I – On the European ITS Action Plan and the related proposal for a directive on the deployment of ITS

Polis network of cities and regions welcomes the European ITS Action plan. Polis recognizes the need for an ambitious European initiative on ITS to support the coordination and coherence of ITS deployment across Europe, providing this is designed to support the policy objectives of the European Union.

In particular Polis stresses that European ITS initiatives should contribute to reduce the negative impact of transport on the environment, including achieving EU targets to reduce GHG, the reduction of congestion on European transport networks, the reduction of road accidents and should support the competitiveness of the European economy.

At the local level and in European cities, these objectives can only be achieved with the redefinition of the place of the private car and more efficient urban goods delivery systems. This requires a growth of alternative transport modes such as public transport, soft modes and new mobility services. ITS can contribute to this if it focuses on providing solutions for a better management of the network and help to provide solutions to travellers and the transport of goods. This mean that ITS should help to move away from the management of vehicles on the network to the management of the movement of people and goods.

ITS should support a modal shift at the local level and priority should be given to tools which can help to achieve this goal.

For this reason, Polis regrets that the Action Plan does not take into account the specificities of urban mobility and that the policy objectives are not more clearly identified. Any initiative of this kind and on ITS must be justified by the ability of accelerating the achievement of the policy objectives.

On the optimal use of road, traffic and travel data

Polis members draw the attention to the need to balance the demand for exchange of information between public and private actors of the sector.

Public authorities, i.e. infrastructure and traffic managers, could only provide guaranteed access by private companies to relevant public data on the basis of reciprocal agreements providing them access to relevant private (traffic) data which should support the improvement of traffic management.

It is necessary to clarify point 1.2 of Action Area 1 of the Action plan. Neither the nature of the data referred to in this paragraph nor the reason why it should be collected are specified clearly enough.

European cities and regions also express concerns about the liability issues related to the mandatory provision of public authorities to private companies and require that this be clarified before any obligation to exchange data.

While there are great expectation towards the potential of integrated transport and travel information, it should be stressed that this will only support a more efficient transport systems if it targets travellers rather than vehicles and therefore if it provides multimodal information to individuals.
It is also important to note that current traffic and network management systems are not able to cope efficiently with the amount of data they can receive. They should therefore receive support to be upgraded. Research efforts are important for this purpose. They are also important to develop decision support systems to use efficiently this data in traffic management and the provision of information. These are currently missing.

Minimum universal traffic information services can not be implemented until they are clearly defined and must not create an unfair burden on infrastructure managers, considering that it can potentially have very strong financial consequences for infrastructure managers and in particular local authorities.

**On the continuity of traffic and freight management ITS services on European transport corridors and in conurbations**

Polis members stress that at the urban level, the challenge for the future will not be about how to accommodate increasing levels of traffic but how to accommodate mobility demand, with different modes of transport and multimodal transfer. Important increases of traffic volumes in urban areas can not be sustainable and can not be accommodated on most of city networks.

Polis supports the definition of a European ITS framework architecture and of an ITS framework architecture for urban transport mobility, provided that the European Union and Member States closely associates urban transport authorities to the definition of this architecture. This is essential to guarantee that the challenges faced by cities and local infrastructure managers are taken into account in the definition of this architecture.

Beyond an ITS urban architecture, Polis would welcome initiatives which would guarantee the interoperatibility of various ITS architectures at the urban level to allow for the integration of the various systems, for instance between public transport and traffic management.

**On road safety and security**

ITS is only one of the tools which can help to improve road safety, and vehicle systems are only a part of the ITS road safety tools.

The Action plan fails to mention the need to develop ITS tools which are currently missing on the market for the efficient enforcement of traffic rules on European roads. Enforcement is one of the three main types of initiatives, with Education and Engineering, which can significantly contribute to improve road safety and should not be neglected in this initiative.

Polis members also explain that it is necessary that any initiative in this area avoid to take excessive responsibility away from the drivers of vehicles, which can create adverse effects and increase dangers rather than improve road safety.

**On the integration of the vehicle in the transport infrastructure**

The integration of an open in-vehicle platform should be introduced first in commercial vehicles in public transport vehicles and in public fleets of vehicles. This would allow for the faster deployment of this platform and better feedback on its efficiency considering that the public authorities have a better control of these vehicles.

The deployment of cooperative systems should be done only to the extent that their contribution to achieve the policy objectives of reducing congestion, containing the negative impact of transport on the environment and reducing the number of accidents and fatalities is clearly proven.

A roadmap and a financing plan for their deployment would then be required at the European level.
On data security and protection, and liability issues

Polis members stress the importance of this paragraph for the deployment of ITS. They call for the EU to address this issue in priority. Indeed, answers to questions related to data security and protection and to liability are pre-requirements for further progress in the deployment of ITS.

On European ITS cooperation and coordination

Polis welcomes the proposal for the development of a decision-support toolkit. Such an instrument is much needed to allow for decision-makers to better assess the possible contribution of ITS to achieve their policy objectives.

Polis has already engaged with its members in defining some of the elements which could compose such a toolkit with the European project CONDUITS which is about to start.

Polis members also support the creation of the ITS collaboration platform between Member States and regional/local governments to promote ITS initiatives in the area of urban mobility, as well as the creation of the European ITS Committee and the European ITS Advisory Group.

They insist however on the need that the role and opinion of local authorities, in particular for issues of relevance for urban mobility, is duly taken into account by the European ITS Committee. They expect therefore that the European ITS Advisory group be given a stronger role and that Polis will have the opportunity to play an active role in it.

Polis members also call for the creation of a new financial instrument for urban mobility which provide, among other things, the possibility for cities from all territories in Europe to benefit from European funds to accelerate the upgrade and development of ITS on their network.

This new instrument\(^1\) would also benefit, as far as ITS is concerned, from the development of guidelines for the public funding of ITS facilities and services. These guidelines should among other things allow for the funding of ITS facilities and services for urban areas as part of the TEN-T programme.

\(^1\) This new instrument is proposed by the European parliament draft report on the Action plan on urban mobility.