

REETS-TEN

Activity 5: Interoperability Management

D 5.2 Report on common rules for REETS operation

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1 Scope of Document

Definition of Activity given by Project definition:

“Sub activity 5.2 Common rules for REETS operation

The assessment of the existing Interoperability Management Framework will lead to a definition of common rules for the scope of the REETS operation. These common rules have to be elaborated and developed during this activity and will be put in place for Activity 7 relating to the Information Platform, for the sake of the operation of any testing pilot in REETS toll domains or beyond. Sub activity 5.2 shall furthermore work on a practical guidance on the criteria according to Art 3 of the Decision 750/2009/EC.”

By “..the existing Interoperability Management Framework..” is meant the sum of:

- a) The framework defined by the *Decision 750/2009/EC*
- b) All tasks / issues / areas, not defined by the Decision, but employed by existing interoperable toll systems in establishing and operating interoperable toll systems

The REETS project has the mandate to identify issues within areas that are part of the interoperable toll systems in Europe as of today. D.5.1 has identified tasks and actions for their mitigation. Chapter 2 describes in details these tasks / issues / areas that are part of the interoperable toll systems in Europe including how these might be handled (i.e. what rules / agreed arrangements apply). Activity 7 of the REETS will make these rules applicable on the REETS information platform for the operation of the REETS pilots.

The second part of the task related to “...a practical guidance on the criteria according to Art 3 of the Decision 750/2009/EC” is described in D5.3 which covers EETS related IM functions. Chapter 3 in D5.2 describes experiences from REETS concerning requirements to Service Providers (SP) in relations to each of the requirements a-f in Article 3 of the Decision.

2 Common Rules for IM in REETS Pilots

2.1 Guidance and governance in transition to market

Toll services currently operated at national level shall be opened to competition in order to allow SPs to offer market alternatives. The implementation of interoperability of tolling systems and the opening of the markets for toll related services through the implementation of the EETS in Europe is a huge change process. Parts of the value chain (e.g. provisioning of the On Board Equipment - OBE) of toll services, which are currently operated on national monopolistic structures, shall be opened to competition allowing SPs to offer interoperable OBEs to users.

The European scenario since the Decision 750/2009/EC until now showed that it is not possible to establish a competitive market leaving too much freedom of actions. A strict legal regulation, at least in the phase of transit to market, is needed. In that respect the regulatory framework for EETS has been insufficient; it did not go far enough (due also to some unavailable standards at the time), left out important parts (as recommended by major stakeholders) and was in some parts unrealistic. In particular this was true with regard to the assessment of the business environment, concerning the timeline for roll-out of the EETS, and the request for pan-European coverage within 24 months from the registration of a SP.

As a consequence of the delay of the EETS, it was a wise decision of the EC to bring together the major stakeholders of large Member States with electronic fee collection systems in central Europe or with significant volume of transnational traffic in the project Regional European Electronic Toll Service (REETS). The REETS initiative aims at implementing cross-border toll services in a regional project hopefully kick-starting the EETS.

2.2 Provisions and Requirements of the REETS-TEN Funding Decision

On December 16, 2013, the Commission released the **EC Decision C (2013) 9473** concerning the granting of Union financial aid for projects of common interest "Regional European Electronic Toll Service (REETS-TEN)" - 2012-EU-50009-S - in the field of the trans-European transport network (the "EC Funding Decision").

According to Art II.2.3 of the EC Funding Decision, the proposed action has two main phases:

1. Analysis Phase:

Analysis of contractual, procedural and technical topics, in order to develop recommendations and solutions that can facilitate the introduction of EETS (Activity 1 – 4).

2. Monitoring Phase:

Implementation of an open information platform on the experience gained (Activity 7 "Information Platform") and monitoring and coordination of any pilot demonstrations of EETS compliant services covering several participating Member States (Activity 8 "Monitoring of Testing / Implementation").

Furthermore, under Activity 8 the REETS-TEN Project shall perform the monitoring and coordination of potential pilots. The results of Activity 8 are summarised in half-yearly progress reports, covering the progress with regard to testing/implementation. Activity 8 started on 01/01/2014.

