



Introduction of the digital tachograph

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The speaker



Thierry GRANTURCO

GRANTURCO & Partners

French

- Legal adviser in the digital tachograph project : 1997 – 1999
- Legal adviser in the Enforcement/3820 project : 1999 – 2001
- Legal adviser in the CEECs/digital tachograph project : 2000 – 2002
- Legal adviser in the IDT project : 2002 – 2004
- Legal adviser in the MIDT project : 2005 - ...

Barrister at the Bar of Paris and at the Bar of Brussels

Phd in European Law

Phd in Political science

Phd in International relations

Professor of Law

Secretary General of **CORTE** (**C**onfederation of **O**rganisations in **R**oad
Transport **E**nforcement)



The agenda



- 1 – Introduction by the AETR/UNECE Secretariat and the European Commission
- 2 – Type approval
- 3 – Security policy
- 4 – Workshop approval
- 5 – Issuing of tachograph cards
- 6 – Enforcement
- 7 – Data protection
- 8 – Risk management
- 9 - Conclusion





1. Introduction



Considering the constant increase of:

- registration of passenger cars
- registration of commercial vehicles

as a consequence of this, the constant increase of:

- road traffic congestion
- road traffic accidents
- fatalities and injuries
- the number of heavy vehicles involved in fatalities

the EU legislator has decided in 1969 to regulate the professional drivers' activities for the very first time.

Regulation (EEC) n° 543/69, Official Journal L 77, page 49
(see <http://europa.eu.int/eur-lex/lex/en/index.htm>)



This Regulation aimed mainly at:

- limiting driving time allowed by day and by week
- obliging professional drivers to record their activities through a recording equipment called “tachograph” or, alternatively, to use a kind of booklet



First generation of
recording equipment
In the EU



In the meantime, the EU signed in 1970 under the auspices of the United Nations an agreement called AETR extending the use of the recording equipment to the European but non EU Members (former Eastern countries, former Soviet republics, Balkan countries, etc...)

For EU drivers, the use of recording equipment became mandatory including outside the EU whilst for non EU AETR drivers, the use of recording equipment became mandatory for international journeys only

The UNO-AETR agreement foresees that each change of the recording equipment decided by the EU has to be implemented at AETR level so that each generation of recording equipment, as presented hereinafter, has also been the one used at AETR level



This Regulation changed considerably the drivers' behaviour

But the recording equipment was not yet mandatory in the sense that booklets could be used instead

Therefore, to avoid any distortion of competition between transport operators, the EU legislator decided to amend the 1969 Regulation in 1985 and to introduce a recording equipment on a mandatory basis for every professional driver

Except for very few exceptions

Regulation (EEC) n° 3821/85, Official Journal L 370, page 8

See <http://europa.eu.int/eur-lex/lex/en/repert/0720.htm#07204020>



This new Regulation:

- was much more demanding with drivers (in terms of driving, working, availability and rest times)
- increased the number of data collected by the tachograph through the charts used to record data (speed, time, distances, names of drivers/co-drivers, locations, vehicle registration numbers, etc... have to be recorded and stored)
- introduced new obligations for transport operators (in terms of breakdown or faulty operation of their tachograph)
- introduced more stringent requirements for the repair workshops to ensure a proper calibration of these recording equipments



Over the time, the recording equipment evolved and from mechanical became electronic



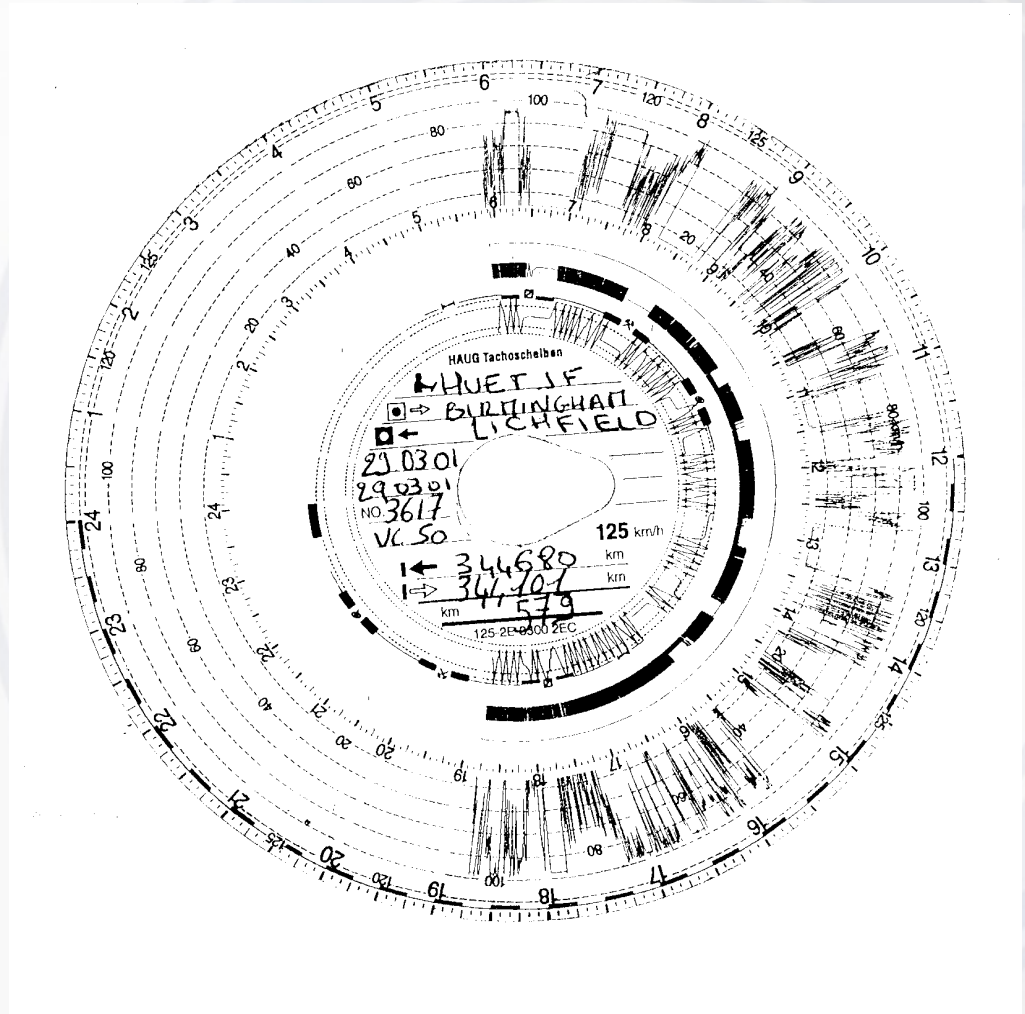
First generation



Second generation



But both generations
are anyway working
with paper discs





Nevertheless, it became rapidly clear that analogue tachographs were tampered (paper discs not used, destroyed, withdrawn during journeys, parameters mechanically or electromagnetically altered, etc...).

Whereas experience has shown that the economic pressures and competition in road transport have led some drivers employed by road haulage companies to flout certain rules, particularly those concerning the driving and rest times laid down in Council Regulation (EEC) n° 3820/85 of 20 December 1985 on the harmonisation of certain social legislation relating to road transport;

Whereas blatant infringements and fraud present a road safety hazard and are unacceptable for reasons of competition for the individual driver who does respect the rules;

[...]

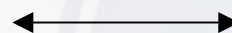
Whereas to put an end to the most common abuses of the present system, it is therefore necessary to introduce new advanced equipment [...];

Whereas the total security of the system and its components is essential if recording equipment is to function efficiently;

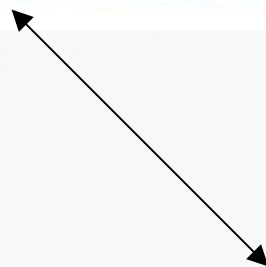
Recitals 2, 3, 6 and 7 of Regulation (EC) n° 2135/98



The EU legislator decided therefore to introduce a new kind of recording equipment



Encryption of data

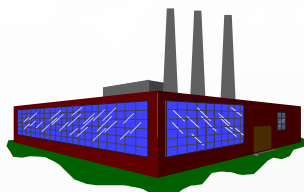




Obligations of the Member States' authorities



Situation with analogue tachographs



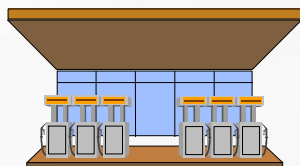
Manufacturers



Type approval



Control bodies



Fitters
Workshops



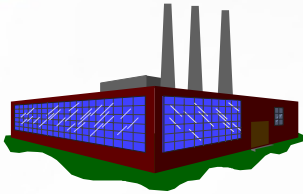
Transport companies



Drivers



Situation with digital tachographs



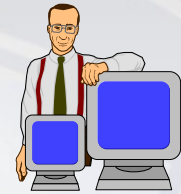
Manufacturers
Card / VU / Sensor



Type approval



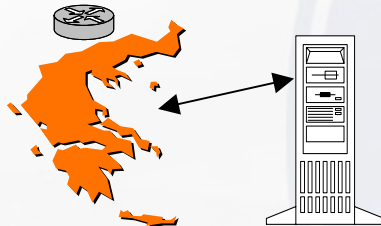
Security
Management



(Security) Personalisation
Card / VU / Sensor



Card Issuing



TACHOnet



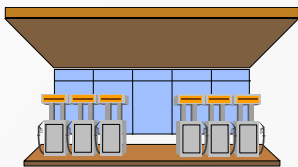
Data protection



Control
Bodies



Control
Card



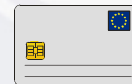
Fitters
Workshops



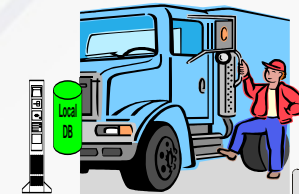
Workshop
Card



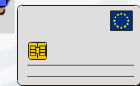
Transport companies



Company
Card



Drivers



Driver Card



2. Type approval





- Digital tachographs and tachograph cards are not type approved if they cannot work with all types of tachograph and of tachograph cards already type approved
- With analogue tachographs, the situation is different.

They are type approved with a particular type of paper disc.





Therefore, the applicant for a type approval has not anymore to be granted with one certificate, as it is the case with the analogue tachograph, but with four different certificates :

- a functional certificate ;
- a security certificate ;
- an interoperability certificate ;
- a type approval certificate.



Type Approval Tests



ITSEC evaluation



Functional Tests



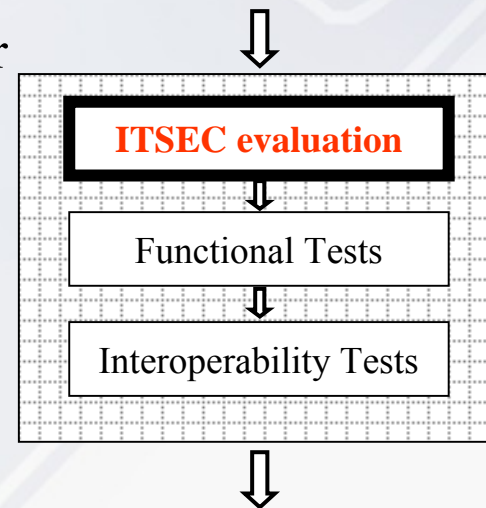
Interoperability Tests





Card ITSEC evaluation: Requirements Annex I B

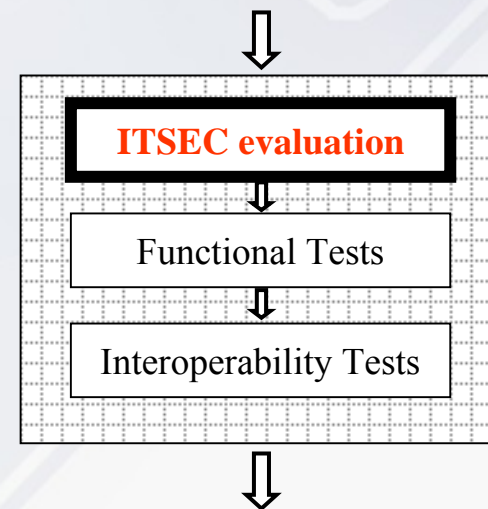
- Claimed Minimum Strength of Mechanisms
 - The minimum strength of mechanisms for the Tachograph Card is **High** as defined in ITSEC
- Level of Assurance
 - The target level of assurance for the Tachograph Card is ITSEC level **E3**





Card ITSEC evaluation: Result

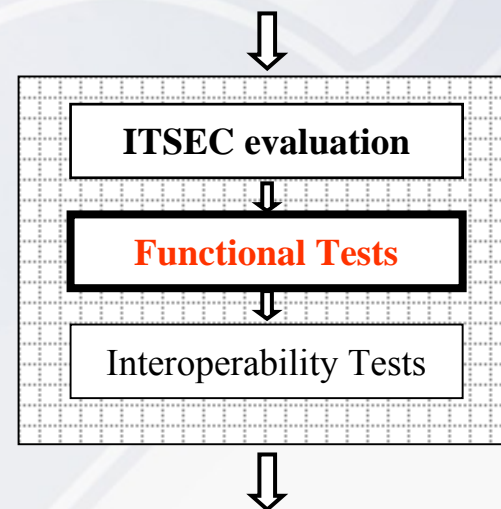
- ITSEC assure that the card manufacturers implement the cards with the specified *target levels*
- The *static characteristics* of the cards and the corresponding manufacturing process are following the requirements





Card Functional Tests: Overview

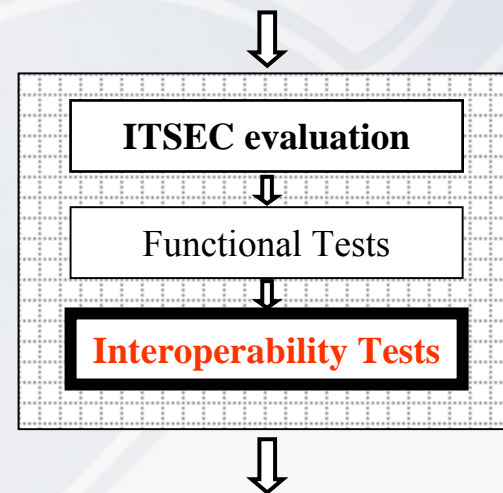
1. Administrative examination
2. Visual inspection
3. Physical tests
4. Protocol tests
5. Card structure
6. Functional tests
7. Environmental Tests





Interoperability Tests

- Appendix 9 defines the interoperability tests :
- Mutual Authentication between VU and cards
- Read/Write Tests
 - ✓ activity scenarios
 - ✓ card downloading
 - ✓ card printout



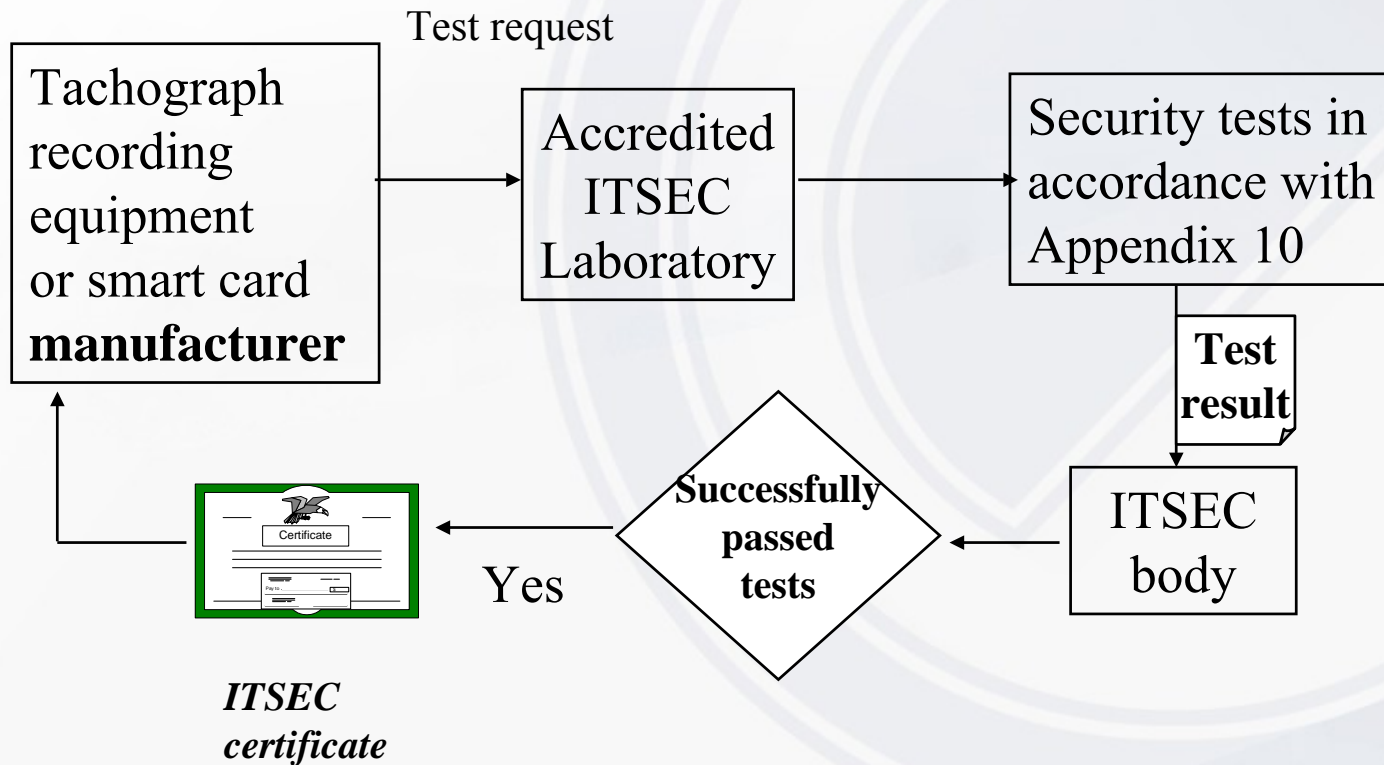


In other words...



