

Public consultation on the revision of the Directive on intelligent transport systems

Fields marked with * are mandatory.

Introduction

“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. These applications are being developed for different transport modes and for interaction between them (including multimodal interchange hubs).

Intelligent Transport Systems (ITS) help to significantly improve road safety, traffic efficiency and comfort, by helping transport users to take the right decisions and adapt to the traffic situation. They also help to increase multimodality options and improve mobility management. Their deployment can make an important contribution to the Commission priorities, in particular the European Green Deal and making Europe fit for the digital age.

Directive 2010/40/EU (The ITS Directive) aims to accelerate and coordinate the deployment and use of ITS applied to road transport and its interfaces with other transport modes. The [evaluation of the Directive](#) concluded that there remains a clear need for further action on interoperability, cooperation and data sharing to enable seamless, continuous ITS services across the EU.

Without further EU action, ITS services will continue to develop in a slow and more fragmented manner, limiting sustainable, inclusive and multimodal mobility of passengers and freight, and will not contribute enough to wider EU policy objectives, in particular the target to reduce greenhouse gas emissions by at least 55% by 2030.

The COVID-19 crisis is significantly impacting transport demand and use. However improving information exchange through further digitalisation remains key to support the recovery of the transport system and will remain essential to address congestion, traffic incidents, air pollution and CO2 emission as mobility demand increases again and the operational capacity of public transport could be constrained.

The European Commission is inviting the public and stakeholders to express their opinion on possible measures and potential impacts of a revision of the ITS Directive. Information received in this consultation will support the Impact Assessment that the European Commission is currently carrying out.

Furthermore, participants to the consultation and particularly stakeholders affected by the provisions of the Directive are invited to share data and factual information on specific aspects of the legislation.

Respondents are welcome to expand on their answers in the text boxes foreseen for this purpose. At the end of the questionnaire, it is also possible to upload supporting evidence documents to complement the contribution.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation

- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Belma

* Surname

YASHAROVA

* Email (this won't be published)

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* Organisation name

255 character(s) maximum

AMICE - Association of Mutual Insurers and Insurance Cooperatives in Europe

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain

- Belize
- Benin
- Bermuda
- Bhutan

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi

- Cambodia

- Cameroon

- Canada
- Cape Verde
- Cayman Islands

- Central African Republic

- Ghana
- Gibraltar
- Greece
- Greenland

- Grenada
- Guadeloupe

- Guam

- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau

- Guyana

- Haiti
- Heard Island and McDonald Islands

- Honduras
- Hong Kong

- Hungary

- Iceland

- India
- Indonesia
- Iran

- Iraq

- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru

- Nepal

- Netherlands
- New Caledonia
- New Zealand
- Nicaragua

- Niger

- Nigeria
- Niue

- Norfolk Island
- Northern Mariana Islands
- North Korea

- North Macedonia
- Norway
- Oman
- Pakistan

- Palau

- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Syria

- Taiwan
- Tajikistan
- Tanzania
- Thailand

- The Gambia

- Timor-Leste
- Togo

- Tokelau
- Tonga

- Trinidad and Tobago
- Tunisia

- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu

- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

Please specify which interests you (the organisation on behalf of which you respond) represent

- National public authorities (transport ministries, agencies)

- Regional or local public authorities
- Road authorities
- Road operators
- (Public) transport operators
- Vehicle and equipment manufacturers/ suppliers
- ITS service providers
- Mobility service providers
- Digital maps providers
- Telecommunications providers
- Research/Academia/Consultancies
- Logistics companies and integrators
- Societal interests and/or consumer rights
- Employees, trade unions and professional organisations
- Other (please specify)

Please specify Other

Trade association representing the interests of mutual and cooperative insurers

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
- No

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your contribution, country of origin and the respondent type profile that you selected will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

Citizens' experience with intelligent transport systems

“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, adaptive cruise control), traffic management and more.

1. How familiar are you with intelligent transport systems, applications and services?

- Very familiar
- Moderately familiar
- Somewhat familiar
- Slightly familiar
- Not at all familiar

2. Do you use intelligent transport systems in the following environments? (multiple answers possible)

	In your own city	In your own country	In another EU country
Travel information services (e.g. navigation systems)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Real-time traffic information (e.g. on traffic jams, accidents, availability of parking)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Journey planner for private transport (walking, cycling, car, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Journey planner for public transport (bus, tram, metro, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Journey planner for multimodal transport (combining several different modes of transport)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reservation systems for shared mobility (e.g. bicycles, scooters, cars)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment / ticketing systems for single transport journeys	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment / ticketing systems for multimodal transport journeys	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Driver support systems such as adaptive cruise control or intelligent speed assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In-car driver information services linked to infrastructure (e.g. traffic lights, road works warnings, vehicle proximity detection)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. Which of the following applies to you when using intelligent transport systems, applications and services? (multiple answers possible)

- They help me navigate to my destination
- They help me choose between different transport or journey alternatives
- They help me plan my schedule or day
- They give me insights in the financial costs of my journey
- They allow me to pay for my journey
- They give me insights in the environmental impact of my journey
- Other (please specify)

