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Opinion

Title

DG INFSO - Impact Assessment on the implementation of the harmonised EU-wide in-vehicle emergency call, eCall

(draft version of 20 December 2010)

(A) Context

The Commission has proposed, as a priority action to mitigate consequences of road accidents, the introduction in all vehicles in Europe of an eCall service based on a single European emergency number 112 and on common standards developed by the European Standardisation organisations. The full deployment of eCall was initially aimed for in 2009, but progress has been slow, and roll-out severely delayed. This IA report analyses different solutions for the eCall implementation.

(B) Overall assessment

While the IA report presents a significant amount of information, it needs to be improved in several key aspects. It should provide greater clarity about the nature of the problems at stake by better explaining which market and regulatory failures have caused the low uptake of the eCall and require public intervention. The IA report should clarify whether a wider range of options can be defined, and provide further details about the concrete measures to be proposed under the legislative option 3. It should strengthen the impact analysis and provide greater transparency on the assessment of costs and benefits of the options. The options should be assessed on the basis of their impacts measured as net changes compared to the baseline scenario, using the same set of comparison criteria.

(C) Main recommendations for improvements

(1) Clarify the nature of the problem and the baseline situation. The IA report should be clearer about the market and regulatory failures which have led to the low uptake of eCall and require public intervention. It should briefly discuss how this situation is likely to evolve without new EU action, taking into account the expected implementation of the Directive on the deployment of Intelligent Transport Systems for road transport.

(2) Explain whether a wider range of options can be defined. The IA report should provide greater clarity about the concrete measures to be proposed under the legislative

option 3. It should define possible sub-options for each of the key measures reflecting different ambition levels and/or staggered introduction of the obligation (or should clearly explain why it is not feasible to do so), and should clarify the delivery instrument that will be used. The IA report should also consider an option of mandating the upgrade of both emergency services and mobile phone networks, while leaving it up to the buyer whether to opt for an eCall service.

(3) Improve the assessment and presentation of impacts. The assessment of costs and benefits of the options (including the overall costs and benefits) should be done in a more transparent manner, and should be clearly presented in the main IA report. The IA report should clarify whether the data used to assess the costs and benefits of different options can be considered as sufficiently representative, given the differences in road infrastructure and safety across Member States. It should address more explicitly the claim of a large Member State that the benefits of a mandatory deployment of eCall in that country would be smaller than the costs. The report should assess the impact of different options on consumers' choices, on low-income consumers and on telecom operators. Finally, it should also assess the possible impact on competition in the relevant markets of making the instalment of eCall compulsory for all vehicles.

(4) Better compare the options. When comparing options, the IA report should use the same set of appraisal criteria for all the options. It should assess the impacts of options as net changes compared to the baseline scenario (tables 5 and 6).

Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

(D) Procedure and presentation

All procedural requirements appear to have been respected.

(E) IAB scrutiny process

Reference number	2010/INFSO(+ENTR, MOVE)/013
External expertise used	No
Date of Board Meeting	Written procedure