

Report

Report of the meeting for (E)ETS providers regarding the RDW Temporary Tolling Scheme.

Meeting Date

15 June 2023

Meeting location

Van der Valk Schiphol

Date report

8 July 2023

Drafted by

RDW

Appendix

Slides of presentation EETS Domain Statement
Temporary Tolling

On June 15, 2023, RDW hosted a meeting regarding the EETS Domain Statement (EDS) for Temporary Tolling (TTH). The purpose of this meeting is to maintain a timely dialogue with potential ETS and EETS providers ((E)ETS providers) and their business partners and to be transparent in what the RDW is doing in the context of the EDS TTH. The RDW wishes to continuously involve and inform interested parties about content and process around the implementation of TTH in the Netherlands and the set up of the tolling system.

During the meeting on June 15 last, the components of the EDS TTH were substantiated in more detail as they are currently envisioned, in addition to an update on the status of the program and planning as a whole. Questions raised in the previous meetings were also addressed in depth. Below are questions raised by attendees on June 15 following the presentation by RDW and the subsequent dialogue.

Introduction

The information day intended to inform (E)ETS-providers about, among other things, the status of the EETS Domain Statement (EDS) TTH and to engage in dialogue with each other about it.

The presentations held during the information day are published on TenderNed in Dutch and in English. It is still possible to submit questions at algemenezakenTOL@rdw.nl.

The information day, the presentations and the answers to the questions, as well as this report are purely informative and not binding. They serve only the purpose of informing and jointly exploring the current vision for TTH.

Legal

Q: Are the requirements for the accreditation procedures for the Heavy Goods Vehicle Charge (HGVC) and TTH interchangeable, after all, the same things are required?

A: The accreditations for HGVC and for TTH are not interchangeable one-to-one. This is because they concern two different toll scenarios (toll charger-dominant versus service provider-dominant) and make use of different (web) interfaces.

Q: Are On Board Units (OBUs) used with TTH?

A: No, OBUs are not used at TTH. Toll collection is based on license plate recognition via so-called Automatic Number Plate Recognition (ANPR) cameras.

Q: Who pays the toll?

A: The license plate holder is liable to pay the toll pursuant to the TTH Act.¹ Third parties may also pay the toll on behalf of the holder.

Q: Are two sets of KPIs needed for TTH?

A: TTH consists of two different EETS domains: Blankenburgverbinding (BBV) and ViA15. For both EETS domains, RDW is the toll charger and a separate EDS is established for each of the EETS domains. The current policy view is that the EDSs are expected to contain the same KPIs.

Q: Are two contracts needed to provide toll Services on the BBV and ViA15 routes?

A: Yes, that is correct. Because it concerns two separate EETS domains and two separate EDSs apply, a contract is entered into for each separate EETS domain to obtain access to the respective EETS domain. However, the current policy view is that the conditions under which access can be obtained and the KPIs regarding contract management are the same wherever possible, to facilitate combination of service provision in both the EETS domain BBV and EETS domain ViA15 in a practical and technical sense.

Q: Is one invoice per route sufficient?

A: The (E)ETS Provider will charge its customer for the services provided on one invoice (the basis of the EETS concept), but the invoice should clearly distinguish between the different charges and toll routes per toll domain and the costs for the service provided by the (E)ETS Provider. This obligation follows from Implementing Regulation 20230/204,² the EETS Directive Implementation Act,³ the Bill to amend the Blankenburg Link and ViA15 Temporary Tolls Act in connection with the EETS Directive Implementation Act and some technical adjustments and the EDS TTH.

Q: Is parking a part of the TTH system?

A: No, parking services are not part of TTH. However, service providers from other domains, such as parking service providers, can apply (in addition to EETS providers) to be accredited for TTH. The non-EETS providers are defined as ETS providers in Dutch legislation.⁴

¹ In Dutch: Wet tijdelijke tolheffing Blankenburgverbinding en ViA15. Accessible in Dutch through <https://wetten.overheid.nl/BWBR0037517/2023-05-16>.

² Accessible through <https://eur-lex.europa.eu/legal-content/nl/TXT/?uri=CELEX%3A32020R0204>.

³ Accessible in Dutch through <https://wetten.overheid.nl/BWBR0045586>.

⁴ See the definition in Article 1 Temporary Tolls Blankenburg Link and ViA15 Act and Article 1 EETS Directive Implementation Act.

Accreditation

Q: Suppose a holder has entered into two service agreements. How does the toll charger handle this?

A: The toll charger shall use the service agreement last known to the toll charger through the White List, at the time of passage.

Q: Is it possible to pay through a separate platform, i.e. in a separate way?

A: Yes, TTH provides different payment methods to holders. One of the payment methods is through the 'direct payment' channel where the holder has to pay the toll on his own accord via the E-tol website within 72 hours of passing over the toll road.

Q: How many EETS and/or E-tol providers should there be?

A: For the Blankenburg Link and ViA15 together, there is one and the same main Service Provider and potential EETS and ETS providers can apply to be admitted. The goal of the toll charger is that as many holders as possible pay the toll through a service agreement.

Q: Is it possible to pay with cash?

A: No.

Q: Paying with a fuel card, is that possible?

A: The ETS or EETS providers themselves determine the payment methods they offer their customers. A fuel card can be part of that. Under the TTH Act, there is an obligation for (E)ETS providers to enable at least cashless payment.

Q: The start of accreditation for HGVC is planned in 2025. What does an EETS party have to do in addition to that for TTH?

A: The accreditation for HGVC and for TTH are two separate accreditations. There are no 'exemptions' for certain accreditation components. However, similar requirements are imposed, for example, on the service delivery plan that must be submitted when applying for accreditation so that information provided therein by EETS providers may be reusable by EETS providers.

Q: Is it possible for an EETS Party to accredit for HGVC and not for TTH?

A: A premise under the EETS Directive (Article 5(1) and (2))⁵ is that EETS Providers cover all EETS domains in a Member State. The obligations in this respect for EETS providers registered in the Netherlands are included in Article 8 and Article 25 of the EETS Directive Implementation Act. On this basis, it is therefore not possible for an EETS Provider to offer its services in only one EETS domain in the Netherlands.

Q: Is it true that an EETS provider can choose: accredit now for TTH or accredit in two years for HGVC?