Whereas the Activities 1 – 7 of the REETS-TEN Project have clear project character (all members have committed to produce the agreed deliverables), Activity 8 is different:

According to section 1.3.3 of the REETS-TEN Project Definition V 3.0 (Project Definition), there are two external factors influencing the project, both remaining outside the control of the project. More precisely, any pilot test/demonstration or the transition to a sustainable operational implementation under real market conditions will need important long-term investments that will have to be maintained beyond the duration of the project. It is only possible for the stakeholders to undertake such investments when:

- interested SP(s) will be in a position to identify a critical mass of potential REETS users and take the decision to examine the implementation of EETS compliant services, and
- the commercial conditions are acceptable for both individual TCs and SPs and the negotiations between these parties are successful.

There is clearly no competence of the project or its management structures to impose implementation or set deadlines etc.

This is a clear consequence when setting up the project as to kick-start the development of the market. If the goal remains, the market approach implementation shall follow the model of establishing it by bilateral contracts between TCs and independent SPs in competition with each other. Any other solution, e.g. a top down designed rollout of the EETS would be a completely different approach.

2.3 Roles of the Actors

Since any pilot implementations have to be based upon sustainable solutions, which could in principle, be transferred into normal operation, it is decisive that the single TCs and SPs take the responsibility for the implementation.

The REETS project is open to any European SP, independent of their participation in the previous activities. This allows for an open competition between the SPs, and consequently AETIS – as an association – does not participate directly in the pilot activities, but take part in coordination activities for the pilots.

Obviously, any SP can contact any TC in Europe to seek a contract for providing EETS-compliant services. The project will make all results available to stakeholders. However, within the framework of the project the project management will not monitor any activities beyond the planned geographical region.

Project Management will monitor, coordinate and facilitate as far as possible any testing/implementation activities managed and performed individually by each TC and SP and not centrally by the consortium.

2.4 Facilitating Implementation

2.4.1 Bottom-up Approach following EETS

The fundamental basis of the implementation of EETS are the bilateral contacts, negotiations and contracts between individual TC and SP, the latter being in competition with each other. Thus, the approach of Activity 8 (Monitoring of Testing / Implementation) remains based on this concept.

Furthermore, Activity 8 builds on existing interoperability solutions instead of a top-down design of a pilot all over the REETS region. Pilot activities aim at technical implementation and testing of cross-border services in a "friendly" environment with a limited number of users in the pilot, but with the final objective to enable the transit to sustainable operation. Enabling the transit of the pilot to normal operation is a major aim, because without that and consequently without the opportunity to earn return on investment, the costs of testing and the pilot would not give return on investments.

REETS Activity 8 therefore – acting like a catalyst – focuses on the facilitation of the process, by providing processes and a platform for bringing together the interested stakeholders. Within the limits of the EETS concept, Activity 8 facilitates EETS implementation in three main areas:

- Coordination of key issues and activities
- Simplifications in the process
- Facilitation in coordination

2.4.2 Forum for coordination of key issues and activities

One key element is to bring together the actors involved in the implementation to meet on regular basis. Objectives are the coordination of operational pilot activities, information exchange and reporting to other stakeholders.

The main tool of Activity 8 for that is the REETS Pilot Coordination Group (see below No 2.6.2). The results and the progress are summarised in half-yearly progress reports which are prepared by the Management of Activity 8. The main content of the report is provided by the REETS TCs and SPs.

The progress report enables Project Coordination, the REETS-TEN Steering Committee and the European Commission to monitor the progress of the implementation. In order to encourage open and substantial contributions of the participants (REETS TCs and SPs), the progress reports are not published to a larger public. However, lessons learnt from these activities will be published in Deliverable 6.1.c (Return on Experience Implementation).

2.4.3 Simplifications in the process

To the extent possible, REETS TCs have committed themselves to facilitate pilot operations by checking carefully the qualification of an applying company, not asking for formal registration of an EETS SP (EP). As a consequence of that also more flexible solutions are possible, for instance the number and types of the required OBE.

Furthermore, the REETS pilot is open to any SP, independent of their participation in the previous activities.

2.4.4 Facilitation by (TC) Coordination in Testing

One of the conclusions of REETS-TEN Activity 2 (Certification) was that Coordination among clustered TCs could simplify testing and thereby reduce costs (REETS-TEN Summary Document, Chapter 2, Activity 2: Results and Benefits of the Analysis):

"TCs that, at least, share the same technology for ETC (Electronic Toll Collection), should seek to optimise and adopt toll domain independent requirements whenever possible, in order to drive the development of a simple and effective common service. Optimisation by TCs, of processes for testing of an OBE model is of the decision of the concerned TCs and should be on a voluntary basis. Close and efficient cooperation between the TCs is required to build the new framework of interoperability qualification of an OBE model."

