.

In Annex I of the ITS Directive, a number of priority areas and actions are set out. The ITS Action Plan has set out a list of similar action areas. The aim of the following question is to identify if the objectives of the actions have been met in an effective manner.

The description of the actions has been shortened to improve readability; the full description can be found in Annex I of the ITS Directive. Additional actions included from section 6 of the Action Plan are indicated by (AP).

**1. From your point of view, have the objectives of the following actions been met in an effective manner (multiple answers possible)?**

|   | Yes      | Yes, but slower than expected | Yes, but not completing the full scope / limited ambition | No | No Opinion / I Don't know |
|---|----------|-------------------------------|---|----|---------------------------|
| Definition of requirements for EU-wide multimodal travel information services                                       |          |                               | <b>√</b>  |    |                           |
| Definition of requirements for EU-wide real-time traffic information services                                       |          |                               | <b>√</b>  |    |                           |
| Definition of requirements for the collection and provision of road and traffic data                                |          |                               | <b>√</b>  |    |                           |
| Definition of requirements for data used for digital maps   |          |                               | <b>√</b>  |    |                           |
| Definition of requirements for road safety related universal traffic information                                    |          |                               | <b>√</b>  |    |                           |
| Promoting development of national multimodal door-to-door journey planners (AP)                                     |          | <b>√</b>                      |   |    |                           |
| Developing an EU ITS Framework Architecture   | <b>√</b> |                               |   |    |                           |
| Definition of minimum necessary requirements for continuity of ITS services, in particular cross-border (passenger) | <b>√</b> |                               |   |    |                           |

|   |   |   |   |  |   |
|---|---|---|---|--|---|
| Definition of minimum necessary requirements for continuity of ITS services, in particular cross-border (freight) |   |   | ✓ |  |   |
| Measures for realizing ITS for freight transport logistics (e-freight)  |   |   | ✓ |  |   |
| Interfaces between urban and EU ITS architectures   |   |   | ✓ |  |   |
| Interoperability of electronic road toll systems (AP)   | ✓ |   |   |  |   |
| Measures for the harmonised provision of an interoperable EU-wide eCall   |   | ✓ |   |  |   |
| Measures for information services for safe and secure truck parking   | ✓ |   |   |  |   |
| Measures for reservation services for safe and secure truck parking   |   |   | ✓ |  |   |
| Measures to support road user safety with respect to on-board Human-machine Interface                             |   |   | ✓ |  |   |
| Measures to support security of in-vehicle communications   |   |   |   |  | ✓ |
| Measures to improve safety and comfort of vulnerable road users   |   |   | ✓ |  |   |

|  |   |  |   |  |   |
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| Measures to integrate advanced driver support information systems into vehicles and road infrastructure      | ✓ |  |   |  |   |
| Measures to integrate ITS on an open in-vehicle platform   | ✓ |  |   |  |   |
| Measures to progress the development and implementation of cooperative systems                               |   |  | ✓ |  |   |
| Mandating European Standardization Organisations to develop harmonised standards for ITS implementation (AP) |   |  | ✓ |  |   |
| Addressing security and data protection aspects in handling of data in ITS applications (AP)                 |   |  | ✓ |  |   |
| Addressing liability issues pertaining to the use of ITS applications (AP)                                   |   |  | ✓ |  |   |
| Developing a decision-support toolkit for investment decisions in ITS (AP)                                   |   |  |   |  | ✓ |
| Developing guidelines for the public funding of ITS from EU and national                                     |   |  |   |  | ✓ |

|   |   |  |  |  |  |
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| sources (AP)  |   |  |  |  |  |
| Setting up an ITS collaboration platform for ITS in urban mobility (AP) | √ |  |  |  |  |

**2. Please elaborate on your answers to the previous question.**

The major reason that a lot of these objectives still need completion is the implementation step required. The fragmented development and implementation character of ITS is still not solved.

**3. Are relevant actions currently missing in the scope of the ITS Directive and ITS Action Plan? Please elaborate.**

It is unclear, how (transnational) private data provider have to be incorporated by the data access structure of national access points. Furthermore, regulations regarding the multi-modal integration are missing.

The Commission has adopted four delegated regulations under the ITS Directive:

- (EU) No 305/2013 on eCall, followed by Decision No 585/2014/EU on the deployment of eCall
- (EU) No 885/2013 on road-safety related minimum universal traffic information
- (EU) No 886/2013 on information services for safe and secure parking places
- (EU) No 962/2015 on EU-wide real time traffic information services

**4. Do you agree with the following statements related to the delegated regulation No 305/2013 on eCall?**

|  | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly Disagree | No Opinion / I Don't know |
|--|----------------|-------|----------------------------|----------|-------------------|---------------------------|
| The delegated regulation is an effective instrument for achieving its goals                              | ●              |       |                            |          |                   |                           |
| The delegated regulation is sufficiently specific and detailed to ensure compatibility, interoperability |                |       | ●                          |          |                   |                           |

|  |  |   |   |  |  |  |
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| and continuity for deployment and operational use of ITS   |  |   |   |  |  |  |
| The delegated regulation is still relevant (e.g. considering ongoing technological and policy development) |  |   | • |  |  |  |
| Decision No 585/2014/EU on the deployment of eCall provides added value to the delegated regulation        |  | • |   |  |  |  |
| The development of the delegated act was a cooperative and inclusive process                               |  |   | • |  |  |  |
| The implementation of the delegated act is a cooperative and inclusive process                             |  |   | • |  |  |  |

**5. Please elaborate on your answers to the previous question.**

The implementation of eCall came too late after the technical development of the system. The necessary "wave" that was needed for a speedy implementation had passed before the specifications were sufficient. Deployment is coming too late.

