

Dear Sir/Madam,

due to being made aware of the consultation today, I have had no possibility to delve deeply into the matter. Nevertheless, I wish to offer some reflections on the matter especially in the domain of road safety, and the technological innovations to improve safety.

First, I wish to point out that all state aid and other public incentives to measures and activities reducing environmental damage and pollution are in full analogy to measures and activities reducing fatalities and injuries resulting from road accidents. The markets do not reflect the true external costs of road accidents in any better way than they do those of environmental damage. All special rules and instruments targeted towards reducing environmental hazards should apply or be adapted to cover also reducing accident consequences.

Second, the emergence and roll-out of innovation in the form of intelligent safety systems can be promoted by targeting the basic building blocks of intelligent safety systems:

- 1) availability of technology platforms (communication networks, positioning, compatible operating systems, ...)
- 2) legal, institutional and business framework for operations including standardisation
- 3) availability of information infrastructures (data bases, system architectures, information markets...)
- 4) sustainable business models for both private and public stakeholders
- 5) innovative technology solutions

For all of the above, R&D provides keys to innovation but these keys can only be utilised with State Aid and other incentives to reduce the risks involved with applying R&D results.

Third, I wish to especially note with satisfaction the proposals in paragraphs 34-39, 59-62 and 71 also from the point of view of intelligent safety systems in transport.

Fourth, I agree with the comments as provided earlier today by Dr Wolfgang Reinhardt

Kind regards,

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