TYPE APPROVAL

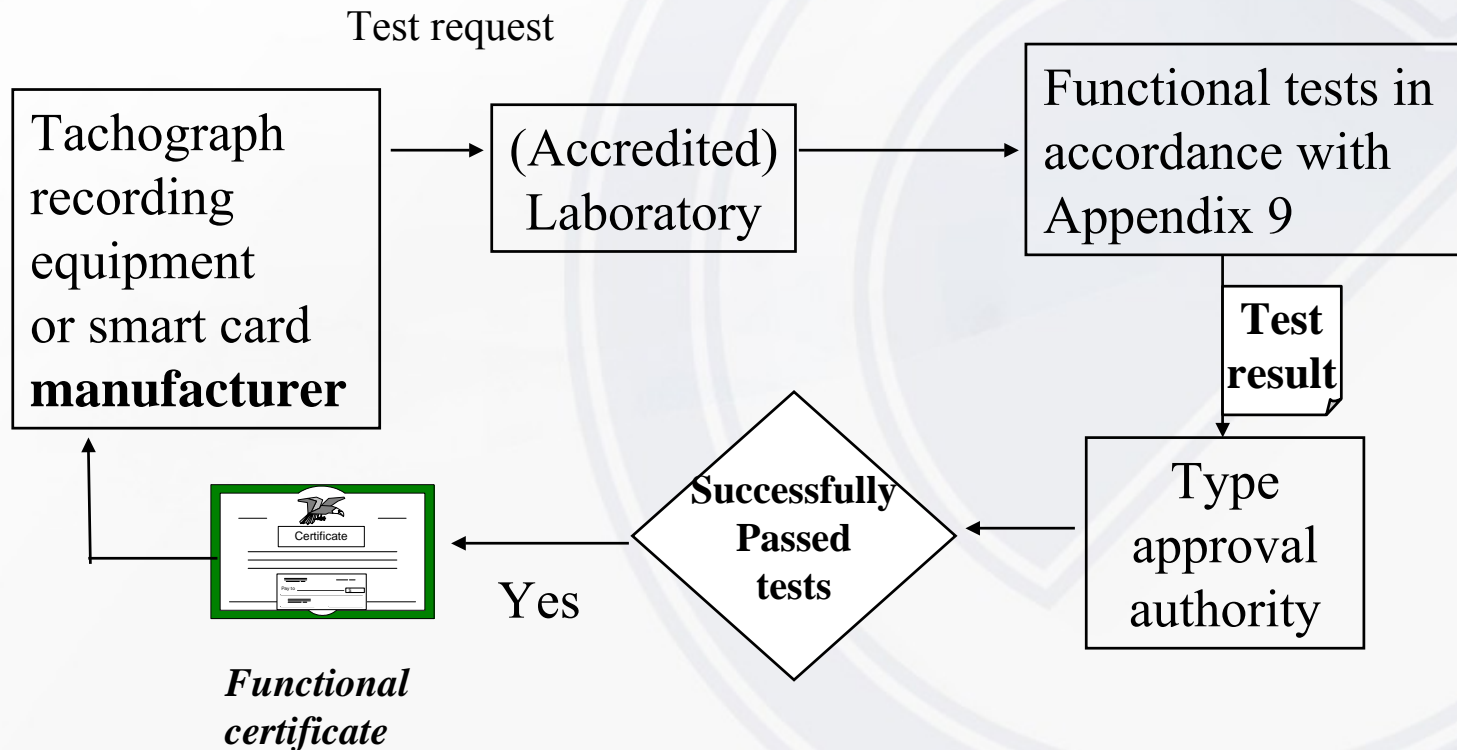
Security evaluation





TYPE APPROVAL

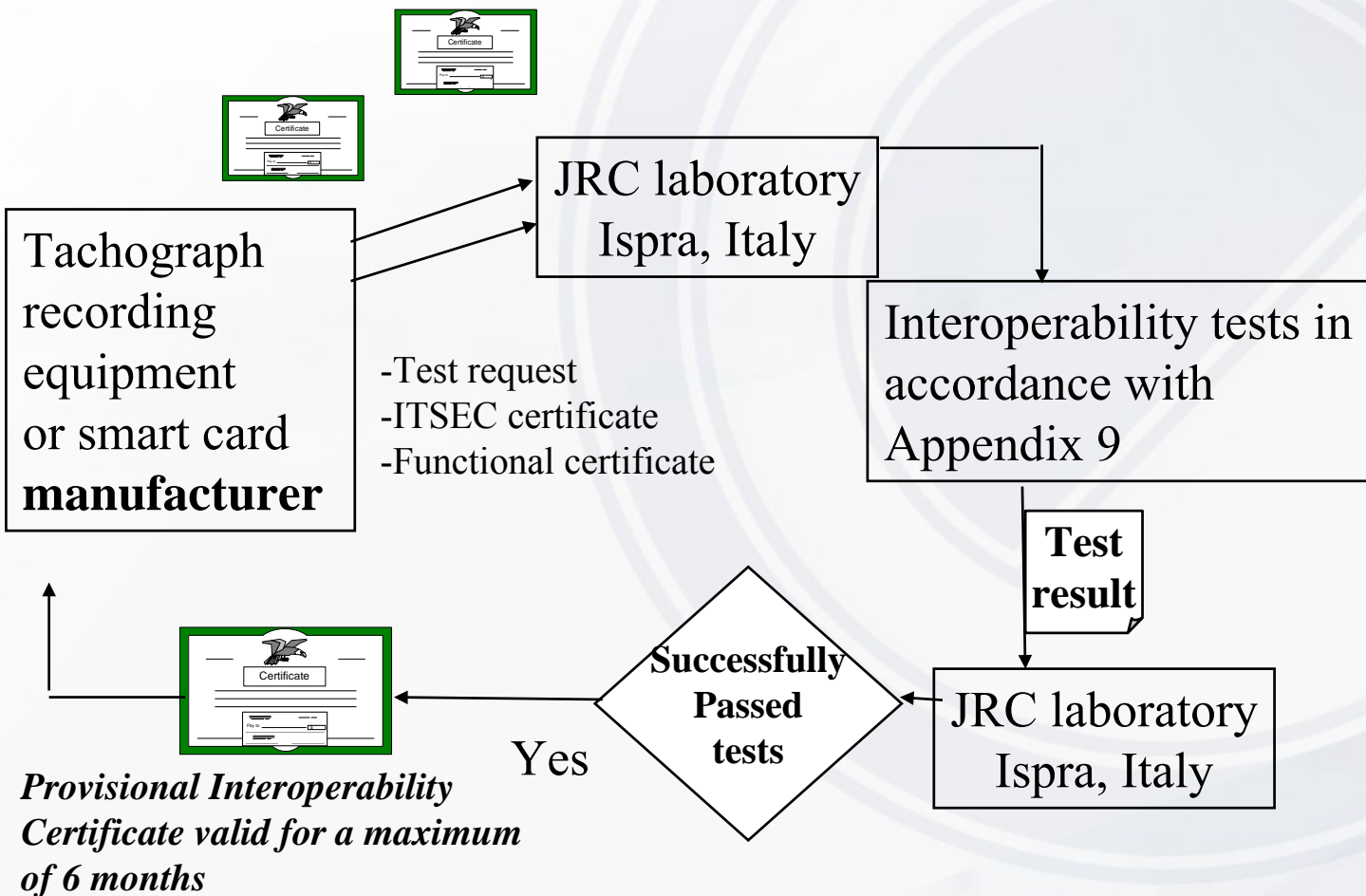
Functional tests





TYPE APPROVAL

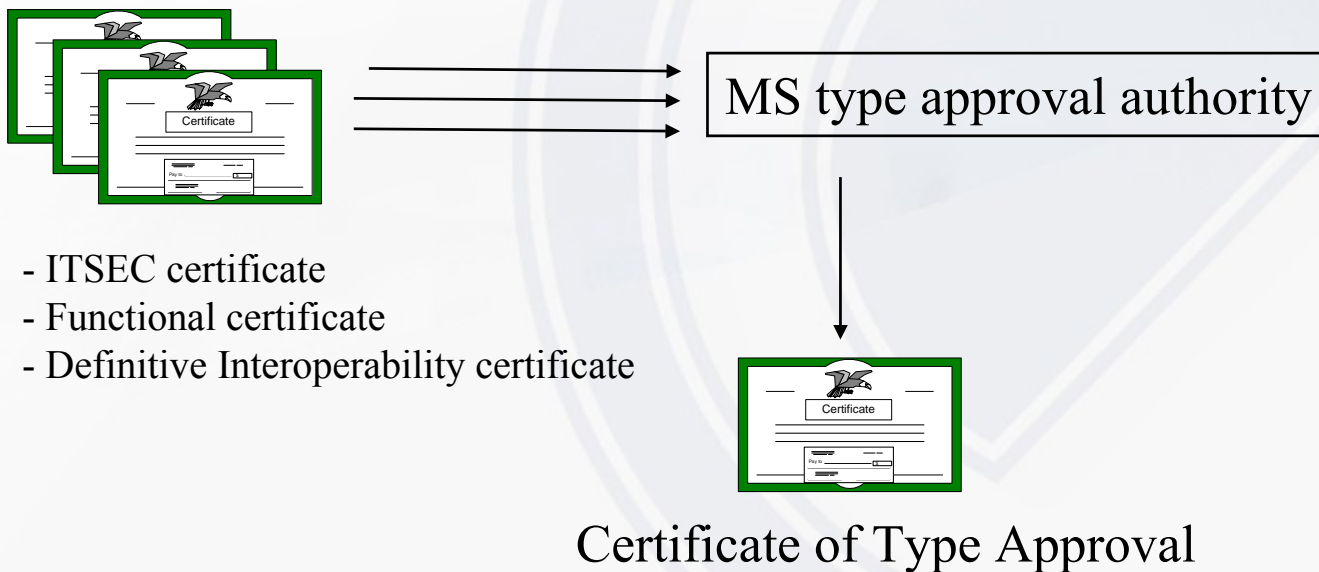
Interoperability tests





TYPE APPROVAL

EC Type Approval





TYPE APPROVAL

Type Approved Tachograph equipment/cards

MS
type approval authority



Copy of Certificate
of Type Approval

JRC



Public web site
with list of type approved
recording equipment
and tachograph cards
models

<http://dct.jrc.it/pages/Root%20Certification.htm>



With analogue tachographs, your country had no responsibility whatsoever in type approval matters (tachographs and charts were approved in other Countries).

With digital tachographs, your country will have to require cards (to be issued to drivers, transport companies, workshops and control officers) to be type approved (even if your country decides to opt for another Member State's cards, already type approved).





Analogue tachographs

No type approval required

Digital tachographs

Type approval required:

- **either full type approval (functional, security, interoperability and type approval certificates) = develop own cards**
- **or simplified procedure = adaptation and type approval of a card already type approved by another Member State**



The list of type approved cards can be found on the following web site:

<http://dtd.jrc.it/text/39436108-13.html>

Requirement 290 of Appendix 1B of the AETR

The main type approval authorities in the EU are the following:

- Kraftfahrt-Bundesamt - Germany
- Ministry of Industry – France
- Swedish Road Administration – Sweden

Their contact details can be found on the following web site:

<http://www.eu-digitaltachograph.org/ContactDisplay.asp>



The authorities granting security certificates are (only) the following:

- BSI (Germany): <http://www.bsi.bund.de/>
- CESG (UK): <http://www.cesg.gov.uk/>
- DCSSI (France): <http://www.ssi.gouv.fr/fr/dcssi/index.html>



The authority granting interoperability certificates is (only) the following:

European Commission, DG JRC (Ispra, Italy): <http://dtc.jrc.it/text/IOT.html>

Requirement 278 of Appendix 1B of the AETR



Questions?



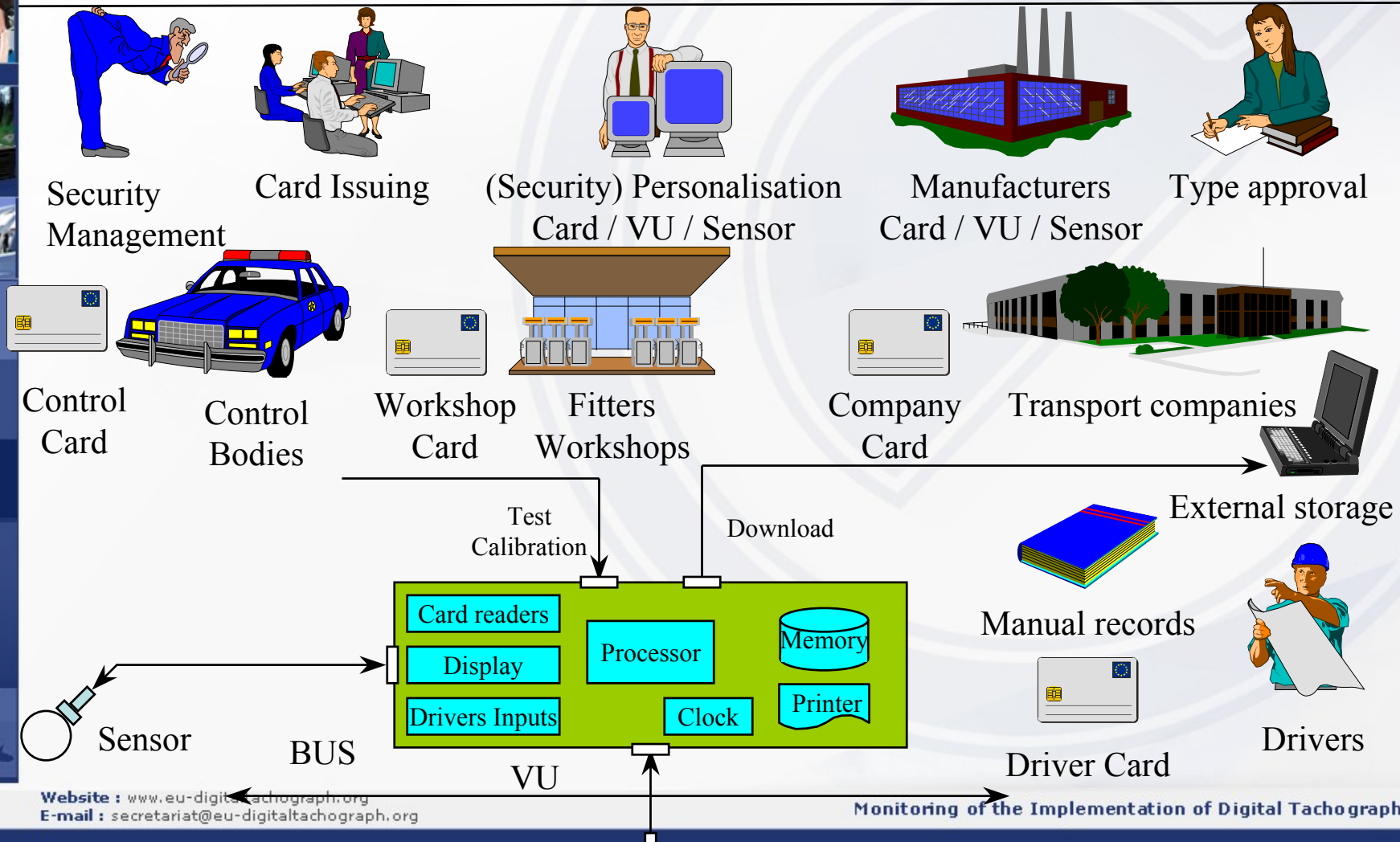
3. Security policy





Global Security Policy

Who / What is involved





Member States have to ensure the maintenance of the system once deployed in the field.

