

AMICE feedback on the Commission's Delegated Regulation relating to the implementation of C-ITS

AMICE welcomes the opportunity to provide feedback on the European Commission's Delegated Regulation relating to the implementation of cooperative intelligent transport systems (C-ITS).

One of the main challenges that could impede the orderly deployment of connected/automated vehicles and therefore, intelligent transport systems, is the access to in-vehicle data.

AMICE considers that a coordinated EU action is necessary in the field of access to in-vehicle data.

One of the ongoing risks is to adopt a fragmented and inconsistent approach that could endanger the principle of legal certainty.

AMICE understands the need to standardize vehicle-to-vehicle transfer of data and does not challenge the proposal in this respect. But it is clear that both regulatory and private initiatives are multiplying without a consistent view. In addition to this draft Delegated Regulation, there is an ongoing revision of the General Safety Regulation which provides for the mandatory installation of event data recorders on board of new vehicles, thereby leading to further data transfer. According to recital 7 of the proposal, "The introduction of event (accident) data recorders storing a range of crucial vehicle data over a short timeframe before, during and after a triggering event (for example, the deployment of an airbag) is a valuable step in obtaining more accurate, in-depth accident data. Motor-vehicles should therefore be required to be equipped with such recorders."

In parallel, manufacturers are also already considering transfers of data generated by vehicles they build for their own account, and at this stage without any standardization.

This situation is worrisome. A privileged access of only some stakeholders, such as car manufacturers and telecommunications operators, would lead to anti-competitive outcomes and distort competition within the EU single market. This issue should be addressed by adopting a coherent framework on this topic.

Therefore, the European Commission should have a global vision and ensure that all service providers can have the same access to that data, communication streams and infrastructure (V2V, V2X, B2G, I2I) in order to be on an equal footing with car manufacturers (or telecommunications operators) in terms of competition. This means direct access free from any interference by vehicle manufacturers (or telecommunications operators), and in accordance with the General Data Protection Regulation. We consider that the data types should be categorized, including a specific category of data of 'public interest' which should be standardized. These measures should be taken to ensure a healthy competitive market for vehicle data-based services, to the benefit of consumers.

About AMICE (Association of Mutual and Cooperative Insurers in Europe)

AMICE is the voice of the mutual and cooperative insurance sector in Europe. The Brussels-based association advocates for appropriate and fair treatment of all mutual and cooperatives insurers in a European Single Market. It also encourages the creation and development of innovative solutions for the benefit of European citizens and society.

Mutual and cooperative insurance follows the principles of solidarity and sustainability and is characterised by customer-membership and a democratic governance. The mutual business model, with its focus on using surpluses for the benefit of its members, is the natural way to provide insurance.

Mutual and cooperative insurers have a market share of more than 30% of the European insurance sector, with more than €420 billion in premiums written and over 410 million policyholders across Europe.