

**17 Rock-a-Nore Road
Old Town
HASTINGS
East Sussex
TN34 3DW
01424 434181
jonathan.coe01@mail2web.com
jonathan.coe@telematics.com**

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Mr Andrew Millar MP
Chair
House of Commons Science and Technology Select Committee
House of Commons
London SW1A 1AA

– submitted online ---

Dear Mr Millar,

Inquiry: Horizon scanning

Written evidence submitted by Jonathan Coe as Editor of the website Telematics.com. This submission is reflective of our editorial policy. This submission is for your case study into 'autonomous road vehicles and intelligent transport infrastructure'.

I note that you are asking:

- What are (or were) the policy challenges presented by this technology? How have these challenges been identified?
- How prepared is (or was) the Government to react to challenges presented by this technology? How effective was this reaction?

I am the editor of a newly-established website telematics.com which is an independent website developing an editorial policy which seeks to advance all aspects of telematic applications from a public perspective.

Summary

- The need for horizon scanning by government is well made and the need for it is illustrated by the government's confused response to aspects of intelligent transport infrastructure. As government has failed to identify and respond to the policy challenges it leaves the potential customer (and indeed the potential insurance provider and vehicle builder) with a bewildering variety of applications and supporting systems in which key aspects have not been clarified among which are the following policy challenges:
 - are telematic devices operating with a common data set, if not why not?

- are the current data bases any use for accident and emergency use and consequently wider issues of highway planning, emissions reduction, and the efficient use of existing transport capacity without the need to build costly (and damaging) schemes (road building, HS2)?
- who owns the data transmitted by telematic devices, what are the constraints on the public use of privately owned data, what is the public interest in the public use of telematics data, what constraints are placed on government in its use of telematics data?
- is there capacity to handle telematics data, what happens in case of data failure?
- how are the conflicting interests between vehicle manufacturers, device manufacturers, telematics insurance providers and the public interest to be resolved and subsequently managed?
- why is there little or no attention paid to ensuring the public interest in these issues is properly defined and represented?
- Who is defining how to relate to fast-moving developments in the EU?
- These are issues for Parliament because institutions of government do not appear to be grappling with the issues in an informed and timely manner, and these are issues which require public interest (and hence Parliamentary) scrutiny so as to ensure the lawful, democratic, accountable, and effective employment of these technologies.

Definitions and assumptions

1: I use the term telematics to collectively describe any device (and its supporting system and processes) installed in a vehicle (or in an app) which either is used by an insurance company to provide driver cover ('telematics insurance') or to track a vehicle or to provide emergency road-side help (as in the EU eCall system).

2: 'Telematics data' is any information collected by a mobile app or in-vehicle device.

3: I treat telematics as part of intelligent transport infrastructure and I assume therefore that this submission is within the terms of reference of the inquiry.

Problems for the vehicle builder and equipment designers

4: All British vehicle builders are represented on the **Automotive Council UK** (AC). Last year (May 3 2012) it hosted (under sponsorship of the global heavy engineering firm [Arup](#)) the [Intelligent Mobility Summit](#) opened by SoS Department of Business Innovation and Skills Mr Vince Cable MP. This followed the publication (on December 11 2011) of a comprehensive report from the AC which promised big things. As its press release of the time said:

The "Intelligent Mobility" Report calls for cross industry and government collaboration to enable better mobility through the convergence of intelligent transport systems. Congestion costs the UK around £12bn annually. Capacity of existing UK roads could be increased significantly by optimising vehicle movements using existing technology; in some places by as much as three to five times. The UK has the opportunity to be a worldwide centre of excellence for Intelligent Mobility.

5: The Council identified three critical issues which it said required strong leadership from government:

1. The short-term user benefits (eg entertainment and driver convenience) are quite different from the long-term user benefits (eg congestion/pollution management at the national scale). Unfortunately, ***it is not clear that a free-market economy, acting alone, will encourage the transition from the first to the second.***

2. Associated with the above, the business drivers for the vehicle OEMs [Original Equipment Manufacturers] are quite different to those for the infrastructure providers and electronic/information communications systems developers. ***But there is no authoritative forum in which these independent business interests are brought together.***

3. The product development and product life cycles in the different business sectors are quite different (electronics/communications 6-12 months; automotive industry 3-5 years; infrastructure provision 5-30 years). This makes it very difficult to coordinate development programmes across the different sector. [***My emphasis***]

6: ***The issue for your enquiry is:***

- has the 'authoritative forum' has been created – or the issues resolved in other ways? What has government actually done?

Europe and eCall

7: The Automotive Council report also says:

'...there are several factors which could still act to accelerate the short-term development of new Intelligent Mobility products. These include: The new EU ITS Directive introduced in August 2010, titled the 'Framework for the Deployment of Intelligent Transport Systems in the Field of Road Transport'(Directive 2010/40/EU). This document puts forward an Action Plan aimed at speeding the deployment of ITS throughout Europe with targets and activities detailed in six key action areas. Delivery dates across these action areas run from now until 2014.'