Two proposals have been described to further reduce the complexity of the technical accreditation process and reduce the effort for the procedure:

1. Centralised approach for testing Toll Domain specific specifications
2. Harmonising technical requirements and mutual recognition

REETS-TEN Activity 4 (Back-office Interfaces) concluded: "Due to the individual EFC system definitions and requirements, the implementation for REETS and EETS may be complex for SPs. However, thanks to a cluster approach (like EasyGo, TIS PL, VIA-T, Telepass – see Deliverable D5.1), unique specifications have been implemented for several decades of TCs and several SP." Consequently, the usage of common specifications operated through back-office interface-hubs would, at least on mid-term, also reduce costs for implementation.

Following that approach and considering the interest from SPs to establish interoperable services in the framework of the pilot in the toll domains of ASFINAG, GDDKiA and Sund & Bælt, the three TCs have started a dialogue to evaluate a closer cooperation. The dialogue (excluding GDDKiA, because cooperation activities with Poland (GDDKiA) are unfortunately postponed, due to the need for decisions

by the Polish authorities) is focusing on identifying possible synergies with regard to the REETS Pilot, e.g. in the area of testing. As there are many similarities between the systems, there is a potential for common activities, which can be beneficial for both the TCs and the participating SPs.

ASFINAG and Sund & Bælt have aligned their interoperability solutions (interfaces etc.) in the framework of EasyGo. One of the points being discussed is whether common solutions can be arrived at which meet the requirements of further toll domains leading to reduced testing and development efforts for all parties and minimising the additional costs for each party.

Further cooperation between TCs accompanying the implementation could facilitate and simplify processes.

2.5 Governance and Management Structures of REETS

A clear project and management structure is necessary for the coordinated guidance to market.

The project structures are as follows:

2.5.1 Project structure

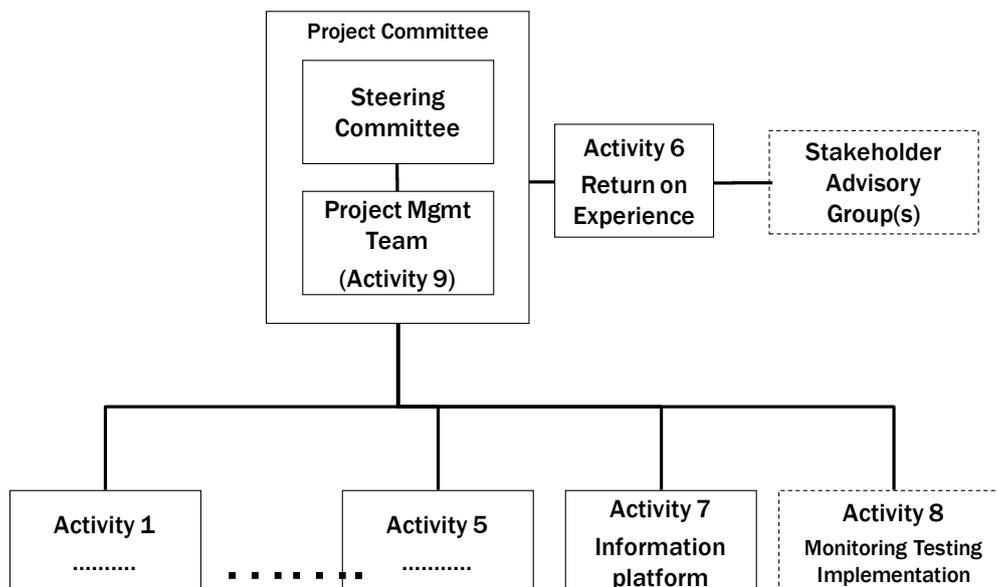


Fig. 1

2.5.2 Steering Committee

The Steering Committee has the overall responsibility of the project. The Steering Committee manages the project at the strategic level and is supported by the Project Management Team for the operational tasks. It is responsible for setting the direction of the project through decisions on strategic matters, for establishing a framework (context) that allows the project to fulfil its objectives and for approving project action plan and budget. Furthermore, the Steering Committee approves the deliverables of the project and acts as escalation level if issues cannot be solved by the Activity teams.

All REETS partners are represented in the Steering Committee.

