EATA Observations on the European Commission's Data Strategy

May 2020

The European Automotive and Telecoms Alliance (EATA) represents the automotive and telecommunications sectors in Europe: two main drivers and innovators of the data economy. Given the broad scope of our members' activities, our response to the consultation questionnaire is deliberately broad. We have prepared this short position paper highlighting some of our reactions to the European Strategy for Data.

Introduction

World-class connectivity through cellular networks (currently 4G and expected 5G) will enable the rapid growth of the Internet of Things (IoT): the number of mobile IoT connections in Europe is set to grow from 140 million in 2018 to nearly 740 million by 2026.[1]

One of the most visible and well-known applications of such connectivity, and an exemplar of the Internet of Things, is **connected and automated driving**. The connections and devices in the Internet of Things in general, and connected mobility in particular, generate vast amounts of data, creating resources for data analytics and Artificial Intelligence. Connectivity drives the IoT, and the IoT will in turn power European Artificial Intelligence. This virtuous circle promises globally competitive European industries, and – when it comes to connected and automated driving – **increased safety and greater efficiencies**.

The central role of data in this ambition is recognised by the European Commission's Strategy for Data. The strategy sets the vision and goals for creating a European single data market, which drives competitiveness and builds a robust governance model.

European cloud infrastructure

As demonstrated by our sectors, and highlighted in the Data Strategy, Europe is a major and competitive generator of industrial data, notably in the field of connected and automated driving. Data storage, use and analytics are not only carried out by EU players but to a larger extent even by non-EU players, based on a cloud infrastructure that is largely activated by only a few companies from the US and China.

The ongoing development, roll-out and uptake of connected and automated mobility solutions will, for some use cases where V2V, V2I and V2X communication is of vital importance, however, require extremely high response times. This is guaranteed by **very low latency** connectivity on the one hand, but also demands more and more **data processing at the edge**. Demand for cyber-secure, robust and reliable processing of data on the one hand, and reliance of European industry on non-EU players, carries considerable implications not only for the cybersecurity of data, and the privacy of personal data, but ultimately for the safety of citizens.

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[1] ETNO, The State of Digital Communications 2020, January 2020.

As such, EATA welcomes the ambition of the European Commission to realise common European data spaces (most notably in the field of mobility) where B2G data sharing should be incentivised but not mandated, and a European federation of trustworthy edge and cloud infrastructures. Indeed, the Data Strategy recognises that to achieve this, *interoperability* of data needs to be assured, based on *standards*, appropriately tailored to strategic sectors, which we welcome.

We also welcome the ambition of the Commission when it comes to funding major investments into these infrastructures, prioritising computing power, encryption capacity and cybersecurity tools.

Data Sharing

Data sharing is tackled at various placeholders and proposed initiatives by the Commission. We would welcome a more synchronised approach for our industries. Examples of such proposed initiatives are:

- DG CNECT: Data Act, Common European Data Spaces, Implementing Act G2B data on high value datasets under the Open Data Directive
- DG GROW: access to in-vehicle data
- DG MOVE: data sharing under the ITS directive with a review of the delegated act on real time traffic information (RTTI), the delegated act on safety related traffic information (SRTI) and the work on federation of the National Access Points

Furthermore, **data-sharing mechanisms must ensure the (cyber-)security and integrity** of the data-generating device or system, the safety of the user, and allow for a fair return on investment for the manufacturer.

EU regulators must balance the interests of data holders and access seekers. Voluntary sharing based on agreements should be facilitated and promoted, while exceptions from the principle of contractual autonomy are only justified in sectors where a market failure has been established.

Should regulatory intervention be needed in specific sectors, due to identified market failure it is also important to think carefully about the way in which it should be designed. We welcome the opportunity to share our perspectives on the Commission's policy work in the context of forthcoming public consultations.

About the European Automotive and Telecoms Alliance (EATA)

The European Automotive and Telecoms Alliance (EATA) comprises six sectorial associations: ACEA, CLEPA, ETNO, ECTA, GSMA and GSA. Together they represent around 32 leading companies, including telecom operators, vendors, automobile manufacturers and automotive suppliers.

The objectives of EATA are to:

- Facilitate and accelerate the EU-wide deployment of connected and automated driving
- Remove potential roadblocks and highlight needed technical and regulatory measures
- Identify the business models underlying connected and automated driving
- Provide a platform for knowledge-sharing between the automotive and telecommunications sectors to develop a 'common language'
- Create societal benefits by improving road safety and traffic efficiency
- Promote the European digital economy