8: I take one aspect of the EU agenda – eCall. It is not clear what government is doing about eCall in the UK. The DfT says in its report to the EU (Intelligent Transport Systems in the UK Report on Information on National ITS actions envisaged over a five year period):

The DfT is supportive of technologies that improve road safety and have been proved to represent value for money through measuring benefits against the cost of their implementation. The study commissioned in the case of eCall, the UK has not been able to establish a positive benefit to cost case for mandatory deployment.

But ...

Future plans

6.1.2 While a voluntary approach to deployment, (offering consumers a choice) could be acceptable we would only consider implementation if no negative impact on industry or on our existing emergency services was assured. The UK would oppose any proposals for the mandatory fitment of eCall to new vehicles.

9: What study ? It's a transport research study published three years ago (March 2010) of data from 2009. That is, government has taken from March 2010 to

September 2012 to make a decision not to proceed on the basis of research conducted in 2009.

10: In any case this study has a remarkable deficiency – it has not been subject to, takes no account of and asked for no submission from any representative of the wider public interest in the issues. Yet there are big public issues at stake here – road safety, highway planning, vehicle emissions, actual cost of fatal road accidents. These are all clearly stated in the [latest report of eCall progress here](#). ([Progress across the EU of eCall is available on the Hero EU site here](#))

11: And why such a long time to come to the conclusion to do more-or-less nothing? In the meantime eCall has been substantially developed. (As above)

12: ***The issues for the inquiry are:***

- why such a long time to take a negative decision when the field is rapidly changing
- how will government now respond to eCall given its widespread development in the EU with UK outside the loop
- which part of government is alert to the political dynamics of these changes?

Telematics insurance

13: Telematics insurance provides a case study of the relationships between technology, commercial provision (in this case insurance, particularly under-25 drivers) product development (devices and their supporting systems and processes) civic rights and the public good. One government department (Department for Transport) and two agencies are involved in aspects of telematics insurance (Information Commissioner [ICO], Financial Conduct Authority [FCA] along with the Association of British Insurers [ABI] and the British Insurance Brokers Association [BIBA]).

14: Earlier this year the ABI and BIBA with assistance from the ICO and FCA published two guidance documents on telematics for both potential customers and providers. I reviewed them [here](#) and [here](#).

15: The Department promised a green paper on young driver insurance earlier this year – so far nothing has appeared though publication is promised sometime now.

16: It is outside the scope of this submission to look at insurers' guidance in detail, but they are, in my view, practically worthless. This is because key concepts remain undefined – and indeed could not be defined because the definition lies outside the scope of the authors' interests. For example, the ABI is aware that 'additional data protection issues arise from telematics products' and usefully, it lists them (*I have numbered them*):

1. there is more data collected and
2. consumers need to understand what is being collected and why
3. without appropriate consent, there is potential for Personal Telematics Data to be collected, processed or disclosed illegally
4. the existence of additional data, combined with varying outsourcing arrangements, will make responding to subject access requests more complex;
5. Personal Telematics Data will be an attractive data resource for third parties.

17: These are good issues – but who is sorting them out – particularly, who or what is representing the public interest in sorting these issues out? Clearly the implication is that new legislation is needed to clarify and safeguard personal data and absolutely separate it from the information which can be used for the general public good (health, welfare, security). The ABI says:

Using Personal Telematics Data for marketing purposes

Personal Telematics Data will be valuable to other parties for marketing and research purposes. While it is acceptable if data is shared with other parties with the appropriate consent, consumers will lose trust in telematics products if explicit consent is not given before it is shared or if regardless of any consent obtained, the Personal Telematics Data are used in a manner or for purposes which go beyond the reasonable expectations of the consumer.

18: Who is defining what is 'acceptable', 'acceptable data sharing', 'appropriate consent' and 'reasonable expectations'? What is the difference between 'appropriate consent' and 'explicit consent'? How does it become possible for data to be shared 'regardless of any consent obtained'? Are we talking about government here or some other dark forces? These issues need a clear head. They need drawing out and examining carefully in a public arena.

19: Here is an example of what happens is the debate is constrained. The Royal Society for the Protection of Accidents suggested, [in its comprehensive report on telematics and black box technology](#), early this year:

'... There are issues around data ownership and data portability that need to be clarified. For example, drivers may find it very useful to be able to use the data collected about their driving when seeking competitive insurance quotes from a range of different insurance companies. This would be much easier if there were common data standards used across the insurance industry, but at the moment there are no agreed industry standards (except for raw GPS data)'

-RoSPA Black Box report p 4'

20: *The issues for the inquiry are:*

- what issues have delayed the publication of the young driver insurance green paper?
- which part of government is taking the lead in sorting out the present and emerging issues from the application of telematics to insurance, road safety and road design, defining what is public and private about the consequent data, ensuring that Parliament's interests in ensuring its laws (on human rights for example) are respected by government and its agencies?

21: One final question for the inquiry:

- is the dilatory unfocussed approach of government to these issues acting as a brake, or obstacle to the proper and democratic exploitation of telematics?

Jonathan Coe October 1 2013 [Submitted via Select Committee website]