4. How do you perceive the quality of intelligent transport systems, applications and services? (multiple answers possible)

- I feel safer when I use them
- I trust the information they give me is accurate
- They are cheap to use
- They are easy to use
- Other (please specify)

5. In case you have difficulties using intelligent transport systems, what are the main underlying reasons? (multiple answers possible)

- I do not know which systems are available in a given situation
- The systems are not easy to use/access
- The systems offer limited added value
- I have concerns about privacy and re-use of my personal data when using the systems
- I have concern about the security of the systems
- Other (please specify)

6. Which measures would help to increase your use of intelligent transport systems, applications and services the most?

at most 3 choice(s)

- Develop systems, applications and services which better fit my needs
- Make intelligent transport systems, applications and services cheaper to buy or use
- Deliver better instructions/support in the use of the systems, applications and services
-

Increase transparency in the business models used by the systems, applications and services

- Provide more information on the IT-security and privacy aspects of the systems, applications and services
- Provide more information on the (environmental, costs, time) benefits of the use of the systems, applications and services
- Improve seamless cross-border functionalities of the systems, applications and services
- Other (please specify)

7. Do you have any general comment on using intelligent transport systems that you would like to share?

1000 character(s) maximum

Detailed questionnaire

The detailed questionnaire is open to all participants, but addresses mainly expert views which require more detailed and technical input.

8. In your view, how relevant is a policy on intelligent transport systems at EU level as established by the ITS Directive to support the uptake of these systems?

- Very relevant
- Relevant
- Not relevant
- No opinion

9. In your view, how successful has the policy on intelligent transport systems at EU level as established by the ITS Directive been to support the uptake of these systems?

- Very successful
- Somewhat successful
- Not successful
- Counterproductive
- No opinion

10. In your view, what is the EU-added value of the ITS Directive in comparison with what could be achieved at Member States national and/or regional level activities?

1000 character(s) maximum

We believe that a coordinated action at EU level rather than at national and/or regional level is necessary in order to achieve a greater harmonisation of the ITS deployment. There is a need for further standardisation and interoperability, as well as the establishment of principles of access to in-vehicle data and a neutral governance. All service providers should have access to that data, communication streams and infrastructure in order to be on an equal footing in terms of competition.

Moreover, the revision of the ITS Directive will foster the cooperation among the various stakeholders in the ecosystem and encourage them to use data to help improve road safety, reduce CO2 emissions, noise and pollutants, optimise energy consumption, remedy congestion and develop more accessible and inclusive mobility.

Problems

The inception impact assessment discusses the main problems the initiative aims to tackle.

11. Please indicate to what extent you agree with the following statements:

	Fully agree	Somewhat agree	Neutral	Somewhat disagree	Completely disagree	No opinion / I don't know
The deployment of ITS infrastructure and services remains geographically limited and is not continuous across borders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is a lack of interoperability and continuity of ITS applications, systems and services at EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is a lack of effective cooperation among stakeholders at EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are unresolved issues related to the availability and sharing of data supporting ITS services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

There is a lack of data standardisation which hinders the successful deployment of ITS services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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12. Do you have any comment on these problems or other potential problems that should be considered?

1000 character(s) maximum

We agree with the Commission's assessment that the deployment of ITS initiatives is slow and fragmented due to a lack of interoperability of solutions; a lack of integration of the various stakeholders and limitations on access to data.

Connected vehicles raise major issues related to car and passenger safety and to data protection. Developing standardized solutions is key to make systems interoperable, flexible and resilient. These standards and common norms will not prevent actors from innovating and will benefit the entire transport sector.

13. From your point of view, how important is further EU action in these areas?

	Very important	Somewhat important	Neutral	Not important	No opinion / I don't know
Optimal use of road, traffic and travel data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Continuity of traffic and freight management ITS services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ITS road safety and security applications	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Linking the vehicle with the transport infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Connected and automated mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mobility platforms (e.g. Mobility as a Service - MaaS)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced traffic management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Priority areas

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

In addition, the Commission has identified a number of new emerging themes that could benefit from further action under the ITS Directive:

- Connected and automated mobility
- Mobility platforms (e.g. Mobility as a Service - MaaS)
- Enhanced traffic management

14. From your point of view, how important is further EU action in these areas?

	Very important	Somewhat important	Neutral	Not important	No opinion / I don't know
Optimal use of road, traffic and travel data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Continuity of traffic and freight management ITS services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ITS road safety and security applications	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Linking the vehicle with the transport infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Connected and automated mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mobility platforms (e.g. Mobility as a Service - MaaS)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced traffic management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15. Please elaborate on your answer to the previous question. Do you consider that any priority areas for ITS should be changed, removed or added?

1000 character(s) maximum

It is important to point out that the revision of the ITS Directive will enable the development of new services related to connected and automated vehicles.

Possible measures

16. The inception impact assessment discusses potential measures to ensure that the specific objectives of the Directive are achieved. In your view, how important is it to include these measures in a possible revision?