The Member States Administrations from Austria, Denmark and Italy are not members of the REETS Consortium but participate as observing members in the Steering Committee. It should be noted that also Belgium, the Czech Republic and Norway will take part as observers in the Steering Committee from November 2015.

2.5.3 Project Management Team and Project Coordination

The Project Management Team (PMT) acts on behalf of the Steering Committee and coordinates the project activities at the operational level. The Project Management Team consists of all Activity Leaders and ACTIVITY Deputy Leaders including the Project Coordination Team. The operational project management handled by the Project Coordinators ASFINAG and ASECAP, organised as Project Coordination Team.

2.5.4 Dissemination and Stakeholder Management

Dissemination (return on experience) and Stakeholder Management are essential, in particular to attract the industry and new SPs and to enlarge REETS to other European Toll Domains. The main tools are

- The REETS Website and the upcoming EETS Info Platform (see also below No 2.6.1)
- The yearly REETS Day
- Contacts and discussions with other TCs (progress here is reported in the half yearly progress reports).

A summary of all activities for Dissemination and Stakeholder Management are documented in the "Strategic Action Plan" of the REETS Project, in particular Annex 1 REETS-TEN Stakeholder Management.

2.6 Essential tools for the guidance to market

2.6.1 Activity 7: Information basis for REETS Implementations

As an introduction, the Analysis Phase of the REETS Project included the analysis of contractual, commercial and technical issues, in order to develop recommendations and solutions that can facilitate the introduction of EETS. This work was performed in the period from September 2013 until June 2014 and included the following Activities:

- Activity 1: Contractual Framework and Risk Management
- Activity 2: Certification
- Activity 3: Key Performance Indicators
- Activity 4: Back Office Interfaces and Security

Activity 7 utilises the results from the previous activities, in particular the key finding of Activities 1 to 4. In cooperation with Activity 5 the creation of a part of the Interoperability Management function including a knowledge base for an Information Sharing Resource Platform will take place.

The work of Activity 7 have produced the following deliverables:

- D7.1 REETS implementation guide
- D7.2 REETS implementation knowledge base
- D7.3 Report on REETS Interoperability Management platform
- D7.4 Options for a sustainable REETS/ EETS interoperability management platform

Findings and recommendations have been developed in the above-mentioned areas belonging to the Analysis Phase; the findings and recommendations have been drafted and possibly agreed by all stake-holders represented in the REETS project, thus representing a broad consensus among a relevant part of the current stakeholders of interest for the EETS.

The main components and the design of the Information Platform and Help Desk are described in the deliverable D7.2 REETS Implementation Knowledge Base. Furthermore, the definition of “content” and the “information” to be shared within the Information Sharing Resource Platform was part of the work.

Taking into account the Commission’s Communication COM (2012) 474 final, the comprehensive Information Sharing Resource Platform of the REETS-TEN Project will provide up-to-date information on REETS / EETS as a single point of access on the Internet. The platform is operational since July 1st, 2015 through the REETS website. Further information can be obtained under: <http://www.reets.eu/eetsinfoplatform>.

2.6.2 REETS Pilot Coordination Group

REETS Activity 8 has also set up a REETS Pilot Coordination group, led by the leader of the Activity, including all actively participating REETS TC and SP, plus ASECAP and AETIS.

The composition of the Pilot Coordination Group is as follows:

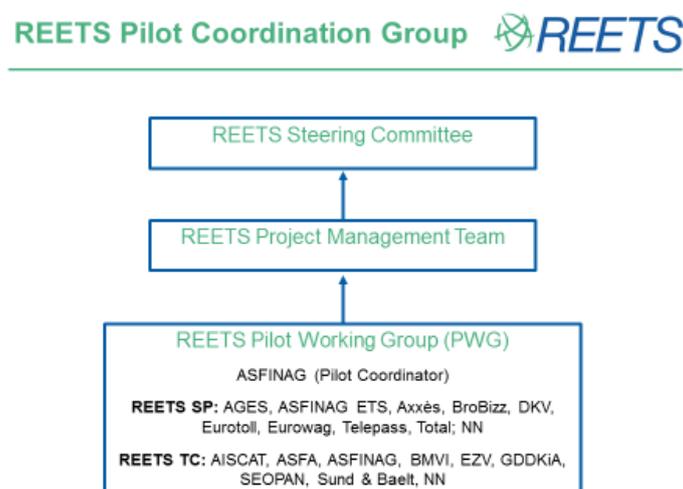


Fig. 2

The Tasks of the REETS Pilot Coordination Group (PCG) are:

- Coordinate REETS pilot activities
- Organise at least quarterly meetings of the group
- Assemble toll domain schedules to global schedule incl. updates
- Exchange of information regarding progress
- Discuss challenges/barriers for implementation
- Facilitate the progress by coordination and communication
- Report to the REETS Steering Committee

The common feedback from all participants was that the group and the meeting is the right set-up to report and discuss the progress and to clarify open topics and important issues. The meetings also provide a global overview of the pilot activities in the REETS Region and thereby enable better coordination and planning. In addition to the ongoing bilateral activities aiming at implementation and testing, all participants agreed that the group and the process is a key factor for the deployment of

REETS and agreed to continue the process. The frequency of the meetings of course depends on the progress of the activities, but at least quarterly meetings have been proved successful.

2.7 Continued REETS Interoperability Management

2.7.1 Launching of a change process in transit to market

The REETS Project will meet its goals. REETS has successfully completed the Analysis Phase (Activity 1 – 4) and will complete the Deliverables in Activity 5. As a kick-start and first step to the deployment of EETS the information platform (Activity 7) has been set up and is running, the first company is registered as an EETS-Provider and implementation activities have begun in the REETS Member States. Therefore, the first step is complete.

Formally, the REETS TEN Project will finish at the end of 2015. However, several activities will continue or are expected to start in 2016 (and further), e.g. started pilot activities, new pilot activities, activities with new Toll Domains, etc. The estimation presented in the REETS Steering Committee on June 08, 2015, is that the (enlarged) REETS community will constantly move towards EETS (horizon 2017/2018).

An evaluation and possible amendment of the regulatory framework (EETS Decision), which would clearly support the process, will be launched by the European Commission.

As the "market approach" of the EETS is the way forward, the continued support and guidance for the EETS change process by

- the operation of the EETS Info Platform and
- continued pilot coordination in similar structure

are strongly recommended.

The D5.3 report provides recommendations for interoperability management activities that need to be performed to support further development and operation of EETS.

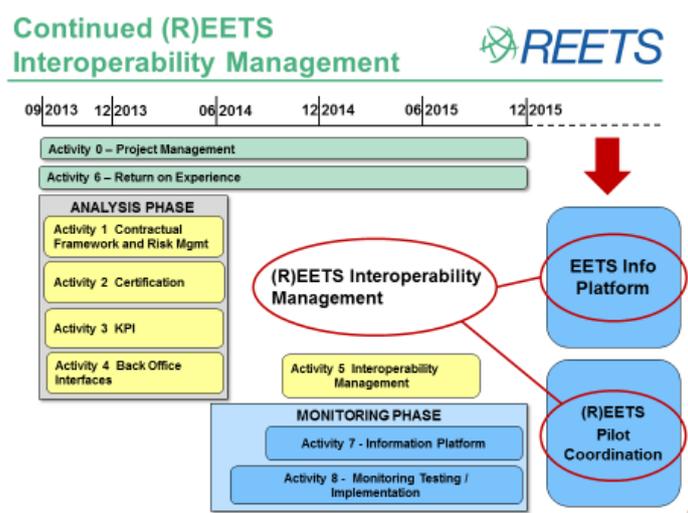


Fig. 3

Stopping the current coordination and information activities would cause puzzlement of the whole market and the momentum EETS has achieved would lose its positive effect.

2.7.2 EETS Information Platform

2.7.2.1 REETS Information Platform

The Information Platform is the end product of the Activity 7 of the REETS project and is exactly what Article 19 of EETS Decision 2009/750 asks and what EC describes in its Communication COM (2012) 474 final. It is a comprehensive “Information Sharing Resource Platform” designed to act as a single information point of access in the internet, gathering and providing up-to-date information on EETS. Such a unique point will enhance the multidirectional-bilateral information services among states, between state to state, between State and EC and between state and interested stakeholders and the public.

The Information Platform described in the REETS-TEN project is structured to serve not only during the period of the project (that ends at 31/12/2015). The Information Platform is designed in a way to serve as (with the political blessing of the Member States and European Commission) an efficient interactive single point of access, addressing properly all the EETS specificities, mainly after the closing of the REETS-TEN Project. It is designed to function as requested by the Decision 2009/750 and by EC Communication COM (2012) 474 final §4.1.

