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CLEPA Position Paper

Open Telematics Platform

CLEPA welcomes that the European Commission, the European Parliament and the European Council have agreed on an eCall legislation and that legislators recognize the need to assess requirements for an interoperable, standardized, secure and open access platform:

“Following a broad consultation with all relevant stakeholders and a study assessing the costs and benefits, the Commission shall assess the need of requirements for an interoperable, standardized, secure and open-access platform. If appropriate and no later than two years after the entry into force of this Regulation, the Commission shall adopt a legislative initiative based on those requirements.”

(Regulation (EU) 2015/758 of the European Parliament and of the Council of 29 April 2015 concerning type-approval requirements for the deployment of the eCall in-vehicle system based on the 112 service and amending Directive 2007/46/EC)

This recognition will pave the way for telematics applications and services far beyond the scope of the eCall legislation. A multitude of use cases and business models are possible to evolve based on the available in-vehicle data. Consumers (vehicle drivers or owners) must be able to choose between different service providers and control what kind of data is used for what purpose. The In-vehicle architecture shall ensure safe, secure and reliable use.

With regard to current regulation securing aftermarket competition: Consumers (vehicle drivers or owners) must be free to have their vehicle repaired and maintained in a workshop of their choice, either independent or OEM authorized. Fair competition between the Vehicle Manufacturers' distribution network (OES) and Independent Aftermarket network (IAM) and a level playing field between both parties has to be ensured. According to the Motor Vehicle Block Exemption Regulation, independent repairers must have access to all spare parts and parts manufacturers must be able to sell directly to the aftermarket. Furthermore authorized repairers must also have the ability to source spare parts from the supplier of their choice. EUR 5/6 regulation ensures independent operators to have direct access to in-vehicle data, free of charge, in an unmonitored and non-discriminatory way using today's On Board Diagnostics (OBD).

It is in the interest of fair competition and of a level playing field between the different stakeholders of the automotive aftermarket that consumers and independent operators have the possibility to select the provider of their choice for added value services.

An in-vehicle telematics system offers the possibility to transfer data/information via wireless communication. The system can be used to exchange additional data or information between vehicles and external infrastructure. This information must be shared with all stakeholders in the Aftermarket who can act as service providers.



CLEPA supports an interoperable standardized and secure in-vehicle open telematics Platform. All relevant in-vehicle information should be accessible to third parties for service development and future business models. This will ensure consumers free choice for service provision and the parts and applications to be installed in the vehicle.

An intermediate solution should provide a competition neutral data access via a backend server together with a state of the art data access via an in-vehicle connector.

Both designed to respect the need of a level playing field for all operators in the automotive aftermarket and the possibility to offer innovative and competitive services.

CLEPA stands for the principle that privacy and data protection must be ensured, using existing state of the art technology.

CLEPA supports the adoption of a standardized European General Data Protection Regulation that ensures possibilities of data use with protection of the rights of the individual vehicle driver/owner.

Direct and open access to in-vehicle information and data from the vehicle will ensure fair competition between the different distribution channels in the Aftermarket and the level playing field that has been established with the MVBBER and EUR 5/6 regulations. The consumer (vehicle driver/owner) must have the choice to decide whom he wants to give access to the in-vehicle data for diagnostics, repair and maintenance and/or any other purpose.

CLEPA is the European Association of Automotive Suppliers.

113 of the world's most prominent suppliers for car parts, systems and modules and 23 National trade associations and European sector associations are members of CLEPA, representing more than 3 thousand companies, employing more than 5 million people and covering all products and services within the automotive supply chain. Based in Brussels, Belgium, CLEPA is recognized as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc).

Facts about the European automotive industry

- Some **12 million** people are employed in the European automotive industry
- European automotive suppliers directly employ **5 million** people
- European automotive suppliers invest **€18bn** in RDI per year. They are the biggest private investor into research and innovation
- Per year, **18 million** vehicles are manufactured in Europe, contributing to the stability and growth of the European economy