A: Yes, that is correct, subject to the answer to the previous question.

Q: Why is it a temporary tolling scheme?

A: The toll decisions for the Blankenburg connection and for the ViA15 serve to use tolls to partially finance these infrastructure projects.

⁵ Accessible through <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0520&qid=1687249764031>.

The Toll Decisions (part of the Route Decrees) include a present value of €286 million (2016 price level) for the ViA15 and €315 million (2014 price level) for the Blankenburg connection.⁶ The coverage through tolling has been made comparable to the shortfall in the construction budget, and the tolls are temporary until the tolling tasks are realized. Toll may be discontinued earlier than realization of the tolling task, if and to the extent that the Pay to Use project (in Dutch: Betalen Naar Gebruik) is introduced. In the Coalition Agreement "Looking out for each other, looking forward to the future" dated December 15, 2021,⁷ it is foreseen that in 2030 a system of Pay To Use for all automobility will be introduced. When implemented, that charge is expected to replace the temporary tolls.

Q: Last year, the NIS2 Directive⁸ was adopted. This directive addresses risks that threaten network and information systems, such as cybersecurity risks. How will this directive be implemented in TTH?

A: As of January 2023, the implementation period of 21 months has started, within which the NIS2 directive must be implemented in Dutch legislation. It is currently expected that the relevant implementation laws will enter into force at the end of 2024.⁹ The implementation in Dutch legislation will make clear what choices the Dutch legislator makes and to what extent they impact the TTH system. The exact implications are therefore not clear at this time.¹⁰

Q: Are service windows (e.g. Microsoft updates) excluded from KPIs?

A: We understand that a service window is indeed necessary. We will include this point in the drafting of the KPIs.

Q: Regarding the KPI on system availability: which availability is RDW talking about exactly and why is a KPI of 99% on availability requested and how does RDW measure this?

A: Thanks, we will take this point on board and specify further in the further elaboration.

Q: How to deal with special markings on license plates: spaces etc?

A: Based on the country code, the meaning of spaces and hyphens in the license plate is checked. This means that in some cases (e.g. Germany) the position of the hyphen is relevant to a license plate. This has been taken into account in the data exchange. RDW is familiar with this matter.

Q: (E)ETS providers do not deal with the license plates, do they?

A: (E)ETS providers provide license plates of their customers to the Toll charger so that the Toll charger knows which service agreements have been entered into with which (E)ETS providers.

⁶ Section 14 Route Decree ViA15, accessible in Dutch through <https://platformparticipatie.nl/via15/tracbesluit+2/relevante+documenten+7/default.aspx> en article 15 Route Decree Blankenburgverbinding, accessible in Dutch through https://blankenburgverbinding.nl/bibliotheek/_bibliotheek+planstudie/default.aspx

⁷ Accessible in Dutch through <https://www.rijksoverheid.nl/onderwerpen/rijksoverheid/documenten/publicaties/2022/01/10/coalitieakkoord-omzien-naar-elkaar-vooruitkijken-naar-de-toekomst>.

⁸ Directive (EU) 2022/2555, accessible through <https://eur-lex.europa.eu/eli/dir/2022/2555>.

⁹ The currently foreseen planning is accessible through <https://www.ncsc.nl/over-ncsc/wettelijke-taak/wat-gaat-de-nis2-richtlijn-betekenen-voor-uw-organisatie/tijdtlijn-van-eu-richtlijn-naar-nationale-wetgeving>.

¹⁰ For completeness, it should be noted that an overhaul of the NIST Cybersecurity Framework is also currently underway. Information is accessible through [https://csf.nist.gov/News/2023/csf-2-0-concept-paper-released#:~:text=The%20NIST%20Cybersecurity%20Framework%20\(CSF,with%20the%20evolving%20cybersecurity%20landscape](https://csf.nist.gov/News/2023/csf-2-0-concept-paper-released#:~:text=The%20NIST%20Cybersecurity%20Framework%20(CSF,with%20the%20evolving%20cybersecurity%20landscape).

Q: Regarding the KPI around handling complaints by (E)ETS providers within 48 hours; if this cannot be read as working days it is too short for (E)ETS providers. Does it indeed refer to working days?

A: Thanks, we will take this point on board and specify further in the further elaboration.

Q: Regarding the KPI around the handling of complaints by (E)ETS providers within 48 hours. If there is a complaint, information has to be requested first, and then 48 hours is too short.

A: RDW understands the dilemmas. What is workable?

Participant comment: this is a complex problem: suppose a foreigner rents a car, he then immediately flies on to e.g. the U.S.: how can an EETS/ETS provider retrieve and handle all information related to the complaint within 48 hours?

Participant comment: in Portugal, a service provider has 15 days to handle a complaint. This KPI will be reconsidered.

A: We will take this input on board when further elaborating the KPI.

Communication

Q: Does the e-Tol brand only apply to TTH?

A: Yes.

Q: Can communication take place in other languages as well?

A: Yes

Q: Suppose a holder does not have a service agreement and does not pay (on time) through the direct payment option, what happens then?

A: CJIB will first send a reminder and not immediately a fine because toll collection is new in the Netherlands. Sending a reminder is part of the communication about tolls with the holder.

Q: Suppose a holder forgets to pay, how does that work?

A: If a holder has entered into a service agreement, the method of payment is part of the contractual arrangements between the EETS/ETS provider and the holder. Suppose a holder has no service agreement and uses the option to pay directly to the toll charger, the holder must pay the toll within 72 hours via the e-Tol website. If in the direct payment route the holder has not paid after 72, that holder will receive a reminder.

Q: What about entering into a service agreement after paying the toll for a passage via the direct pay route?

A: When paying the toll via direct payment, the toll charger notifies the holder of the option to pay via a service agreement. That option then exists for future payments.

Participants: After some discussion, participants indicate that there is little appetite to support retroactive service agreement. Participants indicate that as (E)ETS providers they cannot and do not want to be responsible for passages that take place before a service agreement is in place.

Q: Does the €10,000 listed as a one-time fee on the slide count as a payment from the (E)ETS providers to the toll charger?

A: No, it is a one-time fee that the (E)ETS providers receive from the toll charger if they successfully concluded the accreditation procedure. It thus constitutes a part of the remuneration. This

remuneration is equal to the amount that must be paid by the (E)ETS providers to the toll charger in order to be allowed to participate in the accreditation procedure.

