European Blind Union response to the European Commission public consultation on Building Trust in Connected and Automated Mobility (CAM)

November 2018

Background information
Extracts from the consultation document:

Context of the consultation:
“Cars and other vehicles are increasingly equipped with sensors, driver assistance systems, Internet connectivity, etc., allowing them to become connected, smart and autonomous. (…) Fully autonomous vehicles are just around the corner. Building on the previous initiative 'Europe on the Move' of May 2017, on the 17th of May 2018 the European Commission put forward a strategy to make Europe a world leader for automated and connected mobility. The objective is to allow all Europeans to benefit from safer traffic, less polluting vehicles and more advanced technological solutions, while supporting the competitiveness of the EU industry. (…) Transport will be safer, cleaner, cheaper and more accessible to the elderly and to people with reduced mobility.
(…) The Communication on Connected and Automated Mobility (CAM) proposed a comprehensive EU approach towards connected and automated mobility, setting out a clear, forward looking and ambitious European agenda. (…) it is envisaged that the Commission will work towards the adoption of a Recommendation to be addressed to the Member States and industry actors.
(…)
The aim is to ensure that EU legal and policy frameworks are ready to support the deployment of safe connected and automated mobility, while simultaneously addressing societal and environmental concerns which will be decisive for public acceptance.”

**Aim of the consultation:**

“Building on the three key areas, where clarification appears to be necessary – data, cybersecurity, use of 5G commercial bands -, this public consultation aims to identify from the general public and relevant stakeholders (car manufacturers, connectivity providers, service providers, telecom providers, end-users, public authorities, health community and civil society organisations) which are the main challenges linked to the deployment of connected and automated cars today.

(...) The consultation investigates the cybersecurity threats and trust issues, the data governance aspects (e.g. governance models; principles for car data sharing), privacy and data protection needs, as well as the different aspects of technology needs.”

**Feedback**

EBU focused in its feedback on answering the following question:

**Are there other aspects that should be taken into account by the regulators and industry actors when developing connected and automated vehicles and related mobility services that are not covered by this public consultation?**

EBU replied as follows:

Automated driving can enhance the independent mobility of blind and partially sighted persons, provided that accessibility and usability requirements are developed, implemented and respected. We count on the Commission to carefully address their needs from the outset, according to the Design for All principle.

If the Commission is interested, EBU would be happy to provide a list of 12 points that need to be born in mind, to ensure that the blind and visually impaired people as well as other people with assistance needs
can participate in future mobility (source: internal working document on autonomous vehicles prepared for the World Blind Union Technology Committee by an affiliate of our German member DBSV).

Contact person at the EBU Office
Antoine Fobe, Head of Campaigning
Email: ebucampaigning@euroblind.org - Tel: +33 1 47 05 04 84