Law Commission: Consultation Paper 2 on Passenger Services and Public Transport

Response from AXA

About AXA

1. AXA Group is a worldwide leader in financial services operating in 61 countries with over 170,000 employees and 105 million customers worldwide. In the UK, AXA has around 11 million customers, serviced by businesses including AXA UK and AXA XL which operate in the retail and commercial motor insurance markets. AXA UK and AXA XL have provided the expertise for this response, combined, they have been partners on a number of consortia trialling automated vehicles including DRIVEN, FLOURISH, Capri, UK Autodrive, Robopilot, VENTURER, VI-DAS and Oxbotica. AXA Group also has a partnership with Navya, the first company to introduce autonomous mobility solutions.

Executive summary

2. AXA wants to be an enabler of automated vehicle technology and to make certain it is rolled out safely – not blocking beneficial changes for society. AXA welcome the leadership of both the UK Government and Law Commission to facilitate an evaluation of the regulatory framework of automated vehicle. AXA believe this is an important step towards their safe deployment in the UK.

3. AXA agree there should be a single national system of operator licensing and a national scheme of basic safety standards for operating a Highly Automated Road Passenger System (HARPS) that are comprehensive for issues related to insurance, updating, maintenance, cyber security and remote supervision.

4. AXA has continuously called for further evaluation and clarity on the issue of data provision and data sharing especially with regard to the responsibilities of a HARPS operator. AXA believe that further focus needs to be placed on the connected element of automated vehicles to ensure that the regulatory framework enables data to be shared responsibly and equitably between operators, authorities and insurers when required.

5. The Law Commission's analysis of controlling congestion draws attention to the need for further discussions on road pricing for all types of vehicles on the UK road network. AXA would welcome further and more detailed discussions on road pricing with the Law Commission and government, to enable a more proactive approach towards fulfilling specific transport objectives including reducing traffic congestion and lowering greenhouse gas emissions.

CHAPTER 3: OPERATOR LICENSING – A SINGLE NATIONAL SYSTEM

A single national scheme

Consultation Question 1 (Paragraph 3.82): Do you agree that Highly Automated Road Passenger Services (HARPS) should be subject to a single national system of operator licensing?

6. AXA agree that it would be sensible for there to be a dedicated regulator to supervise the safety and technical aspects of any automated vehicle system and its licensing. Current expertise in licensing may be valuable in this area especially with regard to Public Service Vehicle (PSV) type licensors and current LGV licence requirements. AXA believe this expertise

could be invaluable to inform operator licensing in the formative years given that HARPS may be used for shuttle-type services.

7. As outlined by the Law Commission there is a detailed case to be made of why the current regime for all vehicle types could be reformed. AXA believe that there could be unintended consequences of adding a further regulatory layer focused on the automated environment which does not solve the issues of fragmentation already present in the transport system.

Consultation Question 2 (Paragraph 3.86): Do you agree that there should be a national scheme of basic safety standards for operating a HARPS?

8. Yes, AXA does agree that there should be a national scheme of basic safety standards for operating a HARPS. AXA would recommend that these minimum standards are comprehensive for issues related to insurance, updating, maintenance, cyber security and remote supervision. Moreover, these standards should be regularly reviewed and updated.

CHAPTER 4: OPERATOR LICENSING – SCOPE AND CONTENT

Scope of the new scheme
Consultation Question 3 (Paragraph 4.33):
Do you agree that a HARPS operator licence should be required by any business which:
(1) carries passengers for hire or reward;
(2) using highly automated vehicles;
(3) on a road;
(4) without a human driver or user-in-charge in the vehicle (or in line of sight of the vehicle)?

9. Yes, AXA agree that a HARPS operator licence should be required by any of the businesses listed above. Moreover, AXA would welcome the inclusion of not-for-profit and charity status companies.

Consultation Question 4 (Paragraph 4.34): Is the concept of "carrying passengers for hire or reward" sufficiently clear?

10. AXA believe that from a legal perspective, the concept of "carrying passengers for hire or rewards" is sufficiently clear. However, AXA would welcome further analysis on whether this terminology is sufficiently clear in practice for operators and passengers.

Exemptions
Consultation Question 5 (Paragraph 4.46): We seek views on whether there should be exemptions for community or other services which would otherwise be within the scope of HARPS operator licensing.

