

**Targeted Consultation concerning revision of Directive 2004/52/EC and Decision 2009/750/EC on the European Electronic Toll Service. Input from the Dutch Ministry of Infrastructure and the Environment.**

**Please note in case of multiple choice question, the chosen answer is marked with green text , as is any additional information.**

## **A. INTRODUCTION**

This questionnaire forms part of the (stakeholder) consultation on the review of Directive 2004/52/EC and Decision 2009/750/EC on the European Electronic Toll Service (EETS). It targets stakeholders with a direct professional link to the electronic tolling market, and thus complements the questionnaire of the open public consultation ([http://ec.europa.eu/transport/modes/road/consultations/2016-eets\\_en.htm](http://ec.europa.eu/transport/modes/road/consultations/2016-eets_en.htm)).

Some of the questions are particularly aimed at a group of stakeholders who – by the nature of their business activities – have access to specific data or information. Where this is the case, it will be mentioned at the beginning of the question. Other respondents are however free to answer these questions as well.

Apart from section B, answers to the questions are to be provided in free text. Supporting material can be annexed to the answered questionnaire in a separate file. The answers should respect the numbering of the questions to facilitate their analysis. Respondents can answer in any official language of the EU, and answers in all languages will have the same value and be analysed in the same manner.

The responses to the targeted consultation will be published and the results will be presented in a public report. Respondents must clearly state it if they wish their answers to be treated anonymously (cf. first part of the questionnaire).

Answers (filled in questionnaires in word format<sup>1</sup>) are to be sent to the following email address: [move-d3-EETS@ec.europa.eu](mailto:move-d3-EETS@ec.europa.eu) before **13 November end of the day**.

## **B. ABOUT THE RESPONDENT**

- (1) Please indicate your full name and, where applicable, the entity on behalf of which you participate in this public consultation  
**Dutch Ministry of Infrastructure and the Environment**
- (2) Please indicate, if applicable, the registration number of the entity in the EU Transparency Register **n/a**
- (3) Please indicate your email address:
- (4) Please indicate your country of residence/country of establishment of the represented entity **The Netherlands**
- (5) Please indicate the stakeholder group to which you belong, choosing from the list below (you can pick more than one):
  - (a) **Public authority/administration**
  - (b) Toll charger
  - (c) Toll service provider
  - (d) Toll system operator (playing the roles of both toll charger and toll service provider, e.g. Satellic in Belgium, Toll Collect in Germany, etc.)

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<sup>1</sup> Please avoid PDF as it makes the analysis of the answers more difficult.

- (e) Road user (including associations of road users)
- (f) Notified body
- (g) Tolling equipment manufacturer
- (h) System Integrator
- (i) Standardisation body
- (j) Consultancy
- (k) Academia
- (l) Industry association
- (m) Other (please indicate)

(6) Please indicate whether you agree to the publication of your response.

- a) Under the name indicated – I agree to the publication of all information in my response, except for my email address
- b) **Anonymously** – I agree to the publication of all information in my response, except the replies to question 2 (name), question 4 (registration number) and question 5 (email address)

### C. COVERAGE BY THE SERVICE

The legislation as it stands requires EETS providers to offer the European Electronic Toll Service to their clients in all EETS domains within 24 months from their official registration in their State of establishment. This requirement is often seen as excessive and even impossible to meet, given the great (and growing) number of EETS domains in the EU and the complexity of the accreditation and certification procedures. However, the removal of the requirement of universal coverage could potentially lead to "cherry picking", where the EETS would eventually never be offered in peripheral markets.

A number of solutions to the problem could be considered:

- a) Completely remove the requirement to cover all EETS domains within 24 months
- b) Keep the requirement to cover all EETS domains, but extend the deadline
- c) Replace the full EU coverage requirement by the obligation to cover a certain, high percentage of EETS domains and/or Member States **how would the coverage be measured? Population/vehicles involved? Km2 covered (of roads within the domains)?**
- d) Replace the full EU coverage requirement with an obligation to cover certain regional EETS domains and allow the coverage to be completed through partnerships with other EETS Providers **This would require contracts between EETS Providers, that for the EETS provider outside that regional area might end up replacing contracts with the toll chargers in question within that area. As such this could possibly be used as a way to evade fulfilling the requirements stated by the toll chargers within that area.**
- e) Replace the requirement to cover all EETS domains by the obligation to provide the service in the country of registration and all neighbouring countries. **The country of registration doesn't necessarily have an EETS-domain itself, and this obligation would then mean a circle of service around the country of registration, but otherwise this idea seems sound.**
- f) Other?

