

The European Voice of Freight Logistics and Customs Representatives

Brussels, 31st of March 2008

RE: Intelligent Transport System – questionnaire.

CLECAT represents the interests of the vast majority of EU enterprises which offer logistics, freight forwarding and Customs services both within and outside Europe. Cleat has therefore a first and foremost interest in ITS application connected with freight transport and fleet management.

CLECAT participated in several discussions connected with transport and mobility, notably in recent consultations on urban mobility (online questionnaire¹ and additional comments²). Freight movements, deliveries, collections, fleet managements etc. can greatly benefit from an interoperable and harmonised display of ITS instruments. ITS can offer a significant contribution to the reduction of externalities³ and mitigation of the adverse effect of congestion⁴. CLECAT is one of the most active stakeholders participating in the discussions on freight logistics⁵.

CLECAT therefore welcomes the approach taken by the Commission aiming at creating the conditions for a well-thought, interoperable and harmonised introduction of ITS systems in logistics and road transport in particular. A European framework and strategy would be supported, in full respect of the subsidiarity principle, provided such strategy is deployed in harmony with, and without the ambition to impose itself onto, the market.

Whilst CLECAT recognises ITS as one of the instruments that could significantly contribute to mitigating congestion and creating the condition for a more efficient use of existing infrastructure, it does not contemplate ITS as the panacea which could substitute improvements in infrastructure maintenance or substitute badly wanted investments in new infrastructure.

Concerns exist, and must be addressed, in the following areas:

¹ <http://www.clecat.org/dmdocuments/PP009aSECR070427ReplyQuest.pdf>

² <http://www.clecat.org/dmdocuments/PP009OSECR070427UrbanTransport.pdf>

³ Anecdotic quotations affirm that one truckload into a distribution centre is equivalent to 600 private cars driven out of it by consumers going shopping. Clecat is not in a position to confirm or deny this piece of information, which is provided only to better explain the statement made in the above text. More interesting references can be found in the following study: <http://transweb.sjsu.edu/mtiportal/research/publications/documents/Freight.htm>

Evidence that a delivery vehicle is equal to nine shoppers' cars can be found in the following study:

<http://statistics.defra.gov.uk/esg/reports/foodmiles/annex4.pdf>

⁴ see also: <http://www.clecat.org/dmdocuments/SR002OSECR061213congestion.pdf>

⁵ http://www.clecat.org/index.php?option=com_content&task=view&id=218&Itemid=47

CLECAT, aisbl (n° 0408301209)

- ITS as an enabler of policy actions could be a useful concept, but ITS should not become a policy action in its own right;
- ITS can help co-modality in boosting the efficiency of all transport modes, but it should not be seen as an instrument to force modal shift;
- A prudent approach in dangerous goods management is necessary: there is no need of mandatory ITS; existing regulations are generally sufficient to ensure safe transport of dangerous goods;
- The proliferation of different tolling systems and different (and possibly incompatible) on board units should be prevented;
- Enhanced exchange of information is useful, but adverse counterproductive effects should not be forgotten, e.g. organised crime might take advantage of such instruments and theft become more frequent and targeted;
- Interpretability of ITS equipment across modes is still fairly unclear;
- Public sector's interfaces (between public agencies as well as between public and private organisations) are at present not clearly identified;
- The suggested creation of a committee needs prior clarification in its remit, the lack of which might create confusion, in particular in the private sector where policy and commercial errands might tend to irrationally overlap;

In view of the above Clecat will be happy to continue a fruitful dialogue on this subject and will not fail to submit its views in future, as required by the circumstances.

A consolidated reply to the Commission's online questionnaire follows.

The Questionnaire

1a. Do you think the uptake of ITS in road transport has been slow in the last decade compared to what you had expected?

- YES NO Don't know

Comment: CLECAT has repeated at numerous occasions that *“investments in ITS are made constantly only if they are appropriate and proportional, when they are well tuned to customers’ demand and provide identified added value”*. As far as B2B is concerned, we do therefore believe that the uptake in ITS has been steady in road transport, as well as in other modes and logistics.
The situation is however different as regards communication between business and administrations. There, there is a clear lack of harmonisation and interoperability that generates additional unnecessary costs in transport.

