



The 5G Automotive Association's position on the Commission Draft Regulation for an update of eCall standards

5GAA Automotive Association

Position paper



CONTACT INFORMATION:

Lead Coordinator – Thomas Linget
Email: liaison@5gaa.org

MAILING ADDRESS:

5GAA c/o MCI Munich
Neumarkter Str. 21
81673 München, Germany
www.5gaa.org

Copyright © 2023 5GAA. All Rights Reserved.

No part may be reproduced except as authorised by written permission. The copyright and the foregoing restriction extend to reproduction in all media.

VERSION:

DATE OF PUBLICATION:	28 September 2023
DOCUMENT TYPE:	Position paper
EXTERNAL PUBLICATION:	Yes
DATE OF APPROVAL BY 5GAA BOARD:	21 September 2023

On behalf of more than 120 members, 5GAA welcomes the European Commission's proposed update to the 112-based eCall in-vehicle system (eCall) standards. We wholeheartedly support the Commission in making sure that future vehicles are designed with Next-Generation eCall (NG eCall) specifications in mind as soon as possible, and we would like to emphasise the importance of the Commission working to address the issues associated with the legacy fleet in parallel. It should be noted that, for the industry to be able to design and execute its strategy regarding production, development, and investments, all of the uncertainties must be clarified collectively as soon as possible. Otherwise, a significant risk is posed to the transition to NG eCall, adversely affecting all stakeholders. To ensure that eCall standards are revised appropriately, we would like to draw attention to the following:

- ▶ Adopt the Delegated Regulation by the end of October 2023 at the latest (as per the timeline provided by the Commission during MVWG on 04th July);
- ▶ Define a clear yet realistic cut-off date for the implementation of NG eCall by all stakeholders, which requires the finalisation and inclusion of relevant CEN technical specifications and standards (as soon as available);
- ▶ Address discrepancies in some of the timeframes referenced within the proposal, and
- ▶ Better future-proof the proposal by explicitly referencing technology evolution and associated best practices.

Proposed approach for Next-Generation eCall

We support the need to confirm the regulation governing future vehicles and technologies as soon as possible and provide legal certainty to public and private stakeholders. This should be done whilst discussions on how to address the legacy fleet continue in parallel and are not neglected or postponed. A straightforward but realistic application date for NG eCall implementation must be set on all parties, i.e., Original Equipment Manufacturers (OEMs), Mobile Network Operators (MNOs), and Public Safety Access Points (PSAPs) and suppliers. Such a date should provide both time and stability for OEMs, MNOs, and PSAPs to introduce Next-Generation eCall in the different Member States and alignment between them, with type-approval regulation, PSAPs regulation and recommendation to MNOs.

5GAA wish to underline that suppliers and OEMs require significant work to develop, procure, test, and type-approve NG eCall systems. To support the industry in this transition, 5GAA supports the entry into force of the new regulation as soon as possible, but allowing the impacted undertakings a reasonable legal/technical timeframe for its mandatory implementation, of at least 3,5 years after date of entry into force.

Industry nonetheless supports the creation of a transitional period where voluntary NG eCall deployment would be possible for potential early deployers, which should be deemed fully compliant with Regulation (EU) 2015/758.

Moreover, the regulation should make provisions not to mandate but not forbid a fallback to legacy eCall for In-Vehicle Systems (IVSs) fitted with both legacy and NG eCall capabilities but leaving the decision to implement it to OEMs, without prejudice to MNOs 2G/3G switch-off strategies. This requires referencing CEN EN 17905:2023 standard and related test specifications (currently under development) in cases where an NG eCall is impossible or fails to allow for a legacy eCall to be made over existing 2G/3G networks.

Comments on legal basis and standards referred to in the draft

Similarly, the current list of standards that the Commission relies on for eCall is not up-to-date and missing some references. This could be remedied by including the new CEN standards expected to be published in 2023. Namely:

- ▶ CEN EN 16062:2023, CEN EN 16454:2023, CEN EN 17184:2023, CEN EN 17240:2023, and
- ▶ CEN EN 17905 specifying HLAP for hybrid domain selection procedures, where CS and PS networks are available,
- ▶ CEN EN yyyyy (test standard for EN 17905 – currently has no number).

However, 5GAA members also support the referencing of technical specifications in the act as well as CEN standards, should these be available at a later time of publication. These should, importantly, be conditioned to periodic updates of the Regulation to replace technical specifications with the corresponding EN standards when published. As already flagged by ACEA, 5GAA would call upon the Commission to support CEN in finalising its packet-switched eCall specifications and convert them into EN standards as soon as possible.

5GAA would also like to flag that CEN standards only describe the Higher Layer Application Protocol (HLAP) and operating procedures for eCall. They do not cover profile-related aspects, i.e. normal and emergency call configurations over VoIP for User Equipments (UEs) and networks. We would invite the Commission and stakeholders to reflect upon the need for both IVSs and networks to support the eCall relevant aspects of the GSMA IR.92 and NG.114 profiles.

Future-proof legislation

5GAA would like to see a statement acknowledging technological evolution and the continual development that characterises technology within the current draft regulation. With this, both the Commission and European industry can avoid finding themselves in a similar situation once 4G/5G systems are replaced by newer technology. If the Commission's "new approach" principle cannot be applied to automotive connectivity requirements in the context of eCall, due to type-approval obligations, a more systematic and frequent periodic review and update of standards should be acknowledged and enshrined in the legislation to guarantee that they remain fit for purpose.

5GAA would like to stress our willingness to work with the Commission and all relevant stakeholders within the ecosystem to guarantee progression to Next-Generation eCall as soon as possible. This remains time-sensitive: each day, more cars are put onto European roads that are not adequately equipped for the future and will require a complex migration.

The update of the eCall regulation is long overdue, and we urge the Commission to adopt as soon as possible the Delegated Regulation provided that the concerns raised above are addressed. In parallel, a few alternative or complementary solutions to the legacy fleet must also be put forward rapidly, including the related funding/subsidies, and this critical issue should be completed on time.

5GAA and its members stand willing and ready to support the Commission in expediting the process to achieve its goal.

