

European Council for Motor Trades and Repairs
Conseil européen du Commerce et de la Réparation Automobiles
Europäischer Verband des Kraftfahrzeuggewerbes



Brussels – 12/12/2016

Insurance, automotive aftermarket, dealers, leasing and consumers coalition says: ACEA/CLEPA position on access to vehicle data jeopardises competition, innovation and consumer choice

The undersigned are united in their concern that consumers' interest are not being placed at the centre of discussions around the possible technical solutions to access in-vehicle data. In addition to undermining free consumer choice, the solution promoted by some stakeholders would also undermine competition, innovation and independent entrepreneurship.

European parts suppliers and vehicle manufacturers recently presented a common technical architecture to access in-vehicle data. This approach would channel all future communication and data access through the vehicle manufacturer's proprietary server. Only part of the data generated would then be sent to a 'neutral server' and be accessible for independent operators. This solution – which would be based on the Extended Vehicle – would not allow direct communication with the vehicle and still grants vehicle manufacturers full control to decide how, when and to whom (mainly aggregated) data access will be granted.

Our broad industry coalition believes this solution undermines vehicle owners' right to decide who they share their data with and for what purposes. We also consider this to be a serious threat to competition, innovation and consumer choice in the digital era. Today, vehicle manufacturers and their partner suppliers now compete on the market for a wide range of vehicle-related services and products (e.g. financial, leasing, insurances, diagnostics, replacement parts etc.) that are increasingly reliant on real time in-vehicle data. In this new digital age, it is not sufficient to only have direct access to the in-vehicle data only through an interoperable *physical* interface - a digital communication lifeline is also needed.

Ensuring safety and security is crucial for the deployment of connected vehicles and we believe that an 'in-vehicle interoperable, standardised, secure and open-access platform' is the right way forward. This solution would ensure the same high level of safety, security, liability and data protection as the vehicle manufacturers' solution, whilst safeguarding competition, innovation and consumer choice. It could be based on the existing vehicle manufacturers' telematics systems and use the highest possible security standards. Many manufacturers allow chosen partners to operate their own systems and applications in their vehicles today, thus showing that safe and secure direct access is possible without interfering with the vehicle's functions.

The undersigned call upon the European Institutions to create a robust regulatory framework for an interoperable, standardised, secure and safe *digital* in-vehicle telematics platform as intended by the eCall Mandate, to maintain true consumer choice, independent entrepreneurship, competition and innovation for all services "around the car".

For more information, please contact Bernard Lycke, Director General
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Background:

On the 1st of December, ACEA and CLEPA issued a joint press release whereby they both promote "Extended Vehicle" (i.e. all communication and data access should be routed through the vehicle manufacturer's external proprietary server) as the only 'safe and secure' option for the future.

Please find the link below:

<http://www.acea.be/press-releases/article/automotive-industry-joins-forces-on-access-to-vehicle-data>

The undersigned Associations:

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CECRA, established in 1983, is the European federation bringing together national professional associations, which represent the interests of motor trade and repair businesses and European Dealer Councils. CECRA represents on a European scale 336,720 motor trade and repair businesses. Together they employ 2.9 million people.