1b. If yes, what seems to be the main obstacles to this uptake? (tick one or more boxes)

- lack of awareness of decision makers
 lack of customers' awareness
 low penetration because too costly (in case of in-vehicle devices and applications)
 low interest because of insufficient quality, services do not deliver what is promised
 lack of transparency regarding providers and prices
 unsolved questions on privacy or security issues
 ITS have not yet demonstrated their full potential
 lack of full coverage or consistent deployment
(co-operation between main actors seems to be missing)
 other obstacles (please specify)

Please specify:

2a. Do you think ITS should be seen as an important tool to reach one or more of the following policy objectives:

- | | | | |
|----------------------------------------|-----------------------------------------|-----------------------------|-------------------------------------|
| - transport efficiency and mobility | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> Don't know |
| - sustainable environment | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> Don't know |
| - road safety | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> Don't know |
| - competitiveness of European industry | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> Don't know |

Comments

ITS is a tool that can contribute to reaching the above goals irrespective of the fact that these should be policy objectives. We do not think that promoting a tool should be a policy objective.

2b. Do you think the development and deployment of ITS could be accelerated if better linked to the achievement of one of the above policy objectives?

- YES NO Don't know

Please specify: financial incentives aiming at lowering the cost for the end user should not become a subsidy for manufacturers

5a. Do you think concentration of EU actions on a limited set of mature, core ITS applications with the view to their quick deployment, in the first place, would give an impetus and offer added value?

YES NO Don't know

Comment: Yes, as long as the system of incentives and efforts concentration is deployed on to ITS applications that are providing or are intended to provide interoperability.

5b. If yes, what are, according to your opinion, the most important ITS applications that have reached a mature stage and merit to be supported or deployed in the short term?
(tick one or more boxes)

- a. in-vehicle basic safety systems
- ESC (Electronic Stability Control)
 - Emergency Braking Systems (or BAS, Brake Assist Systems: increasing automatically the force on the brake pedal in case of an emergency braking)
 - Automated Emergency Notification (e-Call: sending automatically the position of a vehicle involved in an accident to the rescue services)
 - Speed Alert (warning the drivers for not respecting the actual local speed limits)
 - Others (please specify)

Please specify: provided it is interoperable in all Member States

- b. in-vehicle Autonomous Advanced Driver Assistance Systems (ADAS) like:
- Adaptive Cruise Control
 - Lane Keeping
 - Lane Departure Warning
 - Collision Avoidance
 - Others (please specify)

Please specify:

- c. co-operative systems (based on vehicle-to-vehicle communications and/or vehicle-to-infrastructure communications)

Comments: provided it is interoperable in all Member States

- d. Travel and Driving Support Services, like:
- Real Time Traffic Information (RDS-TMC)
 - Route guidance
 - Parking Reservation and Guidance
 - Multi Modal door-to-door trip planning
 - Contact less Public Transport Ticketing
 - Others (please specify)

Please specify:

- e. Traffic Management systems
- Variable Message signs
 - Variable Speed Management,
 - Queue tail warning systems
 - Dynamic routing and guidance in case of incidents
 - Others (please specify)

Please specify:

- f. a European Electronic Toll Collection Service - enabling a driver to pay tolls or fees everywhere in Europe with one on-board equipment

Additional Comment: as explained above, a new Eurovignette Directive must be technically supported with a European Electronic Toll Collection Service. Drivers must be able to travel all across Europe and pay tolls with one single system. The multiplication of national tolling systems would have catastrophic effects on movements of goods in the EU, not to mention an astronomic cost that would directly impact on EU economy and competitiveness.

