

CDLS/B2547/WSM

Brussels, 6 February 2004

## **IRU POSITION ON THE COMMISSION PROPOSAL RELATING TO THE INTEROPERABILITY OF ROAD USER CHARGING SYSTEMS**

**IRU Position on the Proposal for a Directive on the widespread introduction and interoperability of electronic road toll systems in the Community (COM(2003) 132 final).**

### **I. CONTENT OF THE PROPOSAL**

On 23 April 2003, the European Commission adopted a proposal for a Directive on the widespread introduction and interoperability of electronic road toll systems in the Community. If adopted, the Directive would establish a single European toll service, based on the principle of "one invoice per customer, one box per vehicle". The service would be deployed in two phases, from 2005 for vehicles over 3.5t and from 2010 for cars. All toll systems in the EU are to rely exclusively on satellite positioning and mobile communications by 2012. The 5.8 GHz microwave technology would have to be phased out by this date.

### **II. IRU POSITION**

Without prejudice to its position on infrastructure user charging as such, the IRU considers that the way in which charges are collected must be as efficient as possible. Operators should not be obliged to equip and/or introduce procedures such that many different national, regional or local systems may be applied.

The IRU therefore supports in principle the need for an interoperable toll collection service. For vehicles travelling all over the European Union, a single European system would be highly desirable for a number of reasons: different equipment, each at an unnecessary high cost, different procedures, each implying time losses and many requiring driver intervention, as much as different payment methods and different partners to pay would cause undue costs and risks for operators.

The IRU believes it necessary to underline that charges for road use imply additional use costs and administrative burdens for operators. Equipment for registering infrastructure, time losses implied by stops on route, checking invoices for road use, ensuring reimbursement by the shippers and financing the period between the payment of the charge and its reimbursement by the transport client are just examples.

Tolls and toll-collection systems should explicitly seek to reduce these costs as much as possible, for instance by:

- Not charging the own costs of the toll system to the infrastructure user. These costs should be paid from the revenue of the toll system as it accrues from charging for the costs of road use as such.

- Making toll collection equipment available free of charge and allow installation and maintenance to take place during other vehicle stand-still times.
- Detailed information on invoices, including all elements operators may need to recuperate VAT, billing of transport clients and taking advantage of possible compensatory measures such as reduced diesel fuel excise duties.
- A reasonable time for paying invoices for road use, to reduce the financing burden on the transport company.
- A simple cash/credit card payment option for occasional users as part of the collection system.

Observing that the optimum collection system depends on the infrastructure charging system itself and that the short and medium-term prospects for a coherent and harmonised charging system at EU level are much reduced, the IRU considers that priority should be given to the “one invoice per operator” objective. Recognising that specific problems need to be solved, the IRU considers similarities with the mobile phone invoicing system to be such that the “one invoice per operator” objective is feasible.

As regards the technology for registering road use, the IRU is in favour of a cheap, technically fully reliable and tamper-proof system. If, in the long run, the system will be GPS-based, the need for an international approach is evident. There is no future, from the transport operator’s angle, for a variety of communication and registration equipment on board vehicles. Therefore, the IRU would like to underline the need to finalise the development of such a system and to require that new national or local road user charging systems in an EU Member State be based on it. Only in this way has the “one box per vehicle” concept a chance of being implemented in the future.

Having regard to

- the local character of many road vehicle movements,
- the presently higher technical reliability of microwave technology,
- the losses implied by the compulsory replacement of payment systems before the end of their lifetime,
- the availability of dual equipment that suits both DSRC and GSM/GPS-based systems,
- the continued existence of different national charging systems,

the IRU favours that the GSM/GPS-based system advocated by the European Commission will only be required for new national or local user charging systems.

Existing systems, based on short range communications, should be allowed to continue for their economic lifetime. Also, if countries, not applying road pricing for lorries generally, levy a toll for a specific stretch (tunnel, bridge, etc.), the obligatory introduction of GPS technology could be too costly. Dual technology on-board equipment could solve the problem of the continued use of both short range and GPS communication systems and might therefore be made mandatory in all Member States as the equipment to be provided – free of charge – to all operators from a certain date.

A further reason for delaying the compulsory use of GSM/GPS-based systems is that the latter should combine road user charging with other functions, such as recording driving and rest hours and voluntary company usage, e.g. fleet management, transport security, etc.

The present EU rules on the digital tachograph have been adopted without considering other possible uses of the recorded data. Rules relating to Toll Collection should not be developed in such an isolated manner, as safety, cost efficiency, and the organisation of transport operations would substantially gain from an integrated approach.

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