Q: Regarding information about communication about TTH: what will the Toll charger do, what is expected of an EETS/ETS provider?

A: This topic was addressed on the information day on March 23, 2023 and there is a communications team from RDW working on this topic further. RDW invites every potential (E)ETS provider to attend the so-called Sector Day in September where there will be an opportunity to explain the services and get in touch with representatives of future customers.

Q: Has RDW provided a structured and simple way of exchanging documents between toll chargers and the (E)ETS providers?

Q: A safe file protocol has been set up (RDW's so-called BUS system), to exchange documents securely.

Closing remarks

With thanks to all the attendees for the attendance, good dialogue and useful feedback.

Verslag

Verslag van de bijeenkomst voor (E)ETS-aanbieders in het kader van het RDW programma Tijdelijke Tolheffing.

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15 juni 2023

Plaats bespreking
Van der Valk Schiphol

Datum verslag
8 juli 2023

Opgemaakt door
RDW

Bijlage
Presentatie EETS-gebiedsverklaring Tijdelijke
Tolheffing

Op 15 juni 2023 organiseerde de RDW een bijeenkomst over de EETS-gebiedsverklaring (EGV) voor Tijdelijke Tolheffing (TTH). Het doel van deze bijeenkomst is om tijdig in dialoog te blijven met potentiële ETS- en EETS-aanbieders ((E)ETS-aanbieders) en hun business partners en transparant te zijn in wat de RDW doet in het kader van de EGV TTH. Daarbij wil de RDW deze partijen continue betrekken en informeren over inhoud en proces rond de invoering van TTH in Nederland en de manier waarop dit tolstelsel zal worden ingericht.

Tijdens de bijeenkomst van 15 juni jl. zijn onderdelen van de EGV TTH nader toegelicht zoals deze nu zijn voorzien, naast een update van de stand van zaken van het programma en de planning als geheel. Tevens is er verdiepend ingegaan op de vragen die in de vorige bijeenkomsten zijn gesteld. Hieronder zijn vragen opgenomen die door de aanwezigen op 15 juni jl. zijn gesteld naar aanleiding van de presentatie door de RDW en de daaropvolgende dialoog.

Inleiding

De informatiedag is bedoeld om (E)ETS-aanbieders te informeren over onder meer de status van de EGV TTH en de voorbereiding van de invoering van het stelsel TTH en met elkaar hierover de dialoog aan te gaan.

De presentaties die zijn gegeven tijdens de informatiedag zijn gepubliceerd op TenderNed in het Nederlands en Engels. Het is nog steeds mogelijk om vragen te stellen via algemenezakenTOL@rdw.nl.

De informatiedag, de presentaties, de antwoorden op de gestelde en dit verslag zijn zuiver informatief en niet bindend. Ze zijn slechts bedoeld om te informeren en gezamenlijk de huidige visie op TTH te verkennen.

Juridisch

Q: Zijn de eisen voor de accreditatie met betrekking tot Vrachtwagenheffing (VWH) en TTH uitwisselbaar, dezelfde zaken worden immers gevraagd?

A: De accreditaties voor VWH en voor TTH zijn niet één-op-één uitwisselbaar. Het betreft namelijk twee verschillende tolsценario's (tolheffer-dominant versus dienstaanbieder-dominant) en verschillende (web)interfaces.

Q: Wordt er geen boordapparatuur gebruikt bij TTH?

A: Dat klopt, bij TTH wordt geen boordapparatuur gebruikt. Tolheffing vindt plaats op basis van kentekenplaatherkenning via zogenaamde Automatic Number Plate Recognition camera's (ANPR).

Q: Wie betaalt de tol?

A: De houder van het kenteken is ingevolge de Wet tijdelijke tolheffing Blankenburgverbinding en ViA15¹ tolplichtig. Ook derden kunnen de tol namens de houder betalen.

Q: Zijn er twee sets KPI's nodig voor TTH?

A: TTH bestaat uit twee verschillende EETS-gebieden: Blankenburgverbinding (BBV) en ViA15. Voor beide EETS-gebieden is RDW de tolheffer en voor elk van de EETS-gebieden wordt een aparte EGV opgesteld. Het huidige beeld van de beleidsvorming is dat de EGV's naar verwachting dezelfde KPI's bevatten.

Q: Zijn er twee contracten nodig om toldiensten op de trajecten BBV en ViA15 aan te bieden?

A: Ja, dat klopt omdat het twee aparte EETS-gebieden zijn en er twee aparte EGV's gelden, wordt per afzonderlijk EETS-gebied een contract afgesloten om toegang te verkrijgen tot het desbetreffende EETS-gebied. Het huidige beeld van de beleidsvorming is dat de voorwaarden waaronder toegang kan worden verkregen en de KPI's in het kader van contractmanagement waar mogelijk hetzelfde zijn, hetgeen combinatie van de dienstverlening in zowel het EETS-gebied BBV als het EETS-gebied ViA15 in praktische en technische zin bevordert.

Q: Volstaat één factuur per traject?

A: De (E)ETS-aanbieder zal zijn klant de geleverde diensten in rekening brengen op één factuur (de basis van het EETS-concept), maar op de factuur dient duidelijk onderscheid te worden gemaakt tussen de verschillende heffingen en toltrajecten per toldomein en de kosten voor de dienstverlening door de (E)ETS-aanbieder. Deze verplichting volgt uit Uitvoeringsverordening 2020/204,² de Wet implementatie EETS-richtlijn,³ de Wet tijdelijke tolheffing Blankenburgverbinding en ViA15 en de EGV TTH.

¹ In te zien via <https://wetten.overheid.nl/BWBR0037517/2023-05-16>.

² In te zien via <https://eur-lex.europa.eu/legal-content/nl/TXT/?uri=CELEX%3A32020R0204>.

³ In te zien via <https://wetten.overheid.nl/BWBR0045586>.

Q: Is parkeren een onderdeel van het stelsel TTH?

A: Nee, parkeren is geen onderdeel van TTH. Dienstaanbieders uit andere domeinen, zoals parkeerdienstaanbieders, kunnen zich (naast EETS-aanbieders) wel aanmelden om te worden geaccrediteerd voor TTH. Die niet-EETS-aanbieders worden in de toepasselijke regelgeving aangeduid als ETS-aanbieders.⁴

Accreditatie

Q: Stel een houder heeft twee dienstverleningsovereenkomsten afgesloten; hoe gaat de Tolheffer daarmee om?

