



Director General

To: Antonio Tajani
Vice-President of the European Commission
B-1049 Brussels
Belgium

Your
reference: -

Our
reference: NLI-MTR-12-025

Subject: Insurance Europe comments on the future eCall draft proposal

Brussels, 21 March 2012

Dear Vice-President Antonio Tajani,

Insurance Europe would like to share its views and concerns on the forthcoming European Commission (EC) Regulation on motor vehicles type-approval requirements for the implementation of the eCall system.

Insurance Europe welcomes the EC initiative to implement the European eCall by 2015 for all new vehicles. We call upon the EC to avoid any consumer detriments, which could result from additional Third Party Services. The insurance industry would like to underline that it is important that the upcoming proposal will ensure free consumer choice, free and fair competition by obliging car manufacturers to implement a possibility for consumers to choose and change Third Party Service Providers and to inform them adequately. The EC proposal should also ensure the in-vehicle data platform will be opened to other service providers.

Insurance Europe supports the EC proposal that allows each Member State to decide, whether the already existing emergency call centres or other Third Parties should be handling the emergency calls according to their market situation. The fact that the EC proposal allows for additional services to be combined with eCall but does not set out parameters to ensure consumer choice and open access among stakeholders is ensured is a deficiency in the current proposal.

Firstly, the vehicle manufacturer implements the new eCall technology which is the gateway to any additional services such as breakdown assistance, theft tracking systems etc. Since the EC does not intend to elaborate on the parameters for additional services, the vehicle manufacturer will choose their preferred Third Party providers for any additional services (e.g. assistance companies, garages, spare parts providers etc.). The consumer is therefore unlikely to have had an influence on or made an active decision as to his/her preferred Third Party provider.

Second, the consumer who often already has assistance cover through an insurer or a membership in an automobile club, buys a vehicle with a new technology called eCall, but will not be aware that it will also entail changing from trusted partners to new partners chosen by the vehicle manufacturer. The change might even result in double coverage, because existing contracts cannot be terminated at the time of the vehicle purchase.



Thirdly, the induced provider change can ultimately result in higher vehicle maintenance costs for the consumer without having the possibility to change provider. In the worst case scenario, the consumer is bound to his chosen vehicle manufacturer and its chosen Third Party Service providers for the lifetime of his vehicle. The vehicle manufacturer selling the gateway product, the passenger car with eCall technology, has an exclusive position in respect of any other additional services. The competition between Third Party Service Providers is, therefore, restricted if no parameters to ensure free consumer choice and open access to stakeholders is not ensured at the outset, and could lead to complete market foreclosure once all passenger cars are equipped with eCall.

We remain at your disposal, should you wish to discuss this further or should you need any further information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "M. Koller", is positioned above the printed name.

Michaela Koller
Director General