11. Given this is a new complex technology which requires the highest standards of professional competence, especially in the formative years, AXA would urge legislators to not allow exemptions for community or other services. Current Large Goods Vehicle (LGV) requirements offer an example of when exemptions can result in misuse and confusion of legislation.

Consultation Question 6 (Paragraph 4.54): We seek views on whether there should be statutory provisions to enable the Secretary of State to exempt specified trials from the need for a HARPS operator licence (or to modify licence provisions for such trials).

12. Yes, AXA agree with the ability to modify licence provisions for trials, provided that the trial operator is compliant with the regulators covered by the Code of Practice for automated vehicle trialling. Fee-paying passenger trial exemptions may not be sufficient on their own, but AXA is generally in favour of applying certain exemptions for specific trials in order to free trial operators and automated vehicle developers from having to apply for a HARPS licence.

Operator requirements

Consultation Question 7 (Paragraph 4.72): Do you agree that applicants for a HARPS operator licence should show that they:

(1) are of good repute;

(2) have appropriate financial standing;

(3) have suitable premises, including a stable establishment in Great Britain; and

(4) have a suitable transport manager to oversee operations?

13. AXA does agree that applicants for a HARPS operator licence should evidence that they fulfil the above requirements. However, AXA would recommend further consideration of three points. One, AXA would urge legislators to ensure that the necessary obligation to provide evidence of appropriate insurance cover and the passing of all relevant safety standards is made abundantly clear to applicants. Second, AXA believe that as these requirements will be technical in nature it may be more appropriate for applicants to apply for a Certificate of Professional Competence (CPC) for the use of automated vehicles. Third, AXA believe that licensing should be subject to a periodical renewal which can also be suspended in the case of an unexpected event or to prevent a new emerging risk.

Consultation Question 8 (Paragraph 4.73): How should a transport manager demonstrate professional competence in running an automated service?

14. AXA believe that a transport manager can demonstrate professional competence in running an automated service by holding a specific CPC for automated vehicles that can be applied for, monitored and renewed in a similar way to current CPC qualifications for a lorry, bus or coach.

Adequate arrangements for maintenance

Consultation Question 9 (Paragraph 4.89): Do you agree that HARPS operators should:

(1) be under a legal obligation to ensure roadworthiness; and

(2) demonstrate "adequate facilities or arrangements" for maintaining vehicles and operating systems "in a fit and serviceable condition"?

15. AXA does agree that HARPs operators should fulfil the above requirements. As discussed elsewhere in this consultation, AXA would urge a particular focus on technical competence given the nature of the technology.

Consultation Question 10 (Paragraph 4.90): Do you agree that legislation should be amended to clarify that HARPS operators are "users" for the purposes of insurance and roadworthiness offences?

16. AXA support the consideration of HARPS operators as "users" for the purposes of insurance and roadworthiness offences. However, it should be made clear that there are already regulations in place to sufficiently deal with these types of offences.

<u>Compliance with the law</u>

Consultation Question 11 (Paragraph 4.124): Do you agree that HARPS operators should have a legal duty to:

(1) insure vehicles;
(2) supervise vehicles;
(3) report accidents; and
(4) take reasonable steps to safeguard passengers from assault, abuse or harassment?

17. Yes, AXA does agree that HARPS operators should have a legal duty to fulfil the above obligations. However, AXA believe that there are further obligations that should be considered for inclusion including the reporting of accidents, the provision of data as required by authorities and insurers and ensuring that technical updates are completed.

Consultation Question 12 (Paragraph 4.125): Do you agree that HARPS operators should be subject to additional duties to report untoward events, together with background information about miles travelled (to put these events in context)?

18. AXA has continuously called for HARPS operators to be subjected to additional duties such as the sharing of vehicle data to authorities and insurers where necessary.

19. AXA do recognise that from both a legal and practical perspective there are several issues associated with the transferring and sharing of data between entities. For example, the significant volume of data may be unmanageable for a number of entities to manage, protect and store, especially for new entrants to the market place. There have been a number of papers constructed on minimum standards for data-sharing and provision in the automated vehicle environment that look to address these concerns such as the *Insurance & Legal Report* published by AXA UK and Burges Salmon LLP for the FLOURISH consortium and *Defining Safe Automated Driving* by Thatcham Research and the Association of British Insurers.

20. To an insurer, data is vital to establish liability in an untoward event and for accurate risk modelling. Given the need for data sharing to ensure insurance can be provided effectively and the aforementioned practical concerns, AXA would recommend closer interaction between providers and insurers. AXA believe this will create a "self-regulated" environment where insurers can provide safety insight to carriers and regulators.

