

Open Letter to the Council

Europe should avoid a false start on C-ITS: industry calls for Council to object the rushed adoption of the Delegated Act

Brussels, 24 June 2019 – As the Council of the European Union prepares to decide on the Delegated Regulation on Cooperative Intelligent Transport Systems (C-ITS), we call upon Member States to formally object to the current version of the Delegated Act. The proposed Regulation fails to ensure technology-neutrality, ignoring that newer technologies have emerged in recent years, offering unique capabilities to accelerate the market penetration of C-ITS and to deliver enhanced safety in a global ecosystem. Moreover, the significant concerns raised by the Council Legal Service on the lawfulness of certain provisions of the Regulation cannot be ignored.

The Delegated Regulation is a significant opportunity to ensure that driving becomes a safer and smarter experience for all road users – including cyclists and pedestrians – while fostering innovation in both the automotive and ICT sectors. Only a technology-neutral, innovation-friendly approach can deliver upon these goals by allowing unhindered market access for the most advanced global standards.

For this reason, we call upon the Council to request the Commission to revise the Delegated Regulation swiftly and make it technology neutral. European industry leaders should be able to deploy the latest available technology, Cellular-Vehicle-to-Everything (C-V2X). We therefore believe that Member States should formally object to the current version of the Delegated Act.

Markets and technologies are ready. Europe should be too

We believe that automakers should be empowered to choose the best and most future-proof technologies. An increasing number of automotive companies and world regions are already switching from older Wi-Fi-technology to C-V2X. In China, 14 OEMs have announced the roll-out of C-V2X as early as 2021.¹ Other global automotive players have committed to deploy e.g. in all new U.S. vehicle models starting in 2022², while previously announced DSRC deployment (Dedicated Short-Range Communication) have been “paused”³ for an indefinite period. In Europe, the RED certification of a C-V2X technology platform is yet another example of its maturity and commercial readiness⁴. Considering the current global context and developments, Europe risks isolating its automotive industry due to a technology lock-in.

The Delegated Regulation, at present, only makes superficial references to technologies other than the old Wi-Fi standard 802.11p. Despite claims that integration of new entrants would be allowed, national experts state that its review clause *de facto* excludes other mature technologies by burdening them with discriminatory conditions. If we limit new technologies by mandating their interoperability and compatibility with the old 802.11p devices, this condition would effectively block any innovative

¹ Announcement made during Shanghai Motor Show (15 April, 2019) by the following OEMs: SAIC Motor, FAW, Dongfeng, Changan, BAIC Motor, GAC, Geely, BYD, Great Wall, JAC Motor, Southeast, Zotye, Jiangling, Yutong.

² <https://medium.com/@ford/how-talking-and-listening-vehicles-could-make-roads-safer-cities-better-f215c68f376f>

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<https://static1.squarespace.com/static/596fb16003596e0fa70a232f/t/5cc36cda0d92970826c3655b/1556311258955/4-26-2019+Toyota+FCC+Comment.pdf>

⁴ <https://www.ficosa.com/news/ficosa-first-global-manufacturer-to-receive-the-european-red-certification-for-c-v2x-technology-from-its-carcom-platform/>

technology for the foreseeable future. In other words, if the current Delegated Regulation comes into force by the end of the year, it will *de facto* mandate Wi-Fi 802.11p as the only technology promoted in Europe.

The dynamic and innovative nature of this technology means that, today, there is no consensus within the automotive industry – or among EU member states – on the technology of choice for the C-ITS deployment. We believe that the European Commission should support the roll-out of both C-V2X and ITS-G5 while ensuring uncompromised safety, rather than picking a technology winner.

C-ITS means more than just cars – we must empower a new ecosystem

Ensuring that today's and tomorrow's European cars connect via cellular technology means empowering the development of a new ecosystem, that connects people and objects for smart mobility. This new ecosystem builds on existing networks, which already today are connecting millions of people. This will facilitate a faster and cheaper evolution and take-up. Network effects will ensure that the more individuals, objects, and networks a car can connect to, the more people can be protected, and the more socio-economic benefits can be gained. This will not be the case if only one technology is mandated.

The Commission's own support study for Impact Assessment on C-ITS (2018) noted that none of the Day 1 services *"are specifically aimed at the safety of pedestrians and cyclists."* Thus, it is surprising that the Delegated Act effectively ignores the significant benefits that C-V2X can offer for these vulnerable road users (VRUs). C-V2X can easily be integrated into smartphones and thereby offer protection to whoever carries a mobile phone, thereby including pedestrians and cyclists that, otherwise, would not have access to those safety services. LTE-V2X – as part of the global telecom standards family – provides an evolution path to 5G. Just as with 802.11p, C-V2X offers a direct short-range communication mode, ensuring that critical services even without 4G/LTE network coverage.

Due process is key to Europe's success

To ensure that the aims of the C-ITS Directive are delivered and that the benefits of all technologies can be used, we call upon the Council to ask the Commission to revise the Delegated Regulation. While not affecting the overall deployment of C-ITS services, this would, in turn, ensure that European innovation leaders are not left behind global peers. At the same time, a revision would also give the opportunity to address the doubts and questions⁵ arising from the assessment by the Council Legal Service.

This Open Letter is supported by:

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⁵ <https://agenceurope.eu/en/bulletin/article/12276/14>



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5GAA is a global cross-industry organisation bringing together 120 companies from the automotive, technology and telecom industries to advance connected & automated mobility. 5GAA includes leading OEMs such as BMW, Daimler, Ford or Groupe PSA who were among the 24 CEOs writing to President Juncker urging for a technology-neutral C-ITS framework in July 2018 (other signatories included Deutsche Telekom, Ericsson, Nokia, Telefonica or Vodafone). See their open letter [here](#).