A: De tolheffer hanteert de op het moment van passage laatstelijk bij de tolheffer via de klantenlijst bekende dienstverleningsovereenkomst.

Q: Is het mogelijk om via een apart platform, dus op een aparte manier te betalen?

A: Ja, een houder kan bij TTH op andere manieren betalen dan bij het stelsel VWH, namelijk via het kanaal 'rechtstreeks betalen' waarbij de klant binnen 72 uur na een passage over de tolweg uit eigen beweging de tol moet voldoen via de website van E-tol.

Q: Hoeveel EETS- en/of-ETS-aanbieders moeten er komen?

A: Voor de Blankenburgverbinding en ViA15 tezamen is er één en dezelfde hoofddienstaanbieder en kunnen potentiële EETS- en ETS-aanbieders zich melden om te worden toegelaten. Het doel van de tolheffer is dat zoveel mogelijk houders de tol betalen via een dienstverleningsovereenkomst.

Q: Is het mogelijk om met cash te betalen?

A: Nee.

Q: Betalen met een brandstofkaart, is dat mogelijk?

A: De ETS- of EETS-aanbieders bepalen zelf de betaalmethoden die zijn hun klanten bieden. Een brandstofkaart kan daar onderdeel van uitmaken. Op grond van de Wet tijdelijke tolheffing Blankenburgverbinding en ViA15 bestaat de verplichting voor (E)ETS-aanbieders om in ieder geval girale betaling mogelijk te maken.

Q: De start van de accreditatie voor VWH is gepland in 2025. Wat moet een EETS-partij daarnaast dan nog doen voor TTH?

A: De accreditatie voor VWH en voor TTH zijn twee aparte accreditaties. Er gelden geen 'vrijstellingen' voor bepaalde accreditatieonderdelen. Wel is het zo dat bijvoorbeeld aan het dienstverleningsplan dat bij aanmelding voor accreditatie moet worden overgelegd, vergelijkbare eisen worden gesteld zodat informatie die daarin door de EETS-aanbieders wordt aangeleverd wellicht herbruikbaar is voor EETS-aanbieders.

Q: Is het mogelijk om als EETS-partij te accrediteren voor VWH en niet voor TTH?

A: Uitgangspunt onder de EETS-richtlijn (artikel 5, eerste en tweede lid)⁵ is dat EETS-aanbieders alle

⁴ Zie de definitie in artikel 1 Wet tijdelijke tolheffing Blankenburgverbinding en ViA15 en artikel 1 Wet implementatie EETS-richtlijn.

⁵ In te zien via <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0520&qid=1687249764031>.

EETS-gebieden in een lidstaat bestrijken. De verplichtingen hieromtrent voor in Nederland geregistreerde EETS-aanbieders zijn opgenomen in artikel 8 en artikel 25 van de Wet implementatie EETS-richtlijn. Op die grond is het dus niet mogelijk voor een EETS-aanbieder om slechts één EETS-gebied in Nederland diensten aan te bieden.

Q: Klopt het dat een EETS-partij kan kiezen: nu accrediteren voor TTH of over twee jaar accrediteren voor VWH?

A: Ja, dat klopt, behoudens het antwoord op de vorige vraag.

Q: Waarom is er sprake van een tijdelijke tolheffing?

A: De tologpaven voor de Blankenburgverbinding en voor de ViA15 dienen ertoe met tolheffing deze infrastructurele projecten deels te bekostigen.

In de tolbesluiten (onderdeel van de Tracébesluiten)⁶ is een contante waarde van de tologpave voor de ViA15 opgenomen van € 286 miljoen (prijspeil 2016) en voor de Blankenburgverbinding van € 315 miljoen (prijspeil 2014). De dekking door tolheffing is vergelijkbaar gemaakt met het tekort op het aanlegbudget en de tolheffing is tijdelijk tot dat de tologpave is gerealiseerd. Mogelijk wordt de tolheffing eerder gestopt dan dat tologpave is gerealiseerd, indien en voor zover het project Betalen Naar Gebruik wordt ingevoerd. In het Coalitieakkoord '*Omzien naar elkaar, vooruitkijken naar de toekomst*' d.d. 15 december 2021⁷ is voorzien dat in 2030 een systeem van Betalen naar Gebruik voor alle automobilititeit wordt geïntroduceerd. Bij invoering zal die heffing naar verwachting de tijdelijke tolheffing vervangen.

Q: Afgelopen jaar is de NIS2 richtlijn⁸ vastgesteld. Deze richtlijn richt zich op risico's die netwerk- en informatiesystemen bedreigen, zoals cybersecurityrisico's. Hoe wordt deze richtlijn geïmplementeerd in TTH?

A: Vanaf januari 2023 geldt een implementatietermijn van 21 maanden, waarbinnen de NIS2-richtlijn moet worden geïmplementeerd in de Nederlandse wetgeving. De verwachting is dat de desbetreffende implementatiewetten eind 2024 in werking zullen treden.⁹ De implementatie in de Nederlandse wetgeving zal uitwijzen welke keuzes de Nederlandse wetgever maakt en in hoeverre die impact hebben op het stelsel TTH. De precieze implicaties zijn daarom op dit moment nog niet duidelijk.¹⁰

⁶ Artikel 14 Tracébesluit ViA15, in te zien via

<https://platformparticipatie.nl/via15/tracbesluit+2/relevante+documenten+7/default.aspx> en artikel 15

Tracébesluit Blankenburgverbinding, in te zien via

https://blankenburgverbinding.nl/bibliotheek/_bibliotheek+planstudie/default.aspx

⁷ In te zien via

<https://www.rijksoverheid.nl/onderwerpen/rijksoverheid/documenten/publicaties/2022/01/10/coalitieakkoord-omzien-naar-elkaar-vooruitkijken-naar-de-toekomst>.

⁸ Richtlijn (EU) 2022/2555, in te zien via <https://eur-lex.europa.eu/eli/dir/2022/2555>.

