Geotab Australia Pty Ltd
Level 24 Westpac House,
91 King William Street
Adelaide SA 5000,
Australia

+61 1300 436 822

www.geotab.com

Geotab Submission to Right to Repair Draft Report
July 23, 2021

Geotab Inc. appreciates the opportunity to make the following submission regarding the Right to Repair Draft Report. On February 1, 2021, Geotab provided initial comments to the Right to Repair Consultation, linked here.

Geotab remains committed to the principle of Right to Repair that consumers should be protected from anti-competitive practices, this includes the right for the vehicle owner to access the data generated by their operation of their vehicle. However, we are concerned about the exclusion of electric vehicles (EV) and alternative fuel data from Right to Repair information, as the Report considers this data to be Safety and Security data. EV and alternative fuel systems are now high tech pieces of equipment and as such create a vast amount of data that can and should be utilised to maintain their efficiency, safety and to keep the vehicle on the road thus minimising the need of repair. At Geotab, we believe the consumers should have full right to access their vehicle data and if they wish to, share it with third parties, e.g. those who can assist them calculate their road tax credits (RTC), fringe benefit tax (FBT), Battery State of Health etc.

Geotab is advancing security, connecting commercial vehicles to the internet and providing web-based analytics to help customers better manage their fleets. Geotab's open platform and Marketplace allow both small and large businesses to automate operations by integrating vehicle data with their other data assets. As an IoT hub, the in-vehicle device provides additional functionality through IOX Add-Ons. Processing billions of data points a day, Geotab leverages data analytics and machine learning to help customers improve productivity, optimise fleets through the reduction of fuel consumption, enhance driver safety, and achieve regulatory compliance. Since being established in 2000, Geotab Inc. has grown from a small, family business to a global leader in solutions for fleet management and vehicle tracking. We are now one of the largest telematics outfits in the world and have become the first to surpass two million connected vehicles built on a single, open platform.

View our Corporate Profile brochure.

Electric Vehicles, and Alternative Fuels Systems

- In the future, with EVs needing less maintenance, the consumers' comprehension of these vehicles requires direct access to their operation data will be increasingly vital as electric vehicles become a larger part of the transportation universe. Access to and interaction with data will become the foundation of competition, innovation and value creation.
- Consumers and the repair market should not be excluded from their vehicle's operational data, such as electric and alternative fuel energy use: (charging energy added, driving energy used), state of charge, charging status, and charge assurance dashboards. All of the systems will lead to tools and services which rely upon having access to in-vehicle data, yet there are brand new

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metrics to monitor with EVs, such as state of charge (SOC), charging session details and for plug-in hybrids, electric miles versus fuel miles. If access is lost, existing services will cease to be available and innovative future services will not be developed.

- While many new EVs and alternative fuel vehicles are provided with maintenance included in the purchase price, the maintenance and coverage of costs is managed via the importer, exclusively for affiliated brand channels. Crediting these costs is difficult and not transparent. Software updates can often only be executed by an OEM garage. Equipment to perform this is often too expensive for non-OEM garages to afford.
- In case of new electric vehicles, OEM requirements to perform a repair might be quite strict about isolating the vehicle from any electrical source. Electric vehicle charging services use vehicle usage data to identify opportunities to replace ICE with EV based on utilisation, and overall life cycle cost to consumer, and inform optimisation of type and location of required charging stations.
- Furthermore, this data can be leveraged by electrical utilities to understand load balancing for charging vehicles: connect utilities to EVs to optimise utility load balancing and reduce the cost to the consumer.

Repair Market

- The more the vehicle acts like a platform, the more it enables vehicle owners and operators to collect and share data. Access to data of each individual vehicle data is essential to developing these new services which must remain accessible to our industry to avoid anti-competitive transport monopolies.
- We recommend EV and alternative fuel data, be featured as the foundation for the future transportation repair and maintenance ecosystem, with its evolving technical advantage and be made accessible as repair and maintenance information.

Competition

- From our perspective, any policy changes should highlight the general principles of "equal access to technical progress with equal rights and responsibilities" as a necessary underpinning for competition, innovation, and value creation by the repair and maintenance market. Restrictions to EV and alternative fuel data affects future mobility network solutions and its network of insurers, garages, diagnostics, rental cars and roadside assistance.
- Independent, owner-controlled access to vehicle repair and maintenance data is an important “check and balance” in the interest of a transparent and competitive transportation economy.
- A defining feature would be that owners and drivers of those vehicles would have maximum freedom to choose when and how to upgrade components and software as part of their repair and maintenance (compliant with safety standards).
- With privileged access to repair and maintenance services for EV and alternative fuel vehicles will result in lack of consumer choice from service providers. While the select companies will always get in-vehicle data first and can reserve access to the required functional abilities for their own services and applications (e.g. conducting a remote diagnosis, detecting a service need depending on the driving habits).

Standardisation

- EVs lack a standardised in-vehicle access port (no OBD requirement on EVs). Some OEMs require

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battery use reports as part of their battery warranty, rather done by the OEM or a qualified service provider. EV battery health isn't readily available to the repair and maintenance market.

- Each vehicle has varying levels of data architecture, data formats, parameter sets, and access, making it increasingly difficult to develop standard data practices across mixed fleets. So, upfront, it is difficult to define what data points you can collect/retrieve from the vehicle for repair and maintenance.
- From a regulation standpoint, we need a faster control mechanism to ensure that prices, terms and conditions, data/function and security standards are always kept up to date following market and technical evolution.
- In order to facilitate real time, authorised, bi-driectional communication, we strongly support legislation mandating standardised access to vehicle data for the repair and maintenance market.