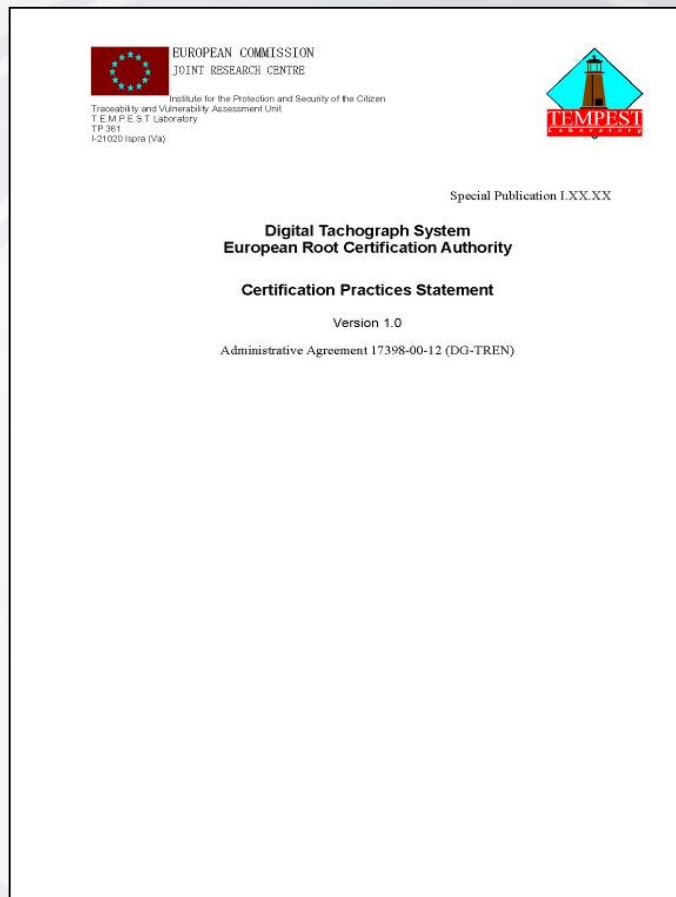
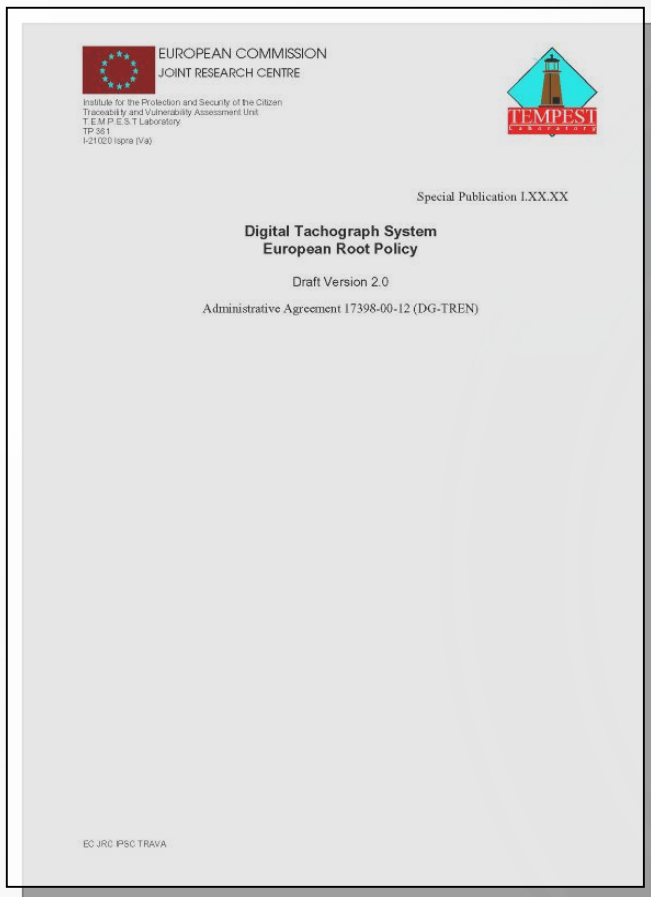
Before being issued with Member States keys (to be used to cipher cards before they are issued) Member States have to submit a security policy to the ERCA (European Commission – DG JRC)

Security policy has to be maintained

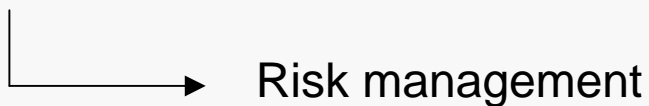


The European Commission (referred to as the European Authority) is responsible for the European Root Certification Authority (ERCA) of the cryptographic key management infrastructure supporting the digital tachograph system.

An ERCA policy has been approved by the European Authority on 9th July 2004. The policy of the ERCA applies only to the cryptographic keys and keys certificates used in the mutual authentication, secure messaging and digital signature mechanisms of the digital tachograph system.



It does not cover, therefore, the overall security of the digital tachograph system





According to points 4.3.1 and 5.2.1 of the ERCA policy, Member States Authorities (MSA) have to submit security policies for approval since

“the objective of the approval process is to assure comparable levels of security in each Member State”.





Points 5.1.1 and 5.1.2 of the ERCA policy state that:

(5.1.1) The MSA shall produce and maintain a MSA policy covering the following processes, where applicable:

- *issuing of tachograph cards, including keys and certificates;*
- *issuing of vehicle unit keys and certificates;*
- *issuing of motion sensor keys;*
- *management of the Member State keys.*

(5.1.2) The operation and management practices related to these processes shall be documented in practices statements approved by the MSA.



In simple terms:

- the EU/AETR key has to be used to certify the AETR Contracting Parties' keys
- the AETR Contracting Parties' key has to be used to certify the equipments' and cards' keys
- equipments and keys using these cryptographic keys can then exchange encrypted and therefore secure messages



No security policy = no national key = no possibility to issue and use cards



KEY Ceremony – Activation Data

Initial conditions, HSM activation data, HSM key backup custodian PINs, ERCA Boot and Root Passwords, Safe key combination settings and safe settings, Integrity CD passwords





KEY Ceremony – ERCA Workstation Setup

ERCA Boot Password setting, ERCA Software
Initialization (copy of physical HD image)





KEY Ceremony – Initial Workstation configuration and hardening

First boot sequence, user account setup and login password setting
user permission setting





KEY Ceremony – ERCA key generation and key back-up

HSM configuration, ERCA slot creation and initialization (setting of HSM security mode), ERCA keys generation, creation of the two sets of key backup (2x2)





KEY Ceremony – Creation of ERCA Integrity CDs

Creation of the baseline integrity check data, creation of
4 copies of the Integrity CD





KEY Ceremony – Creation of ERCA Back-UP CDs, ERCA System First Reference State

Creation of the backup file set, creation of 4 copies of the integrity CD.

Shutdown of the system, start-up with an HD image utility, creation of the system first reference state.



KEY Ceremony – Conclusion

Completion of the logbook entry, sealing of envelopes, item distribution, closure of the Ceremony.





National authorities need therefore to:

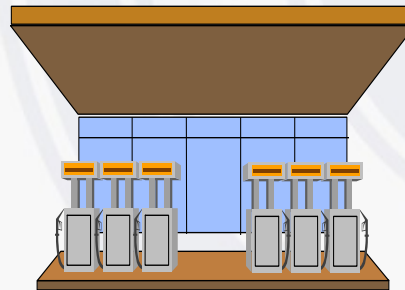
- issue a security policy
- get it approved by the ERCA
- once approved, it has to be audited and maintained

Timing: from 3 up to 6 months

Work eventually to be done in close cooperation with your smart cards supplier



4. Approval of workshops





The Requirements

All workshops should be approved against two sets of criteria:

- Technical Competence and Facilities
- Suitability of Applicant (Fitters and Workshops)



Technical Competence and Facilities

Appropriate workshop facilities

Appropriate approved equipment

Suitably trained and competent technicians

Other considerations (e.g. health and safety guidelines).



Suitability of Applicant (Fitters and Workshops)

Repute (Honesty and Integrity)

References (Business and Personal)





Technicians Qualifications

Properly trained and understand the duties required of them;

Competent to carry out the work required of them;

Meet acceptable standards of reliability, honesty and integrity.





Control of Workshop Technicians

It remains for individual States, dependent on their individual administrative systems, to determine how to ensure that staff working for workshops, in particular the technicians, maintain standards and conduct there duties satisfactorily.

Control could be carried out by the Competent Authority, the Workshop Management, another agency or all of these provided that control is effective.



The Competent Authority will need to:

- Decide the period of validity of workshop approvals;
- Decide the fees for approval and/or renewal;
- Undertake (or delegate responsibility for) conducting periodic inspections of workshops, individual technicians, records, equipment and security aspects;
- Ensure that approval criteria are reviewed periodically to reflect changes and experience;
- Ensure that applications for workshop cards are screened and validated and that cards are not issued inappropriately.



The Competent Authority will also need to:

- Ensure that Workshop Cards are issued only for use at workshops within the State's territorial jurisdiction.
- Ensure PINs are issued securely so as to be known only to the individual technician who will use the workshop card to which it provides access.
- Maintain a list of approved workshop seal code numbers and share this information with the other EU Member States.
- Approve and oversee a training programme for fitters



Workshops are basically approved to carry out:

- Installation (requirement 239)
- Activation (requirement 243)
- Calibration (requirement 248)
- Producing Plaques and Certificates (requirement 249)
- Sealing (electronic) (requirement 251)
- Periodic inspections (requirement 256)
- Downloading (requirement 260)
- Issue Undownloadability Certificates (requirement 261)



Monitoring and Control of Workshops

To work effectively and keep its integrity it is vital that workshops are properly monitored and controlled.

Monitoring the competence and the activities of workshops by (or on behalf of) the Competent Authority must be treated as a continuing activity.

States shall have to determine the appropriate level of resources required to monitor the workshops to prevent the security elements of the scheme being compromised and to ensure that downloaded tachograph data is adequately safeguarded.



Disciplinary Procedures

The Competent Authorities who issue the approval for a workshop will need to take disciplinary action if:

- The workshop has failed to comply with the criteria of its original approval; or if,
- The standard of work falls below an acceptable level; or if,
- Malpractice or criminal activities have been detected.



Security of Workshops and Cards

To meet the EU/AETR vision, accuracy of the recording equipment is imperative.

Workshop cards in the wrong hands or misused, probably represents the highest risk to the integrity of (recorded) drivers hours data.

The individual technicians represent a key link in the security chain.

Essential that all workshop card activities are recorded in such a way that they provide a complete audit trail.



How should workshop cards be issued?

Given the importance workshop cards should be delivered to specific workshops or collected personally and signed for.

PINs will need to be issued to individual technicians under a separate cover completely.

It is for each State to decide exact procedures to ensure secure issue of cards to workshops and the secure issue of the PIN codes to the individual technicians who will use them.



Control of Workshop Cards and PINs

States need to ensure that secure arrangements exist to issue PINs to the individual technicians for whose use the workshop card is authorised;

After issue the PIN shall be the responsibility of the individual technician to whom it has been issued;

Individual technicians need to be aware of the security issues for Workshop Cards and PINs and to take responsibility for them whilst in their care.



Records and records keeping

In order to exercise control over the tachograph workshops and to maintain standards it is necessary to conduct audit.

Key to effective audit is the availability of accurate records.

For enforcement purposes it is important that a vehicle is found with an incorrectly set tachograph checks can be made at the workshop against whom the last inspection or calibration is attributed.



The management of tachograph workshops will need;

A register recording vehicle identity and VU details for all tachographs installed, activated, calibrated, inspected, repaired and decommissioned at the workshop.

As above for downloads from workshop cards to ensure a continuous and verifiable record of calibrations.

A record of all undownloadability certificates issued.

In addition all unused, spoilt, invalid or damaged certificates are retained for audit purposes;



Analogue tachographs

Approval of workshops

Training of fitters

Equipment

Honesty

Premises

Audit

Digital tachographs

Approval of workshops

(New) Training of fitters

(New) Equipment

Honesty

(New) Premises

Security

Data download

Workshop card management

Audit

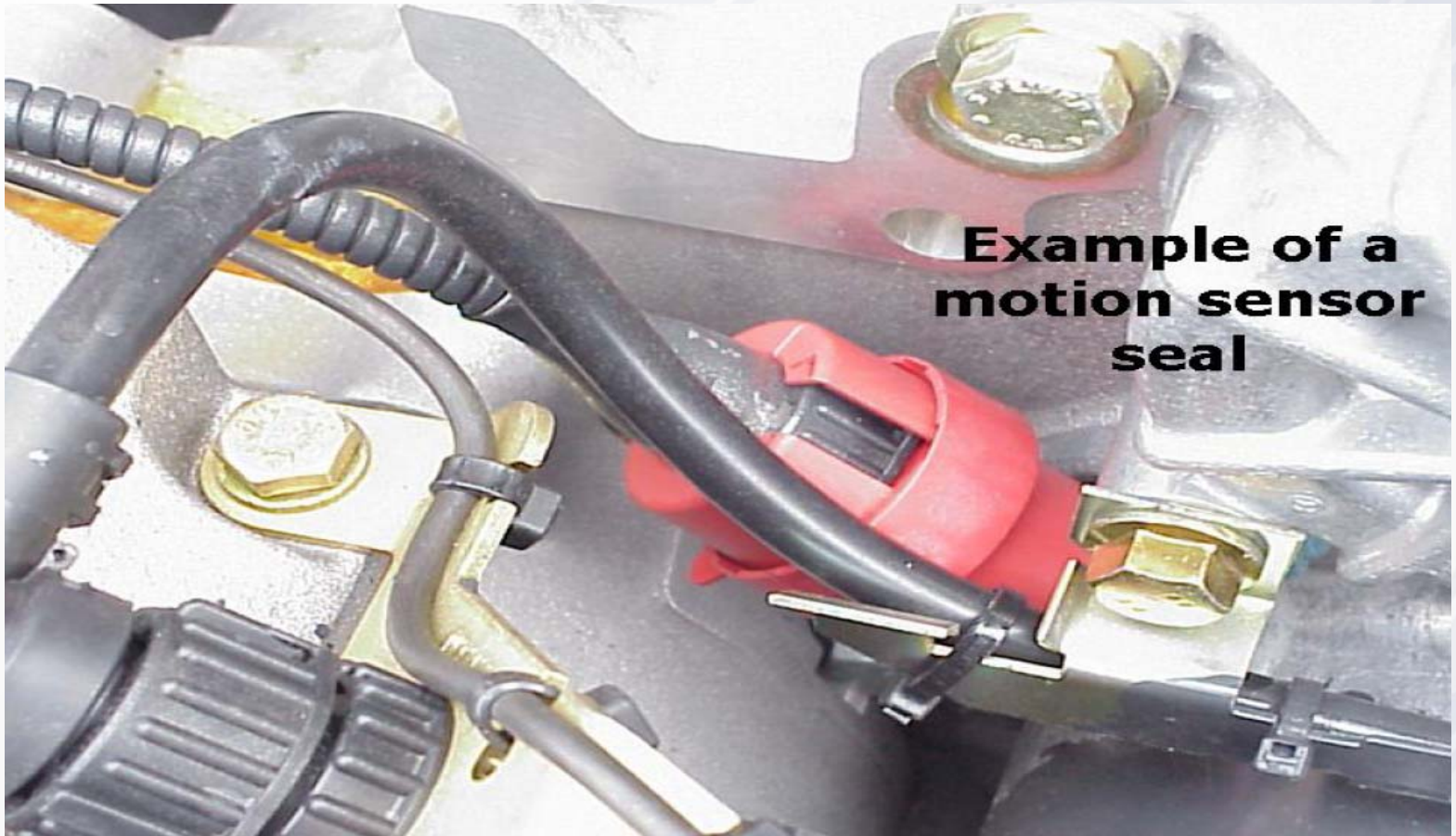


Today: they check the seals





Tomorrow: they check the seals



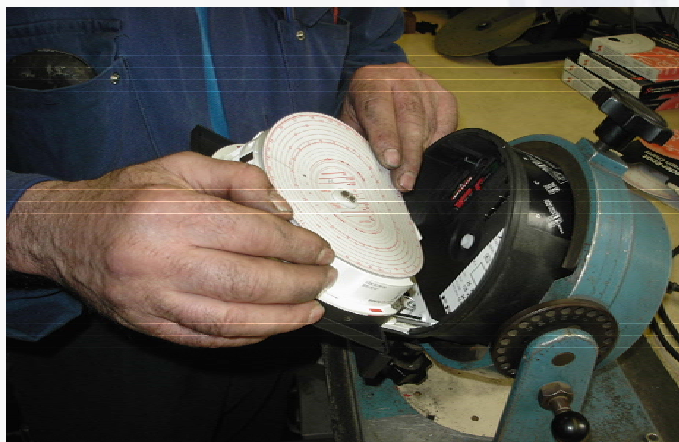




Today: Data Accuracy

Dates, time, speed, distances, VRN and/or VIN, etc... These data may come from different sources but some of them, at some stages, will need to be calibrated. For example:

- when the recording equipment is installed
- when it is repaired
- when it is regularly checked





Tomorrow: programming





Keep The Records

Stoneridge Electronics Limited
Manufacturers of VIFERED ROOT Tachographs
TACHOGRAPH RECORD SHEET
This record to be kept for 6 years from tested date

Vehicle Registration: B121 M58
Date: 26th April 04

Customer: FIRST BUS
Address: KING ST
ALBERTON

Vehicle Make: MANITOU D. DECK
Tyre Pressure: 100 PSI
Tyre size and make: GOOD YEAR
Serial number of instrument: KA3656
813305

