













Insurance, dealers, automotive aftermarket, leasing and consumers coalition says:

ACEA/CLEPA position on access to vehicle data jeopardises competition, innovation and consumer choice

Brussels, 9 December 2016. 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 invehicle 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 invehicle 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".

Coalition for interoperable data access



ADPA – the European Independent Data Publishers Association aims to ensure fair access to automotive data and information and to provide competitive framework conditions for independent data publishers. This will allow the publishers to be able to design and provide competitive, innovative and multibrand products and services to operators of the automotive aftermarket. Contact: Laurence Eeckhout – EU Affairs Manager – laurence.eeckhout@adpa.eu – tel: +32 2 761 95 16.



CECRA- the European Council for Motor Trades and Repairs- is the European Federation representing the interests of the motor trade and repair businesses and European Dealer Councils on behalf of vehicle dealers for specific makes. Its main aim is to maintain a favourable European regulatory framework for the enterprises of motor trade and repair businesses it represents. Contact: Bernard Lycke — Director General — Bernard.lycke@cecra.eu — tel: +32 2 771 96 56.



EGEA- the European Garage and test Equipment Association represents both manufacturers and importers of tools and equipment for the repair, servicing and technical inspection of vehicles, as an integral part of supporting the automotive industrial value chain. Its role is to provide a healthier environment for the garage and test equipment industry throughout Europe and a stronger support to ensure competitive consumer choices for affordable mobility against the background of the increasing vehicle technology and complexity. Contact: Eléonore van Haute — Secretary General — Eleonore.vanhaute@egea-association.eu — tel: +32 2 761 95 15.



The **FIA** is a worldwide federation of Motoring and Touring Clubs. The FIA Region I represents the interest of these members as motorists, public transport users, pedestrians and tourists in Europe. Its primary goal is to secure a mobility that is safe, affordable, sustainable and efficient. Contact: Laurianne Krid – Policy Director – Ikrid@fia.com – tel: +32 2 282 08 18.



FIGIEFA is the international federation of independent automotive aftermarket distributors. Its members represent retailers and wholesalers of automotive replacement parts and components and their associated repair chains. FIGIEFA's aim is to maintain free and effective competition in the market for vehicle replacement parts, servicing and repair. Contact: Sylvia Gotzen – Chief Executive – Sylvia.gotzen@figiefa.eu – tel: +32 2 761 95 10.



Insurance Europe is the European insurance and reinsurance federation. Through its 35 member bodies — the national insurance associations — Insurance Europe represents all types of insurance and reinsurance undertakings, eg pan-European companies, monoliners, mutuals and SMEs. Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers generate premium income of €1 200bn, directly employ over 975 000 people and invest nearly €9 800bn in the economy. Contact: Thomas Gelin, Policy Advisor, Tel: +32 2 894 30 48, Gelin@insuranceeurope.eu



Leaseurope - the European Federation of Leasing Company Associations- represents both the leasing and automotive rental industries in Europe. The scope of products covered by Leaseurope members' ranges from hire purchase and finance leases to operating leases of all asset categories (automotive, equipment and real estate). It also includes the short-term rental of cars, vans and trucks. Contact: Richard Knubben - Director - r.knubben@leaseurope.com - tel: +32 2 778 05 68.