⁹ De voorziene planning is raadpleegbaar via <https://www.ncsc.nl/over-ncsc/wettelijke-taak/wat-gaat-de-nis2-richtlijn-betekenen-voor-uw-organisatie/tijdljn-van-eu-richtlijn-naar-nationale-wetgeving>

¹⁰ Volledigheidshalve wordt opgemerkt dat op dit moment ook een revisie van het NIST Cybersecurity Framework op handen is. Zie hierover [https://csrc.nist.gov/News/2023/csf-2-0-concept-paper-released#:~:text=The%20NIST%20Cybersecurity%20Framework%20\(CSF,with%20the%20evolving%20cybersecurity%20landscape](https://csrc.nist.gov/News/2023/csf-2-0-concept-paper-released#:~:text=The%20NIST%20Cybersecurity%20Framework%20(CSF,with%20the%20evolving%20cybersecurity%20landscape).

Q: Zijn service-windows van leveranciers (bv. Microsoft updates) uitgesloten van KPI's?

A: We begrijpen dat een service window inderdaad nodig is. Dit punt nemen we mee in de uitwerking van de KPI's.

Q: Inzake de KPI over beschikbaarheid van het systeem: over welke beschikbaarheid heeft RDW het precies en waarom wordt een KPI van 99% op beschikbaarheid gevraagd en hoe wordt deze dan gemeten door RDW?

A: Bedankt, dit punt nemen we mee en specificeren we nader in de verdere uitwerking.

Q: Hoe om te gaan met speciale vermeldingen op de kentekenplaten: spaties etc.?

A: Op basis van de landcode wordt gekeken wat de betekenis is van spaties en koppeltekens in het kenteken. Dit houdt in dat in sommige gevallen (vgl. Duitsland) de positie van het koppelteken relevant is voor een kenteken. Hiermee is rekening gehouden in de gegevensuitwisseling; RDW is bekend met deze materie.

Q: (E)ETS-aanbieders gaan toch niet over kentekenplaten?

A: (E)ETS-aanbieders geven kentekens van hun klanten door aan de tolheffer, zodat de tolheffer weet welke dienstverleningsovereenkomsten bij welke dienstaanbieders zijn afgesloten.

Q: Inzake de KPI voor het afhandelen van klachten door de (E)ETS-aanbieders binnen 48 uur; als dit niet kan worden gelezen als werkdagen is dat voor (E)ETS-aanbieders te kort. Betreft het inderdaad werkdagen?

A: Bedankt, dit punt nemen we mee en specificeren we nader in de verdere uitwerking.

Q: Inzake de KPI rond het afhandelen van klachten door de (E)ETS-aanbieders binnen 48 uur: als er een klacht is, moet eerst informatie worden opgevraagd, en dan is 48 uur te kort.

A: RDW begrijpt de dilemma's. Wat is wel werkbaar?

Opmerking deelnemers: dit is een complex probleem: stel dat een buitenlander een auto huurt, hij vliegt daarna meteen door naar bv. de VS: hoe kan een EETS/ETS-aanbieder dan alle informatie met betrekking tot de klacht binnen 48 uur achterhalen en afhandelen?

Opmerking deelnemer: in Portugal heeft een dienstaanbieder 15 dagen de tijd om een klacht af te handelen. Deze KPI zal heroverwogen worden.

A: We nemen deze input mee bij verdere uitwerking van de KPI's.

Communicatie

Q: Geldt het merk e-Tol alleen voor TTH?

A: Ja

Q: Kan ook in andere talen worden gecommuniceerd?

A: Ja

Q: Stel dat een houder geen dienstverleningsovereenkomst heeft en niet (op tijd) betaalt via de mogelijkheid om rechtstreeks te betalen, wat gebeurt er dan?

A: Het CJIB stuurt dan eerst een herinnering en niet meteen een boete omdat tolheffing nieuw is in Nederland. Een herinnering sturen is onderdeel van de communicatie over tol met de houder.

Q: Stel dat een houder vergeet te betalen, hoe gaat dat dan?

A: Als een klant een dienstverleningsovereenkomst heeft afgesloten, dan is de wijze van betaling onderdeel van de contractuele afspraken tussen de EETS/ETS-aanbieder en de houder. Stel dat een houder geen dienstverleningsovereenkomst heeft afgesloten en gebruikt maakt van de mogelijkheid om rechtstreeks aan de tolheffer te betalen, dan dient de houder binnen 72 uur via de e-Tol website de tol te betalen. Als in het rechtstreeks betalen traject de houder na 72 niet heeft betaald, dan ontvangt deze houder een herinnering.

Q: Hoe zit het met het afsluiten van een dienstverleningsovereenkomst nadat via het rechtstreeks betalen-traject de tol voor een passage is voldaan?

A: Bij voldoen van de tol via rechtstreekse betaling, wijst de tolheffer de houder op de mogelijkheid om via een dienstverleningsovereenkomst te betalen. Die mogelijkheid bestaat dan voor toekomstige betalingen.

Deelnemers: Na enige discussie geven de deelnemers aan dat er weinig animo is om dienstverleningsovereenkomst met terugwerkende kracht te ondersteunen. De deelnemers geven aan dat zij als (E)ETS-aanbieders niet verantwoordelijk kunnen en willen zijn voor passages die plaats vinden voordat een dienstverleningsovereenkomst is afgesloten.

Q: Geldt de € 10.000,- die als eenmalige vergoeding op de slide is vermeld als betaling van de (E)ETS-aanbieders aan de tolheffer?

A: Nee, het betreft een eenmalige vergoeding die de (E)ETS-aanbieders ontvangen van de tolheffer indien de accreditatie met goed gevolg is afgerond. Het vormt daarmee een onderdeel van de remuneratie. Deze vergoeding staat gelijk aan het bedrag dat moet worden betaald door de (E)ETS-aanbieders aan de tolheffer om deel te mogen nemen aan de accreditatieprocedure.

Q: Inzake informatie over communicatie over TTH: wat gaat de tolheffer doen, wat wordt verwacht van een EETS/ETS-aanbieder?

A: Dit onderwerp is aan de orde gekomen tijdens de bijeenkomst op 23 maart 2023 en er is een communicatieteam vanuit RDW met verdere uitwerking van dit onderwerp bezig. RDW nodigt iedere potentiële EETS/ETS-aanbieder uit om in september aanwezig te zijn op de zgn. Brancheday waar de mogelijkheid bestaat de dienstverlening toe te lichten en in contact te komen met vertegenwoordigers van toekomstige klanten.

