



# Revision of the EU legislation on the recording equipment in road transport (Tachographs)

## Contribution to the EC consultation

Eurosmart, the Voice of the Smart Security Industry, is keen to contribute to the definition of all applications that need security. In Eurosmart opinion, the smart card is the key element of the security of the current tachograph equipment, and similarly to payment, identification and telecommunication application fields, this technology shall remain a key pillar of the global security of an innovative in-vehicle system that can be restricted to tachograph functions or enlarged to other off-line and/or on-line functionalities.

### **Question 2**

Considering the need for a more real time management of fleet and transport of goods and the evolution of the technology, Eurosmart is encouraging open vehicle platforms. This will allow providing at the same time better security and safety conditions for drivers and goods inside and outside Europe. For these M2M applications, the smart card technology may bring helpful features, such as identification and strong end-to-end authentication.

### **Question 3**

As fraud with the existing software is important, Eurosmart members believe that remote download of the digital tachograph should be encouraged. This does not prevent in card data storage, for an off-line check. It would enable tachographs to be more efficient. Eurosmart recommendation is to foresee a CC evaluation of the software (EAL2).

### **Question 4**

Downloading of data from the recording equipment would improve the performance for users as the length of downloading data would be improved (less volume, less data). Privacy would not be an obstacle when using smart card technology.

### **Question 5**

Mobile control of identity is being developed in Europe. It could be of interest to consider with the MOBIDIG group the possibility to integrate the tachograph control in a mobile terminal that shall check ID documents and driving licenses.

Another possibility could be to link the tachograph control to the payment of ecotax.

The key ideas on future eID orientations and research proposed in the frame of the European Security Research and Innovation Forum<sup>1</sup> (ESRIF) could be largely used for the tachograph evolution. A focus should be made on electronic identity, security and privacy management in a complete European eID scheme in which the tachograph would be only one element in the global system.

### **Question 6**

Eurosmart members agree that the security level on tachograph should be improved. Two options for increasing the security would be either to adopt a minimum key length suitable to digital tachograph (RSA 2048, however only valid until 2020 according to certification bodies), or to use new algorithms, such as elliptic curves.

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<sup>1</sup> [http://www.esrif.eu/documents/esrif\\_final\\_report.pdf](http://www.esrif.eu/documents/esrif_final_report.pdf)

**Question 7**

A smart card is a safe box of data that also provides the identification and strong authentication functionalities. Recording activities by equipment shall be made in a tachograph card, even for vehicles that are only occasionally used.

**Question 8**

Eurosmart members are supporting compatibility and interoperability between the current digital tachographs and a new generation. They would favour option n° 2 that appears the most reasonable and efficient one, because there are already millions of driver cards issued in the field.

**Question 9**

As the current level of security is not sufficient enough, Eurosmart members recommend introducing new equipments that will provide to the whole chain a homogeneous level of security

**Question 10**

To Eurosmart knowledge, there are no official tests suites for digital tachograph equipment. Steering up such official test suites would be useful to better assess the efficiency of tachographs and to better adapt them to technical progress. This approach allowed achieving a very good level of interoperability for e-passports. A possible test house could be JRC, in Ispra, Italy.

**Question 11**

Eurosmart recommends a functional and security certification of the complete chain.

**Question 12**

Eurosmart members believe that manufacturers should be associated to the updating process of specifications. They would favour option n° 3 as it gives manufacturers the final word on technical details. Option n° 2 would be their second favoured position.

**Question 13**

In the smart card industry, the R&D and manufacturing sites are audited for quality and security. The trustworthiness of workshops should be considered in the same manner.

**Question 17**

The main concern of Eurosmart is to define, promote the standardisation and roll out solutions that provide interoperability, security and privacy protection. The EU Commission may rely upon Eurosmart for new contributions that will achieve such target for tachographs.



Eurosmart is an international non-profit association located in Brussels and representing the Smart Security Industry for multi-sector applications. Founded in 1995, the association is committed to expanding the world's Smart Secure Devices market, promoting Smart Security standards and continuously improving quality security applications and services.

Eurosmart members are suppliers and manufacturers of smart cards, semiconductors, terminals, equipment and technology for Smart Secure Devices, system integrators, application developers, issuers, associations, laboratories and independent experts. They work in dedicated working groups (communication, marketing, security, electronic identity, new form factors, and prospect emerging markets).

Eurosmart is acknowledged as representing “the Voice of the Smart Security Industry” and is largely involved in political and technical initiatives as well as research and development projects at the European and international levels.

For more information, please visit [www.eurosmart.com](http://www.eurosmart.com)

**EUROSMART**

Rue du Luxembourg 19-21 – B-1000 Brussels  
Tel. (+32) 2 506 88 38/ Fax. (+32) 2 506 88 25  
Email: [eurosmart@eurosmart.com](mailto:eurosmart@eurosmart.com)