Intelligent Car Coalition

May 31, 2013

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue N.W.
Room H-113 (Annex B)
Washington, DC 20580

Submitted via email to: iot@ftc.gov
Re: Comments submitted for FTC Workshop: Privacy and Security Implication of the "Internet of Things"

Please find respectfully submitted below the comments of the Intelligent Car Coalition, a group whose founding members include Association for Competitive Technology (ACT), AT&T, Hughes Telematics (a Verizon company), Intel Corporation, the Telecommunications Industry Association (TIA), and Verizon.

The Coalition is a group of technology industry stakeholders devoted to educating policymakers about the exciting developments in the rapidly evolving intelligent vehicle space and bringing tech sector insight to policy issues such as distracted driving, privacy and security, and more.

In the tech community we talk a lot about convergence – a term we use when technologies break down traditional barriers between industries. We see the intelligent vehicle space as a convergence – the place where advanced mobile wireless connectivity and vehicles meet.

Intelligent vehicle technologies are entering the marketplace at a rapid pace. IHS reported in March that every major brand of car will have models connected to the Internet by 2014. And the scope of the impact could be wide: a May 2013 McKinsey Global Institute study that examines "Disruptive technologies: Advances that will transform life, business, and the global economy" ranks "mobile Internet" as the top technology that "could drive truly massive economic transformation." Number three on the list is the "Internet of things," number four is "the cloud," and number six is "autonomous vehicles." All of these technologies play a role in the intelligent vehicle sector.

These intelligent vehicle technologies come in a variety of forms: in-vehicle, vehicle-to-infrastructure, and vehicle-to-vehicle. In addition, smartphones can host connected technologies such as apps that interact with vehicles to perform functions such as allowing consumers unlock or start a car remotely.

The potential benefits of these technologies reach far beyond those who drive connected cars, however. Intelligent vehicles have the potential to benefit all of society by:

…Saving Lives. Cars that are aware of other vehicles and road infrastructure can compensate for roadway dangers. For instance, the government and private companies are testing technologies that allow vehicles to "talk" to teach other, thereby avoiding crashes. Other technologies being investigated

will allow cars to alert drivers when their eyes wander from the road for an unsafe period of time. Other technologies on the market today enable consumers to learn of dangerous weather and road conditions, and alert medical personnel when they have been in an accident.

…Helping to Save the Planet. Cisco estimates that between 10 and 17 percent of urban fuel is wasted at stoplights when there is no traffic. But "smart" traffic lights that are aware of how many cars are sitting in line can adjust timing to allow traffic to flow and fuel to be saved. In addition, autonomous technologies hold the promise of reducing the stop-and-go traffic that contributes to increased emissions.

…Saving Time. The Texas Transportation Institute's 2012 Urban Mobility Report estimates that "in order to arrive on time for important trips, travelers had to allow for 60 minutes to make a trip that takes 20 minutes in light traffic." Today, companies that make intelligent vehicle technologies have created products for owners of commercial fleets that track fleet traffic via GPS, allowing companies to increase route efficiency and reduce the amount of time trucks stay on the road.

…Saving Sanity.   Companies that make intelligent vehicle technologies are creating devices that consumers can activate in order to alert owners of certain conditions. For instance, on the market now are systems that enable parents to receive an email if their teenaged driver strays outside a perimeter they have agreed upon.

The point of convergence is that it brings technologies together in often unexpected ways with tremendous benefits for consumers. Government policies can sometimes inadvertently interfere with the innovation that occurs in this dynamic process. At the same time, these great breakthroughs also bring up policy questions, including those surrounding the use of consumer data.

The good news is that the government and the tech industry have spent years working on answers to data-related policy questions. Collaborative, multi-stakeholder processes have yielded solid frameworks that protect consumers while giving organizations the flexibility to innovate in the rapidly evolving Internet space.

The Intelligent Car Coalition supports this type of collaboration when it comes to resolving issues involving privacy and intelligent vehicle technologies.

Coalition members have experience as stakeholders in the diverse and rapidly-changing Internet ecosystem – a world where industry, consumer advocates, and government work together to solve issues that may arise when quickly-evolving innovations present both promise and challenge. We look forward to continuing this collaborative work. The Coalition offers itself as a resource for the staff and Commission as investigation into these important matters is considered over the coming months.

Sincerely,

Catherine McCullough

Executive Director, Intelligent Car Coalition