Tester's Signature: David Moy

580516

SW: 5850

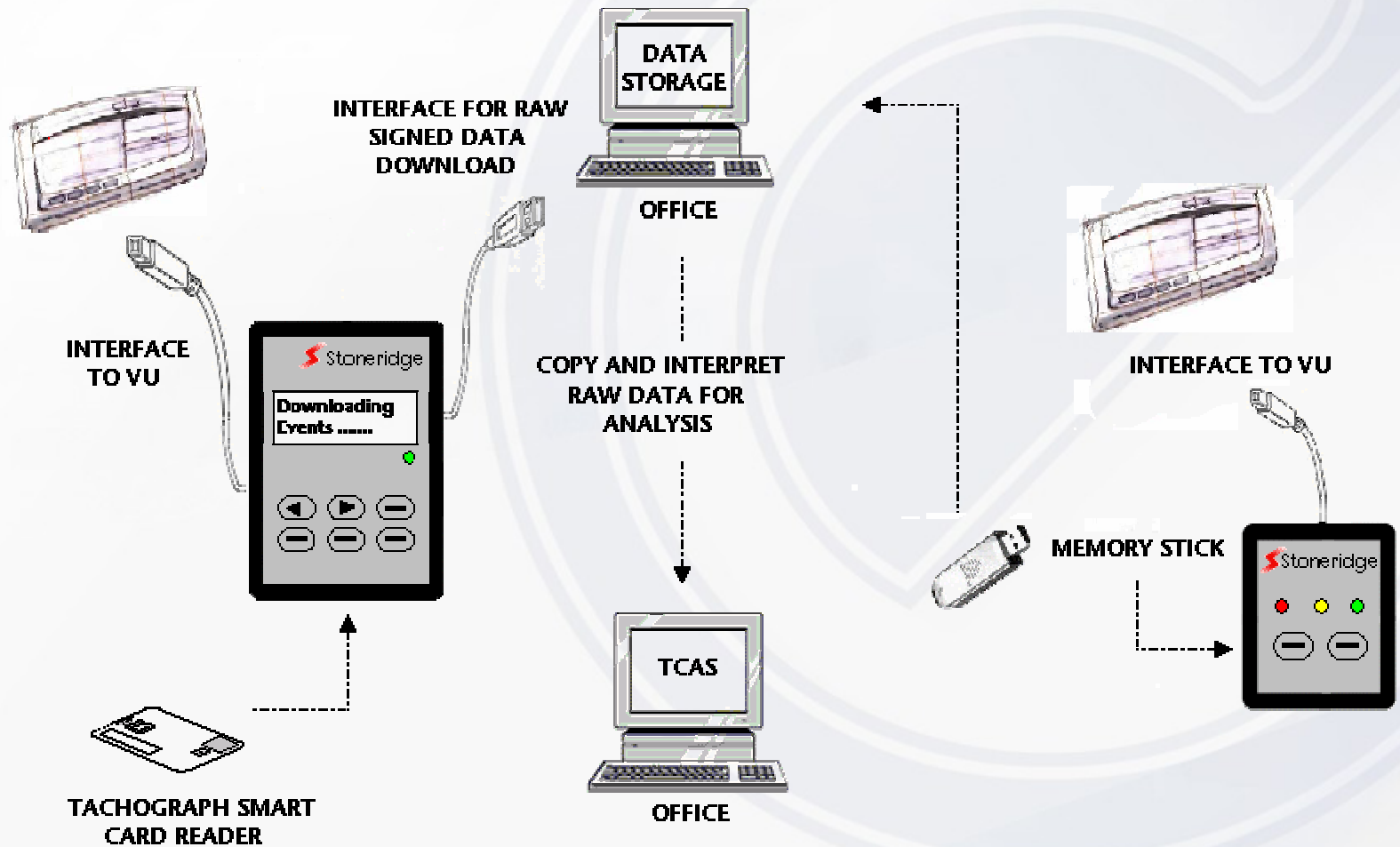
2-YR INSPECTION
Renewal Date: 31.12.105

MINOR REPAIRS DETAIL



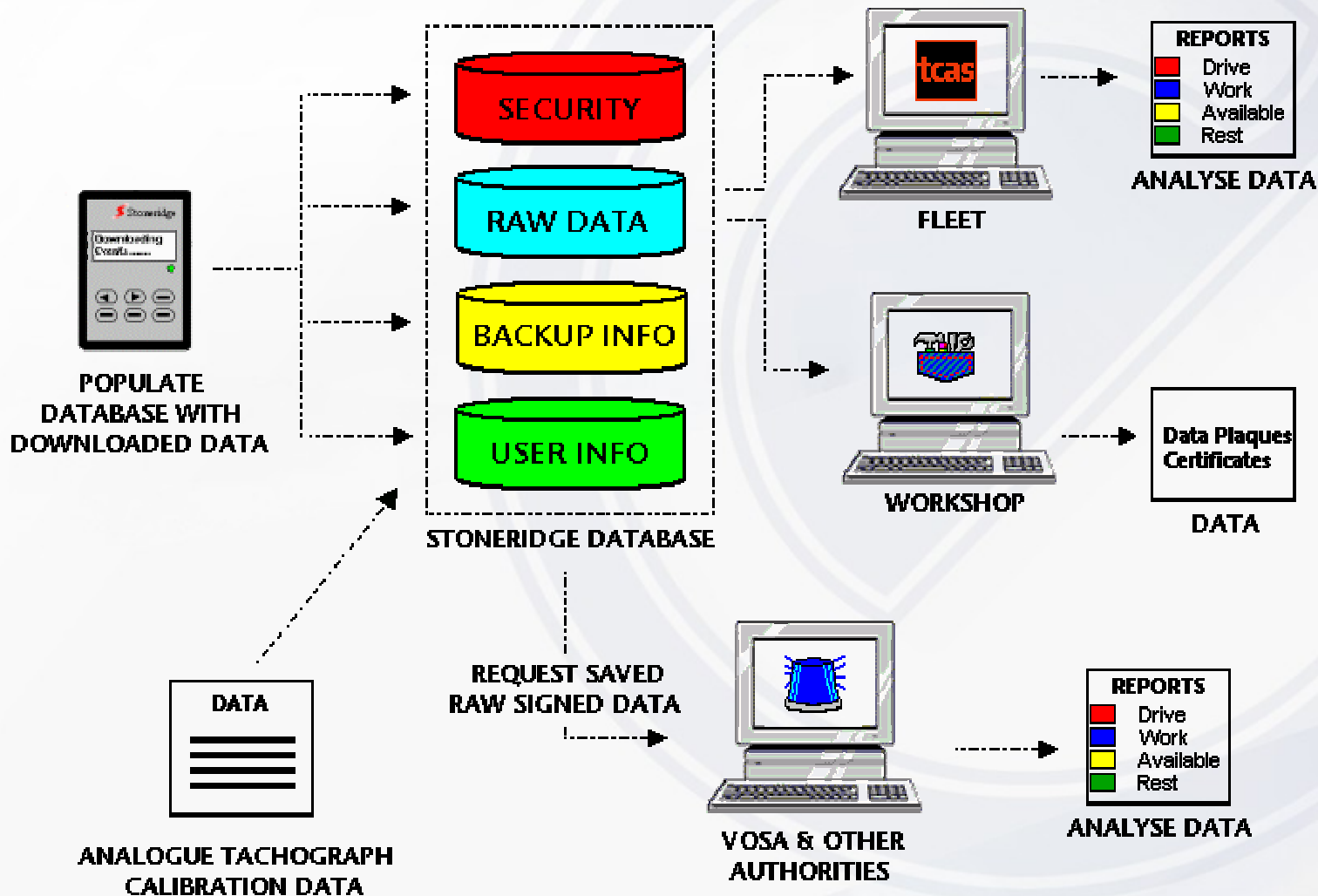


Keep the data





Legal Database





Coexistence of two systems for workshops





National authorities need therefore to:

- issue or amend their national laws on the approval of workshops
- ensure the proper training of fitters
- ensure to set up a sufficient network of approved workshops at their respective national level

Timing: from 6 up to 16 months

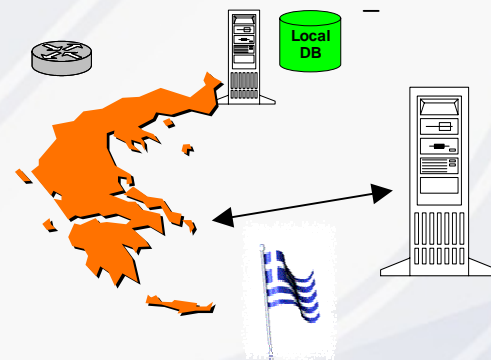
Work to be done in close cooperation with tachograph manufacturers



Questions?



5. Card Issuing TACHOnet





CARD ISSUING





Driver card

Personalised for use by the Driver

- 5 Year Validity Period
- Holds an average of 28 days data
- Driver must hold one card only



Workshop card

Used by approved tachograph fitters to install, activate, calibrate and download the recording equipment.

- One year validity period
- Personalisation recommended
- Issued with a PIN



Company card

Allows the company to ‘Lock and Download Data’ recorded in the vehicle unit.



Control card

Used by enforcers to carry out roadside compliance checks.

- Personalisation recommended



Card Application Types

First Issue - First application for a tachograph card

Replacement - Issued when a card is lost, stolen or malfunctions

Exchange - Change of administrative data

Renewal - Issued when a card is renewed after 5 years



Card Issuing Authority (CIA) Organisation

Centralised - database, application processing system, card personalisation & issue

De-Centralised - administrative desks for application processing with centralised database. Card personalisation either from central office or at administrative desks



Considerations for setting up a CIA

Application processing system

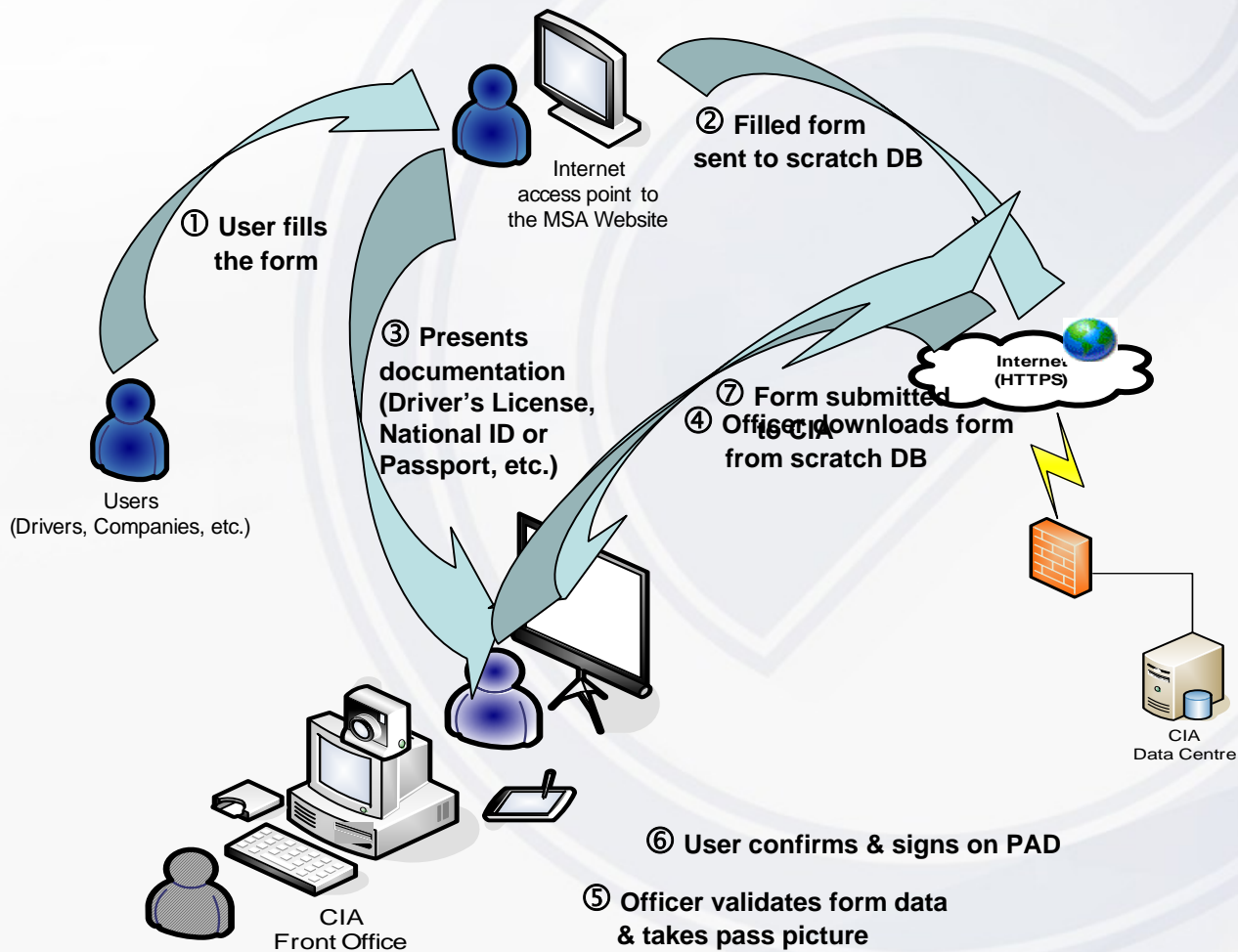
Database to hold & maintain records

Contract with smart card supplier/personaliser

Certification Authority



CIA Front Office Operational concept














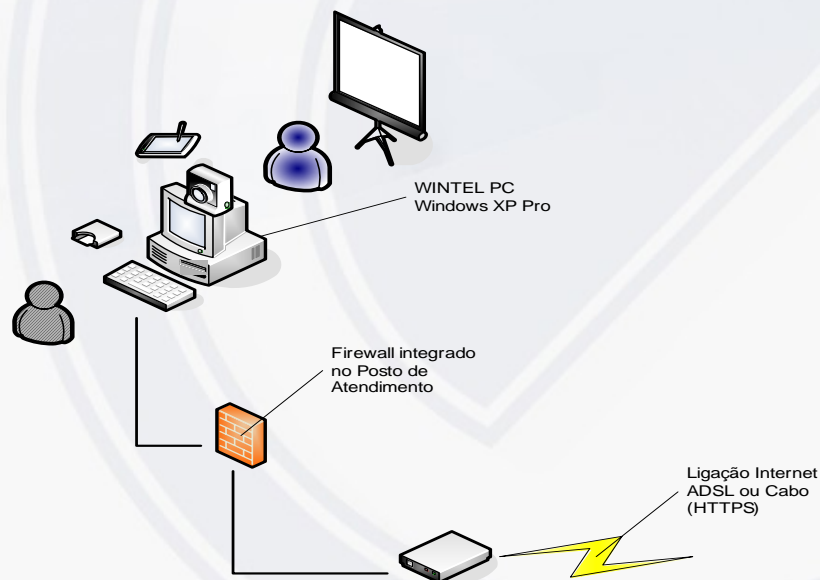
CIA Front Office Architecture

SPTD – CIA Posto de Atendimento

Legenda

CIA – Posto de Atendimento

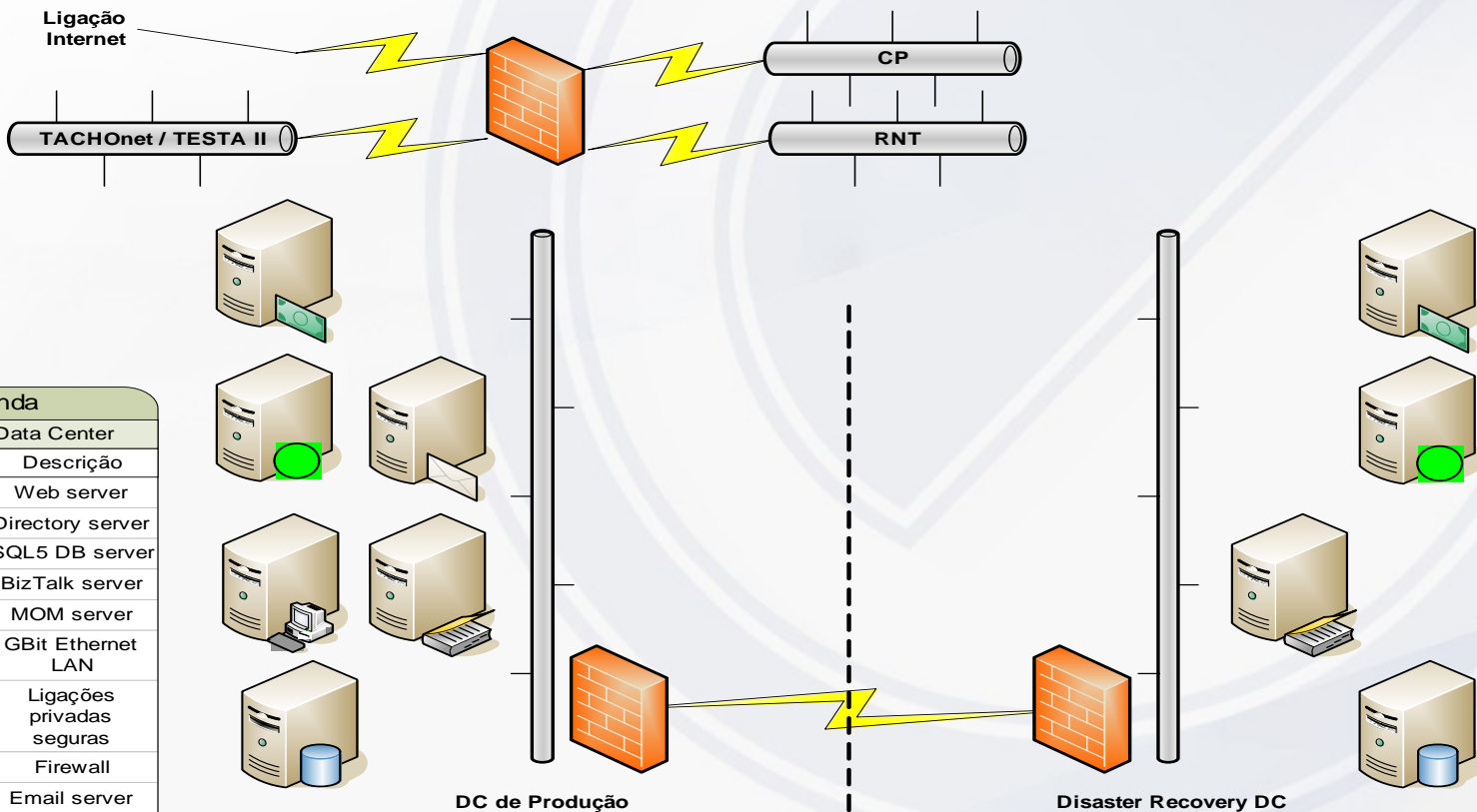
| Símbolo | Qty | Descrição |
|---|-----|--|
|  | 1 | Modem ADSL/ Cabo |
|  | 1 | WINTEL PC |
|  | 1 | “Webcam” para recolha de fotografia |
|  | 2 | Agente SPTD e Requerente |
|  | 1 | Ecrã ou superfície clara |
|  | 1 | “Smartcard reader” para autenticação do Agente SPTD |
|  | 1 | Firewall |
|  | 1 | PAD digital p/ recolha de assinatura |
|  | 1 | Ligação Internet segura |













CIA Data Centre Functional Architecture

SPTD – CIA
Data Center



Legenda

SPTD – CIA Data Center

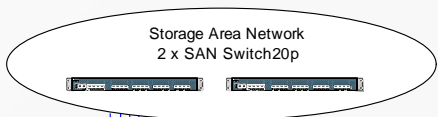
| Símbolo | Qtd | Descrição |
|---|-----|---------------------------|
|  | 2 | Web server |
|  | 2 | Directory server |
|  | 2 | SQL5 DB server |
|  | 2 | BizTalk server |
|  | 1 | MOM server |
|  | 5 | GBit Ethernet LAN |
|  | 5 | Ligações privadas seguras |
|  | 3 | Firewall |
|  | 1 | Email server |