21. Furthermore, AXA believe that government and Parliament should place greater focus on the data and connected element of automated vehicles. To ensure data is responsibly protected but does not inhibit the functioning of the system (e.g. insurers' having sufficient access to standardised accident data) and to ensure operator duties can be made clear, we recommend that government and industry collaborate to structure a 'data map' to identify who needs to access data, what type of data and when. The usefulness of data variables such as vehicle speed and time of user intervention depend on different driving scenarios. Therefore, it is important stakeholders undertake a far-reaching analysis into the data

required by local authorities, insurers and developers in different circumstances and how this data is processed, used, stored, standardised and protected.

22. For the purposes of trials, AXA would expect that all data is relevant and should be collected for the purposes of informing operators, insurers and legislators ahead of the deployment of automated vehicles across our transport system.

Consultation Question 13 (Paragraph 4.128): Do you agree that the legislation should set out broad duties, with a power to issue statutory guidance to supplement these obligations?

23. AXA believe that this should be a duty for local authorities as per current requirements.

Price information

Consultation Question 14 (Paragraph 4.133) We invite views on whether the HARPS operator licensing agency should have powers to ensure that operators provide price information about their services. In particular, should the agency have powers to:

(1) issue guidance about how to provide clear and comparable price information, and/or

(2) withdraw the licence of an operator who failed to give price information?

24. While the price information of HARPS operators is not relevant for AXA, AXA is supportive of any measures that increase the general public's trust in this new technology whilst maintaining fair competition.

Who should administer the system?

Consultation Question 15 (Paragraph 4.138) Who should administer the system of HARPS operator licensing?

25. AXA believe that the current structure of licensing authorities would be suitable to administer the system of HARPS operator licensing.

26. However, a further workable proposal may be a system whereby the agency responsible for authorising automated driving systems works co-operatively with the current structure of Traffic Commissioners could provide greater expertise of automated driving systems whilst still ensuring there is a single point of contact for the operator.

Freight transport

Consultation Question 16 (Paragraph 4.140) We welcome observations on how far our provisional proposals may be relevant to transport of freight.

27. As one would expect, there are far more detailed safety requirements for passengers compared to the transport of freight. However, AXA believe that with regard to minimum levels of safety the requirements for automated vehicles should not differentiate between transporting passengers and transporting freight. As rightly discussed in the Consultation Paper, automated freight vehicles may face very similar challengers to those transporting passengers.

CHAPTER 5: PRIVATELY-OWNED PASSENGER-ONLY VEHICLES

Setting a boundary between HARPS and private leasing

Consultation Question 17 (Paragraph 5.12) Do you agree that those making "passenger-only" vehicles available to the public should be licensed as HARPS operators unless the arrangement provides a vehicle for exclusive use for an initial period of at least six months?

28. AXA believe that a company that provides short-term leases should be regulated. In the scenario of the family hiring an automated vehicle for one month and continually renewing the arrangement from month to month, AXA agree with the Law Commission that the leasing company should continue to be a HARPS and that the family would not be subject to these responsibilities. Furthermore, AXA believe that the regulation should be regularly reviewed as deployment of AVs continues.

Allocating responsibility for a privately-owned passenger-only vehicle: placing responsibilities on keepers

Consultation Question 18 (Paragraph 5.40): Do you agree that where a passenger-only vehicle is not operated as a HARPS, the person who keeps the vehicle should be responsible for:

(1) insuring the vehicle;
(2) keeping the vehicle roadworthy;
(3) installing safety-critical updates;
(4) reporting accidents; and
(5) removing the vehicle if it causes an obstruction or is left in a prohibited place?

29. AXA agree that where a passenger-only vehicle does not fall into the definition of operating as a HARPs the above requirements are appropriate.

Consultation Question 19 (Paragraph 5.41): Do you agree that there should be a statutory presumption that the registered keeper is the person who keeps the vehicle?

30. Yes, AXA agree that there should be a statutory presumption that the registered keeper is the person who keeps the vehicle.

Consultation Question 20 (Paragraph 5.42): We seek views on whether:

(1) a lessor should be responsible for the obligations listed in Question 18 unless they inform the lessee that the duties have been transferred.

(2) a lessor who is registered as the keeper of a passenger-only vehicle should only be able to transfer the obligations to a lessee who is not a HARPS operator if the duties are clearly explained to the lessee and the lessee signs a statement accepting responsibility?