Q: Heeft RDW voorzien in een gestructureerde en eenvoudige manier van het uitwisselen van documenten tussen tolheffer en de (E)ETS-aanbieders?

Q: Er is een safe file protocol ingericht (het zgn. BUS-systeem van RDW), om veilig documenten uit te wisselen.

Afsluiting

Met dank een de aanwezigen voor de opkomst, de goede dialoog en de bruikbare feedback.



Temporary toll

Information Day EETS
Domain Statement

-

Dialogue with EETS and ETS
providers

-

15 June 2023

Why this meeting

- As a substantive deepening and follow-up of the meetings of November 2, 2022 and March 15, 2023
- Dialogue and information
- Giving room to express possible interest and to flag points of attention with regard to the EETS domain statement (EDS)
- Insight into the way in which (E)ETS-providers want to be/remain involved

Framework for today

- The information day is intended to inform (E)ETS-providers about the status of the EETS Domain Statement (EDS) and to engage in dialogue.
- The presentations during the information day will be published on TenderNed afterwards and there will be an opportunity to submit questions during the information day and in writing afterwards at algemenezakenTOL@rdw.nl.
- The information day, the presentations and the oral and written questions answered during and after the day are informative and not binding. They serve only the purpose of informing and jointly exploring the current vision for TTH.



Developments in the Netherlands

Three payment methods for the use of (parts of) the road

- Temporary toll
- Heavy goods vehicle charge
- Pay by use

This presentation is about temporary toll (TTH)

Agenda today

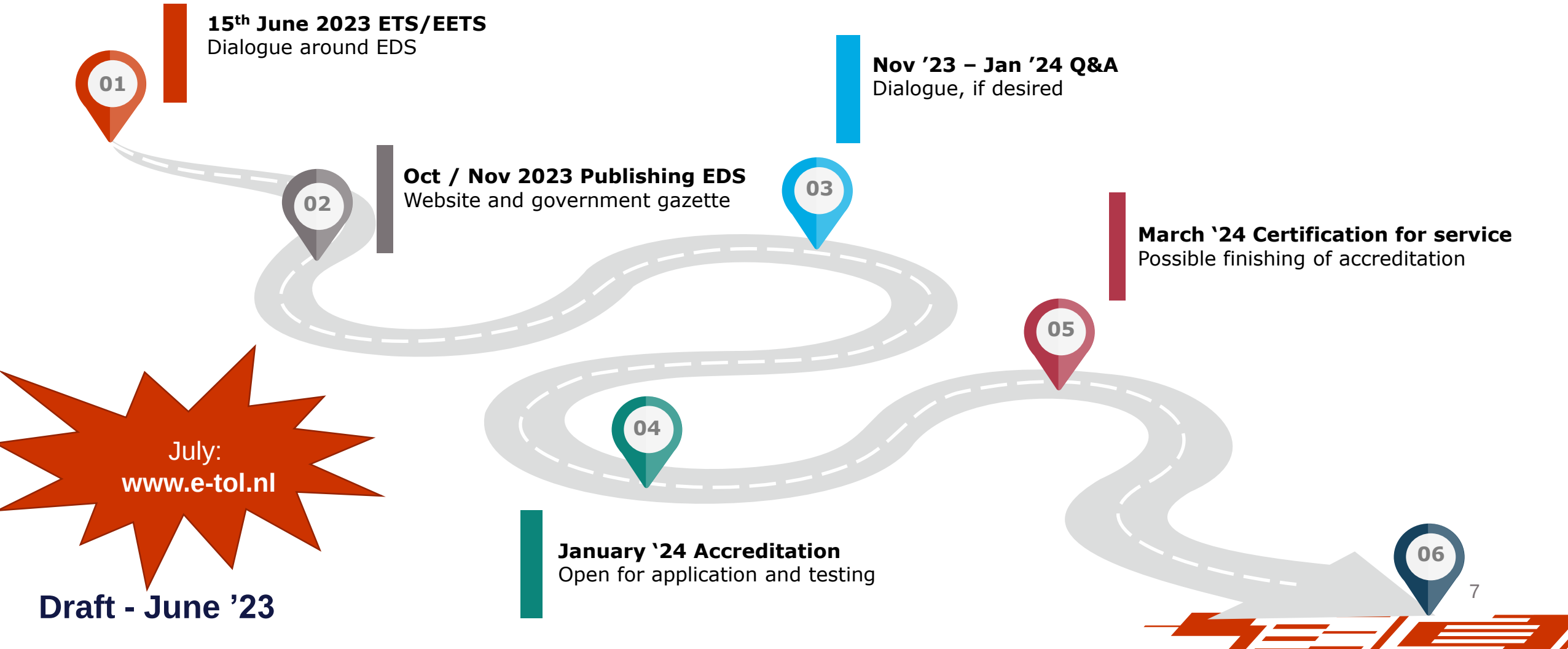
1. Wrap up
2. Legal
3. Pre-operation: Accreditation
4. Message flows TC – TSP
5. Requirement process EETS domain statement
6. System- and process requirements
7. Risk and compliance
8. KPIs
9. Communication
10. Facts and figures: your business case
11. Enforcement
12. Closure and questions

Wrap up

- Two free flow toll sections
- Toll to fund part of the construction
- Toll charger dominant system
- Important role for (E)ETS-providers
- Q1 2024 opportunity to start accreditation process
- Q4 2024 targeted Go-live Blankenburg connection



Provisional timeline EDS and EETS/ETS on-boarding TTH



Legal outline EDS



- Drafting process EDS: involvement of (E)ETS-providers
- Set up EDS
- Accreditation: entering into EETS agreement and access to toll domain
- Operation: EETS agreement management / KPI's
- Operation: contractual relationship (E)ETS-provider and customer





Drafting process EDS: involvement (E)ETS-providers – I

1) Alignment with other toll domains:

- Extensive consultation with other toll chargers (Humberbridge Leeds, M50 Dublin, ...)
- Careful consideration of market practice, such as parking-domain

2) Informational sessions November 2022, March 2023 and today, which:

- Provide information on the progress of TTH implementation and systematics and core elements of TTH, including key technical requirements, contractual obligations and remuneration
- Are announced on Tendered and accessible to all interested parties
- Constitute an opportunity to ask questions on the day itself or afterwards in writing
- Constitute an opportunity to provide the toll charger with points of attention



Drafting process EDS: involvement (E)ETS-providers – II

3) Q&A

- Following publication of the final EDS, a Q&A will be conducted among (E)ETS providers for the purpose of clarifying questions and points of attention
- Input from the Q&A will be assessed in conjunction to determine whether the toll charger deems it necessary to process amendments to the published EDS
- Restraint is exercised in processing amendments to the published EDS, in favor of legal certainty



Set up EDS

Indicative Table of Contents EDS TTH

Explanatory notes

Part 1 General conditions

1. Definitions
2. Interpretation rules
3. Communication
4. Acces to EETS-domain / toll domain [Blankenburgverbinding / VIA15]
5. Use of third parties
6. Liability
7. Indemnification
8. Data protection, intellectual property rights and digital security
9. Confidentiality
10. Dissolution and termination (E)ETS agreement by toll charger
11. Compensation in case of termination EETS agreement
12. Dissolution and termination (E)ETS agreement by (E)ETS provider
13. Termination (E)ETS agreement by law
14. Information obligation
15. Changes to EETS Domain Statement
16. Obligatory changes to TTH system
17. Changes by (E)ETS provider
18. Monitoring obligations (E)ETS provider
19. Contradiction
20. Waiver right of suspension and offsetting right
21. VAT and indexation
22. Competent court and applicable law
23. Appendixes

Part 2 Procedural conditions

Part 2.1 Obligations (E)ETS provider

24. Agreement between (E)ETS provider and License holders
25. Cooperation (E)ETS provider and toll charger
26. Electronic lists to be maintained by (E)ETS provider
27. Passage notification and payment request

28. Technical requirements
29. Key Performance Indicators
- Part 2.2 Commercial conditions
30. Payment of toll to the toll charger
31. Late payment by (E)ETS provider
32. Bank guarantee for toll revenue
33. Remuneration (E)ETS provider
34. Invoicing

Part 3 Accreditation

35. Accreditation
36. Applying for accreditation
37. Indicative length of accreditation procedure
38. Costs accreditation procedure
39. Service plan
40. Technical tests
41. Proof of accreditation

Part 4 Tolcontextdata

42. EETS domain /toll domain [Blankenburgverbinding / VIA15]
43. Technology
44. Tolling principles and motor vehicle classification parameters

Appendixes

- I. Model EETS-agreement
- II. Model bank guarantee
- III. Data protection
- IV. Intellectual property rights
- V. Digital security
- VI. Testing proces for accreditation
- VII. Technical requirements
- VIII. Servicedescription data exchange
- IX. Key Performance Indicators



Accreditation: entering into EETS agreement and access to toll domain – I

- 1) (E)ETS-provider applies for accreditation and submits
 - Proof of EETS-registration (if applicable)
 - Draft service plan (including test plan)
 - Signed non-disclosure agreement to receive interface specification
 - Contact information
- 2) Toll charger assesses (completeness of the) application and provides (E)ETS-provider with
 - Interface specification
 - Invitation for EETS-agreement meeting. The model EETS-agreement is an annex to the EDS.



Accreditation: entering into EETS-agreement and access to toll domain – II

3) Start accreditation

- Toll charger assesses (if applicable) EETS registration and draft service plan
- Some additional requirements apply to ETS providers
- The EETS agreement meeting covers
 - draft service plan according to the terms in the EDS
 - schedule and duration of test phases
 - remuneration according to the terms in the EDS
 - amount of the bank guarantee according to the terms in the EDS
- (E)ETS provider provides toll charger with final service plan



Accreditation: entering into EETS-agreement and access to toll domain – III

- 4) EETS-agreement is signed and enters partially into force:
- general provisions and provisions concerning accreditation enter into force, provisions concerning services and remuneration enter into force at a later stage
 - for an indefinite period, ultimately until TTH ends
 - termination possible at any time by (E)ETS provider with three months notice
 - predetermined termination options for toll charger



Accreditation: entering into EETS-agreement and access to toll domain – IV

5) Test phase

- Technical testing: assessment of test plan, conformity test, compatibility test. Further substantiated in relation to separate topic Accreditation

6) Completion of accreditation

- (E)ETS provider receives proof of accreditation
- (E)ETS provider provides bank guarantee

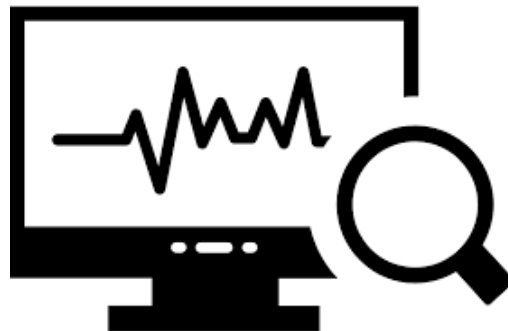
7) Commencement of (E)ETS services

- Access to the EETS domain / toll domain
- Entry into force of provisions concerning (E)ETS services in the EETS-agreement



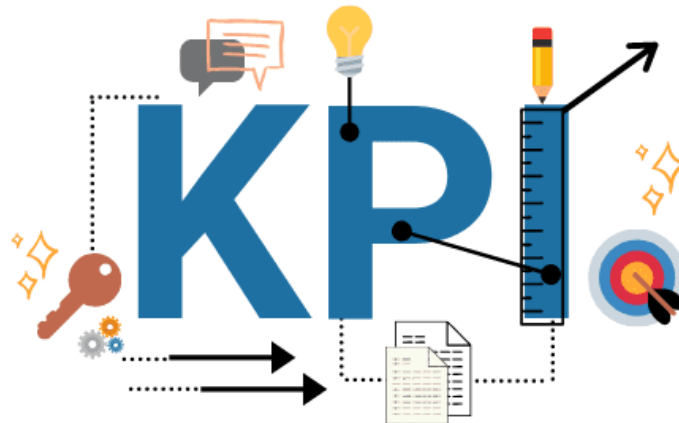
Operation: contract management and KPI's – I

- Contract management through (further substantiated in relation to topic Requirements EDS)
 - General and technical requirements
 - Monitoring, reporting and auditing requirements
 - Key Performance Indicators
- Monitoring, reporting and auditing requirements
 - (E)ETS provider must monitor its performance and reports monthly and quarterly to the toll charger
 - Audit right toll charger by way of assurance statement
 - The toll charger is authorized at all times to investigate (or have investigated) the (E)ETS provider's performance on the KPIs and/or to perform (or have performed) audits for this purpose.