**Question 1:** Do you agree that the above-described requirement for EETS providers is a problem? If so, please give examples of its negative effects.

#### **Answer:**

The current obligations for EETS Providers, as stated in article 4 of the Decision, include EETS contracts covering all EETS domains within 24 months following their registration in accordance with Article 19. In reality considering the many EETS toll domains in Member States, this seems an excessive demand, especially in view of the different demands that are set out from the different toll domains. Normal contract negotiations can easily take months. Two years therefore seems a relative short period to effect this obligation. In order to level the negotiation field for service providers in terms of their position opposite

toll chargers of the different toll domains, the choice of which toll domains they wish to engage in, could be left to them. However, Member States at the fringe of the territory and Member States with less vehicles involved and therefore less enticement for service providers to make a good business case, have valid concerns about the effect on their territory, if this obligation is dismissed. These concerns should be addressed before any definitive choices are made. E.g. it could be impressed upon service providers to at least provide services to neighboring countries, in order to let a coverage to adjacent toll domains grow naturally.

Considering the difficulties in realizing an EU wide EETS coverage with a solid business case for EETS Providers, there definitely seems cause for concerns. However no solid examples can be given of the negative effects, besides the general one, that there isn't any EETS providers that has fulfilled the obligation to cover all EETS domains within 24 months.

**Question 2:** Please indicate your preferred solution to the problem (from the list above or other) and explain why. Please also rank the solutions considered according to your preference (1=preferred solution).

**Answer:**

Solutions in order of preference: 1e, 2b,3 c, 4d, then 5f, 6a.

#### **D. ENSURING THE FAIR FUNCTIONING OF THE EETS MARKET**

Today, EETS providers and toll service providers encounter problems of a legal, administrative, contractual and/or technical nature in accessing certain national markets. When access is sought, the contractual terms required sometimes, allegedly, do not adequately reflect the costs and risks of the parties, which undermines the viability of the EETS business model and thus discourages the provision of the service.

Alleged discriminatory practices and unfair contractual conditions are typically reported in the EETS domains where the roles of toll charger and toll service provider are played by the same entity. In such cases, it is difficult to compare the conditions offered to the operator of the toll system, on the one hand, and to the EETS provider, on the other hand, for the provision of the toll collection service alone. Several solutions to this problem could be considered, such as:

- a) Defining, in the legislation, of the services for which EETS providers should be remunerated by the toll charger This would mean a public obligation, concerning the private contracts between the toll charger and the service providers. In order to validate the necessity thereof, it would first have to be clear which services are being considered, under what circumstances and in how far fair remuneration would be specified. Generally speaking, the more detailed the obligation, the less justified it seems.
- b) Strict separation of accounts between the toll charger and toll service provider types of services It is already stated in article 8 of the Decision that “where an organization provides both Toll Charger and EETS Provider services, Member States shall take the measures necessary to ensure that separate profit and loss accounts and balance sheets are kept and published separately for each type of activity and that cross subsidies between the two activities are excluded.

The accounting systems for Toll Charger and EETS Provider activities shall be kept separate and from accounts relating to any other type of activities so that a clear evaluation can be made of the costs and benefits related to EETS provision.”

It is unclear whether a further act of legislation concerning the separation of accounts in this matter, is going to provide insights that will enable a mediation body to establish an act of discrimination against a registered EETS service provider, attempting to be accredited for a toll domain, based on remuneration. When Member States tender out to one company, the winning bid is chosen considering not only the total price, but many different points of comparison between tender offers. The price of remuneration for particular services may well be an integral part of that winning tender bid.

From a different viewpoint concerning a separation of accounts, efforts should always be made to prevent a possible misuse of company sensitive data, and therefore access to company sensitive data should always be limited to those working in areas for which the data is delivered, E.g. when the toll charger is involved with the service providers, but also delivers this service itself.