**6. Do you agree with the following statements related to the delegated regulation (EU) No 885/2013 on road-safety related minimum universal traffic information?**

|  |                |       |                            |          |                   |                           |
|--|----------------|-------|----------------------------|----------|-------------------|---------------------------|
|  | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly Disagree | No Opinion / I Don't know |
|--|----------------|-------|----------------------------|----------|-------------------|---------------------------|

|   |  |   |   |  |  |   |
|---|--|---|---|--|--|---|
| The delegated regulation is an <b>effective</b> instrument for achieving its goals  |  | • |   |  |  |   |
| The delegated regulation is sufficiently specific and detailed to ensure compatibility, interoperability and continuity for deployment and operational use of ITS |  | • |   |  |  |   |
| The delegated regulation is still <b>relevant</b> (e.g. considering ongoing technological and policy development  |  | • |   |  |  |   |
| Decision No 585/2014/EU on the deployment of eCall provides <b>added value</b> to the delegated regulation  |  |   |   |  |  |   |
| The <b>development</b> of the delegated act was a cooperative and inclusive process   |  |   |   |  |  | • |
| The implementation of the delegated act is a <b>cooperative and inclusive process</b>   |  |   | • |  |  |   |

**7. Please elaborate on your answers to the previous question.**

The regulation is effective, however implementation was performed at various degrees. Collection and analyses of data still needs work. Quality versus quantity should be prioritized.

**8. Do you agree with the following statements related to the delegated regulation (EU) No 886/2013 on information services for safe and secure parking places?**

|   | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly Disagree | No Opinion / I Don't know |
|---|----------------|-------|----------------------------|----------|-------------------|---------------------------|
| The delegated regulation is an <b>effective</b> instrument for achieving its goals  |                |       |                            |          |                   |                           |
| The delegated regulation is sufficiently specific and detailed to ensure compatibility, interoperability and continuity for deployment and operational use of ITS |                |       |                            |          |                   |                           |
| The delegated regulation is still <b>relevant</b> (e.g. considering ongoing technological and policy development)   |                |       |                            |          |                   |                           |
| Decision No 585/2014/EU on the deployment of eCall provides <b>added value</b> to the delegated regulation  |                |       |                            |          |                   |                           |
| The <b>development</b> of the delegated act was a <b>cooperative and inclusive process</b>  |                |       |                            |          |                   |                           |

|   |  |  |  |  |  |  |
|---|--|--|--|--|--|--|
| The implementation of the delegated act is a <b>cooperative and inclusive process</b> |  |  |  |  |  |  |
|---|--|--|--|--|--|--|

**9. Please elaborate on your answers to the previous question.**

**10. Do you agree with the following statements related to the delegated regulation (EU) No 962/2015 on EU-wide real time traffic information services?**

|   | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly Disagree | No Opinion / I Don't know |
|---|----------------|-------|----------------------------|----------|-------------------|---------------------------|
| The delegated regulation is an <b>effective</b> instrument for achieving its goals  |                | ●     |                            |          |                   |                           |
| The delegated regulation is sufficiently specific and detailed to ensure compatibility, interoperability and continuity for deployment and operational use of ITS |                | ●     |                            |          |                   |                           |
| The delegated regulation is still <b>relevant</b> (e.g. considering ongoing technological and policy development)   | ●              |       |                            |          |                   |                           |
| Decision No 585/2014/EU   |                |       |                            |          |                   | ●                         |

|  |   |   |  |  |  |  |
|--|---|---|--|--|--|--|
| on the deployment of eCall provides <b>added value</b> to the delegated regulation           |   |   |  |  |  |  |
| The <b>development</b> of the delegated act was a <b>cooperative and inclusive process</b>   | • |   |  |  |  |  |
| The <b>implementation</b> of the delegated act is a <b>cooperative and inclusive process</b> |   | • |  |  |  |  |

**11. Please elaborate on your answers to the previous question.**

Although the delegated regulation was a big step forward, further actions to improve and speed up the implementation of especially -EU-wide- real time traffic information services need to be performed. One topic not efficiently addressed is the harmonization of the access between public and private data provider.

**12. Do you have any additional comments regarding this consultation questionnaire? Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report. You may also upload relevant files below.**

In order to support the research and development of novel ITS solutions (which is the motor of the European economy) the according community needs simplified access to available data and ITS implementations. This enables further improvements in technical as well as organisational domains and will be the step to ITS 2.0.

**Contact**

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