Response from BSI EPL/278

Dear Sirs,

BSI EPL/278 is the British Standards Institute panel responsible for the standardisation of Intelligent Transport Systems technologies.

As representatives of industry actors and trade bodies we would like to express concern at the proposals as tabled. In similar consultations in both the USA and the EC transport professional have expressed concern about the potential erosion of spectrum allocation that has been set aside for ITS applications. The so-called ITS-G5 spectrum allocation is widely used internationally for DSRC Electronic Fee Collection and Tolling applications. At present this does not represent a large marketplace in the UK (UK Tag population is probably in the region of 500k with an asset value of ~ £5M) but the same spectrum is also being used within largescale field trial of vehicle to vehicle and vehicle to infrastructure communications in many regions internationally (generally known as C-ITS). The UK Government has expressed a desire to take a leading position in automated and connected vehicle technologies and several key field trials are emerging in the UK using ITS-G5, such as the UK CITE project, the connected vehicle trials in Greenwich, Milton Keynes and Bristol and perhaps most significantly the under-design connected vehicle corridor on the A2/M2 London to Dover corridor and its connection to collaborative cross-channel trials.

The European Commission's strategy for C-Roads notes the importance of the 5.9 safety channel and wishes for it to be protected.

Several of my colleagues on EPL/278 have expressed technical concerns related to the availability of spectrum set aside for C-ITS safety related services. Other concerns have been expressed about the impact of Wifi at 5.8Ghz that will cause DSRC Tags to be in a continuously active state which will have a significant impact on Operational Life. Trials in 2006 at TfL showed that tags in vehicles parked in DSRC zones (continuously active) could have an operational life of less than 7 days as opposed to 5-7 years.

This represents points of concern made by my expert members within standardisation – we also have concern that the wider set of transportation stakeholders with a growing interest in C-ITS and connected vehicles may not be engaged, aware of the consultation or realise its potential implications.

Yours Sincerely, Dr Jonathan Harrod Booth Chair, BSI EPL/278