Public Affairs Department
Permanent Delegation to the European Union

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Public consultation on Radio Frequency Identification (RFID)
Michelin's position

The Michelin Group, world leader of the tyre industry, has always been contributing to progress in the area of mobility, through its expertise in the field of tyres, and support services. Therefore, Michelin welcome the public consultation on Radio Frequency Identification (RFID), launched by the European Commission, which will boost the competitiveness of Europe's economy and improve the quality of life of its citizens.

Why Michelin's involvement in RFID ?

Michelin is a global player focused on technological innovation and for this reason is dedicated to using RFID in tyres on a worldwide basis. In addition to usual logistics applications, RFID represent many interesting advantages; indeed tags on tyres can be used to exchange identification and dispatch other information to the vehicle and drivers for greater safety. It will also enable some systems to be better tuned according to the tyre specification. In other words, RFID for tyres will be one of the elements of a larger system dedicated to the vehicle.

Michelin motivations to use RFID are multiple: better services brought to the consumer, positive contribution to road safety *(as explained below),* and excellence in top-of-the-range products.

But as we'll see hereafter, some obstacles still exist regarding the development of RFID technologies in Europe.

Actions needed in Europe and globally regarding the standards

One of the obstacles to be overcome before generalizing such systems in Europe is the non harmonisation of frequency spectrum. This is the reason why the European Commission should establish the opening and the harmonization of the spectrum as a top priority not only for current member states, but also for candidate countries to the EU, or countries which have signed a partnership agreement with the EU. From the EU external relations point of view, the European Commission could also take the lead to encourage other countries in the world to accept a globally harmonized spectrum (reference to emerging countries).

The main obstacle to RFID emergence globally is the non harmonization between regions (North America, Europe, Asia…). On the North American market for instance, RFID may be developed quickly and with efficiency enabling economies of scale and decrease in costs for tags and readers.

In Europe, the UHF RFID frequency faces the 'Listen Before Talk' constraint and a power limitation which both limit the number of potential applications and the read rate. Therefore, the European Commission should encourage ETSI to modify the standard EN 302-208, which today has ostensibly marginalized UHF in Europe. The Commission should, for example, challenge the reasons why the European standard is more stringent than the US one. A

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European Commission request to the ITU-R for harmonization of RFID internationally certainly appears in order.

Regarding RFID and privacy issue

Some people are concerned that RFID will be used improperly to invade individual privacy. This is the reason why they propose the right to desactivate the tag when a product is purchased. This perception is perhaps understandable in the case of the purchase of everyday goods in a supermarket but this is a misunderstanding of the future use of RFID, where post-sales applications are the primary benefit of the technology.

The Michelin group is of course sensitive to privacy protection in general, in accordance with the principles of the Charter of Fundamental Rights of the European Union, and more specifically to the guidelines issued by the EU Data Protection Working Party. Nevertheless there is no basis in the tyre RFID area for these concerns. Many of the criticisms of RFID are the same as those made with regard to credit cards, mobile phones, internet or motorway automatic toll. It is not the credit card wherein lies the problem, but moreover the information systems that process credit card data. Likewise, it is the information system behind the RFID tags that need serious attention, not the RFID tags. In the case of a tyre with an embedded RFID tag, the usefulness of the RFID is not tied to the purchasing action but to the use of the purchased goods. By identifying itself to the rest of the vehicle, the tyre will enable to better monitor systems like ABS or ESP and to bring more safety to the road users. We may even envisage a system where the tyre gives information to the vehicle on the status and condition of the road and then the information is dispatched from the vehicle to another vehicle. In no case is personal data on driver identity is needed. Deactivating the tag would mean to deactivate the benefits brought by RFID to the consumer.

Regarding identification, a potential benefit from RFID in tyres is to remove marks, and not add more marks. However, the application of a tyre label or sticker to identify the presence of an embedded RFID tag would respect the right of the consumer and enhance the value of the RFID application. This should not be applied anymore when RFID will become ubiquitous, i.e. every product will include an RFID tag.

The concept of customers requesting that tags be desactivated or removed would result in the loss of potential benefits such as manufacturers' warranty information, tyre identification number accessibility, i.e. DOT code, and other consumer benefits that would not be personal in nature. The key here is the major difference between "disposable" tags and those that have utility after the sale.

Public education and communication directed at the consumers are keys to the realization of the benefits to all stakeholders, and specifically, the respect for the consumers' rights.

- The type of data stored on an RFID tag is made known to the consumer.
- The when, where and for what purpose a tag in their possession would be read is made known to the consumer at the time of purchase or issuance.