CIA Data Centre Systems Architecture

Site Principal

| | | | | | |
|--|--|---|--|--|--|
| ISA Server Blade BL20p 1 CPU 3.4GHz 2 GB RAM 2xHDD 72GB | DB Server Blade BL20p 1 CPU 3.4GHz 3 GB RAM HBA SAN | BizTalk Server Blade BL20p 1 CPU 3.4GHz 3 GB RAM HBA SAN | AD+MOM+ Exchange Server Blade BL20p 1 CPU 3.4GHz 2 GB RAM HBA SAN | Web Server Blade BL20p 1 CPU 3.4GHz 2 GB RAM 2xHDD 72GB | Dev Server Proliant DL360 1 CPU 3.4GHz 2 GB RAM 2xHDD 72GB HBA SAN |
|--|--|---|--|--|--|



Sistema de Storage MSA 1500
Controladores Redundantes
I/O Redundantes
8 Discos de 146GB

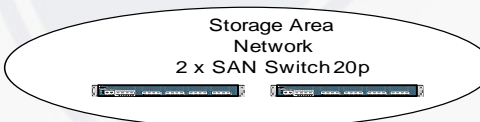
**Deployment
+Backup Server**
Proliant DL360
1 CPU 3.4GHz
2 GB RAM
2xHDD 146GB



UPS de soporte a toda a
infraestructura

Site DR

| | | | | |
|--|--|---|---|--|
| ISA Server Blade BL20p 1 CPU 3.4GHz 2 GB RAM 2xHDD 72GB | DB Server Blade BL20p 1 CPU 3.4GHz 3 GB RAM HBA SAN | BizTalk Server Blade BL20p 1 CPU 3.4GHz 3 GB RAM HBA SAN | AD Blade BL20p 1 CPU 3.4GHz 2 GB RAM HBA SAN | Web Server Blade BL20p 1 CPU 3.4GHz 2 GB RAM 2xHDD 72GB |
|--|--|---|---|--|



Sistema de Storage MSA 1500
Controladores Redundantes
I/O Redundantes
8 Discos de 146GB

Deployment
Proliant DL360
1 CPU 3.4GHz
2 GB RAM
2xHDD 146GB

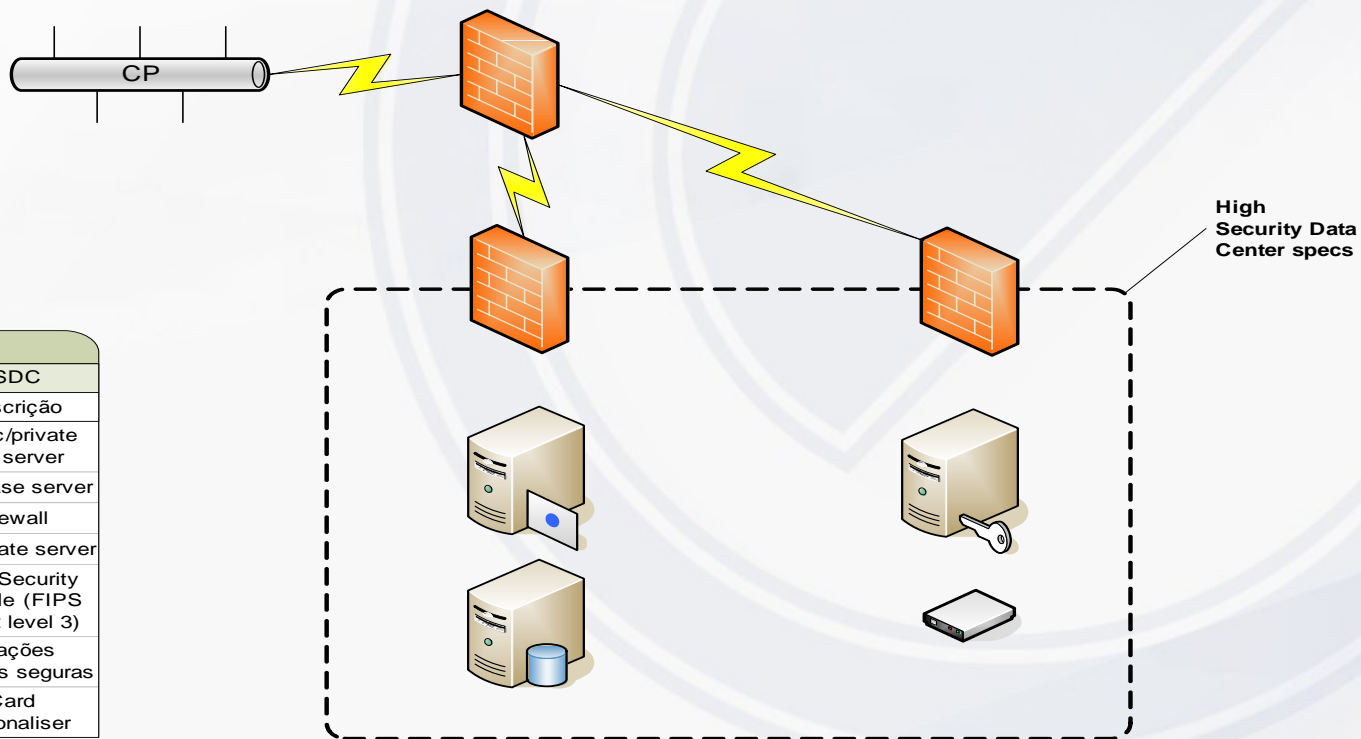


UPS de soporte a toda a
infraestructura





MSCA Data Centre Functional Architecture

SPTD – MSCA
High Security Data Center



Legenda

SPTD – MSCA HSDC

| Simbolo | Qty | Descrição |
|---|-----|---|
|  | 1 | Public/private key server |
|  | 1 | Database server |
|  | 3 | Firewall |
|  | 1 | Certificate server |
|  | 1 | High Security Module (FIPS 140-2 level 3) |
|  | 3 | Ligações privadas seguras |
|  | 1 | Card Personaliser |



