

Paris, le 16 juin 2010

Memorandum of ATEC-ITS France Working Group on “Proposal for a Directive of the European Parliament and of the Council laying down the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other transport modes”

ATEC- ITS France is the French forum fully dedicated to the development and the promotion of Intelligent Transport Systems. ITS France’s aim is to set up a strategic and shared vision of ITS development in France, and to secure its integration in the European frame.

The purpose of the Working Group initiated by ATEC-ITS France is to analyse and comment the provisions of the proposed Directive and associated Action Plan.

WG Members represent key actors in the field of Intelligent Transport Systems (ITS) in France:

- Toll road operators: ASFA (French Toll Highways Association)
- National road network: MEEDDM (Ministry of Transport), SETRA (Technical Institute for Roads)
- Local road network: ADF (French Departments Association)
- Car manufacturers: Renault, PSA,
- Companies of road transport of goods: TLF (French Federation of Transport and Logistics Companies)
- ITS experts: Algoe, Logma, AFNOR standardization CGIT group

The memorandum provides the official position of French ITS stakeholders on the proposed Directive and associated Action plan.

This Memorandum is for the benefit of elected representatives at the French Parliament and of French representatives at the European Parliament.

This document also provides guidelines for ITS French actors in elaborating strategic plans for the development of ITS services in the near future.

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ITS France stakeholders consider that development of Intelligent Transport Systems in line with the recommendations of the Directive is essential to develop the sustainable mobility of persons and goods, to limit the emission of GHG, to control consumption of fossil fuels and to create a real interoperability of transport systems within the Member States. This development shall take into consideration the existing systems in Member States (MS) and more specifically the outputs of EASYWAY Project, in which French actors are highly involved.

Furthermore, department-level public authorities, which are now major road operators in France, shall be closely associated to the development of the European and French action plans supported by the proposed Directive.

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Priority Areas and Actions as referred to in Article 1a and 1b of the Directive have been reviewed and commented.

1- Optimal use of road, traffic and travel data

French Toll Highways Association (ASFA) agrees that harmonized development of ITS, using high quality traffic data and interoperable ITS, will provide road users with more reliable information on infrastructure availability and will therefore improve road safety. However, a technological approach in developing new systems for road users is not sufficient. It is also necessary to take into consideration the following aspects:

- A full quality control of traffic data information
- An economic model of new information services which take into consideration the cost of collecting and qualifying traffic data and the amount to be paid by the road user who will benefit from those added -value services.

Public road authorities at local level share above ASFA concern regarding the economic model and recall that the European association POLIS has proposed that this responsibility be supported by each MS within its own national action plan

MEEDM, the State level Road Authority in France, shares this position: travel data delivered to road users shall be accurate and reliable and associated costs to produce those data must be supported by the end user

2- Continuity of traffic and freight management ITS services

While fully supporting the Commission's initiative, ITS France Working Group recommends that the action plan on this matter be based on user needs rather than on technological requirements. This specific plan must be intermodal, international and shall be in coherence with other Directives of the European Commission on telematic issues.

An European program called « Opérateur Economique Agréé » (OEA), initiated in 2008, has already implemented new specifications in terms of safety/security which are now mandatory for cross-border sales operations. "Fédération des Entreprises de Transport et Logistique de France" (TLF) requests that above organizational rules be taken into account while developing the action plan.

ITS France Working Group is also reminding the important work made in France to develop multimodal information for road and public transport users. This six years-long effort has been carried out within a framework project, called PREDIM funded by the MEEDDM

3- ITS road safety and security applications

Highways operators are favourable to the development of secured parking lots to meet the objectives of road safety and safety of the goods.

Highways operators will be able to supply real-time information on the availability of parking places by means of variable message panels and via a dedicated web site (who will inform about the availability of parking places for heavy trucks on the network of secure parking lots).

To meet the objectives of improvement of the safety/security on highways, operators have recently implemented, and plan to strengthen, dynamic systems for management of traffic such as: dynamic regulation of speed, regulation of access, dynamic control of traffic ban to Heavy Trucks, information about weather conditions along the route.

Concerning the use of nomadic devices in motor vehicles, the Working Group considers that priority shall be given to the application of ESOP by the manufacturers of such nomadic devices.

