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Department of Infrastructure, Transport,
Regional Development, Communications, and the Arts

Dear Madam/Sir

Re: **'Draft Principles for a National Approach to Cooperative Intelligent Transport Systems in Australia'**

The Transurban team is pleased to respond to the "Draft Principles for a National Approach to Cooperative Intelligent Transport Systems in Australia (Draft Principles)" published by the Australian Federal Government's Department of Infrastructure, Transport, Regional Development, Communications, and the Arts (The Department).

We are pleased to see the Department's effort to initiate the development of a nationally consistent framework to support C-ITS. The Draft Principles for a National Approach is a critical step towards this objective and preparing Australia for a nationally consistent approach towards the C-ITS systems and technologies. We fully support the development of a pragmatic approach that provides direction and consistency, removes restrictions, enables innovation and delivery of the C-ITS systems and encourages market competition.

At Transurban, we design our roads for the long term, ensuring they will deliver real and lasting benefits to cities and their communities. While addressing the demands for safe and reliable journeys today, we are also thinking about how people commute in the future.

Transurban are constantly looking at ways to improve our roads and pertinent technologies to meet our customer's expectations about the technological capability of our assets.

C-ITS is shaping a new era where our road infrastructure and traffic control systems will be able to exchange necessary information with connected vehicles and devices to improve road safety, journey reliability, customer experience and environmental outcomes.

We do not know when most vehicles on our roads will be connected but we do know that they are coming, and we also know we need to be ready. Transurban's involvement in multiple connected and automated vehicle technology trials indicates our willingness and capacity to participate in preparing our roads assets and supporting technologies for such future.

We also believe that streamlined and scalable deployment of C-ITS systems would require collaboration between Australian governments, private road operators, vehicle manufacturers and transport technology providers.

We are pleased to see that the Draft Principles document is centred around collaboration and harmonisation and heavily focuses on road user benefits.

Hence, Transurban would like to offer the following comments:

- 1) **Strategise:** The Draft Principles and prospective participants in the C-ITS development can benefit from prospect of a development roadmap. The roadmap might include topics such as building forums and communities, improving social acceptability, public education and establishing shared knowledgebase, national position on content, security, privacy and short-range communication standards, and exploring facilitated testbeds.
- 2) **Enable market offering:** Considering the role of private industry in C-ITS innovation, importation, development and delivery and Australian market size, we recommend acknowledging this role by incorporating a principle around enabling and supporting market-led innovation and competition.
- 3) **Harmonise:** There are multiple harmonisation areas that the C-ITS can benefit from Government and industry collaboration. It includes the short-range communication standard as well as the data (content and exchange protocols), security and privacy standards. C-ITS device specification and end-to-end data flow certification is also another aspect that require attention. Australian device certification and type approval process as well as TCA's certification services are invaluable for successful establishment of such harmonisations processes.
- 4) **Certify:** As per earlier item, C-ITS equipment and software platforms as well as the exchange and flow of data among these components require oversight. Depending on the C-ITS use cases, especially in road safety related use cases, hardware, software, data content, data exchange and communication might require certification and type-approval.
- 5) **Built trust:** Social acceptability of C-ITS systems especially when citizens are going to share their data with government and industry require both public education on C-ITS and specific public benefits as well as establishing public trust through development and delivery of stringent processes to ensure privacy and security.
- 6) **Uplift:** Digital and physical transport infrastructure require uplift to support service providers and provide a platform for collaboration and long-term technology and operational development. Examples include (real-time) data exchange platforms and APIs, scalable short-range communication infrastructure, and high-accuracy global positioning systems.

It is also recommended to utilise the previous work conducted by NTC (National Transport Commission) on "Government Access to Vehicle-generated Data" Policy Paper ([here](#)).

Especially, the following items from the paper are noteworthy:

- The establishment of a National Vehicle Data Working Group with representatives from broad range of public and private sectors,
- NTC and Austroads support provision to the working group,
- Exploring Data Exchange opportunities; and
- Commercial and non-commercials considerations and terms of data exchange

We emphasise the point that we do support the nationally consistent C-ITS system and are keen to explore opportunities to support such technologies. Considering that the number, extent, and geographical spread of Transurban's road assets across three Australian States provide an ideal situation to develop and trial C-ITS

systems, we would like the opportunity to be included in the relevant future developments of the regulatory frameworks, and the pertinent technical and operational guidelines, and technology trials and deployments.

I hope these comments are helpful and I would be happy to arrange a discussion on the points raised if you would like any further clarification.

Yours sincerely

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