MSCA Data Centre Systems Architecture

2 Servidores de Geração de Chaves/Certificados

Proliant ML310

1 CPU p640

1 GB RAM

2xHDD 160GB SATA

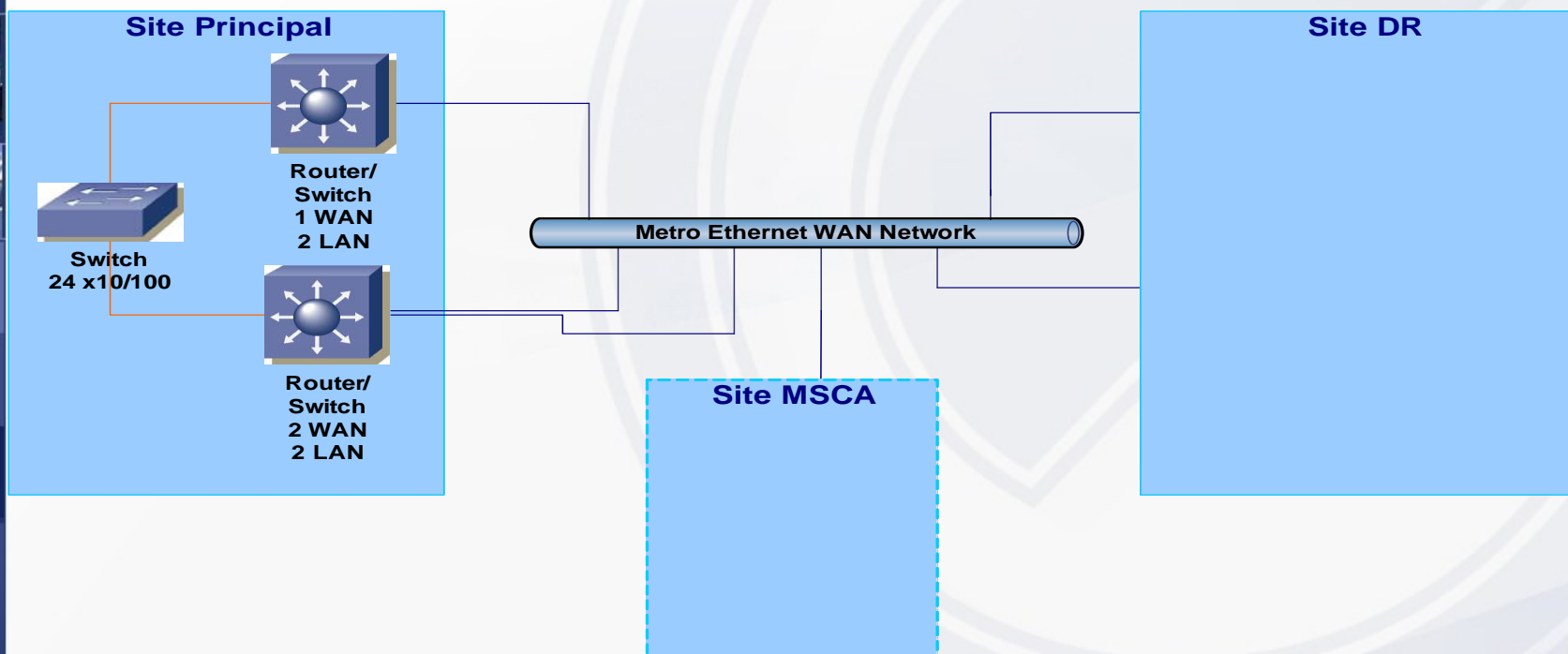
Bastidor de 14U's em opção



HSM from nCipher
Model "nShield F3 PCI"
FIPS 140-2 level 3 Cert # 527

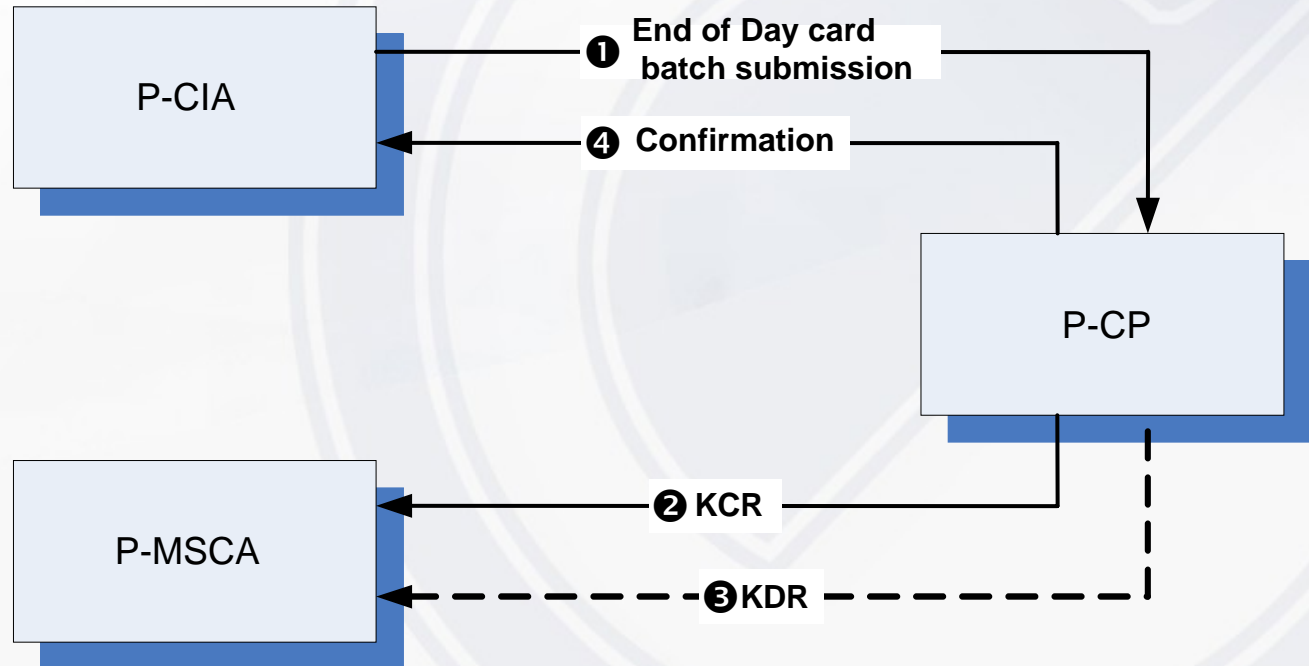


CIA-MSCA Networking Architecture



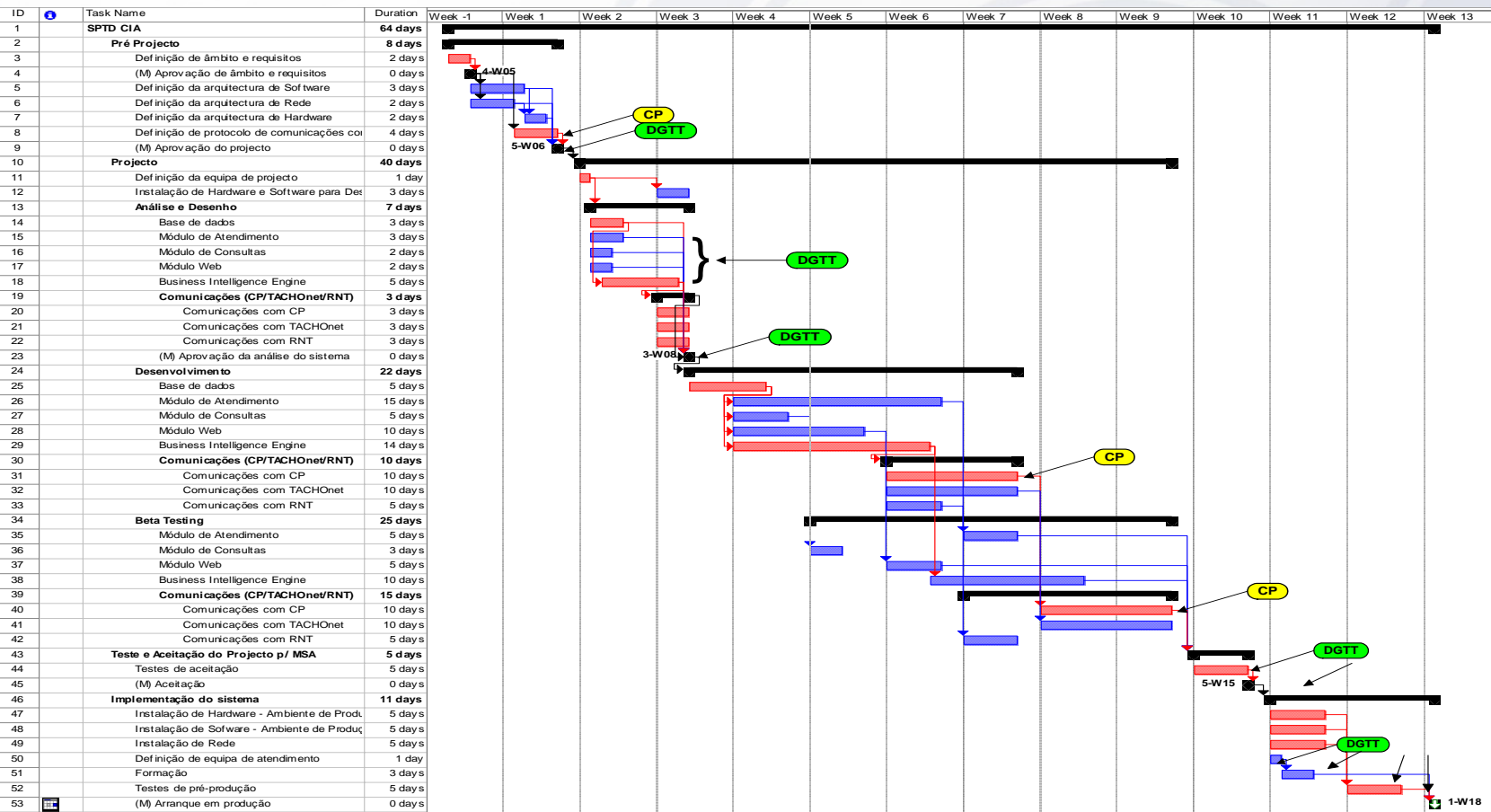


Communication Protocols





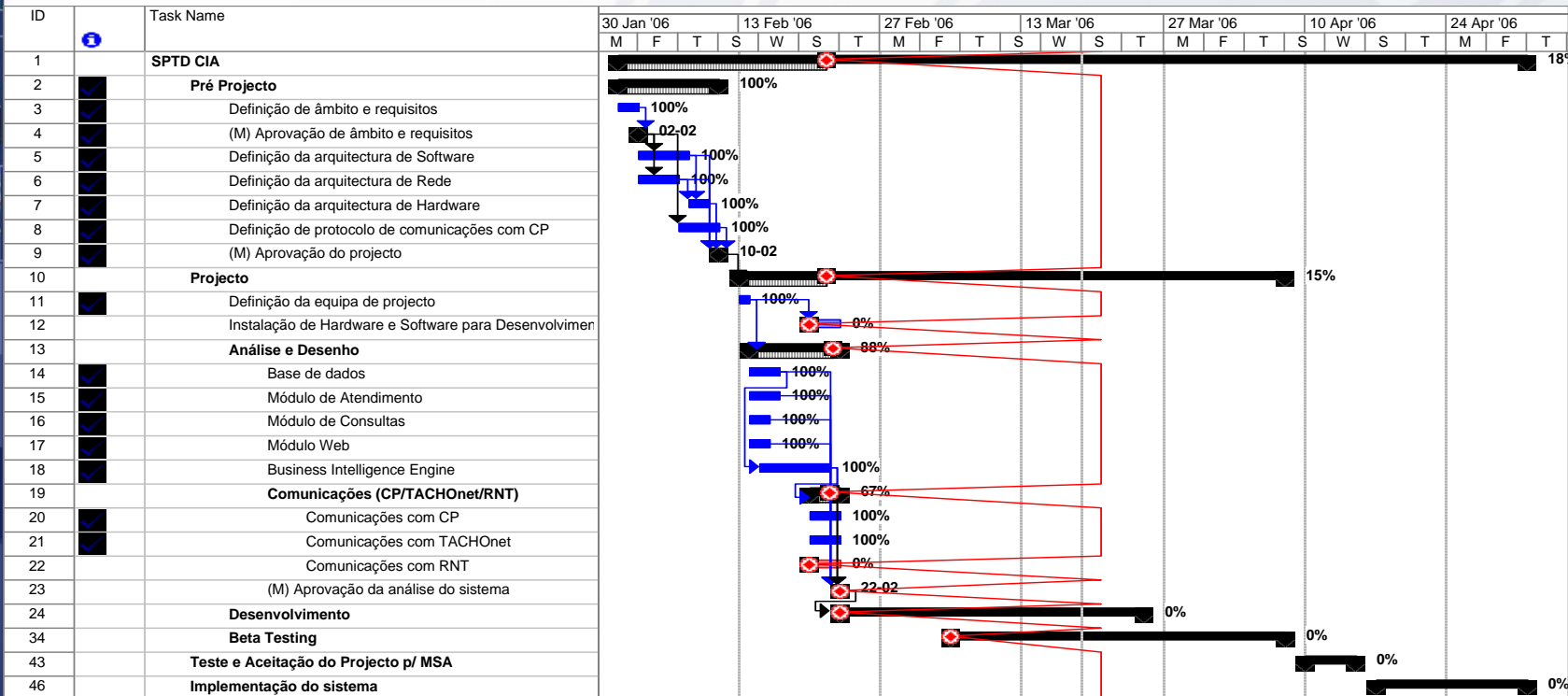
CIA Planning





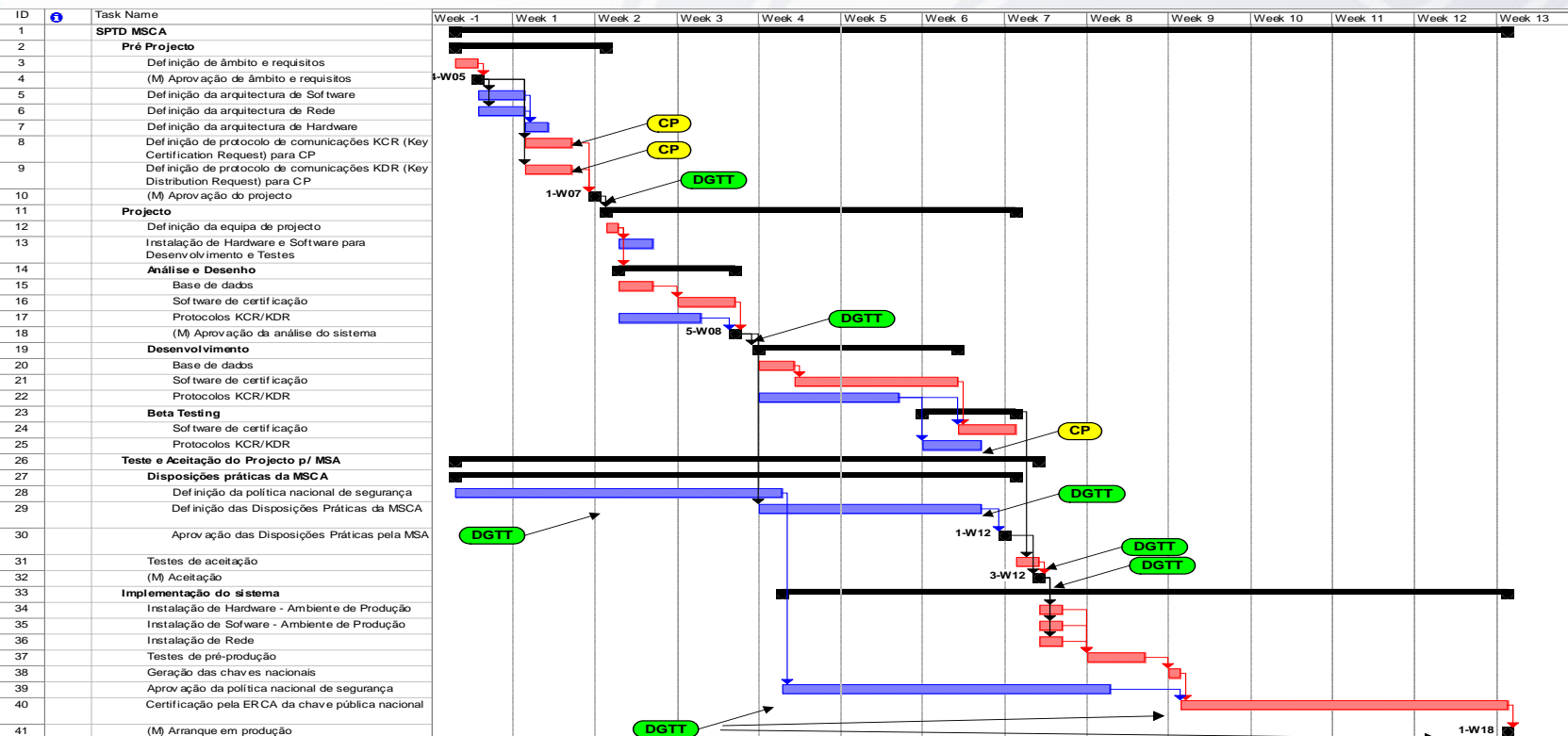
CIA

Tracking Gantt To Date





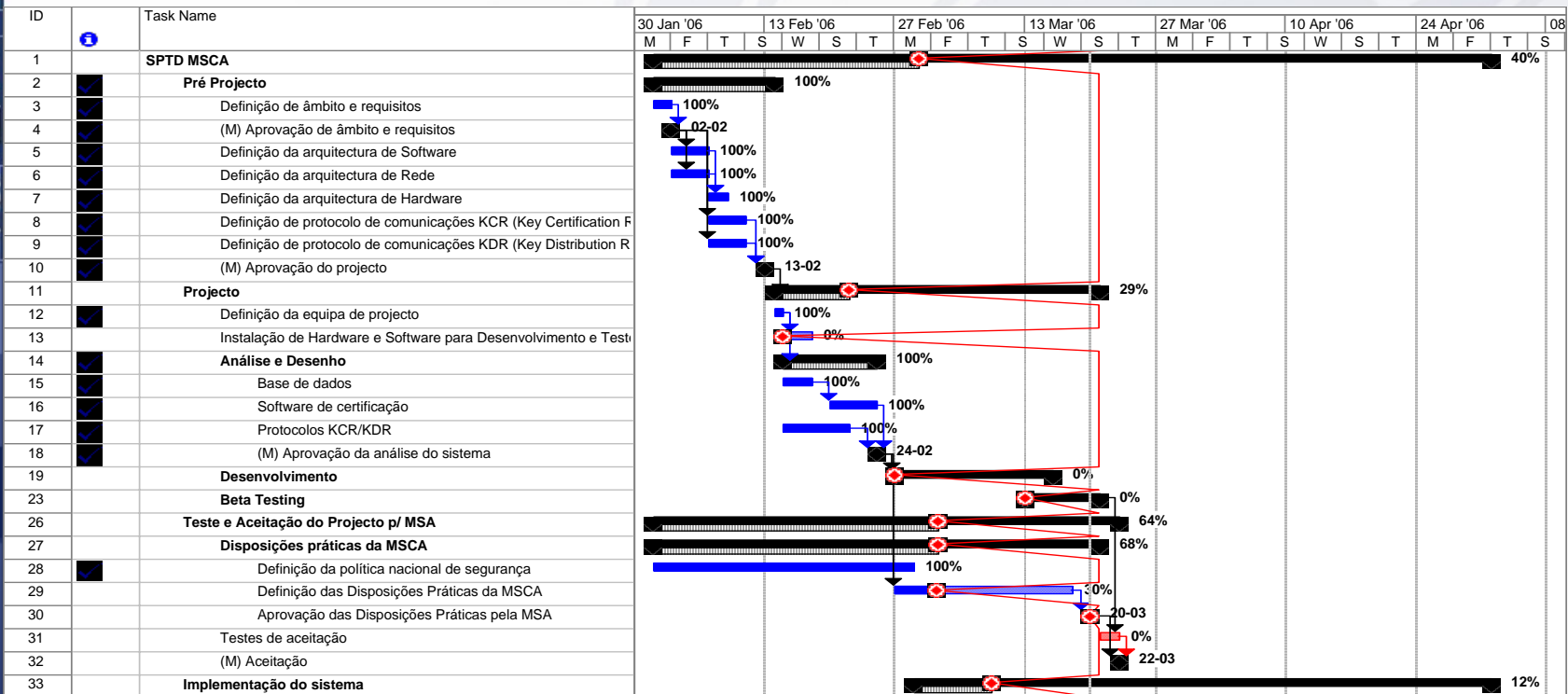
MSCA Planning





MSCA

Tracking Gantt To Date





Questions?



TACHONET





TACHOnet Project Objectives

Create a telematics network aiming at facilitating data exchange between national administrations in charge of issuing tachographs cards

TACHOnet network:

- Ensures a reliable and secure exchange of necessary and sufficient data between States issuing tachograph cards
- Makes sure the exchange is done within the legal constraints stated in the EU-AETR rules
- Imposes only limited constraints on the local systems managing cards in the different States

TACHOnet project is owned by European Commission *DG TREN*



Scope and Exclusions of TACHOnet

Organisational:

1. Included:

- Central secure and reliable XML messaging system allowing competent authorities to exchange information about tachograph cards based on well defined interfaces
- Intelligent router between States (hub & spoke)
- Central logging/tracking for non-repudiation & statistics
- Access granted at State level using digital certificates handled by IDA PKI services.



Scope and Exclusions of TACHOnet

Organisational:

2. Not included:

- Establishment of card holders data bases is the responsibility of each State
- Access to the TACHOnet network within each State is under the responsibility of each State



Scope and Exclusions of TACHOnet

Business processes:

1. Included:

- Check that an applicant for a card in a State does not already hold a valid card in another State
- Check the actual status of a tachograph card based on its number/index (useful for control authorities)
- Information about lost, stolen, defective cards, as well as about exchange of driver cards



Scope and Exclusions of TACHOnet

Business processes:

1. Included:

- Information interchange about the usage of a driving license number for an issued card
- Provide a central Greek or Latin to US/Ascii transliteration service
- Provide a central service for getting the Phonex search keys of a driver's surname and first of first names
- Produce irrefutable statistics about activities (response by request, average response time/delay,...) for every State



Scope and Exclusions of TACHOnet

Business processes:

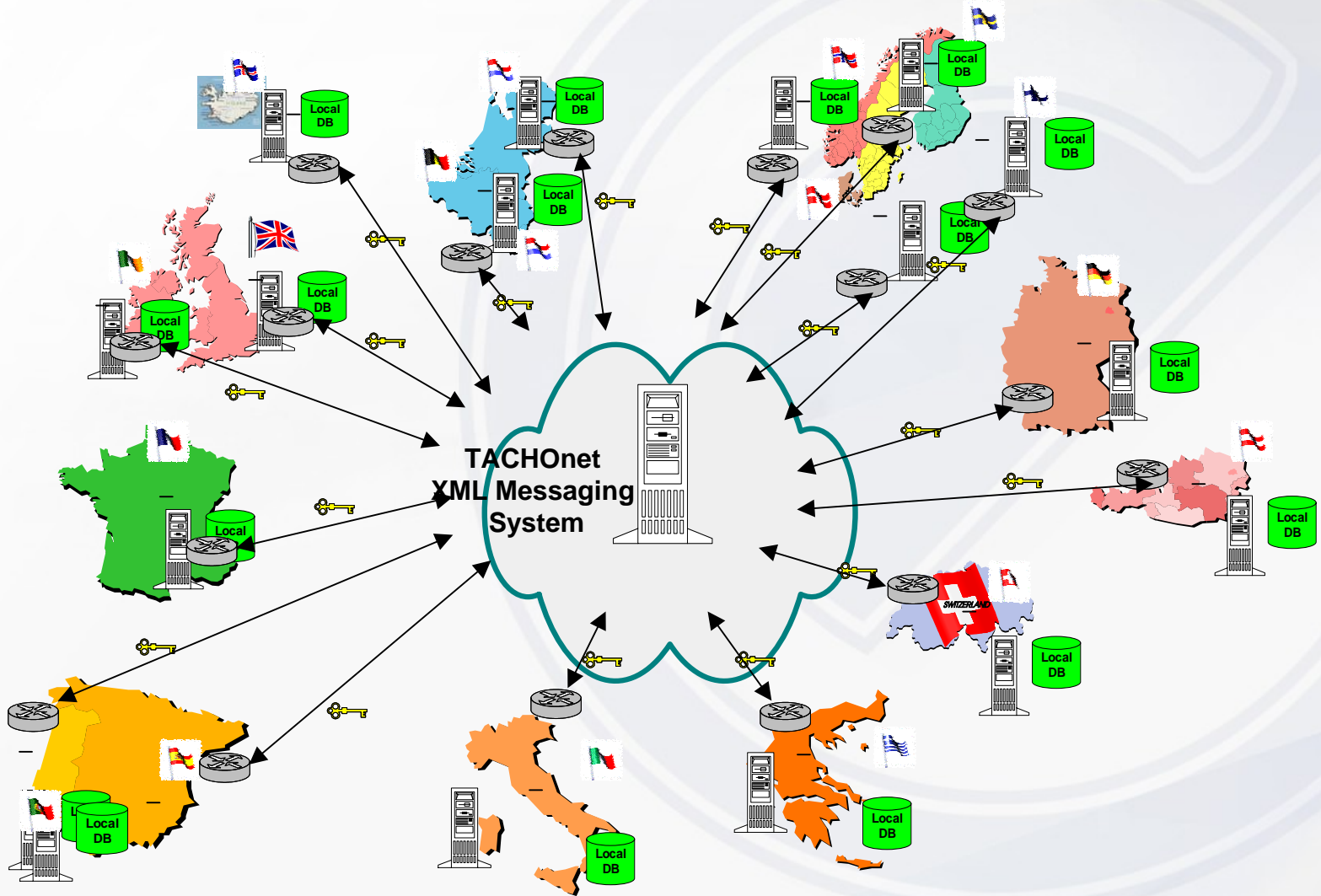
2. Not included:

- Check for driver license number by integrating calls to external systems





TACHOnet Architecture





National authorities need therefore to:

- exchange information making sure that they do not issue a card to an applicant who already holds one
- connect to TACHOnet ?
- set up an AETR net to be connected to TACHOnet ?

Timing: ?

Coordination between the EC and the UN/AETR Secretariat highly recommended



Analogue tachographs

Digital tachographs

- Security management

Security policy

Security audits

- Issuing of cards

- Connection to a net or active exchange of information between AETR Contracting Parties



Questions?



