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
  Zoi

* Surname
  Sagia

* Email (this won't be published)
  z.sagia@etrma.org

* Organisation name
  255 character(s) maximum
  European Tyre & Rubber Manufacturers Association

* 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.
  6025320863-10

* Country of origin
  Please add your country of origin, or that of your organisation.
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.
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)

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)

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

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

EU harmonization can ease the deployment of ITS services & accelerate citizens’ acceptance to use these systems.

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:

<table>
<thead>
<tr>
<th></th>
<th>Fully agree</th>
<th>Somewhat agree</th>
<th>Neutral</th>
<th>Somewhat disagree</th>
<th>Completely disagree</th>
<th>No opinion / I don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The deployment of ITS infrastructure and services remains geographically limited and is not continuous across borders</td>
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<tr>
<td>There is a lack of interoperability and continuity of ITS applications, systems and services at EU level</td>
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<tr>
<td>There is a lack of effective cooperation among stakeholders at EU level</td>
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<tr>
<td>There are unresolved issues related to the availability and sharing of data supporting ITS services</td>
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<tr>
<td>There is a lack of data standardisation which hinders the successful deployment of ITS services</td>
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</table>
12. Do you have any comment on these problems or other potential problems that should be considered?

There are cases that standards do exist and are potentially well suitable to resolve several of the harmonization challenges e.g. SVI for securing in vehicle data access. The biggest limitation is that they are not fully deployed because several stakeholders prefer proprietary solutions. Access to in vehicle data is crucial for the development of new services. The data quality should be ensured cross-borders.

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

<table>
<thead>
<tr>
<th>Priority areas</th>
<th>Very important</th>
<th>Somewhat important</th>
<th>Neutral</th>
<th>Not important</th>
<th>No opinion / I don't know</th>
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</thead>
<tbody>
<tr>
<td>Optimal use of road, traffic and travel data</td>
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<tr>
<td>Continuity of traffic and freight management ITS services</td>
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<tr>
<td>ITS road safety and security applications</td>
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<td>Linking the vehicle with the transport infrastructure</td>
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<tr>
<td>Connected and automated mobility</td>
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<td>Mobility platforms (e.g. Mobility as a Service - MaaS)</td>
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<td>Enhanced traffic management</td>
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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?

<table>
<thead>
<tr>
<th>Area</th>
<th>Very important</th>
<th>Somewhat important</th>
<th>Neutral</th>
<th>Not important</th>
<th>No opinion / I don't know</th>
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</thead>
<tbody>
<tr>
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<tr>
<td>Enhanced traffic management</td>
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</table>

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

They are all interconnected. ETRMA would like to clarify data sharing framework for Connected and Automated Mobility.

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

<table>
<thead>
<tr>
<th>Specific objective: increase interoperability and cross-border continuity of ITS applications, systems and services</th>
<th>Neutral</th>
<th>No opinion</th>
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<tr>
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<td>Very important</td>
<td>Somewhat important</td>
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<tr>
<td><strong>Update the priority areas and/or actions (including new ones) for setting specifications</strong></td>
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<tr>
<td><strong>Strengthen provisions for putting on the market and operating ITS components and services</strong></td>
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<tr>
<td><strong>Establish operation and coordination structures at EU level necessary for ITS deployment across borders (e.g. for a trusted EU C-ITS system)</strong></td>
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<tr>
<td><strong>Establish mechanisms to ensure interoperability of ITS services in cross-border or multiple operator scenarios</strong></td>
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<tr>
<td><strong>Mandate deployment of essential ITS services (with geographical coverages to be determined)</strong></td>
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</table>

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

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<th>Very important</th>
<th>Somewhat important</th>
<th>Neutral</th>
<th>Not important</th>
<th>No opinion / I don’t know</th>
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<tbody>
<tr>
<td><strong>Update and streamline reporting obligations including common key performance indicators</strong></td>
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<tr>
<td><strong>Establish sustainable coordination mechanisms for national access points and for the deployment of ITS services</strong></td>
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<tr>
<td><strong>Improve the current interaction with ITS stakeholders provided by the European ITS Advisory Group</strong></td>
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<td><strong>Integrate the existing ITS expert group into the Directive</strong></td>
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</table>

**Specific objective: solve issues related to the availability and sharing of data which supports ITS services**
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<tr>
<th></th>
<th>Very important</th>
<th>Somewhat important</th>
<th>Neutral</th>
<th>Not important</th>
<th>/ I don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>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)</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>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</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Establish data sharing and fair reuse mechanisms to ensure the continuity of essential ITS services across the EU</td>
<td>○</td>
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<tr>
<td>Establish terms and conditions or guidelines for the deployment of mobility platforms such as MaaS</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Mandate provision of a set of data to support the continuity of essential ITS services across the EU</td>
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<tr>
<td>Mandate the use of standardised data formats at EU-level for use in ITS services</td>
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<tr>
<td>Update interlinkages with related legislation (e.g. in the area of processing of data, liability, privacy, common European data spaces)</td>
<td>○</td>
<td>○</td>
<td>○</td>
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17. Do you have any comment on these measures or other potential measures to consider?

1000 character(s) maximum

Global vision of how ITS Directive will work in the overall Digital Single Market landscape.

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?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Fully agree</th>
<th>Somewhat agree</th>
<th>Neutral</th>
<th>Somewhat disagree</th>
<th>Completely disagree</th>
<th>No opinion / I don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>It will contribute to a more geographically balanced roll-out of ITS across Europe</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>It will reduce redundant/incompatible systems and increase roll-out speed</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Over time it will reduce overall expenditures of citizens and transport operators due to lower investment and maintenance costs</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
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<tr>
<td>It will make the use of ITS services more open, fair and impartial</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>It will contribute to improved traffic flows</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>It will lead to less time spent in traffic</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
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<td>0</td>
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<tr>
<td>It will lead to less energy use and harmful emissions</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
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<td>0</td>
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<tr>
<td>It will lead to increased road safety</td>
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<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>It will lead to improved accessibility of transport</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>It will lead to improved integration between different modes of transport</td>
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<td>0</td>
<td>1</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>It will contribute to a bigger EU market for intelligent transport systems</td>
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<td>1</td>
<td>0</td>
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<td>0</td>
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<tr>
<td>It will improve consumer choice in intelligent transport systems</td>
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<td>0</td>
<td>1</td>
<td>0</td>
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<td>0</td>
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<tr>
<td>It will improve international competitiveness of European industry</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>It will have a positive impact on research and innovation</td>
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<td>0</td>
<td>1</td>
<td>0</td>
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<tr>
<td>It will lead to increased sharing of personal data</td>
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</tbody>
</table>
19. Do you have any comment on these impacts or other potential impacts (not mentioned above) of the possible actions?

Relevance of other action at European level
20. To what extent do you agree with following statements?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Fully agree</th>
<th>Somewhat agree</th>
<th>Neutral</th>
<th>Somewhat disagree</th>
<th>Completely disagree</th>
<th>No opinion / I don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The objectives of the revision of the Directive could be better accomplished through non-legislative tools based on guidance or recommendations by the Commission</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
</tr>
<tr>
<td>The objectives of the revision could be better accomplished through increased funding opportunities from European Union programmes</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
</tr>
<tr>
<td>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</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
</tr>
</tbody>
</table>
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


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


Contact

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