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## **IBM Response to the European Commission's public consultation on the deployment of in-vehicle emergency call – eCall – in Europe**

As a dedicated participant in the telematics ecosystem across Europe IBM welcomes the opportunity to provide comments on eCall and its prospective deployment in Europe. We appreciate the Commission's activities on eCall and support the objective to drive a fast and widespread implementation of the technology to the benefit of the citizens in Europe and their health and safety.

eCall is an intelligent combination of technologies for providing smarter solutions for traffic safety applications such as automatic crash notification, emergency calls and breakdown assistance. The widespread implementation of eCall technologies will facilitate the transition of emergency calling in a vehicular context commensurate with advances in landline emergency communications and numbering. These developments when combined with other ICT initiatives proceeding apace across Europe and globally shall ensure development of a seamless ICT ecosystem as part of a digital IP-based network and an essential successor to 20th century analogue PSTN based systems.

In addition, IBM shares the Commission's views that eCall will be a catalyst for the development and introduction of further telematics solutions for both personal automotive operations from personal vehicles to commercial road transport. The use of standardised, ubiquitous technologies for eCall can provide other valuable location based information to the vehicle. As outlined by the Commission such potential solutions include intelligent traffic guidance and advice based on information gathered by vehicles on the roads, intelligent early-warning systems, etc. All such location based services could be important new features for vehicles and could provide competitive advantage to the vehicle manufacturers and telematics technology providers whilst affording a clear socio-economic benefit to the public. Therefore, on a broader scale eCall has a potential to ensure continued EU leadership and innovation in the field of telematics.

IBM respectfully suggests that the Commission provide for the legal framework that enables and promotes the implementation of eCall. It is important that the Commission provide clear guidance and direction to market actors, government decision-makers and the public with respect to the timing and requirements of the eCall transition in the development of terrestrial, satellite

and hybrid mobile ICT systems. The Commission should also promote the setting up of the infrastructure. Both should be done in co-ordinated way for all of Europe, including standardised technologies and harmonised spectrum bands, working with relevant organisations like ERTICO and the respective standards bodies.

Even though the implementation of eCall may not be done concurrently in all EU Member States, the pan-European perspective will remain important and the subsequent introduction by Member States should be possible. This includes, above all, the aspect of interoperability both between providers of eCall and other services and across borders. In this context IBM very much values the open standards approach which we kindly recommend to the Commission. Relevant standards for eCall have been developed by ISO, CEN and ETSI or are under preparation. Open standards ensure interoperability of the respective services and increase competition between technology and service providers. Therefore, the preference for standards used for an application like eCall should be for open standards that are available for implementation and use on a royalty-free basis. The specific set of open standards identified should be made mandatory so that adherence to specific, proprietary vendor technology can be avoided.

Such an open standards approach would prevent anti-competitive behaviour / SMP and limitation of consumer choice by concerns promulgating restrictive proprietary standards. It would furthermore support EU wide interoperability by both commercial and personal vehicular travel to ensure seamless, ubiquitous access to emergency care for all travellers on European roadways.

Another aspect in the context of the implementation of eCall is the development and management of a database of emergency call responders. This issue is part of the basic infrastructure and should be considered by the Commission, as well, especially with focus on pan-European solutions.

In supporting eCall, IBM cites our own direct efforts in support of its implementation. IBM are currently working with national governments and On Board Unit (OBU) suppliers to demonstrate the use of eCall and bCall (breakdown call) to end users, governments and the public.

In Belgium, for instance, IBM supported the city of Leuven in a showcase together with the National Road Assistance Organisation "Touring" and the Federal Belgium government, the Flemish and Brussels governments and the local city government of Leuven. This showcase proved the value of eCall and the outcome was widely published in local and national media. A coming effort is to get eCall widely known in all Member States. This will be supported by an eCall tour in the EU. Details are provided in a separate presentation sent jointly with this document.

For optimising the information flow, communication and cooperation on eCall in the policy context around the implementation of the new technology, IBM recommends that the Commission implement a stakeholder advisory expert group with the objectives to work closely with the Commission on the implementation of eCall and other telematics services and on the development of respective policies. This advisory group should consist of all relevant stakeholders and should be able to provide the Commission with relevant information about technical developments as well as about ongoing global activities in the given domain.

IBM shall be readily available for any further information or follow-on discussions on the subject.

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Kind regards,  
IBM Nederland B.V.

A handwritten signature in black ink, appearing to read "Eric-Mark Huitema". The signature is stylized with a large, sweeping initial "E" and a long, horizontal flourish extending to the right. The name "Huitema" is written in a cursive script.

Eric-Mark Huitema