

10 February 2023



Submission to the Department of
Infrastructure, Transport, Regional
Development, Communications and the Arts

Draft Principles for National Approach to Cooperative Intelligent Transport Systems (C-ITS)

Department of Infrastructure, Transport,
Regional Development, Communications and the Arts

Via email: C-ITSPinciples@infrastructure.gov.au



10 February 2023

Dear Sir/Madam

Draft Principles for National Approach to Cooperative Intelligent Transport Systems

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to provide this submission in response to the Draft Principles for National Approach to Cooperative Intelligent Transport Systems.

If you have any queries or comments in relation to the content of our submission, please contact Chris Coughlan, Head of Spectrum and Network Infrastructure, on 0401 988 322 or by email chris.coughlan@amta.org.au.

About AMTA

The AMTA is the peak industry body and voice of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians.

AMTA members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

AMTA support the principles as a useful first step towards the development of consistent regulatory measures concerning C-ITS. The potential productivity, efficiency and safety benefits of C-ITS as an enabler of transformative road transport and associated technologies will be best realised where there is broad early engagement on delivery.

There are clear obstacles to the development and implementation of consistent policies and regulations in the road transport space. AMTA supports harmonisation of policies and regulations (Principle 1) to the greatest extent practicable as key to promoting investment in C-ITS. AMTA consider that the remaining principles identify a useful set of issues upon which to focus efforts on harmonisation and should help promote cross jurisdictional engagement on the steps needed to build public trust and deploy technology in a safe and efficient manner.

That said, AMTA has concerns about the wording of Draft Principle 4, which is to “harmonise with international approaches”. Our concern lies with pre-emptively proposing the harmonisation should be to “*European approaches*”. The DITRDCA proposes harmonisation with European approaches because “... *Australia currently bases vehicle safety regulations upon the United Nations Economic Commission for Europe (UNECE) World Forum.*” Clearly, safety regulation is an essential aspect of vehicle operation and regulation, however, it’s only one factor that needs to be considered for the development and implementation of C-ITS.

Australia’s landmass is vast and outside major cities the population is sparse. However, Australia is well served by the coverage of public mobile networks. Europe, by contrast, is a continent of comparatively dense population. Finding 13 in the WSP report,^[1] provided with the consultation, states: “*Dedicated Short-range Communications (DSRC) is currently the most mature technology for short-range communication deployment, has been used in all Australian pilots, and is prioritised for the European uptake of safety-related use cases.*” Here, following the European lead would be a mistake. Alignment to either DSRC or Cellular V2X in the 5.9 GHz band would be a poor decision for Australia, as it would require the deployment of dedicated road-side units (equipment) capable of communicating with vehicles in the 5.9 GHz band. This equipment has not been deployed in Australia, and given our landmass, would be a very expensive exercise.

We note that the Council of the European Union has been advocating for technology neutrality for C-ITS. Specifically, the Council of the European Union’s advocacy can be found in Report A9-0265/2022,^[2] where the Explanatory Statement at the end of the report comments on Technology Neutrality. It states: “*This is a safety related application that will save lives: to this extent technology neutrality, coexistence, interoperability and compatibility are the leading principles*” and “*Technology neutrality - specifications should describe the result to be achieved, but neither impose nor discriminate in favour of the use of a particular type of technology to achieve the result.*”

We consider this to be good advice. The Draft Principles should be just that, principles. As the Council of the European Union observes, they should describe the result to be achieved, rather than prescribing a particular approach (i.e., harmonisation with the UNECE World Forum, as per Draft Principle 4).

AMTA therefore recommends that Principle 4 on international harmonisation should not be specifically anchored to one standards body/forum or approach. To this end, we recommend Draft Principle 4 is reworded to simply retain the first sentence (i.e., remove the second sentence altogether), and we suggest some care is taken in following the recommendations of the WSP report, as DSRC may not end up being the dominant technology for C-ITS.

AMTA notes that the nascent state of C-ITS means that many uncertainties remain. In future there will likely be hybrid communications for C-ITS, including long range communication that is reliant on mobile radio. Further studies and research is required on how this may work – e.g. will this be via a dedicated bandwidth or reliant on existing operator holdings/infrastructure and if so what might be necessary to improve latency across different operators/spectrum holdings. Accordingly, AMTA cautions against prescribing a particular approach to deployment.

While AMTA supports the principles as a useful first step toward consistent Australian policies and regulations, AMTA cautions against a rush to introduce new regulation. There are clear risks to public health and safety that must be sufficiently mitigated. However, AMTA urges the Department and other interested Government bodies to carefully consider the adequacy of existing regulatory frameworks before new regulations are introduced. A principle-based approach is the most appropriate response unless and until further evidence and research is completed that justifies and informs the implementation of more concrete policy and regulatory measures.

AMTA notes that the WSP paper states that government investment in infrastructure would likely total between 1-7% of C-ITS costs with remaining 93-99% the responsibility of the industry. Mobile carriers, equipment and device manufacturers are poised to make a crucial contribution to the C-ITS technological eco-system. It is crucial that the policy and regulatory frameworks are designed and implemented in a manner that supports this investment.

The development of standards does and will take time given the many and often competing views that may contribute to the process. There will be many parties involved in the design and implementation of C-ITS standards and processes including in relation to security and privacy related matters. Effective oversight and governance is required to ensure stakeholder engagement works towards the goal of national harmonisation suited to Australian market conditions. AMTA encourages the government to take on a facilitative role to support broad engagement on the development of industry standards and/or relevant policies and codes.

Government must also consider the need for pro-investment policy initiatives, through incentive schemes, co-contribution or other arrangements to ensure the right motivators are in place and appropriate budgets are allocated/combined.

Australia should be advocating for technology neutrality now as it is unclear if DSRC or C-V2x (advocated by US & China) will become dominant. It is also yet to be proven which will be the best fit for the Australian economy and conditions.

Given Australia's great geographic expanse, low population density and relatively low traffic volumes, compared to other markets, serious consideration should also be given to leveraging existing assets and Government investment.

^[1] **WSP Report – Advice on Strategies to support C-ITS in Australia**, March 2022, p.42. Available at <https://www.infrastructure.gov.au/department/media/publications/wsp-report-advice-strategies-support-c-its-australia>

^[2] Council of the European Union's Report A9-0265/2022, available at https://www.europarl.europa.eu/doceo/document/A-9-2022-0265_EN.html.



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