

Hi and Good Morning.

Unfortunately we received the attached file only in Monday morning (21.Nov.), the day where the consultation ends. We in the eSafety area were not at all aware of this consultation.

It is not possible to give a qualified answer with such a short-term notice. But feel free to forward the following comments to the respective DG.

Our concerns are:

State aid or fiscal/financial incentives need to be **part of an overall package of financial support activities** where stakeholders who benefit need to share their savings and potential revenues with those who have the cost (important basic principle).

A typical example are eSafety measures where the benefits are on the insurance and public authority side while the costs are with Telecom companies and automotive manufacturers.

For those who have the cost (development, productions, product, operations, etc.) **no positive business case is possible**, in particular when services should be offered where customers are not willing to pay for (enforcement measures, control, safety).

For those kind of "customer incentives"

- turn innovations into mass market products
- measures to create market awareness, interest, market pull
- support to set up infrastructure
- product incentives to facilitate purchase/acquiry of the product
- cost of service operations in PPP

an **harmonised approach** need to be followed accross Europe to avoid different national regulations especially when European service (e.g. harmonised European emergency call service) are targeted.

Due to **further increasing crossborder traffic** each country need to offer a similar **infrastructure** so that vehicles can use the same in-vehicle hardware and systems when travelling.

When e.g. Denmark supports the ramp-up of an eCall system and fully subsidized such a system it is not attractive for the Automotive Industry to develop something especially for Denmark due to the low volume just in one single small country (if a product already exists and just need promotion (e.g. navigation systems) this is different but for products that need infrastructure a European approach is essential).

**To summarize:**

Innovative Safety systems and in particular eSafety systems requiring an integrated product approach (different stakeholders) can only reach a fast and large market penetration when systems are made know on a large scale basis and when customer interest turns into sales.

Small volumes require high market prices and therefore hinder a fast ramp-up. Safety systems save human lifes and reduce severe injuries with highest benefits to the society and the social security and health systems. These future savings need to be redirected to reduce the initial price, creating higher volumes and with this reduced prices on the long run.

Financial/fiscal incentives in safety sysems need to be **harmonized across Europe to avoid market distortion** and create a **non-competitive life saving approach** accross Europe.

These incentives **help to ramp-up** the services to create the savings and returns on investments faster, investments which in a normal approach would take 20 to 30 years to reach market penetration.

Legal requirements in particular in the area of location based services (data potection and privacy rights) also

need a European solution.

Regards

Dr. Dr. Wolfgang A. Reinhardt  
Director Regulatory Affairs  
ACEA (The Association of European Vehicle Manufacturers)  
211, Rue du Noyer  
B-1000 Brussels  
Belgium