Joint ACEA-CLEPA response to the public consultation on the draft BEREC Guidelines on the implementation of net neutrality rules

Connected driving requires innovation-proof rules in the Open Internet

The motor vehicles of the future will require powerful digital networks. For connected and automated driving to happen, the automotive sector needs fixed and mobile networks to be ubiquitous, resilient and safe.

The interaction between drivers, vehicles, new technology components and broadband networks will more and more be part of the driving experience.

For this reason, we stress the importance of telecom network providers operating within rules that allow them flexibility to manage their networks appropriately. The ultimate aim for digital networks in connected and automated driving is to ensure high performance, high availability and high reliability.

Innovation in services related to connected and automated driving will undoubtedly need to rely on high levels of quality of service (QoS), replicability and low latency. This implies a need for flexibility in the management of networks e.g. the option to prioritise, at appropriate times, certain kinds of traffic classified by common application and service category, for example where it relates to services and applications that improve road safety.

In this respect, an innovation-proof implementation of the EU Open Internet Regulation (2015/2120) will be fundamental to enabling innovative services to come to market. Network operators will clearly need a fair degree of legal certainty and predictability.

Other than the safeguards already defined in the Open Internet Regulation itself, no further restrictions should come from its implementation. Such a scenario could be very damaging to the provision and/or optimisation of services in connected and automated driving.

We therefore urge that the final draft of the Implementation Guidelines for the Open Internet Regulation reflect an understanding of the specific network-management needs of connected and automated driving. We are concerned that the current draft lacks the necessary flexibility and predictability. Moreover, we stress the importance of ensuring a harmonised implementation across EU Member States. This will be essential to support European scale for services and applications that depend on the Open Internet rules.