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21 December 2016

Data Availability and Use
Productivity Commission
GPO Box 1428
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Dear Commissioner

The Federal Chamber of Automotive Industries (FCAI) has now had the opportunity to review the Commission's draft report on Data Availability and Use. While the report covers a wide range of issues, FCAI wishes to comment on only a few particular areas.

The Draft Report uses the term "data" in a somewhat generic sense and it is important that when considering this term as it applies to new motor vehicles there is some context applied. The initial step in developing options to manage access to vehicle data is to have a common or agreed (among all stakeholders) understanding of the types of data that is generated, stored or transmitted with the operation of vehicles. This is required before any consideration of "ownership," "control of," or "access to" data can be undertaken.

The FCAI considers that vehicle data can be put into three broad levels:

1. **Traffic Data**: currently collected and collated by infrastructure owners for traffic management. This data is aggregated and de-identified.
2. **Vehicle owner/driver information**: data created by use of the vehicle. This data could be generated and recorded by either on-board systems provided by the vehicle OEM or a 3rd party system (e.g. fleet management) and could include:
    a. Positioning/location data.
    b. Vehicle operational/performance characteristics (e.g. speed, time of use, load).
    c. Toll Road administration.
3. **Vehicle systems operation**: data contained within the vehicle management modules to control how the vehicle operates and various performance requirements. This is OEM intellectual property and includes:
    a. Environmental legislative requirements (e.g. in-service compliance with vehicle pollutant emission regulations).
    b. Safety performance requirements (e.g. crash pulse triggering of safety systems including seat belt pre-tensioners and airbags, operation of advanced driver assistance systems including ESC, AEB, LKA etc.).
    c. Security information to meet both legislative (e.g. immobilizer) and non-legislative OE security systems including key security coding.
    d. Engine operation and performance requirements.
    e. Comfort and infotainment systems.

The above approach is proposed as a basis for future discussion and the FCAI recognises that there will be some examples where the data generated could fall into more than a single level as defined above.

The FCAI refers the Commission to our earlier submission to the inquiry (22 August 2016) for our perspective on the range of other issues raised in the draft report.

Please contact me on if you have any questions or would like clarification of the above.

Yours sincerely,

Tony Weber
Chief Executive