The Information Platform will be managed and coordinated by the Info management team in order to:

- gather the needed data
- manage the process of the received data
- produce the information product and, as a result
- provide the information product openly to the Member States, the EC, the interested Stakeholders and the public

The information as “information-production” and “information-provision” of the Information Platform are performed by the Activity 7 Sub-tasks 7.1, 7.2 and with close cooperation with the Activities 5 and 8 which will constitute integral part of the Information Platform.

This Information Platform will directly contribute to the exchange of best practices and the dissemination of up-to-date information on EETS among professional stakeholders. At the current stage until the end of the REETS project, this information platform relates to the REETS participants. The design of the “Information Sharing Resource Platform” will be based on the available data and REETS results from the current phase of REETS Project. More specific the “Information Sharing Resource Platform” will disseminate the results of the REETS Analysis & Monitoring phases and a list with “Links” that will provide direct information from the REETS countries and REETS key stakeholders.

Taking into account the report of Activity 7 and the results from Activities 5 and 8, the Information Sharing Resource Platform may be updated or redesigned in order to provide a more comprehensive and concrete picture of the requirements needed for the EETS implementation.

2.7.2.2 EETS Information Platform after the end of the project?

The Information Platform is designed to function also after the end of the project as EETS Information Platform and will be a part of a continued REETS / EETS Interoperability Management. With support of the European Commission, the Information Platform is subject to be updated and operated being the official EETS single point of contact via the internet. It will collect all the available official EETS information, coming from the EETS Stakeholders (Member States, TCs, SPs, Notified Bodies, Conciliation Bodies, Standardisation Bodies, Manufacturers, others) and will disseminate the proper information through a user-friendly Information Sharing mechanism.

The EETS Information Platform will function with the support of the EC and the Member States, will be properly managed and coordinated by an Info Management team in order to gather the needed data, to manage the received data and share the information.

The roles of the European Commission and the Member States are crucial for the successful operation of the EETS Information Platform. The roles of the European Commission and the Member States are crucial for the successful operation of the EETS Information Platform. More information can be found in D7.4.

2.7.3 Continued REETS Pilot Coordination

The Members of the REETS-TEN Project and the active SPs are committed to continue the process of coordination of pilot activities after 2015 as long as deemed useful for all parties. The activities will continue at two levels:

- Strategic and political level with a REETS Pilot Supervisory Group (invited by the EC)
- Operational level with a Pilot Working Group

According to the REETS SC on June 08, 2015, the structure, goals and tasks are as follows:

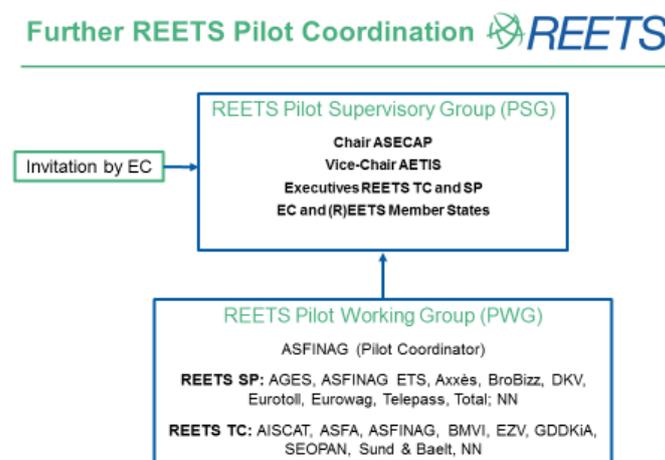


Fig. 4

Objectives and Tasks of the REETS Pilot Supervisory Group are:

- Objectives:
 - Facilitation of the REETS implementation and REETS Pilot operations
 - Continue high level communication and information exchange as set-up during the REETS project
 - Platform for discussion the further evolution of the EETS
- Tasks:
 - Guidance and direction of pilot activities
 - Exchange and discussion of strategic issues
 - Information and exchange on pilot progress

Objectives and Tasks of the REETS Pilot Working Group are:

- Objectives:

- Coordination of operational pilot activities, information exchange and reporting to other stakeholders.
- Tasks:
 - Overall coordination of REETS pilot activities
 - Facilitation of the progress by coordination and communication
 - Discussion of challenges/barriers for implementation
 - Assemble toll domain schedules to global schedule incl. updates
 - Organise at least quarterly meetings of the group
 - Exchange of information regarding progress
 - Dissemination through the Info Platform (currently Activity 7)
 - Stakeholder Management re pilot operations
 - Reporting to REETS Pilot Supervisory Group