- c) Strict separation between the shareholders of toll chargers and of toll service providers  
 A major objective and requirement of tendering a national road pricing scheme, is ensuring that even without EETS providers, the toll system is going to work. Numerous new roads are being constructed in an public-private construction, and hence tendered in a so-called DBFM(O)-contract. Sometimes, the toll revenues are part of the contract. This means a contractor will need the toll revenues to pay the road construction of maintenance. Again, for such a contractor, the major objective is to ensure that even without EETS providers, the toll system is going to work. You cannot task a toll charger with the responsibility of the toll operation, including the financial risk of tolls not being paid, if there is no option for them to ensure that action will be taken and the toll will be paid. A toll charger should have the option of a. providing EETS- services and b. ensuring through e.g. shareholders responsibilities, that this service is well provided and functions well and so toll is paid. In case several companies together form a new party to provide an adequate toll charger company, chances are that the same shareholders would also be involved in the legitimate pursuance of providing toll services. Also, through layered constructions, shareholders could operate in a less visible way not easily recognized
- d) Obligation for toll chargers to organise separate tenders for toll charger- and toll service provider types of services. If It is unclear what is gained by organizing separate tenders for toll charger- and toll service provider types of services. In our view this will take extra time because than we will have two tenders instead of one tender. Furthermore two tenders will introduce the risk of extra legal procedures and the risk of a tender not complying with the EU competition rules because of specific knowledge at the winning party of the other tender.
- e) In case the tender contains a public service obligation (PSO) element, this element should be tendered out separately, or at least clearly delimited (separate remuneration) in the tender It's unclear which services are being considered here, but generally speaking the tender and any bidding reactions concern all parts of that tender and taking out certain parts to tender them separately seems unadvisable considering the larger matter at hand, to get a working toll domain.
- f) Right for the European Commission to issue an opinion on the tenders for the operation of electronic toll systems before they are published – this to spot elements of the tender which could be prejudicial to the fair functioning of the EETS market. No. Tendering is already subject to competition law. Giving the EC the right to issue an opinion on the tenders isn't proportional to what is aimed for in the legislation. Member States are within their right to come up with an architecture of new electronic tolling systems etc and as such choose the most appropriate technical solution considering the political choices made concerning the system. Furthermore, generally speaking Member States, when considering a new system, will of their own accord find their way to the European Commission in order to get the relevant input, as well as learn from best practices in other Member States. As such, there is insufficient ground to give such a specific right to the European Commission, when considering new national plans.
- g) Enhance the powers of Conciliation Bodies (cf article 10 of Decision 2009/750/EC) for a description of the current role of these bodies), turning them into market regulators such as those existing in other fields (e.g. in rail transport, on the electricity market, etc.) No. As stated in article 10 of the Decision, "Member States shall take the necessary measures to ensure that its Conciliation Body is independent in its organization and legal structure from the commercial interests of Toll Chargers and EETS Providers." This should be a party that both sides of a possible difference in opinion can respect and trust. As such, a conciliation body is not easily available nor chosen. However, where it concerns the possible outcome of negotiations, a conciliation body should not be put in a position to overrule a toll charging party. The aim of the conciliation body should be to find a solution to the disagreement at hand. If the matter is not resolved to the satisfaction of both parties before a conciliation body, perhaps a judge should be involved. The conciliation body could provide a recommendation to that end with a preferred solution.
- h) Other? It should be noted that the toll charger is responsible for many more aspects, than a service provider. As such, a dominant position within a toll domain is natural for the toll charger.

**Question 3 (for EETS providers and other toll service providers):** Do you agree with the description of the problem of discriminatory/unfair contractual conditions for EETS providers? Please provide concrete examples of EETS domains where such conditions are applied.

**Answer:** n/a

**Question 4:** Please rank the solutions listed above according to your preference (1=preferred solution) and explain your choices.

**Answer:** Only b seems valid, but that is already an obligation under the existing decision 2009/750/EC. Besides this, none of the solutions above are desirable from a member state point of view. Relevant thoughts are stated behind the options under D.

#### **E. REDUCING THE COST OF ELECTRONIC TOLLING AND OF THE EETS**

Despite the existence of a large and coherent body of standards, electronic toll collection systems in the EU are still very different one from the others. Rather than copying existing, successful models, new schemes, more often than not, design the system architecture from scratch. This is alleged to increase the costs of development, deployment and operation of electronic tolling schemes, but also to increase the cost and level of complexity of providing interoperable toll collection services. Also, a lot of money could potentially be saved by Member States/toll chargers, if, instead of each developing their own systems, they co-operated to run a single one together. Such co-operation has so far happened only between the three Belgian regions, who decided to run together a system which covers the whole country.