The car manufacturers consider that, prior to any European regulation on this subject, it is necessary to conduct research on HMI and develop required standards.

In particular, car manufacturers do not favour regulatory measures in advanced car driving systems until various experimental solutions have been tested and market has selected best solutions.

With regards to the safety of vulnerable road users, working group recommends that new systems take also into consideration the improvement of operator's personnel safety when working on the infrastructure under traffic.

4- Linking the vehicle with the transport infrastructure

This domain concerns the on-board platforms and the development of the cooperative systems vehicle / infrastructure and vehicle / vehicle.

L' Assemblée des Départements de France (French Departments Association) reminds that the development of this type of systems relies on close cooperation between car industry and infrastructure owners / operators. They consider as indispensable that the definition of the aforementioned systems be made in common under a model of governance that must be defined by public and private partners.

ASFA shares the position of Departments' authorities and asks for new systems to be developed from intelligent real time traffic management systems which already exist on highways and on large cities road networks.

Generalization of Vehicle to Infrastructure communications and vice versa will develop driver assistance systems by completing existing systems with variable message panels in the car (real-time road information as incident announcements) and with on-board emergency call support services. In addition, moving vehicles will work as real time sensors of traffic conditions and these data will complement the system.

Quality control must be present in the whole data processing chain and, in this respect, regulations issued by public authorities to road operators must be widened to the new private actors of road information.

Concerning more specifically the questions of standardization:

The working group underlines that it is essential to first define the objectives of the new project and estimate its operational aspects with regards to organizations as well as with the administrative and commercial constraints.

Only at the end of this phase, one can develop Technical Specifications. This approach implies that from the beginning, all actors of " the ITS eco-system " be involved in the project.

The current version of the Action Plan and of the Directive reflects the erroneous approach followed by the Commission during the process of Electronic Toll and E-call European projects.

This remark applies also to the universal « On Board Unit » for motor vehicles for which car manufacturers do not believe that a single technological solution will be compatible with the large variety of services. Therefore, services to be provided must be functionally specified prior to issuing technical specifications and recommending technological solutions.

The implementation of the ideas which have just been exposed supposes to define at first the actors, the services, and the links between them (functional specifications). From there, it is advisable:

- To define the objectives of interoperability and continuity, by taking into account in particular the compatibility with the existing systems
- To specify deployment scenarii
- To develop , when required, new Standards thanks to specific mandates given to CEN by the EuropeanCommission

For those new services where functionalities are still to be clarified, it is advisable to conduct field tests prior to entering into Technical Specifications and eventually Standardization processes.

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In conclusion :

For an effective implementation of the proposed Directive and its associated Action Plan, ATEC-ITS France Working Group suggests:

- Not to stop financing field tests
- Use EASYWAY project as an European platform to deploy and share experiences

ATEC-ITS France Working Group reminds the following essential points:

- The Directive shall allow development of new systems and associated services to be based on, and compatible with, existing systems in Member States (MS),
- The Directive shall give priority to the analysis of organizational and functional aspects of the project prior to the development of Technical Specifications and Standards. All ITS stakeholders must be involved from the beginning,
- The Directive has to emphasize the quality requirements to be respected by all parties involved in production of road data for user information. In particular, realistic economic models must be used in order to provide quality road users information
- Commission shall insure that the new committee established by this Directive works in coherence with other committees set up by Directive 1995/46 on the protection of individuals with regard to the processing of personal data, Directive 1998/34 on Standards, Directive 2003/98 on the re-use of public sector information public data, Directive 2004/52 on the interoperability of electronic toll road systems in the Community and Directive 2007/46 on motor vehicles approval.

ATEC - ITS France is a professional association dedicated to the development of new techniques in traffic, environment and transport domains. Members are coming from complementary horizons: government agencies, private and semi public sector, local authorities and research organizations. They bring their experience in the development of sustainable urban and interurban transport systems. Thanks to the skills of its expert members in traffic and transport field, ATEC aims to achieve complementary objectives:

- Manage an information, exchange and experimentation network between professionals.
- Draw up the state-of-the art, improve knowledge and promote new techniques.
- Promote equipment, systems and services developed by association members.
- Facilitate the dialogue between industry, local authorities, transport operators, organizing authorities and also the research community.