31. AXA would recommend that the Law Commission considers whether vehicle hire companies should be prohibited from being able to delegate obligations to the lessees.

32. From the perspective of the consumer/lessee, there is asymmetrical information in this scenario where the leasing company has greater power and knowledge than the consumer. This is particularly acute during the formative years as these types of vehicles are rolled out. Therefore, consumers may not have the adequate information and expertise, even if they sign a statement accepting responsibility. Related to this, is that the consumer may have limited bargaining power to be in an appropriate position to assume these responsibilities.

33. However, in the future, when deployment is more common place with greater information and transparency, there may be some circumstances in which a transfer of duties could be appropriate, provided that these duties and obligations are clearly explained.

Will consumers require technical help?

Consultation Question 21 (Paragraph 5.47): Do you agree that for passenger-only vehicles which are not operated as HARPS, the legislation should include a regulation-making power to require registered keepers to have in place a contract for supervision and maintenance services with a licensed provider?

34. Yes, AXA believe that this regulatory power may be necessary, but would welcome further consideration by the Law Commission on its appropriateness and impact.

Peer-to-peer lending

Consultation Question 22 (Paragraph 5.53): We welcome views on whether peer-to-peer lending and group arrangements relating to passenger-only vehicles might create any loopholes in our proposed system of regulation.

35. The definition of "hire or reward" includes consumers who use these vehicles for "peer-to-peer" lending. With regard to the shared minibus scenario outlined in paragraph 5.51, this would fall into the normal-use category whereby the registered keeper would be responsible. As outlined elsewhere in this consultation it is important to ensure a distinction is maintained between HARPs and private / semi-private operators.

36. AXA would urge consideration of a situation in which an entity, such as a car-club, could borrow a vehicle through a Peer-to-Peer lending scheme and subsequently use it as a HARPS. A loophole in regulation in this scenario could result in inconsistencies in safety standards and consumer confusion regarding their responsibilities when using automated vehicles.

Protecting consumers from high ongoing costs

Consultation Question 23 (Paragraph 5.60): We seek views on whether the safety assurance agency proposed in Consultation Paper 1 should be under a duty to ensure that consumers are given the information they need to take informed decisions about the ongoing costs of owning automated vehicles.

37. Given that the ongoing costs of ownership are likely to significantly differ for conventional vehicles, especially in the early years of their deployment, AXA believe it is important that there are clear and suitable assurances given to consumers regarding the ongoing costs of owning automated vehicles.

CHAPTER 6: ACCESSIBILITY

What we want to achieve

Consultation Question 24 (Paragraph 6.11): We seek views on how regulation can best promote the accessibility of Highly Automated Road Passenger Services (HARPS)? In particular, we seek views on the key benefits and concerns that regulation should address.

38. Safety, security and whole life costs are areas of concern related to the deployment of automated vehicles. Beyond the significant improvements in road safety, AXA became involved in government-funded automated vehicles trials such as FLOURISH because they focused specifically on benefits for different user-groups which were set to gain from automation. As the FLOURISH *User Needs Final* Report states "the advent of fully-autonomous

vehicles may help to address the mobility issues experienced by those most at risk of isolation and exclusion, older women, the older old, and those in areas poorly served by alternatives to the car".

39. Provided concerns of safety, cost and accessibility can be managed through regulation these groups will benefit from increased mobility by virtue of a more cost-effective and efficient transport solution arriving through HARPs.

Core obligations under equality legislation

Consultation Question 25 (Paragraph 6.31): We provisionally propose that the protections against discrimination and duties to make reasonable adjustments that apply to land transport service providers under section 29 of the Equality Act 2010 should be extended to operators of HARPS. Do you agree?

40. As HARPS is an alternative transport service provider, it is fundamental that there are protections in place against discrimination and duties to make reasonable adjustment. AXA consider an extension of section 29 of the Equality Act 2010 to be an appropriate course of action.

41. AXA would urge legislators to undertake a further operational analysis on this measure to guarantee sufficient safeguards are in place, whilst ensuring the regulatory regime is applicable for this new technology. Automated vehicles have several significant differences compared to conventional vehicles, for which section 29 of the Equality Act 2010 currently applies, these differences will have to be considered going forward to ensure the legislation is appropriately applied.