The following solutions could be considered to address the problems described above:

- (a) Extending the standardisation effort, by developing more profiled standards and thus harmonising tolling schemes to a greater degree **this could possibly work, it would depend on specifics**
- (b) Putting upon toll chargers additional obligations in their relations with EETS providers, such as the obligation to provide electronic maps in GNSS<sup>2</sup>-based schemes, or to support the handling of EETS providers through a harmonised application profile. **If the system at hand doesn't actually work with electronic maps/ specific roads, but rather envisions e.g. all km's driven no matter where, such an obligation could be problematic.**
- (c) Harmonising the verification of conformity to specifications and of the suitability for use of interoperability constituents beyond what is currently provided for in Annex IV of Decision 2009/750/EC **this could possibly work**
- (d) Harmonising the procedure of 'accreditation' of the EETS provider to a toll domain **this could possibly work**
- (e) Supporting co-operation between toll chargers/Member States through the organisation of workshops, exchange of best practices and/or financial support **exchanging of best practices etc. is always a good idea. Not necessarily something to put in the directive however!**
- (f) Other? **If possible, acknowledge the use of OBU's being used in EETS systems, to also be used in systems non-EETS. The account of a German or Belgian OBU could e.g. be used, with the future Dutch toll roads, that work with ANPR. This would be very userfriendly and extend the normality of chosen technology working across borders. It is important however that using the OBU's from another system would not mean that the national system therefore becomes an EETS –system itself, with all that this implies, as this would not be proportional to the national system in question.**

**Question 5:** Please give your opinion on the existence and precise nature of the problem described above.

**Answer:** the current toll domains within the EU all differ in size, public versus private realization, tax, charge or fee, chosen technology, parameters etc. These differences are the consequences of national choices, that very much depends on national circumstances (area, roads, vehicles involved, transit traffic etc. etc. Competition law however also plays a huge role in how far a specific system from a neighbouring country could be "copied" because this would effectively mean that whoever is toll charger of service provider for the system being copied, they would already have a very strong starting position when the tender is published. Another point for consideration would be that specifying systems in terms of functionality, performance and quality rather than technology might provide a more flexible way with better margins for business cases and innovative solutions emerging over time than only very detailed, hardwired technical requirements.

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<sup>2</sup> Global navigation satellite system.

**Question 6 (for EETS providers and other toll service providers):** Please specify, to your best knowledge, examples of local specificities to electronic tolling systems which increase the setup and/or operation cost of the schemes, or constitute obstacles to the provision of EETS in the concerned toll domains. What are the most problematic elements (too restrictive KPIs<sup>3</sup>, requirements stemming from differing national data protection rules, classification of tolls as charges or taxes, model of relationship between the toll charger and the EETS provider – 'reseller' or 'agency', lack of clear remuneration of EETS, risk cover when EETS is in charge of the toll calculation, other)? Please provide concrete examples, supported by background information and figures

**Answer:** n/a

**Question 7 (for public authorities, toll chargers and toll system operators):** Please specify, to your best knowledge, examples of local specificities which constitute obstacles to interoperability, but are objectively justified by local characteristics or law.

**Answer:** Unknown, there are currently no EETS-domains in the Netherlands.

**Question 8 (for public authorities, toll chargers):** What are the main reasons preventing Member States/toll chargers from co-operating in the deployment of electronic tolling schemes? Are they mainly political (questions of national sovereignty over toll collection systems), legal, administrative, economic or other in nature?

**Answer:** As seen in Belgium, when the political will is there, much is possible. However, it takes massive commitment from not only the governments in question, but also from parliaments, stakeholders and the public opinion. To have a political choice made and effectuated within one country can be difficult enough, let alone if you want to coordinate the ideas, the chosen solution and the effectuation thereof across borders. Everything else – legal, economic issues etc. can also be significant hurdles.

**Question 9:** Please rank the solutions listed above according to your preference (1=preferred solution) and explain your choices, including references to concrete examples, data and information

**Answer:** in order of preference: 1c, 2d, 3f, 4a, 5e, not b - though there might be some benefit from a harmonised application profile.

## F. COSTS OF THE LACK OF INTEROPERABILITY FOR ROAD USERS

The absence of interoperability between electronic tolling schemes in the EU has very concrete negative consequences for the road users. The most direct problem resulting from the lack of technical interoperability is the need to equip vehicles with several on-board units to be able to use the roads in different countries. However, the lack of an EETS results in other costs, affecting in particular small companies, such as administrative and accounting costs, fines linked to unintentional non-payment of tolls, traffic diversion to get a truck equipped, costs of installation, re-installation and servicing of OBUs<sup>4</sup>, etc.