Specific objective: increase interoperability and cross-border continuity of ITS applications, systems and services

	Very important	Somewhat important	Neutral	Not important	No opinion / I don't know
Update the priority areas and/or actions (including new ones) for setting specifications	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen provisions for putting on the market and operating ITS components and services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish operation and coordination structures at EU level necessary for ITS deployment across borders (e.g. for a trusted EU C-ITS system)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish mechanisms to ensure interoperability of ITS services in cross-border or multiple operator scenarios	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandate deployment of essential ITS services (with geographical coverages to be determined)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Specific objective: establish effective coordination and monitoring mechanisms between all ITS stakeholders

	Very important	Somewhat important	Neutral	Not important	No opinion / I don't know
Update and streamline reporting obligations including common key performance indicators	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish sustainable coordination mechanisms for national access points and for the deployment of ITS services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve the current interaction with ITS stakeholders provided by the European ITS Advisory Group	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Integrate the existing ITS expert group into the Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Specific objective: solve issues related to the availability and sharing of data which supports ITS services

	Very important	Somewhat important	Neutral	Not important	No opinion / I don't know
Strengthen provisions on the rights and obligations of ITS service providers on fair and non-discriminatory ITS services (for example for MaaS digital service providers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identify access conditions to avoid that mobility platforms such as MaaS are established as closed ecosystems available only to some operators or modes of transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish data sharing and fair reuse mechanisms to ensure the continuity of essential ITS services across the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish terms and conditions or guidelines for the deployment of mobility platforms such as MaaS	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandate provision of a set of data to support the continuity of essential ITS services across the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandate the use of standardised data formats at EU-level for use in ITS services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Update interlinkages with related legislation (e.g. in the area of processing of data, liability, privacy, common European data spaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17. Do you have any comment on these measures or other potential measures to consider?

1000 character(s) maximum

The access to car data is a major topic for the entire value chain of the automotive sector. The Commission should make sure that every actor can have access to these data on a fair and non-discriminatory basis. Technological neutrality is necessary to make this new market competitive. This access to data will enable actors to offer new mobility services (for instance new insurance services) which could improve road safety, gas emissions or quality of life.

Impacts

The Inception Impact Assessment discusses possible impacts of action aimed at accelerating the deployment of intelligent transport systems and their interoperability and cross-border continuity.

18. To what extent do you agree with the following statements on the likely impacts as outlined in the Inception Impact Assessment?

	Fully agree	Somewhat agree	Neutral	Somewhat disagree	Completely disagree	No opinion / I don't know
It will contribute to a more geographically balanced roll-out of ITS across Europe	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will reduce redundant/incompatible systems and increase roll-out speed	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Over time it will reduce overall expenditures of citizens and transport operators due to lower investment and maintenance costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will make the use of ITS services more open, fair and impartial	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will contribute to improved traffic flows	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will lead to less time spent in traffic	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will lead to less energy use and harmful emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will lead to increased road safety	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will lead to improved accessibility of transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will lead to improved integration between different modes of transport	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will contribute to a bigger EU market for intelligent transport systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will improve consumer choice in intelligent transport systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will improve international competitiveness of European industry	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It will have a positive impact on research and innovation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

It will lead to increased sharing of personal data



19. Do you have any comment on these impacts or other potential impacts (not mentioned above) of the possible actions?

1000 character(s) maximum

The revision of the ITS Directive should lead to equal and non-discriminatory access to in-vehicle data and promote innovative solutions for the benefit of consumers. In particular, it is important to safeguard data ownership: data is owned by the customer and not by the manufacturer. The EU legislation must always ensure that it is the customer who decides who is allowed to use his/her data for which purpose and duration.

Relevance of other action at European level

20. To what extent do you agree with following statements?

	Fully agree	Somewhat agree	Neutral	Somewhat disagree	Completely disagree	No opinion / I don't know
The objectives of the revision of the Directive could be better accomplished through non-legislative tools based on guidance or recommendations by the Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The objectives of the revision could be better accomplished through increased funding opportunities from European Union programmes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The objectives of the revision of the Directive could be better accomplished through increased coordination and harmonization with other (non-EU) areas of the world	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Final remarks

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.

1000 character(s) maximum

Please upload any document that provide evidence to support your responses

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Useful links

[The ITS Directive, ITS Action Plan, Delegated Acts \(and accompanying documents, including implementation reports\)](https://ec.europa.eu/transport/themes/its/road/action_plan_en) (https://ec.europa.eu/transport/themes/its/road/action_plan_en)

[Relevant studies \(e.g. supporting the delegated acts\)](https://ec.europa.eu/transport/themes/its/studies/its_en) (https://ec.europa.eu/transport/themes/its/studies/its_en)

[Inception Impact Assessment](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12534-Revision-of-the-Intelligent-Transport-Systems-Directive-) (<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12534-Revision-of-the-Intelligent-Transport-Systems-Directive->)

[Evaluation of Directive 2010/40/EU](https://ec.europa.eu/transport/sites/transport/files/legislation/swd20190368-it-ex-post-evaluation.pdf) (<https://ec.europa.eu/transport/sites/transport/files/legislation/swd20190368-it-ex-post-evaluation.pdf>)

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