SUBMISSION RE: NATIONAL FREIGHT DATA HUB - OPTIONS DISCUSSION PAPER

Please accept this letter as Transport Certification Australia’s (TCA’s) submission to the Department of Infrastructure, Transport, Regional Development and Communications’ (‘the Department’) options discussion paper seeking feedback on key questions regarding the proposed National Freight Data Hub (‘the Hub’).

As you know, TCA is a national organisation that provides assurance, administrative and advisory services relating to transport technologies and data to enable improved public purpose outcomes from road transport. As an authoritative source of vehicle generated data from telematics systems in freight vehicles, TCA welcomes the opportunity to provide input and assist with development efforts with the Hub. As per previous correspondence from TCA, there are elements of the National Telematics Framework (NTF) that TCA administers that could be readily leveraged and built upon when establishing the proposed approach.

The responses below seek to address and support the key discussion questions raised in the discussion paper, in so far as TCA is able to offer a perspective.

Design Principles

1. Please share your organisation’s perspectives on the proposed design principles, including any which are not represented here.

The design principles appear to be reasonable and appropriate for the purposes of this discussion paper. In addition, it is suggested that the following principles be given consideration:

- Recognise and leverage existing authoritative systems and data sources, and avoid creating any duplication, conflict or ambiguity.
- Recognise that not all data can be openly released, and that specific data protection and sharing arrangements may need to be considered on a case-by-case basis.
Data

2. **What specific benefits would each data priority provide to your organisation?**

Of the six data priorities listed, the two that are most relevant to TCA’s functions and services are the Vehicle and the Infrastructure priorities, where related to road transport. TCA could be one of the authoritative sources of data to serve these priorities. This could include data on movements by vehicle type, vehicle speed, vehicle mass data, and associated road infrastructure attributes.

TCA does not extract organisational value from data itself, but rather works with stakeholders to generate the maximum public benefit from the data under its management on behalf of Australian road and transport authorities. It is noted that, if designed and operated appropriately, there may be potential value in the Hub complementing and strengthening TCA’s role as a data assurer and an authoritative source.

3. **What level of data fidelity (i.e. transaction level data or aggregated data) and frequency (i.e. near real-time, weekly, monthly, quarterly) would be required to make the data priorities you’ve identified be of value?**

TCA’s experience suggests that the level of data fidelity and frequency required will depend on the stakeholder seeking to use the data and what their specific needs are.

To address this, the NTF has evolved to support different levels of assurance, along with flexibility in the models to administer and assure telematics schemes. For example, road managers have proven to be comfortable with low frequency, aggregated and de-identified data for lower risk transport tasks and road planning, but require higher frequency, high fidelity data for certain other vehicle movements (such as larger vehicles with the potential to damage vulnerable structures). Note that with this last example, authorities may require a high level of assurance to support compliance and enforcement activities, in which case the Hub should not duplicate or conflict with current authoritative sources.

Technology

4. **If a centralised or federated architecture model were pursued, what would be the benefits and challenges to your organisation to participate in the Hub?**

As per our earlier comment regarding the design principles, it is suggested that the Hub recognise and leverage existing authoritative systems and data sources. To best comply with this principle, a federated or hybrid architecture would be preferred.

A key challenge for TCA is with regards to what data it can release or share. For example, TCA must comply with the strict requirements of the *Heavy Vehicle National Law 2012 (HVNL)*, which prevents the sharing of identifiable information for non-enforcement purposes. The HVNL does allow TCA to use aggregated and de-identified data for research purposes. While this may allow valuable data extracts and visualisations to be provided to the Hub, it would be important that it is appropriately administered by TCA.
5. **What are the preferred methods and technologies to integrate with the data exchange platform?**

TCA suggests that the Hub’s design adopts standards and practices that are in line with current commercial deployments of technology, rather than trying to force progress or changes with existing stakeholder systems. This will likely require the Hub to support a range of data exchange protocols and processes, which may assist with stakeholder engagement and building trust. TCA’s experience has shown that there are risks of industry stakeholders disengaging if they feel forced to make changes that are perceived as having limited or no value to them.

**Governance**

6. **Which governance structure could enable the Hub to be established quickly and generate quick wins, and should it change over time?**

7. **Which governance structure is most likely to facilitate the greatest use and participation?**

To support early engagement and trust with stakeholders, and to effectively advise and facilitate a federated model, there would be benefit in involving a range of government and industry stakeholders in the governance of the Hub. Of the three governance options presented in the discussion paper, the Shared model would appear to be appropriate.

**Funding**

9. **What funding arrangements could ensure users gain the value they are seeking from the Hub?**

10. **What services could the Hub provide that could be paid for by users?**

In TCA’s experience, the willingness of stakeholders to pay for telematics data varies. Also, with information services created from data, the initial deployment of such services requires ongoing investment until they reach a level of development and maturity that the value proposition becomes more compelling to a wider user base. If the development of the Hub is to follow a similar path, then it is likely that Government funding would be required for a period of time.

When developing a funding model for the Hub, TCA would also suggest giving consideration to the need to provide a return in value to those entities that provide data to the Hub. For many entities, including TCA, there will be costs associated with maintaining a data sharing service, so receiving value in return will help to offset this.

**Regulatory**

11. **To support the Hub’s governance, ability to collect and share data, setting of standards and funding model, which regulatory option is best suited?**

12. **Would there be significant costs or benefits for your organisation associated with each of the regulatory options?**

13. **Are there additional circumstances to those outlined above, that may warrant a change, introduction or removal of a regulatory mechanism?**

TCA’s primary comment on this topic is regarding the need to be cognisant of other relevant regulatory requirements and reform initiatives, and to ensure that any options considered for the Hub are appropriately informed and do not conflict with other regulatory approaches.
A key example is the current HVNL review, which is considering an assurance framework for technology and data. It would be wise for the Hub to align with and complement this where appropriate.

Next steps

TCA thanks the Department for the opportunity to provide input and stands ready to provide further input and assistance if required. Our organisations are already working closely together to test the feasibility of utilising data held and aggregated by TCA as part of the Hub, we will continue to do so over the coming months as the questions canvassed in the discussion paper become clearer.