**Question 10 (for haulage companies/road transport associations):** Do you agree with the above description of the problem? Please support your answers with concrete examples, figures and statistics.

**Answer:** n/a

## G. CROSS-BORDER ENFORCEMENT

In the absence of common rules on the exchange of information on toll offenders between Member States and of a legal basis allowing toll chargers to enforce offenders once they are abroad, it is not uncommon that such offenders cannot be prosecuted, and unpaid tolls recovered, once the vehicle leaves the country. On average, losses from foreigners not paying their tolls amount to a small proportion of the road operator's revenues from tolls, but not chasing foreign registered offenders can be seen as unfair to

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<sup>3</sup> Key performance indicators.

<sup>4</sup> On-board units.

compliant users. Furthermore, the problem can become significant on certain roads and toll domains, notably in vicinity of State borders and in free flow systems.

Using the technical solution currently used for the cross-border enforcement of road safety related offenses also for toll offenders appears to be the most obvious solution, but alternative approaches could also be considered.

**Question 11** (for public authorities, toll chargers and toll system operators): Please indicate (and quantify to the possible extent), on the basis of your experience, the extent of the problem of toll avoidance by foreign registered vehicles, as compared to locally registered ones. Please differentiate between different kinds of vehicles (trucks, buses, light vehicles), different types of tolls (free flow, with barriers open/closed, vignette – paper/electronic), different types of roads, etc. What are, in your opinion, the main reasons for the violations (lack of awareness, specific difficulties in registering, lack of willingness to pay, other)? What solutions did you develop to limit the fraud? Which of these have proven to be efficient and which not?

**Answer:** Currently there is no specific experience as there are no EETS- domains in the Netherlands. Whether due to lack of awareness or lack of willingness to pay, the percentage of light vehicles that do not comply with a free flow systems in another country is probably significantly higher, than heavy goods vehicles, because the latter generally speaking aren't incidental road users and therefore a large percentage will probably set up an account.

**Question 12:** Should the exchange of information, between Member States, on the identity of toll offenders be mandated by EU law, as is the case for road safety related offenses? Is the answer the same irrespective of the type of toll, of its classification in national law (charge or tax) and of the type of vehicle concerned? What should be the modalities of this exchange (e.g. should private toll chargers have access to such a system, or should the latter be limited to public authorities?)? What are the pros and cons of such a solution?

**Answer:**

To keep support for road pricing, no matter what system, it is essential that all users, including foreign users, pay the tolls. This is in particular a (political) issue in member states with a relatively high percentage of international transport. Currently an effective approach to ensure the payment by foreign vehicles, is lacking. For this reason, a revisited directive should establish a mandatory mechanism to ensure payment by all vehicles. This should entail all systems where road pricing is being paid by foreigners and inhabitants of that country alike, no matter the chosen form (e.g. different solutions for Flanders, the Walloon region and the Brussel region in Belgium), but obviously this should not apply to other vehicle related taxes, like regular road taxes that are being paid within a country for vehicles registered in that country. The exchange of data in order to enforce the national system should be made possible by EU law no matter whether the national system involved is an EETS-system or not. E.g national systems using ANPR or vignette. However, the full regime of the EETS directive is disproportional to the added value for other toll schemes such as ANPR or vignette, and should therefore not be applied.

The access to such a system should be limited to public authorities, due to privacy reasons. To keep the mechanism as efficient as possible, it would be advisable to utilize EUCARIS and the national vehicle registration authorities.

**Question 13:** Does differing national law relating to the protection of personal data impede the cross-border enforcement of toll payments?

**Answer:** The fact that there is no EU obligation to share information has been mentioned several times to the Netherlands, when studying the options for exchanging enforcement data with vehicle registration authorities in 24 countries, but also the differences between a tax fine versus an administrative fine can be an issue. If exchange of data is possible, the applicant is most often required to state why, to what end and on which grounds the applicant can (legally) ask for the information.

**Question 14:** Do the currently differing national data protection regimes give rise to difficulties in the design of systems by EETS providers? If so, will the General Data Protection Regulation coming into force in 2018 improve the situation and how?

**Answer:**

There are currently no EETS –domains in the Netherlands, unknown.

## H. NEW TECHNOLOGIES

With a progressing penetration of the market with smartphones, the question arises as to the possible use of these devices for tolling. Integration of OBUs with other devices built in the vehicles (navigation tools, enforcement tools such as the smart tachograph, commercial telematics devices) is also regularly considered.