3 Requirements to Service Providers

3.1 Introduction

Deliverable D5.3 “*Report on rules for a potential EETS IM*” describes a “Practical Guideline for the requirements of Art 3 Decision 2009/750/EC”. As input to these guidelines, this chapter briefly describes what some REETS pilots require from the SPs concerning points a-f in Article 3:

- a) Hold EN ISO 9001 certification or equivalent
- b) Technical equipment and compliance of the interoperability constituents
- c) Demonstrate competence in the provision of electronic tolling services or in relevant domains
- d) Have appropriate financial standing
- e) Maintain a global risk management plan
- f) Be of good repute

3.2 Denmark/Sweden

A/S Storebælt and Øresundsbro Konsortiet I/S has requested that all SPs demonstrate that the specified requirements are met. The SPs have done so in a document “Technical and Commercial Concept of the SP” (TCC). Subsequently A/S Storebælt has completed a plausibility check.

The SP shall prepare a technical and commercial concept for its activities as SP in the Toll Domains of A/S Storebælt and Øresundsbro Konsortiet I/S.

This concept must at least contain plausible and coherent information on the following points, whereby the TC, on request, is also to be provided with appropriate documentary proof and all necessary information.

The requirements from the EETS domain statement need to be fulfilled and it should be described how the SP regarding the following points will fulfil them:

- Technical concept
 - OBE
 - Toll transaction
 - Conformity of the OBE
 - Recertification process of the OBE
 - Data interface between SP and TC
 - Suitability for use tests
 - Quality measurement and management
 - Change management
 - Incident management
- Commercial
 - Customer service concept
 - Economic requirements for the SP

Requirements of Art 3 Decision 2009/750/EC	Denmark/Sweden
Hold EN ISO 9001 certification or equivalent	<i>Documentation for this is provided as part of the TCC</i>
Technical equipment and compliance of the interoperability constituents	<i>OBE equipment and data exchange shall fulfil the EasyGo requirements. Documentation describing the proposed solution and how the requirements set will be met is presented in the TCC and subsequently assessed as part of the plausibility check.</i>
Demonstrate competence in the provision of electronic tolling services or in relevant domains	<i>Experience from similar tasks is part of the TCC. Experience as well as general knowledge of the SP is assessed as part of the plausibility check.</i>
Have appropriate financial standing	<i>Requirements have been set up regarding in part proof for ensuring the financial means for implementing the concept at least for the phase up to commencement of operations and the first two years of operation (e.g. commitment of own resources, financing promises, etc., and in part requirements to the solvency of the SP. The latter includes providing of guarantee, however, depending on the SP's credit rating and payment behaviour in general. The TCC includes documentation for meeting these requirements. Subsequently, a credit rating in relation to the ongoing business will be conducted of the SP. Documentation is checked in connection with the plausibility check.</i>
Maintain a global risk management plan	<i>Requirements in this context include that the SP must fulfil the EasyGo security policy. Documentation appears from the TCC.</i>
Be of good repute	<i>All the SPs applying for Storebælt are well known to the company and further documented in the TCC.</i>

3.3 Austria

ASFINAG Maut Service GmbH and A/S Storebaelt together with Øresundsbro Konsortiet I/S are already in close cooperation due to their partnership within the EasyGo Consortium. Taking advantage of that a harmonized process for accepting Service Providers by those respective Toll Chargers was developed. Also ASFINAG has asked the SPs to provide a technical and commercial concept where they describe how and proof that they can fulfil the requirements from the ASFINAG EETS Domain Statement and its respective annexes. Thus, the explanations listed under chapter 3.2 do also apply for Austria

3.4 Italy

In Italy, the Pilot project is being implemented in the framework of the EETS as far as EETS registered SPs ask for Accreditation on the Italian Toll Domains, and in the framework of the SIT-MP service (Interoperable toll service for heavy vehicles only) in the case of SPs, which do not have the EETS Registration. In the latter case the Accreditation procedure includes a first phase in which the candidate SP has to produce the documentation that demonstrates his ability to deliver the said service along the Italian Toll Domains.