6. Enforcement

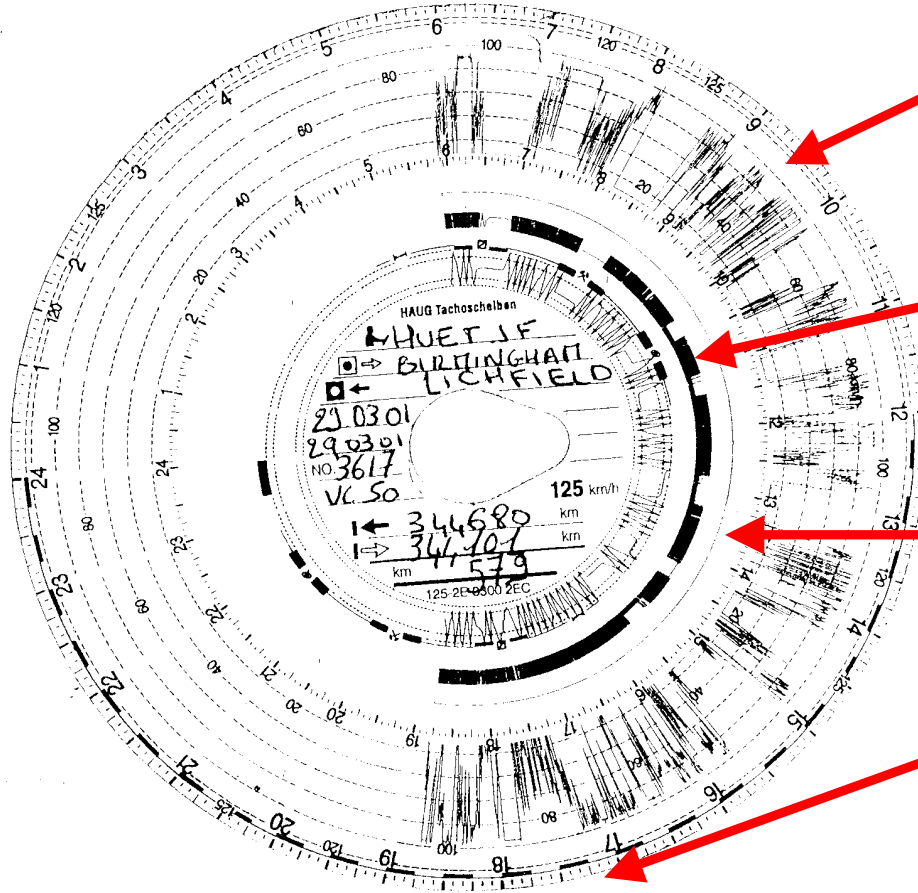


Enforcement

With analogue tachographs



Are recorded



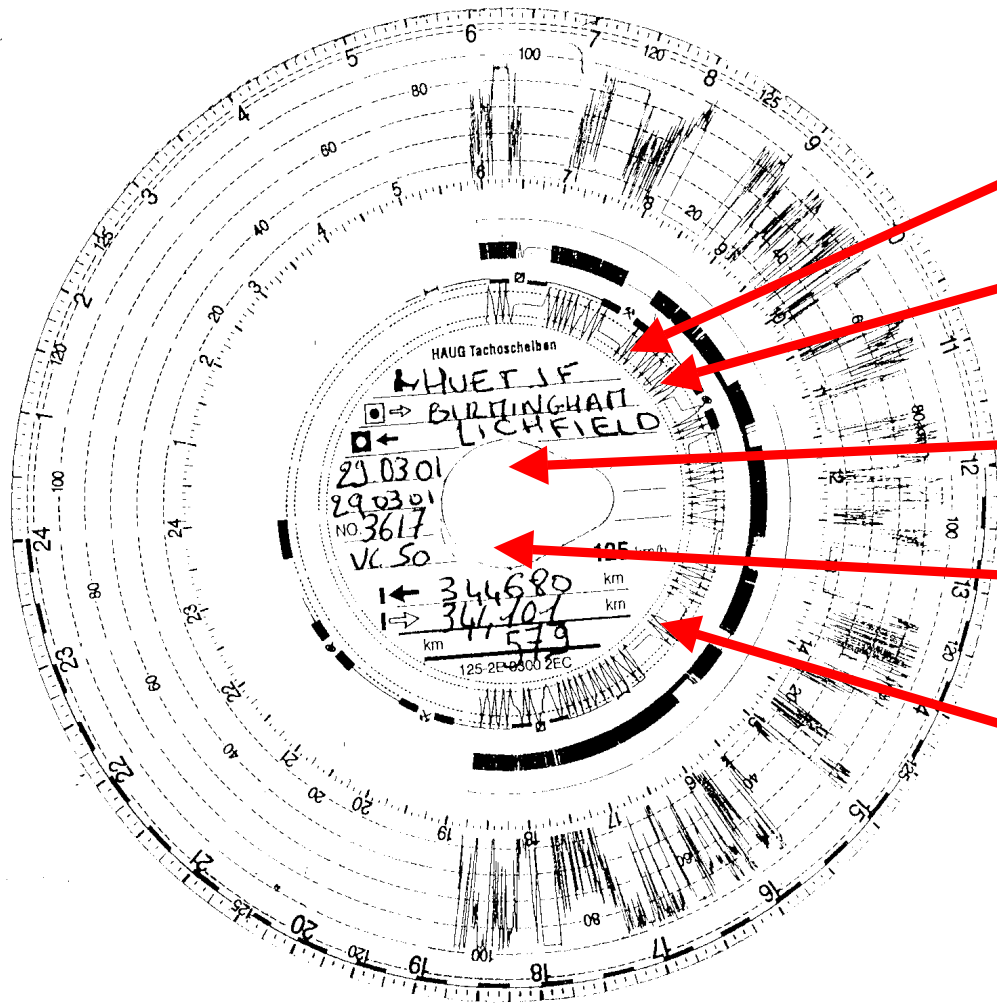
Speed

Distance

Mode of work

Time





Drivers name

Start location

End location

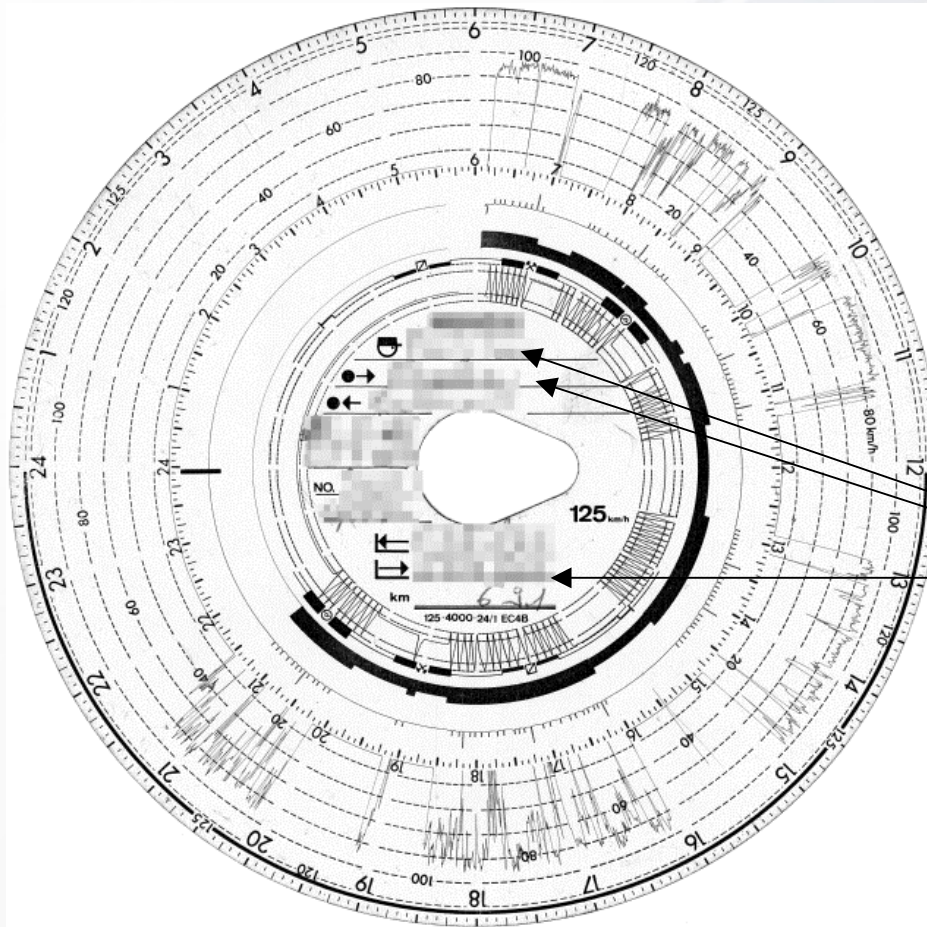
Dates

Vehicle
registration

Odometer
readings



Manipulations can be detected (1)

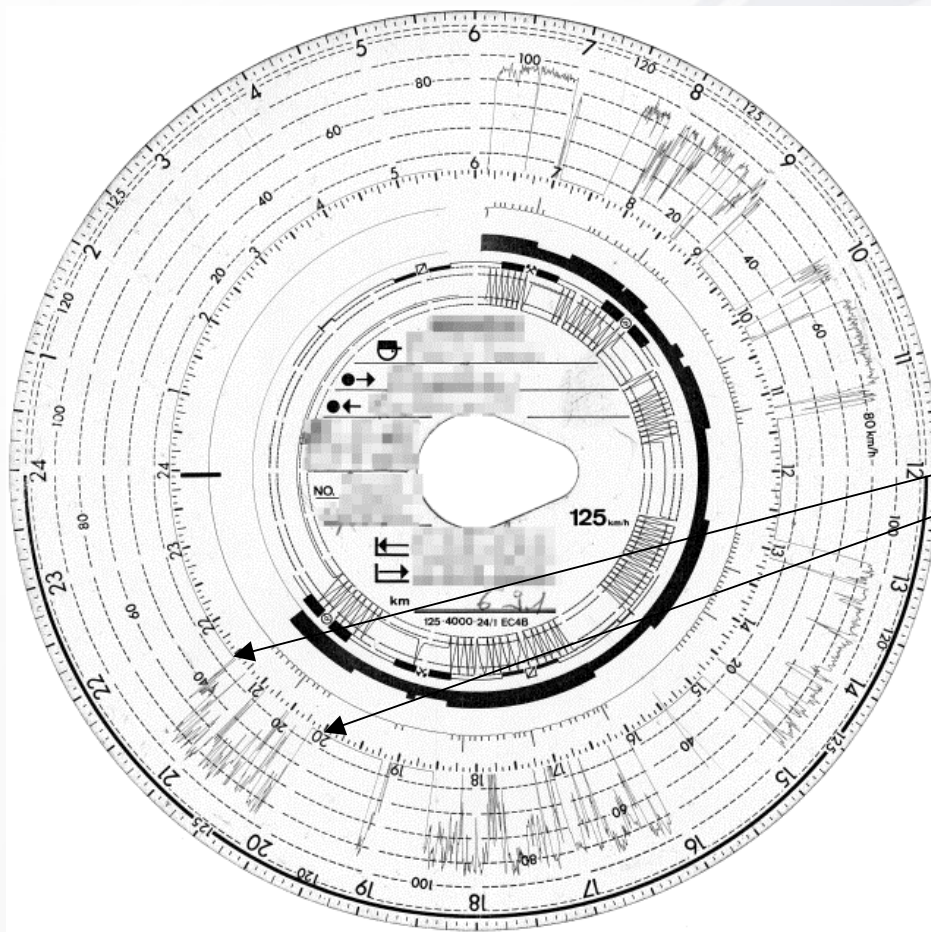


Odometer Distance is insufficient to match geographical locations

Analogue Distance Trace



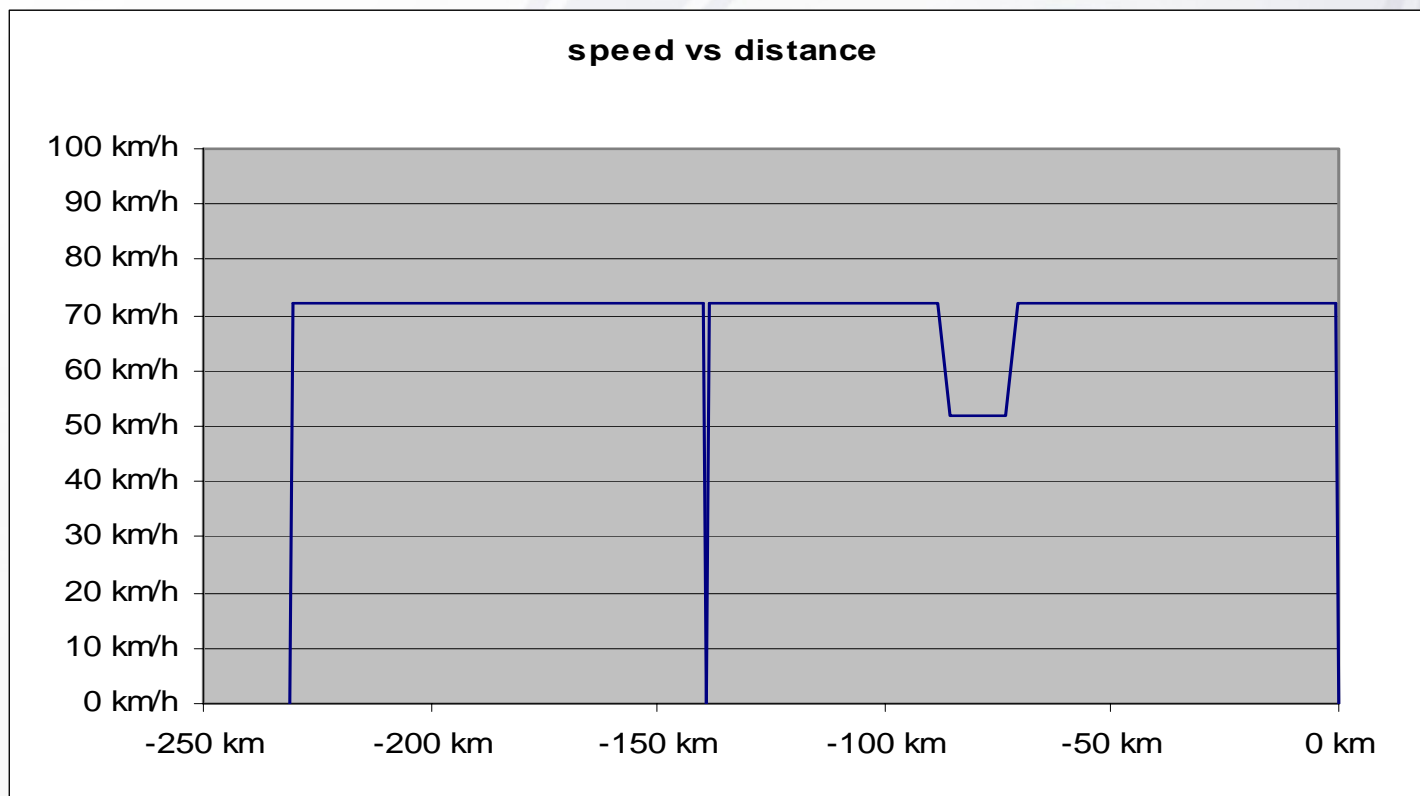
Manipulations can be detected (2)



Analogue Distance Trace



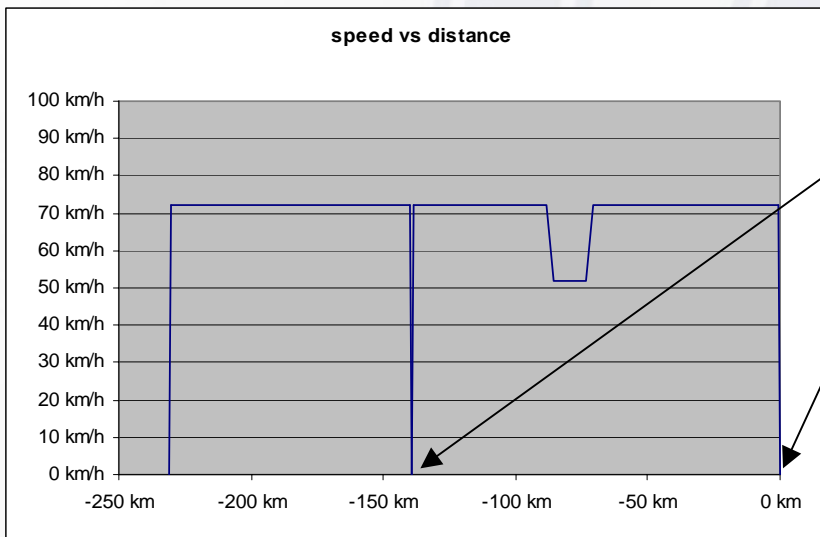
Analysis software can also be used once data are scanned (1)



Digital Distance Trace



Analysis software can also be used once data are scanned (2)



Distance from known highway feature e.g. peage, is insufficient to reach check site

Digital Distance Trace

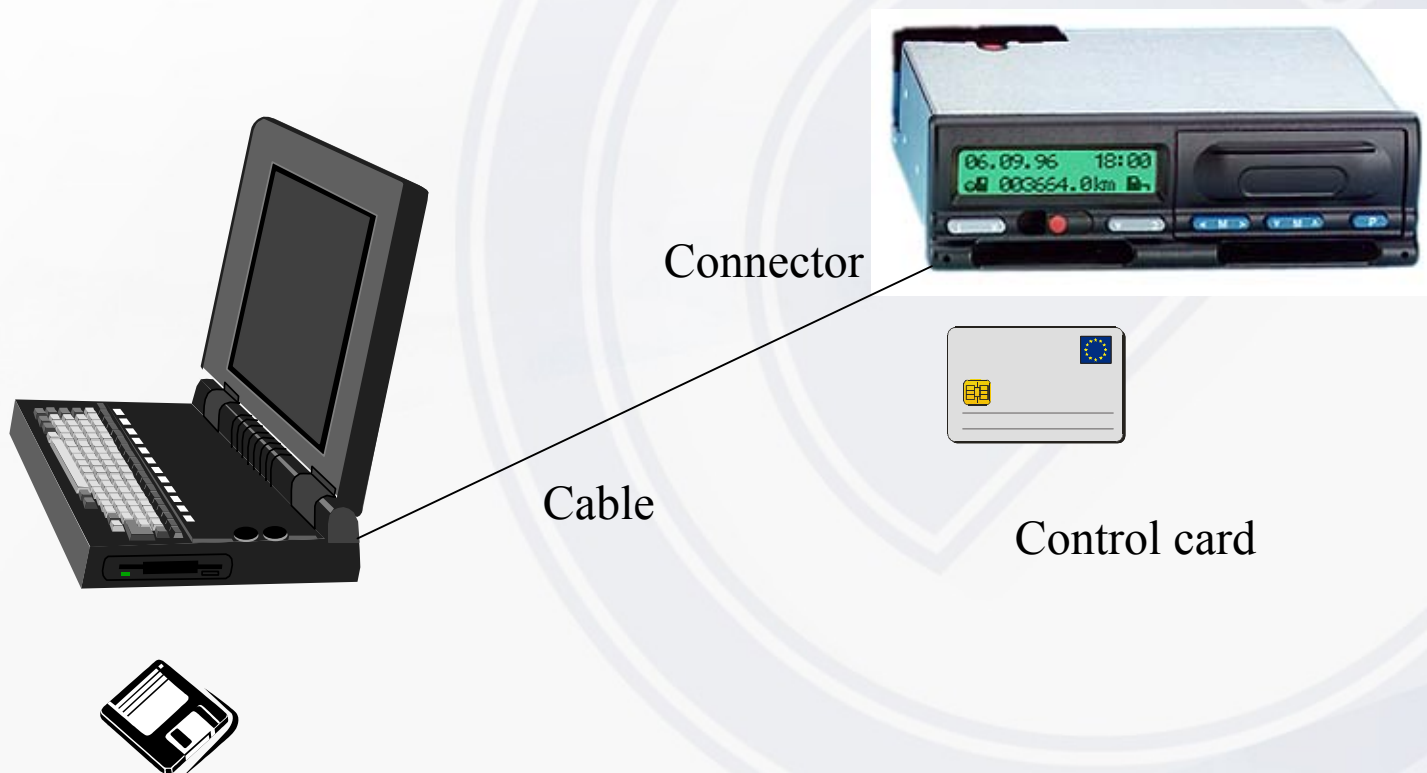


Enforcement

With digital tachographs



Data can be downloaded by control officers if issued with control cards





Alternative for the control officers to get access to the recording equipment's and card's data : printouts

6 types of print-outs, which can be selected through the recording equipment :

- 2 relate to the drivers' activities: one comes from the recording equipment, the other one from the driver card;
- 2 relate to the events and faults: one from the recording equipment, the other one from the driver card;
- 1 concerns the technical data (vehicle, recording equipment, etc...);
- 1 concerns the over speeding.