**Question 15** (*for equipment manufacturers, toll chargers, system integrators and toll service providers*): How could electronic tolling potentially develop over the upcoming ten years? What changes to the EU legislation would be needed to foster welcome market developments in this respect (and, similarly, to protect the market from unwanted risks)?

**Answer:** n/a

**Question 16** (*for equipment manufacturers, toll chargers, system integrators and toll service providers*): Are there other technologies that are proving or may prove to have potential for development in the European market that are worth being considered when revising the EETS legal framework?

**Answer:** n/a

## I. LIGHT VEHICLES

Current legislation on the EETS applies non-distinctively to heavy duty (trucks, buses) and light vehicles (cars, vans). This is disregarding the intrinsic differences between these two segments of the market: trucks tend to cross borders much more often than cars; car drivers have worse knowledge of the regulations applicable abroad than professional truck drivers; there are no GNSS-based tolling systems for cars (but an EETS provider for cars must still offer a GNSS OBU, according to the legislation in place); at the same time, many electronic tolling systems for cars are using the automatic number plate recognition (ANPR) technology, etc.

In order to reflect the above-mentioned differences, the following adaptations to the EU legal framework on EETS could be considered:

- (a) Excluding light vehicles from the scope of the legislation
- (b) Having a number of specific rules for the EETS covering light vehicles, such as:
  - i. No requirement for a GNSS-OBU
  - ii. Inclusion of ANPR-based systems
  - iii. Allowing the use of RFID<sup>5</sup> or emerging technologies for local tolling of light vehicles: urban city tolling, bridges or tunnels
  - iv. Other?

**Question 17** (*for toll service providers, toll chargers and road transport associations*): Please give your opinion on the differences between the EETS markets for heavy duty- and light vehicles. In particular, please indicate if in your opinion there is a market for EETS for light vehicles, and under what conditions. Please be specific in your answers and support them with references to concrete examples, data and information.

**Answer:**

The current EETS scope is systems with the use of an OBU, no matter whether these are mandatory for freight vehicles or passenger cars. It seems valid that interoperability of those systems is advisable in order to achieve the maximum freedom of movement between Member States for passenger cars. However, most Member States with a tolling system for passenger cars have chosen an e-vignette or specific toll roads. Interoperability of those systems is not cost effective, considering the relative low percentage of all passenger car use, that is being used for long distances through several different tolling systems. In conclusion, if a system involving an OBU is used for passenger cars, interoperability with other such systems would certainly be desirable, especially for neighboring countries, and to this end lessons should

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<sup>5</sup> Radio frequency identification.



be learned from the OBU systems for freight. The current goal however is realizing an actual interoperability for EETS systems for freight.

**Question 18:** Please rank the solutions (including sub-solutions) listed above according to your preference (1=preferred solution) and explain your choices, including references to concrete examples, data and information

**Answer:**

iv. For light vehicles all systems in Europe with OBU's are DSRC at the moment. EETS service providers however are met with the obligation that their OBU should present all three technical solutions (5.8 Ghz microwave (DSRC) and satellite positioning (GNSS) coupled with mobile communication (phone)), which makes them an order of magnitude more costly than needed.. Therefore it would be feasible and a real cost safer and improvement of the business case for EETS service providers if EETS Providers would be allowed to deliver DSRC-only OBU's in accordance with the toll domain in question, to light vehicles who ask for it, because they only want to drive in DSRC toll domains. This would leave open the possibility that OBU's including GNSS and CNSS technology could be provided if GNSS toll domains for light vehicles would emerge. In conclusion, it could then be up to the customer to ask for the less expensive DSRC-only OBU if they only drive in DSRC toll domains or for the more expensive 3-technologies'one if they want to drive in GNSS domains too.

Regarding ii) it would be good if the international exchange of data for the purpose of toll enforcement would be possible for all types of systems, EETS or non-EETS, tax or fee, HGVs or light vehicles, OBU or non-OBU such as ANPR. However other obligations from the EETS directive or decision should not apply to non-OBU systems as this would be disproportional.

**Question 19:** Please indicate any other comments or recommendations which you would like to make in the framework of this consultation.

**Answer:** we are pleased with the opportunity to reflect with the EU Commission on possible solutions for more interoperability, before specific proposals are being written.

## **J. APPENDICES**

Please attach any documents to support your answers. The documents must be numbered and clearly referenced to facilitate their analysis in conjunction with the answers to the questionnaire.