



RESPONSE TO THE EUROPEAN COMMISSION CONSULTATION

**DEPLOYMENT OF IN-VEHICLE EMERGENCY CALL
– eCALL – IN EUROPE**

The Royal Society for the Prevention of Accidents' Response to the EC Consultation "Deployment of eCall in Europe"

The European Commission is carrying out an impact assessment of the eCall deployment. The assessment considers various policy options (no intervention, voluntary approach or mandatory implementation of eCall) to implement the eCall system in Europe.

eCall is an in-vehicle technology which activates using in-vehicle sensors following an accident. It then makes an emergency call to the appropriate emergency services with information about the crash.

The main objective of this public consultation is to collect the opinions of stakeholders and EU citizens on the issue and therefore ensure the transparency of the decision making process.

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Answering:

- as individual
- **on behalf of your company/organisation**
- on behalf of your public authority

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eCALL - QUESTIONS

1. *I am aware of the eCall system*

- **Yes**
- *Partly*
- *No*

RoSPA Comments

The function of the eCall system has been described on EC websites, although information through other channels has been limited. In the UK, there has been little mass publicity about it and we suspect that public awareness is low.

2. *I find the eCall system useful*

- **agree strongly**
- *agree*
- *undecided*
- *disagree*
- *disagree strongly*

RoSPA Comments

eCall could be a useful technology. If information about the crash and nature of injuries sustained can be fed back quickly to the emergency services before arrival at the crash scene, then it is likely that the consequences of the injuries suffered could be reduced.

It could have an influence by allowing earlier despatch of fire and rescue and medical services, reducing the time taken to attend the scene by giving the precise location, and by allowing the attending team time to plan for the specific accident if they have information on the number and severity of casualties and vehicle type(s).

Swedish estimates are that eCall will prevent 2-4% of road fatalities and 3-5% of serious injuries.⁽¹⁾

⁽¹⁾ Lind, G., Lindqvist, E. & Persson, S. (2003): Short descriptions of ITS safety applications and their potential safety benefits. Stratega and Transek. Appendix version 1.0 2003-12-31

UK estimates are that it would prevent 3% of all fatalities by 2020 if fitted to all new All Type Approved vehicles ⁽²⁾

⁽²⁾ McClure, D. & Graham, A. 2006 eCall - The Case for Deployment in the UK, Final report

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3. *I would like to have my vehicle equipped with the eCall system*

- **agree strongly**
- *agree*
- *undecided*
- *disagree*
- *disagree strongly*

RoSPA Comments

RoSPA has no additional comments.

4. *I would like the eCall system to work all over Europe and across all automotive brands*

- **agree strongly**
- *agree*
- *undecided*
- *disagree*
- *disagree strongly*

RoSPA Comments

In order to get the most benefit from eCall it needs to be available on all vehicles, but especially the ones most at risk of being involved in an accident.

Younger drivers are still the age group most at risk on Europe's roads, and more frequently drive older or cheaper models of vehicle. If eCall is only available on high end vehicles then it will not have any benefit for this age group and would arguably only make the safest drivers safer.

5. *The deployment of an interoperable EU-wide eCall can be achieved through private-led initiatives*

- *agree strongly*
- *agree*
- *undecided*
- **disagree**
- *disagree strongly*

RoSPA Comments

It must be noted that Government and legislation led initiatives typically bring technologies into the fleet at a faster rate than market led initiatives.

This is especially true given that collaborative action across national borders is required between public organisations, telecom companies and service providers, car manufacturers and retailers, and the public in order to bring the technology to market.

An EC led approach would also allow for it to have more influence in standardising the technology between manufacturers and countries.

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6. *Since 20 EU Member States have signed the eCall Memorandum of Understanding to promote the voluntary deployment of eCall, there is no need for legislative measures.*

- *agree strongly*
- *agree*
- **undecided**
- *disagree*
- *disagree strongly*

RoSPA Comments

RoSPA has no additional comments.

7. *eCall should not be optional, but mandatory in all vehicles*

- *agree strongly*
- **agree**
- *undecided*
- *disagree*
- *disagree strongly*

RoSPA Comments

As stated in response to Q2, optional fitment would likely lead to the technology only being available on the safer vehicles, at the higher end of the vehicle market. This could have large implications for effectiveness and raises the question of whether the money spent to fund eCall by the EC could be better spent on another technology.

8. *eCall should be introduced in the following categories of vehicles?*

- **cars**
- **motorcycles**
- **light trucks**
- **heavy duty trucks**
- **buses**
- *none of them*

RoSPA Comments

It would make sense to introduce eCall across the whole vehicle fleet. Larger vehicles such as trucks and coaches have a longer service life than passenger cars and so it would take much longer to increase fitment rate in these vehicle types.

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9. I would prefer that the voice call and data generated by the eCall system be handled by a private service provider rather than by a public emergency call centre (112 centre)

- agree strongly
- agree
- **undecided**
- disagree
- disagree strongly

RoSPA Comments

RoSPA has no strong opinion either way, other than whichever arrangement must ensure that the system is free to use for end users and have a secure source of funding.

10. How much would you, as vehicle owner, be willing to pay for having eCall in your next vehicle?

- **less than 150 €**
- **between 150 to 300 €**
- **more than 300 €**

RoSPA Comments

RoSPA has no further comments.

11. If the price of all new vehicles goes up by ~ 200€ because it includes the eCall system, this would affect my choice when buying a new vehicle

- Yes, I would change vehicles less frequently or buy cheaper vehicle models.
- No, it would not affect my choice.

RoSPA Comments

RoSPA has no further comments.

12. By providing the basic components for connecting the car to the telecommunications network, the in-vehicle eCall system could also be used to offer optional private or public telematic services, such as pay as you drive insurance schemes, dangerous goods tracking, dynamic navigation, breakdown calls, car localisation in case of theft. The availability of such services would provide me with more of an incentive to equip my next vehicle with eCall.

- **agree strongly**
- agree
- undecided
- disagree
- disagree strongly

RoSPA Comments

The basic components for connecting a car to the telecommunications network are a building block, upon which many beneficial safety or navigation technologies can be

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added – such as providing a method for vehicle-to-vehicle or vehicle-to-road communication.

13. *The mandatory introduction of eCall will contribute to speed up the deployment of other telematics services in Europe.*

- **agree strongly**
- *agree*
- *undecided*
- *disagree*
- *disagree strongly*

RoSPA Comments

RoSPA has no further comments.

14. *Other comments and/or contributions in relation to eCall*

eCall should have a positive effect on reducing the number of road casualties in the EU. However, an EC study found that its Benefit:Cost ratio was between 0.4 :1 to 2:1, depending on the fitment costs⁽³⁾. So for every Euro spent on developing eCall, there would be between 0.4 to 2 Euros of benefit to society.

The same report found that many other technologies had much higher ratios, such as seat belt reminders (7.6-8.2:1), event data recorders (7.1:1), retro-fitting of blind spot mirrors (3.8:1), Intelligent Speed Adaptation (ISA) (3.3:1) and alcohol ignition interlocks (3.1:1).

Whilst benefit to cost is not the only way of deciding which technologies should be prioritised, RoSPA believes that a strong commitment to co-ordinate the introduction of ISA at a European level would help to achieve its earlier adoption, and provide much greater casualty reduction benefits.

⁽³⁾ Cost-benefit assessment and prioritisation of vehicle safety technologies
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The Commission may contact me for further details on the submitted information

- **Yes**