More specifically the candidate SP has to make available the following documentation:

- Proof that it has its registered office in an EU Country
- Information regarding: Chamber of Commerce registration and company general data (office location, capital, shareholders, management bodies, organisation chart, etc.), technical equipment at disposal of the company, balance sheets of last 3 years, data about subcontractors if any
- A professional liability insurance
- Demonstration of compliance with fiscal and social obligations
- Demonstration of the integrity and good repute of his management.
- Letters of reference about his financial standing from commercial partners or financial institutes
- Certification of not being in bankruptcy or in insolvency proceedings

The TSP must also produce references in one or more of the following activities:

- Bank activities
- Issuance of credit cards
- Emission of instruments for identification and transaction support
- Issuance of payment titles

For what concerns the OBE, the candidate SP may (as an alternative):

- use OBEs whose conformity to specifications has been already released by a Notified Body (as an alternative, a recognised laboratory for the SIT-MP)
- start a process themselves with a Notified Body (or a recognised laboratory for the SIT-MP) using an OBE whose conformity to specifications has to be analysed.

In the terms of the provisions of the Decision 2009/750 about the registration, the comparison may be as follows:

Requirements of Art 3 Decision 2009/750/EC	Italy
Hold EN ISO 9001 certification or equivalent	<i>No specific request</i>
Technical equipment and compliance of the interoperability constituents	<i>For what concerns the OBE, the candidate SP may use OBEs whose conformity to specifications has been already released by a NB or start a process themselves with a NB using an OBE whose conformity to specifications has to be analysed.</i>
Demonstrate competence in the provision of electronic tolling services or in relevant domains	References in one or more of the following activities: Bank activities; emission of credit cards; emission of instruments for

	identification and transaction support; emission of payment titles.
Have appropriate financial standing	Information regarding: Chamber of Commerce registration and company general data (office location, capital, shareholders, management bodies, organisation chart, etc.), technical equipment at disposal of the company, balance sheets of last 3 years, data about subcontractors if any. Demonstration of compliance with fiscal and social obligations. Certification of not being in bankruptcy or in insolvency proceedings.
Maintain a global risk management plan	A professional liability insurance.
Be of good repute	Demonstration of the integrity and good repute of his management.

3.5 Comments from Service Providers

The pilots have shown in general that due to the lowering of the administrative requirements (EETS registration) it was possible to reach the first phase of technical exchange, pilot demonstration of selected technical features within the toll schemes listed above and contractual negotiation between SPs and TCs. Further, each toll domain using microwave technology does not create too high technical difficulties and investments for market entry for SPs, which is quite the opposite for satellite tolling systems. The more complexity – which is valid for both technologies - are within the contractual model (reseller & agency model due to tax related issues) and fair remuneration where further work on interoperability could be helpful.

The EasyGo service including the EasyGo HUB is a highly successful example of a «cluster» approach across different Toll Domains, allowing a more efficient implementation of an interoperable service, as it enables participants to:

- Speed up and simplify the accreditation and certification processes
- Conduct Suitability for use tests in parallel, thereby saving time and set-up costs

AETIS strongly supports this approach and suggests that EasyGo should ensure technical harmonization of the HUB with current EETS related standardisation and should be used to include future new toll domains into the REETS framework

Active collaboration between SPs and TCs is the key success factor for interoperability.

A collaborative approach shared by SPs and TCs has been demonstrated by:

- Availability to discuss and use a «Reselling model» as an additional option to the «Agency model»
- Availability to discuss and negotiate different commercial conditions in order to ensure equal treatment of EETS Providers
- An open approach toward the SPs, enabling an ongoing exchange of questions and answers
- Having a clear and shared project plan

The only negative aspect in the experience of SPs in the Pilots has been the lack of availability to negotiate the commercial conditions with some TCs.

The positive lessons cited above can also be considered as requirements / measures for the future that can facilitate REETS implementation.

The current market development shows that some toll schemes do not require EETS registration to become a SP in that particular toll scheme. This allows on the one hand flexibility as EETS is not yet implemented everywhere; on the other hand, it creates an imbalance to those countries where EETS registration is an obligation to become SP (e.g. Germany). Thus, the difference in the speed of implementing EU law creates substantial market differences. One-way of overcoming this development could be that those countries / toll schemes who do have implemented the EETS registration require this EETS registration from all SPs: of those who have their home base in this country, and of those who are entering this country. Thus SPs who do not have the EETS registration or could not register according to the EETS registration procedures as it is not yet possible in the country of origin, are treated the same.