



In this context, FIA clubs call your attention to the standards currently being developed for "proprietary eCall" or Third Part Service supported eCall (TPS eCall). While we understand that it is not the Commission's intention to foster this particular system, the standards currently being developed in CEN TC 278 WG 15 may lead to the limitation of consumers' choice of their service provider. Consequently, FIA clubs are worried that TPS eCall might be used by vehicle manufacturers to tie consumer even more tightly to their authorised network.

If there is an absence of choice and competition among providers of additional services, we are concerned that a consumer purchasing a new car will be tied to the manufacturer electronically with no say in the matter and simply obliged to accept what ever unsolicited services are supplied. This could jeopardise consumer confidence in eCall and pose an obstacle to a full roll out of its road safety benefits. European consumers want good quality that is affordable. This can only be ensured through well-functioning market competition.

The Commission itself acknowledged the potential shortcomings in its Communication<sup>3</sup> (2009) 434 whereby it required vehicle manufacturers to equip vehicles of consumers not opting for proprietary eCall with pan-European eCall. As automobile organisations representing more than 35 million mobile consumers in Europe, we demand that consumers' freedom of choice should be extended to services from automobile clubs, which is the only way to ensure sufficient competition in the provision of emergency services.

In developing in-car communication systems, a closer look should be paid to the possibility of adding a "breakdown call button" next to the manual "eCall button". Thus, overburdening the emergency services with non-emergency breakdown assistance calls would be avoided.

We believe that the EU, in its promotion of eCall (via various funding programmes and initiatives) must uphold the principle of consumer choice as regards the development and supply of additional services. This is the best and fastest route to a full roll-out offering improved road safety and innovation. It would be regrettable if the unintended consequence of not upholding choice and competition in the roll out of eCall was the stifling of potential competition in secondary service provision market.

Thus in developing the necessary type approval regulation needed for introducing the relevant in-vehicle eCall technology, we urge you to adopt an approach for breakdown calls and additional services similar to that adopted for access to vehicle manufacturers technical information needed for car repair and maintenance<sup>4</sup>. We call on you to create a level playing field where the independent automotive service providers can compete openly as an alternative choice for consumers with respect to non emergency breakdown and assistance services.

By ensuring consumer choice, the EU will stimulate not only open competition between all stakeholders interested in providing additional services, vehicle manufacturers and automobile clubs included, but innovation also. We believe the following measures are necessary to achieve this:

1. Interfaces between the eCall device in the vehicle and the technologies of providers of additional services must be standardised. Overly complex in-vehicle technologies should not be used to exclude potential providers of additional services. Any such providers must be able to communicate with all devices irrespective of the manufacturer. The binding technical standards to be defined must ensure this. Until then, manufacturers should at least disclose the technical requirements for additional services.

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<sup>3</sup> COM (2009) 434 final: Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the regions: "eCall: Time for deployment".

<sup>4</sup> EC Regulation N°715/2007 on type approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information Article 6.

2. Consumers must be made aware of their right to choose and be encouraged to use it. When buying a vehicle, information should be available about the possibilities of selecting individual additional services or even opting for alternative providers of preference if available. The right to choose should be available over the whole vehicle lifetime, the choice of the customer should be adjustable in the car through the customer without additional help and the option to choose should be transparent and usable.

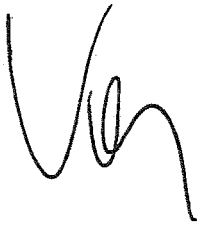
Furthermore, the operating standards approved by the European Standardisation Organisations should be designed to allow consumers to freely choose the service providers for eCall or breakdown services.

Ever safer, cleaner and sustainable mobility that remains affordable for consumers is our priority and it has to be founded on consumer choice and innovative solutions. This matter is of such importance to the FIA automobile clubs that I would very much welcome the opportunity to meet you together with Mr. Enrico Gelpi, President of the Italian Automobile Club, ACI, to present our concerns on this and other relevant matters to you personally at your earliest convenience, hopefully before the end of July. We would be grateful if you could meet us on one of the following dates: 8<sup>th</sup>, 14<sup>th</sup> or 15<sup>th</sup> July 2010.

I do hope that you find merit in our views and that you will be able to respond positively to my request for a meeting if your diary permits it.

I remain at your disposal should you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'W Kraus', written in a cursive style.

Werner Kraus  
President, FIA Region I