In light of the tyre key role in the vehicle system, the tyre industry is looking at the EU COM strategy on connected and automated mobility as an **opportunity to contribute to fostering road safety, innovation and growth**.
In this emerging data economy, it is paramount to ensure fair and undistorted competition in the market.

ETRMA calls on the Commission to propose the standardization of an in-vehicle interface that allows data flow from the vehicle to third parties' applications and a legislative act with a precise implementation timeline, with a view to:

- Improve road safety: With the expected increase in automation and changes to mobility patterns, road users, infrastructure providers and components manufacturers are responsible to ensure safer driving. This can only be achieved by allowing free **access to in-vehicle generated data, functions and resources, on a real-time basis.**

- Stimulate innovation: the tyre industry, as vehicle tier1 manufacturers, calls for the right to access both tyre and other specific in-vehicle data at any moment of the vehicles' life. This would increase the predictive capabilities of the components themselves and tailor product development to real driving conditions. The access to in-vehicle data should not be conditioned by sharing proprietary information with the vehicle manufacturers to develop new services for the owner/user of the vehicle, as it would **constitute a barrier for companies' investments in innovation,** also considering the vehicle manufacturers **privileged position**.

- Guarantee a fair competition and unrestricted choice for the consumer: the exclusive and/or privileged access to in-vehicle-generated data and to the **owner/user related information** of the vehicle manufacturer through the digital interface **undermines the fair competition on the market and the quality of the service provided to the user**. Market players other than the vehicle manufacturers have **no equal rights to (timely) interact with clients and offer services and products on a level playing field.**

It is the same access privileges to vehicle data, in the vehicle, which will fully reconcile the interests of stakeholders in the sector: manufacturers, consumers and service providers.

ETRMA stresses the **need for a technical solution that allows real-time access to the in-vehicle data and resources**, which provides equal technical ability to (a) offer a service to the customer, (b) conduct the service securely in interaction with the customer and (c) execute the service on the car

To this end, it should respond to the following needs:
- **Direct and real-time communication of data to third parties**. Third parties should be able to analyze the data and send back information to the user if needed, at least through the infotainment system – as it is the case today for mobile phones;
- **Access to the in-vehicle network data** (car usage data and car maintenance data). The access should be granted through a port (or wireless) where information provided by the ECU can be read;
- A **secure protocol** to be able to plug in new sensors on the car network that could be fit either as original equipment or aftermarket solution
- Access to data **from hard interface to soft ones** throughout the in-vehicle platform on which data are generated and managed

Furthermore, cost should not constitute a barrier for accessing the data in order not to limit the potential benefits of the platform in terms of innovation and safety. The access rights should be agreed with the end user directly.

The Commission should consider the technical solution of an on-board application platform [1] that will enable the execution of certified applications directly in the vehicle and the access to the in-vehicle data and resources, allowing a bidirectional data flow. A first necessary step to reach that would be to mandate a standardization process for an in-vehicle interface[2] which would give access to real-time data and in particular car operating data[3].

Therefore, **ETRMA urges the Commission to propose a legislative act with a precise implementation timeline allowing third parties to have access to real-time data in the vehicle.**

Security issues

The vehicle manufacturers claim that providing access to vehicle data directly in the vehicle poses a threat to the electrical architecture of the vehicle which could expose the vehicle and its occupants to unacceptable safety and security risks. However as stated in the TRL Final Report on *Access to In-vehicle Data and Resources* "it is indeed technically feasible today to provide an open app platform for third parties in a safe and secure way which allows access to in-vehicle data and can display information on the vehicle human-machine interface HMI"[4].

There are several examples already available on the market like Apple CarPlay, Android Auto etc.

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[1] On-board application platform definition: technical solution for the access to in-vehicle data and resources allowing the unified deployment of certified applications and their subsequent execution directly in the vehicle, including access to the in-vehicle resources to host applications and to display these applications on the vehicle's HMI to allow the customer to select and implement them. This solution supports real-time applications. Source: Final Report of the first phase of the C-ITS Platform". January 2016.
URL : https://ec.europa.eu/transport/sites/transport/files/themes/its/doc/c-its-platform-final-report-january-2016.pdf
[2] In-vehicle interface definition: technical solution for the access to in-vehicle data and resources allowing the connection to the vehicle of external devices. This solution supports real-time applications. Source: Final Report of the first phase of the C-ITS Platform". January 2016.
URL : https://ec.europa.eu/transport/sites/transport/files/themes/its/doc/c-its-platform-final-report-january-2016.pdf
[3] Car operating data are data related to position, car speed, tyre pressure and temperature, door looked or not and other data listed in SAEJ1939 Standards.
[4] Access to In-vehicle Data and Resources, Final Report", TRL mandated by the European Commission, May 2017, page 74
URL : https://ec.europa.eu/transport/sites/transport/files/2017-05-access-to-in-vehicle-data-and-resources.pdf