5c. Which applications should be further developed with the view of deploying them in the medium-to-longer term? (tick one or more boxes)

Comments: CLECAT believes that in the medium-to-longer term, it is preferable to let the market set its own goals

a. in-vehicle safety systems

- ESC (Electronic Stability Control)
- Emergency Braking Systems (or BAS, Brake Assist Systems)
- Automated Emergency Notification (e-Call)
- Speed Alert
- Others (please specify)

Please specify:

b. in-vehicle Advanced Driver Assistance Systems (ADAS) like:

- Adaptive Cruise Control
- Lane Keeping
- Lane Departure Warning
- Collision Avoidance Systems
- Others (please specify)

Please specify:

c. Travel and Driving Support Services, like:

- Real Time Traffic Information (RDS-TMC)
- Route guidance
- Parking Reservation and Guidance
- Multi Modal door-to-door trip planning
- Contact less Public Transport Ticketing
- Others (please specify)

Please specify:

d. Traffic Management systems

- Variable Message signs
- Variable Speed Management,
- Queue tail warning systems
- Dynamic routing and guidance in case of incidents
- Others (please specify)

Please specify:

- e. a European Electronic Toll Collection Service

Additional Comment:

6. Should a set of open standards be developed that would make it possible to have one common, open platform in a vehicle - based on common positioning and communication components - instead of separate platforms for each application?

YES NO Don't know

Comment:

7. Do you think that nomadic devices (handheld wireless devices such as a Personal Digital Assistants or advanced mobile phones) should also be linked to the above open platform in terms of their interaction with the vehicle?

YES NO Don't know

Comment:

8. ITS applications in non-road modes are already being deployed or at the verge of being deployed.

e.g. in air transport SESAR will be the framework for the development and implementation of a new generation of air traffic management. Inland waterways are introducing River Information Services to manage waterway utilisation and the freight transport. The railway network is gradually introducing the European Rail Traffic Management System and Telematics applications for freight with technical specifications for interoperability. Shipping has already introduced SafeSeaNet and Vessel Traffic Monitoring and Information Systems and is progressing towards an Automatic Identification System and Long-Range Identification and Tracking...

Do you think any model could be taken from the other modes to accelerate the uptake of ITS on the road?

YES NO Don't know

Comment: the sheer impact of number of vehicles is so different between road and other modes of transport. In addition, the amount of information to be exchanged would be much greater in road.

9. Liability issues and data protection have been recognised as major issues in developing ITS. Do you agree?

YES NO Don't know

Comment: data protection is an important element. We are unsure as to what kind of liability is envisaged in this question.

10. What other issues of a more general, horizontal nature, in your view, need more attention at EU level? Please specify:

Specify: CLECAT believes that the completion of transport-related administrative procedures should be looked at more closely. As explained in our position on the Logistics Action Plan, since logistics service providers often have to use as many systems as administrations they deal with (or more), CLECAT welcomes any initiative aimed at standardising information exchange systems and fostering interoperability.

11. Do you think that interoperability of ITS in different transport modes could bring about added value?

YES NO Don't know

Comment:

12. If yes, what benefits would you expect from such interoperability?

Comment: [less costs \(currently arising from investments in multiple systems\), more seamless transport, more efficiency etc.](#)

13. How would you share responsibility between different levels in developing and deploying ITS (EU, national, local, industry, users)?

Comment:
[Obviously, the split could be made between private parties and public authorities.](#)

14. Do you agree that for most ITS applications and services more efforts are needed to prove their business case by demonstrating their costs and benefits?

YES NO Don't know

Comment:
[CLECAT is generally reluctant to support one ITS application more than the other. It is clear that ITS application manufacturers have not probably done enough to make sure that awareness of a cost-benefit analysis has gained public attention, especially towards the private sector.](#)

My Identification:

I'm participating in this survey as an

individual

Or representing

- A Public Authority an Association a Company (Industry)

Please specify: CLECAT (European Association for Forwarding, Transport, Logistic and Customs Services) www.clecat.org

Name (optional):	
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Nationality (optional):	
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How did you find out on this Consultation?

- Website
 Direct mailing
 I have been informed
 Meeting
 other

Please specify:
