ACEA Position on eCall

January 2012

General Support to eSafety and eCall

ACEA was one of the first signatories of the Memorandum of Understanding (MoU) on eCall and together with its members has since actively participated in developing potential solutions for pan-European eCall.

However, throughout this process ACEA has consistently outlined the importance of parallel contributions from all stakeholders involved, and it is imperative that the necessary infrastructure is in place before mandatory fitment is required in vehicles.

Key Points

- A public eCall service has to be pan-European and available to all customers. This means, the EU infrastructure including the availability of suitable wireless networks need to be able to receive eCalls, before mandatory fitment is required in vehicles. Parallel legal commitments should apply for all affected stakeholders.
- A range of eCall solutions should be allowed and that only a minimum set of performance/technical requirements based on the CEN standards is necessary. This should be enabled by technology neutral legislative requirements permitting embedded, mobile phone based and Third Party Service solutions alike. Technical specifications of e.g. the automatic triggering mechanism must be at the manufactures discretion.
- It should be permitted to run private eCall services in parallel to the public service, not only in addition to a public eCall but as an alternative, provided all performance standards are met and one of both, the pan-EU or private eCall service, is available in all Member States and for the life-time of the vehicle.
- The cost-benefit assessment conducted for the Commission significantly underplays the level of deployment expected in the coming years. An increasing number of vehicle manufacturers are already deploying private eCall type systems.
- If fitment is required then this should apply only for "new vehicle types according to 2007/46/EC" and sufficient lead-time (minimum of 3 years), should be

provided for development and testing **once** all standards and type approval requirements are available.

- Future type approval legislation must clearly define the scope and boundary for which the type approval requirements apply. ACEA does not believe that those elements outside of the OEM control should be included in type approval (e.g. SIM card, communication device, etc.).
- Product liability of vehicle manufacturers is restricted to the in-vehicle system.
- It is the firm opinion of the industry that so-called value-added commercial services cannot be used to justify the deployment of eCall but need to be dealt with separately.

Back-up

Scope

- For the Automotive Industry the eCall concept is valid for passenger cars and light commercial vehicles up to 3.5 t (N1, M1).

Timing

- The industry requires three-year lead-time after all necessary specifications have been defined / published and, if covered by EU Regulation, the final type approval requirements are adopted.
- Unfortunately, at present, important aspects essential for an efficient roll-out of eCall have not been met. Not all standards have been published, the HeERO field operational test with EC is still ongoing and there are still serious technical concerns (by Mobile Network Providers themselves) over the chosen method for data transfer (in-band modem).

The eCall Concept

- The in-vehicle system unit can for example either be an embedded unit with an integrated network access device (e.g. a GSM module) or a phone-based solution, consisting of an interface between the in-vehicle system and a mobile phone.
- It is essential that any mandatory Type Approval requirements under 2007/46/EC clearly define the test methods for and boundary of the in-vehicle system. For example it is not appropriate for the communication device, which depends on the Mobile Network to function, to be included in the vehicle type approval.

Communication Technology

- It is not up to the automotive industry to recommend a special technical solution but requests that any acceptable solution must be compliant with future technological developments, is sustainable and backward compatible. ACEA is increasingly concerned that this will not be the case with the currently proposed solutions.
- The industry has been notified that the in-band modem solution as proposed by ETSI for a public eCall end of 2008 might have some serious issues. The industry is urgently waiting for a clarification on this issue.

Service Infrastructure

- It is obvious that an in-vehicle eCall can only produce all its benefits when the corresponding infrastructure is in place. This includes availability of mobile network services that match the in-vehicle system, for the vehicle lifetime (up to 15 years).
- A staggered approach where Member States introduce the final infrastructure at different dates and partly with years in between is a non-feasible scenario for the automotive industry.

***