Example: drivers' activities stored on the driver's card

| | |
|--------------------------|---|
| ▼ 15/10/1997 15:15 (UTC) | 1 Printing - Date & Time (UTC) |
| -----▼----- | Delimiter Print-out general information |
| # DavidFish | 2 Controller - Name |
| #■B/4803992633 | Controller - Card Number |
| #† | 3 Control Place (Hand written) |
| ■▼14/10/1997 | 4 Type of Print-Out (Card) & Enquiry date |
| ■ WALSTER | 5 Driver - Last Name |
| Nick D. | Driver - First Name |
| ■■GB/135798642 | 6 Driver Card - Number |
| 14/05/2004 | Driver Card - Expiry Date |
| ■ XAD1117483A | 7 Vehicle - VIN |
| B/PV1772 | Vehicle - Nation + VRN |
| Tacho-Manufacturer | 8 Tachograph - Manufacturer Name |
| Tacho-Part-Number | Tachograph - Part Number |
| † Workshop-Name | Last Inspection/Calibration - Workshop Name |
| †■GB/159482637 | Workshop Card Number |
| † 05/03/1997 | Date |



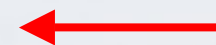
| ----- | | | Delimitar driver information |
|------------------|----------|-------|--|
| ? 00:00 | 06:17 | 06h18 | 9 Card not inserted. Activity unknown |
| ----- | | | 10 Card insertion |
| A B/PV1772 | 42000 km | | Insertion in VRN No |
| * 06:18 | 07:42 | 01h25 | Odometer at card insertion |
| ⊙ 07:43 | 07:53 | 00h11 | 11 Detailed activities with |
| * 07:54 | 08:00 | 00h07 | Start Time, End Time, Duration |
| 42010 km; 10 km | | | ----- |
| A B/PV1772 | 42010 km | | 12 Odometer, Distance travelled at Card withdrawal |
| * 08:01 | 08:13 | 00h13 | 10 Card insertion |
| ⊙ 08:14 | 11:20 | 03h07 | Insertion in VRN No |
| h 11:21 | 12:33 | 01h13 | Odometer at card insertion |
| 42263 km 253 km | | | 11 Detailed activities |
| ? 12:34 | 14:11 | 01h38 | * Rests above 1 hour marked with a star |
| ----- | | | 12 Odometer, Distance travelled at Card withdrawal |
| A B/HKG264 | 81000 km | | 9 Card not inserted. Activity unknown |
| ⊙ 14:12 | 16:03 | 01h52 | 10 Card insertion |
| * 16:04 | 18:00 | 01h57 | Insertion in VRN No |
| h 18:01 | 18:01 | 00h01 | Odometer at card insertion |
| 81111 km; 111 km | | | 11 Detailed activities |
| ? 18:02 | 23:59 | 05h58 | 12 Odometer, Distance travelled at Card withdrawal |
| ----- | | | 9 Card not inserted. Activity unknown |



| | |
|--------------------|--|
| -----Σ----- | Summary information |
| +*06:19 F | 13 Start daily work time Country/Region Odometer |
| *+18:00 E CAT | End daily work time Country/Region Odometer |
| ⊙ 04h59 374 km | 14 Activity totals |
| * 03h42 ■ 00h11 | |
| h 01h14 ? 13h54 | |
| ▣2 05h25 | 15 Duration of crew status |
| -----!■X----- | 16 Delimiter Cards Events and Faults |
| !S12/09/1997 18:24 | Event Security breach attempt |
| !↓12/09/1997 18:23 | Event Power supply interruption |
| -----!AX----- | 17 Delimiter Vehicle Unit Events and Faults |
| !n05/09/1997 06:35 | Event Sensor interruption |
| ▣▣IT/836254363 | Driver Card Number |
| XA21/08/1997 12:45 | Fault VU |
| ▣▣--- | No card inserted |
| XV21/08/1997 12:46 | Fault Printer |
| ▣▣--- | No card inserted |
| ----- | |
| ▣ | 18 Driver's signature |
| # | 19 Controller's signature |



Data analysis





Analogue tachographs

- Roadside checks
- Company checks

based on paper discs

Digital tachographs

- Roadside checks
- Company checks

based on paper discs
based on print-outs
based on digital data

New equipments required
Control cards to be issued
Specific training to be supplied



National authorities need therefore to:

- issue laws to allocate control officers with new powers, to regulate data download, to define under which conditions electronic data can be used before Courts, etc...
- train their control officers
- equip them appropriately

Timing: (6 to 24 months)

National authorities should seek support from EU Member States and manufacturers



Questions?



7. Data protection



Data protection

- The digital tachograph falls under the scope of data protection rules for different reasons :
- The digital tachograph **records and stores digital data** concerning individuals (mainly drivers) as well as legal persons (transport companies and approved workshops)

See requirements 73 to 105 b of AETR Appendix 1B



Data protection

- **These data are accessible** in different ways, depending on whether or not tachograph cards are used, and in case tachograph cards are used, depending on the type of cards that is used (driver, company, control or workshop cards) and of the mode of operation of the tachograph

See requirements 007 to 11 of the AETR Appendix 1B



Data protection

- These data are also **downloaded** and can also be **transferred** for freight and fleet management, but also for enforcement purposes

See requirements 149 to 151 of AETR Appendix 1B



Data protection

- Finally, the digital tachograph **records and stores data on tachograph cards**, to be issued to the different persons submitted to the provisions of the AETR

See requirements 108 to 112 of the AETR Appendix 1B



- Each tachograph card contains data, that are accessible in different ways regulated notably and mainly by the AETR as far as enforcement is concerned

See requirements 194 to 212 b of the AETR Appendix 1B for the driver card

See requirements 213 to 230 a of the AETR Appendix 1B for the workshop card

See requirements 231 to 234 of the AETR Appendix 1B for the control card

See requirements 235 to 238 of the AETR Appendix 1B for the company card



Data protection

- These data, their recording, their storage, the way they can be accessed, their transfer and their use fall under the scope of the data protection rules (if any in the non EU-AETR Contracting Parties)
- Therefore, Contracting Parties which have to implement the amendments to the AETR shall make sure that their implementation scheme does not contradict their data protection rules



Operational Modes

Data Read Access Rights

With his/her driver card, a driver can display, print all data related to him/herself, the other ones being “anonymous”

With his/her control card, a control officer can display, print, download ALL data,

With its company card, a company can display and print all data not locked by another company,

Without card, all data can be displayed or printed except personal identification (Names and Card numbers) which is blinded. Access limited to 8 days.



Operational Modes

Data Read Access Rights

| | No Card | Driver Card | Control Card | Company Card |
|---------------|--|-----------------------------------|--------------|--|
| Print Display | All data with personal identifiers blinded | All own data + Idem No Card | All data | All data except for periods locked by other companies + Idem No Card |
| Download | Forbidden | Forbidden | All data | All data except for periods locked by other companies |



Analogue tachographs

Data protection

No or few requirements

Digital tachographs

Data protection

Digital tachograph's and tachograph cards' data are submitted to data protection rules (if any)



8. Risk management





Point 5.3.38 of the ERCA policy states that:

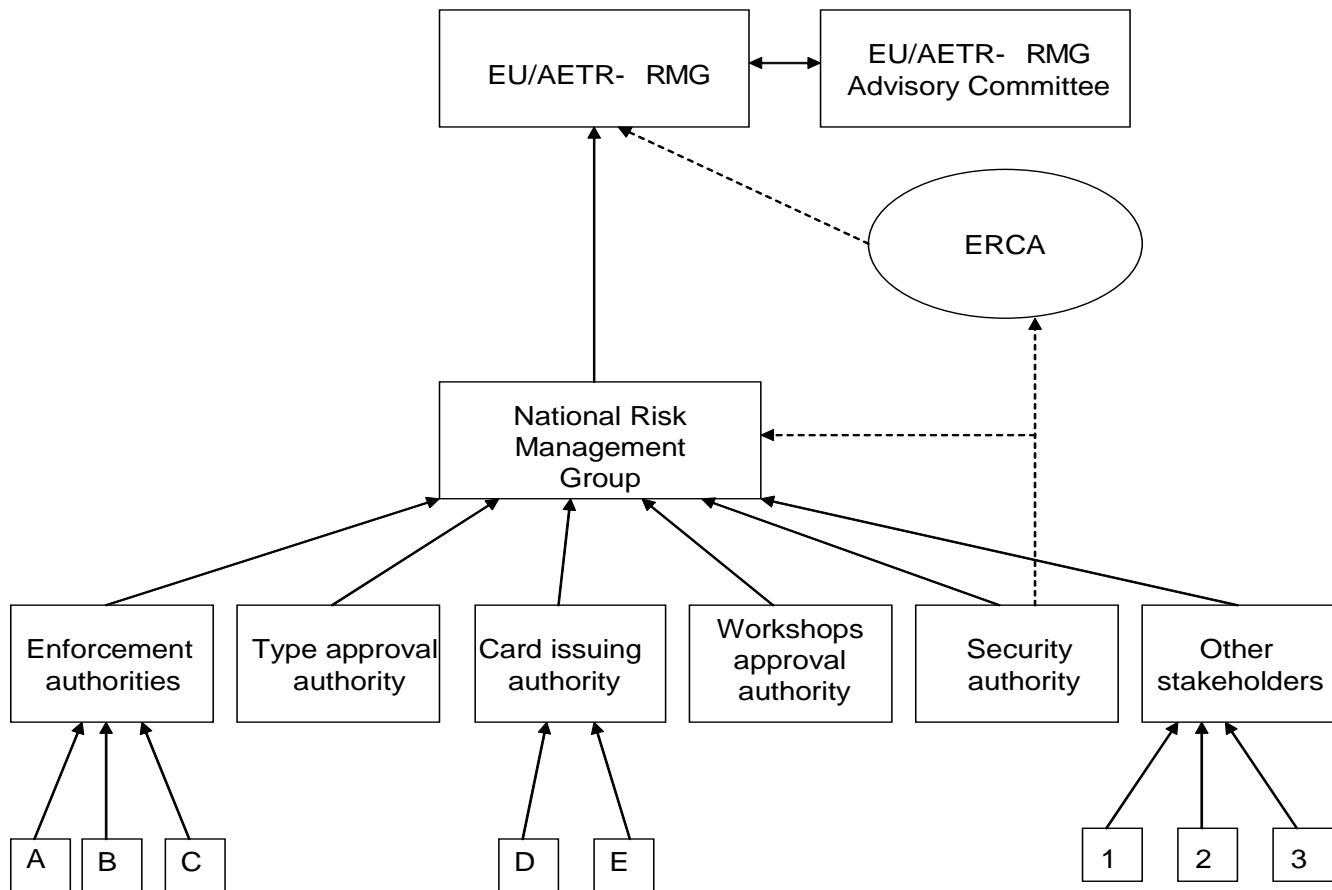
The MSA shall establish an information security management system (ISMS) based on risk assessment for all the operations involved.

The ERCA does not cover the overall security of the digital tachograph system



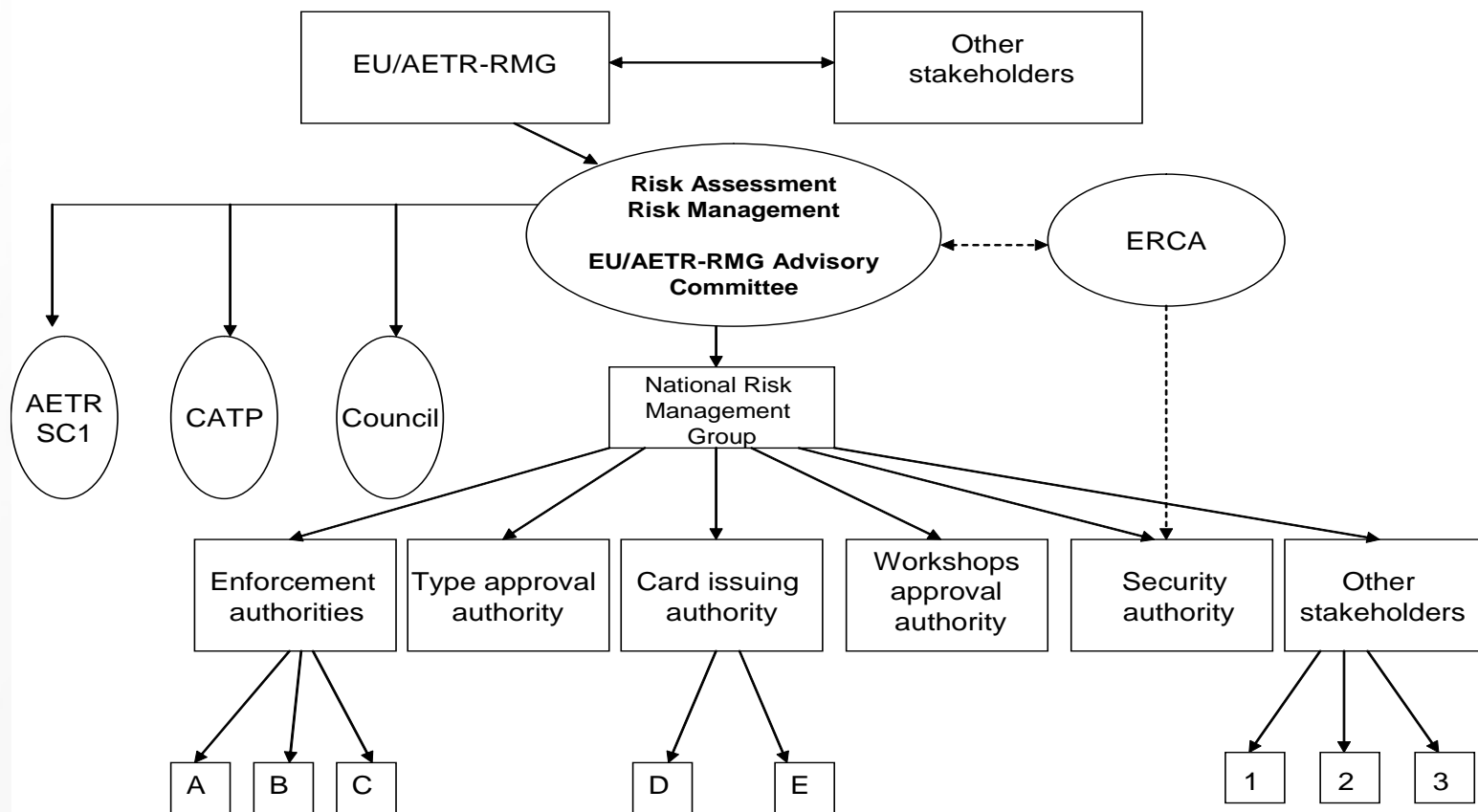


From national authorities to the EU/AETR-RMG





From the EU/AETR-RMG to national authorities





Analogue tachographs

Risk management

No requirement

Digital tachographs

Risk management

Policy to be implemented and maintained



National authorities need therefore to:

- put in place a national risk management policy
- nominate responsible bodies/persons
- maintain this policy

Timing: (2 to 6 months)





Questions?



9. Conclusion



Overview of the Project Organisation

Steering Committee

Per-Arne HOLM (S)
Leo HUBERTS (EC)
Hanna ZELICHOWSKA (Poland)
Andrew KELLY (UK)
Hans DRIJER (Netherlands)
Thierry GRANTURCO (MIDT Team)

Per-Arne HOLM (Sweden)
Project Leader

Leo HUBERTS (EC)
Project Officer

MC BONNAMOUR
L. WALDNEROVA
Project Managers

Help desk

Training & Communication actions

Support to the new Member States

Support to the AETR countries

Plenary

Card issuing and networking Committee

Hanna ZELICHOWSKA (Poland)

T. GRANTURCO
 President

Implementation policy Committee

Andrew KELLY (UK)

T. GRANTURCO
 President

Drivers' hours' and tachograph Enforcement Committee

Hans DRIJER (Netherlands)

T. GRANTURCO
 President

TACHOnet User Group

Chairman: **EC-DG Tren**

Coordinator: A. LALE

Risk Management

Chairman: **EC-DG Tren**

Coordinator: A. LALE



Tachograph life cycle

⇒ **EU-MIDT/PLE/008-2006**

Approval of workshops

⇒ **EU-MIDT/PLE/004-2006**

Roadside checks

⇒ **EU-MIDT/PLE/003-2005 rev 3**

Company checks

⇒ **EU-MIDT/PLE/005-2006**

Data management

⇒ **EU-MIDT/IPC/030-2005**

Card issuing

⇒ **EU-MIDT/CINC/028-2005**

TACHOnet

⇒ **EU-MIDT/PLE/009-2006**

Data protection

⇒ **EU-MIDT/PLE/007-2006**

Risk management

⇒ **EU-MIDT/RMG/004-2006**

Security

⇒ **EU-MIDT/PLE/011-2006**



Scope of the Project



Four Work Packages

- Help Desk
- Communication and Training Actions
- Support to the new Member States
- Support to the UNO-AETR Secretariat and to the AETR countries

Fora for Member States

- Plenary
- Enforcement Committee
- Implementation Policy Committee
- Card Issuing & Networking Committee
- TACHOnet User Group
- Risk Assessment Group



Support to the AETR Countries



Objectives

Helping the control authorities of AETR Contracting parties to face the digital tachograph and the AETR Contracting parties to introduce the digital tachograph by 2010

Three informative workshops to be organised

Help desk

Specific documentation can be made available (in English – IDT deliverables)



THANK YOU VERY MUCH FOR YOUR ATTENTION