Specific accessibility outcomes

Consultation Question 26 (Paragraph 6.106):

We seek views on how regulation could address the challenges posed by the absence of a driver, and the crucial role drivers play in order to deliver safe and accessible journeys. For example, should provision be made for:

(1) Ensuring passengers can board and alight vehicles?

(2) Requiring reassurance when there is disruption and accessible information?

(3) Expansion of support at designated points of departure and arrival?

42. AXA believe there should be a requirement for information related to the above challenges based on a set of minimum standards. Whilst the technical aspects should not be an issue to the above examples, AXA would welcome further analysis of the practical aspects of how these provisions can be made.

Developing national minimum accessibility standards for HARPS

Consultation Question 27 (Paragraph 6.109): We seek views on whether national minimum standards of accessibility for HARPS should be developed and what such standards should cover.

43. AXA believe there should be national minimum standards of accessibility for HARPS. AXA would welcome further analysis of the practical aspects of this proposal to ensure that standardisation can ensure consistency for HARPS whilst still facilitating trials of new solutions that can improve accessibility.

Enforcement mechanisms and feedback loops

Consultation Question 28 (Paragraph 6.124): We seek views on whether operators of HARPS should have data reporting requirements regarding usage by older and disabled people, and what type of data may be required.

44. AXA agree that data reporting is an important feedback mechanism to identify any unforeseen challenges with new technologies and new systems especially with regard to inclusivity. It would also be useful to ensure that the technology is having the desired benefits of increased mobility for different demographics in society. However, AXA recognise that data collection on this scale may be challenging. Therefore, we would welcome further analysis on how best enforcement mechanisms and feedback loops can be managed.

CHAPTER 7: REGULATORY TOOLS TO CONTROL CONGESTION AND CRUISING

Traffic regulation orders

Consultation Question 29 (Paragraph 7.23): We seek views on whether the law on traffic regulation orders needs specific changes to respond to the challenges of HARPS.

45. AXA believe that traffic regulation orders (TROs) need specific changes to respond to the challenges of HARPS. To be compliant with TROs, automated vehicles will need to be programmed with sophisticated datasets to understand where they can and cannot drive, varying speed limits and parking restrictions. TROs are currently designed for the human occupant of a conventional vehicle and vary considerably between different local authorities. To ensure there is a safe and efficient system that includes automated vehicles and for there to be consistency across the roads network, the procedure for TROs needs to be updated for the digital future. As discussed by the British Parking Association in their Traffic Regulation Orders Guide, the current process involves the use of incompatible systems that impede a smooth and efficient transport system. Digital mapping that can be updated flexibly for new development and infrastructure will be necessary. Moreover, the data collected through a digitalised TROs process could also provide some assistance with fulfilling specific transport objectives such as reducing traffic congestion through new route planning systems.

Regulating use of the kerbside

Consultation Question 30 (Paragraph 7.59): We welcome views on possible barriers to adapting existing parking provisions and charges to deal with the introduction of HARPS. In particular, should section 122 of the Road Traffic Regulation Act 1984 be amended to expressly allow traffic authorities to take account of a wider range of considerations when setting parking charges for HARPS vehicles?

46. AXA believe existing legislation provides flexible powers to introduce changes to existing parking provisions and charges. Moreover, unlike conventional vehicles, HARPS vehicles can be pre-programmed to defined parameters to ensure they follow certain requirements e.g. where it is appropriate for them to park.

Road pricing

Consultation Question 31 (Paragraph 7.86): We seek views on the appropriate balance between road pricing and parking charges to ensure the successful deployment of HARPS.

47. AXA consider road pricing to be a really important issue that will require specific attention, not only for HARPS but for all types of vehicles on our roads. A benefit of HARPS is that they do have the propensity to ease the burden on our roads, a benefit which should be

considered when constructing a road pricing approach. For example, a beneficial approach to HARPS carrying multiple passengers rather than one or no passengers could improve incentives to car-share and reduce the number of vehicles on the road at any one point.

48. Ultimately, road pricing is an inevitable part of the modern transport network and will become increasingly important as stakeholders look to reduce traffic congestion and greenhouse gas emissions. AXA would welcome further and more detailed discussions on road pricing with the Law Commission and government, to enable a more proactive approach.

Consultation Question 32 (Paragraph 7.87): Should transport authorities have new statutory powers to establish road pricing schemes specifically for HARPS? If so, we welcome views on:
(1) the procedure for establishing such schemes;
(2) the permitted purposes of such schemes; and
(3) what limits should be placed on how the funds are used.

49. As discussed elsewhere in this consultation the benefits of HARPS include reducing the burden on our roads and reducing greenhouse gas emissions on the UK road network. Moreover, the usage model for HARPS is likely to be different from the usage model for conventional vehicles. Any road pricing system needs to consider these two aspects of HARPS and reflect them in any pricing schemes.

<u>Quantity restrictions</u>
Consultation Question 33 (Paragraph 7.97): Do you agree that the agency that licenses HARPS operators should have flexible powers to limit the number of vehicles any given operator can use within a given operational design domain for an initial period? If so, how long should the period be?

50. Yes, AXA does agree with this measure. AXA would be in favour of a phased approach to safety assurance for an initial period, as it would be safer and more logical for integration. Ultimately, in the initial hybrid period of mixed driving on UK roads there is a need for a focus on promoting the adoption of these vehicles but monitoring the quality to ensure the deployment of automated vehicles maximises safety and consumers can trust the new technology.

Consultation Question 34 (Paragraph 7.120): Do you agree that there should be no powers to impose quantity restrictions on the total number of HARPS operating in a given area?

51. AXA agree that there should be no powers to impose quantity restrictions on the total number of HARPS operating in a given area. AXA believe that this power would be self-limiting.

52. However, AXA believe that careful attention must be paid to the overall volume of traffic in any given area. AXA recognise there are transport objectives that need to be considered by government and local authorities to ensure that the benefits of Mobility-as-a-Service can be harnessed by all. For example, AXA recognise the need to ensure that there is provision of HARPS in areas of lower population density such as rural villages away from main city hubs. It is in these areas where automated technology can really benefit those where the transport network is inaccessible. Moreover, AXA understand there are a number of transport objectives where automated technology, if planned for properly, can assist, including reduced transport congestion and carbon emissions.

53. Nonetheless, AXA believe that imposing quantity restrictions may not be a strategy that is conducive to effective competition between operators or an environment that encourages innovation, especially in the formative years. Preventative measures such as road pricing may be more beneficial for managing the concerns raised above. On the issue of ensuring automated technology reaches all areas of the UK, AXA would welcome further collaboration between government, local authorities, operators and academics to ensure there are strategies in place that enable all communities to access self-driving technologies.

CHAPTER 8: INTEGRATING HARPS WITH PUBLIC TRANSPORT

The current system of bus regulation: HARPS as mass transit

Consultation Question 35 (Paragraph 8.92): Do you agree that a HARPS vehicle should only be subject to bus regulation:

(1) if it can transport more than eight passengers at a time and charges separate fares; and

(2) does not fall within an exemption applying to group arrangements, school buses, rail replacement bus services, excursions or community groups?

54. AXA believe that further evaluation of the current system of bus regulation may be required to consider how the regulatory system can best incorporate HARPS as mass transit safely and efficiently.

Consultation Question 36 (Paragraph 8.94): We welcome views on whether any particular issues would arise from applying bus regulation to any HARPS which transports more than eight passengers, charges separate fares and does not fall within a specific exemption.

55. If there is a strong belief that operators would seek to evade bus regulation by modifying their fare structure, AXA propose that the legislation considers HARPS which habitually follow predetermined routes as this seems more to the character of a public transport system and considers pricing, routing, traffic and community concerns. A consideration that must be assessed in the application of this type of regulation is ensuring that fair competition is maintained.

Consultation Question 37 (Paragraph 8.95): We welcome views on whether a HARPS should only be treated as a local bus service if it:

(1) runs a route with at least two fixed points; and/or

(2) runs with some degree of regularity?

56. As outlined by the Law Commission in paragraph 8.93, HARPS may operate in a far more flexible manner than current conventional local bus services. AXA would welcome further analysis on whether the two above points are sufficient to define a local bus service in an automated vehicle environment.

<u>Encouraging use of mass transit: Mobility as a Service</u>

Consultation Question 38 (Paragraph 8.109): We seek views on a new statutory scheme by which a transport authority that provides facilities for HARPS could place requirements on operators to participate in joint marketing, ticketing and information platforms.

57. As this will depend on local structures, AXA do not feel it is appropriate to comment on this question. As outlined elsewhere in this response, AXA is supportive of measures that increase the general public's trust in this new technology.

If you need to get in touch regarding the information in this submission, please get in touch with Public Affairs Executive, Jonathon Murphy, at jonathon.murphy@axa-uk.co.uk or on 07866032309.