Operation: contract management and KPI's – II

- Key Performance Indicators
 - EDS describes minimum performance requirements for KPI, as well as how meeting the KPI's is determined
 - A performance discount is imposed when a KPI is not met (also max amount per event and quarterly)
 - No performance bonus
 - Repeatedly not meeting KPI's may lead to termination of the EETS-agreement
 - KPI's are further substantiated in relation to topic Set up requirements EDS





Operation: contractual relationship (E)ETS-provider and customer – I

- Customer = license plate holder
- Underlying premise: very little interference from toll charger in relationship (E)ETS provider – customer
- (E)ETS provider enters into the service agreement and sends out invoices in its own name, not in the name of or on behalf of toll charger



Operation: contractual relationship (E)ETS-provider and customer – II

- Requirements:
 - Contracts may only enter into force after the (E)ETS provider has obtained proof of accreditation
 - The (E)ETS provider must inform its customers about applicable legislation
 - It must be clear to the customer with whom he concludes an agreement
 - General conditions must be published on website (EETS-directive obligation)
 - The invoice must clearly distinguish between the costs of the (E)ETS provider's services and the toll rate payable
 - The (E)ETS provider shall not discount or give the impression of discounting the toll payable.
 - The (E)ETS provider must maintain a customer service and a complaint handling procedure

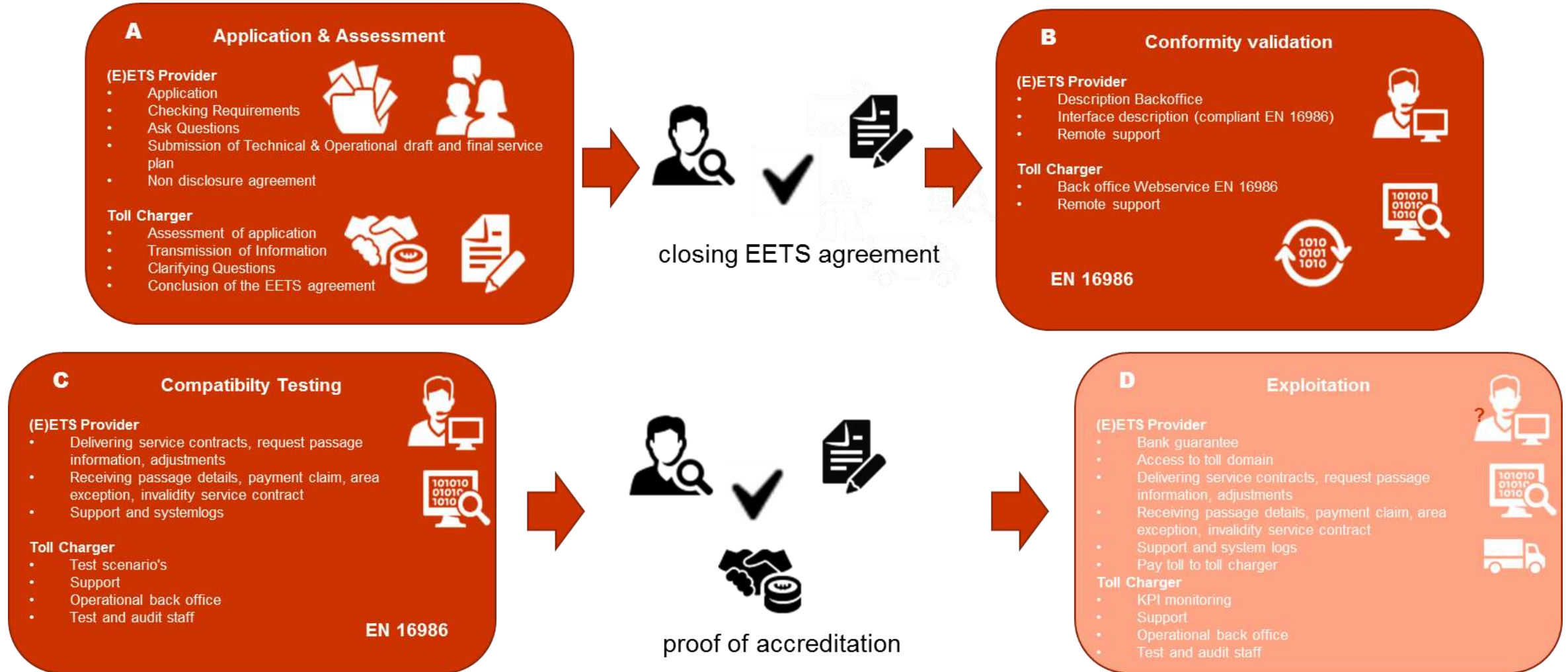
Pre-operation: accreditation



- Accreditation process
- Requirements for application
- Test scenarios



Overview accreditation process



Requirements for accreditation (1): Service plan

Service plan contains at least the following items

Number of passes	
Description existing back office	
Description test facilities	

<i>Only for ETS</i>
Description of knowledge/experience
Financial statements and annual report
Letter of intent bank guarantee

To measure

- Is the service plan complete (candidate may be asked to provide additions)
- Letter of intent bank guarantee must meet A rating (S&P), A2 rating (Moody's) or equal

Requirements for accreditation (2): test plan

The test plan is in line with the test approach and provides insight into (toll charger format)

Organization of tests	Risks and measures
Resources and organization	Appointments about attending tests
Registration test results	Test approach in operation
Relationship test results and criteria	Continuity and disaster recovery
Findings procedure	Previous successful tests

To measure

- Is the above insight provided (candidate may be asked to provide additions)



Requirements for accreditation (3): Test report

The test report in any case provides insight into (toll charger format)

Tests conducted	Specification hardware and software
Success criteria met	Problems around testing
Success criteria that have not been met	Planning to solve problems
Incomplete tests	

To measure

- Is the above insight provided (candidate may be asked to provide additions)

Test scenarios

The test scenarios are divided in 3 phases:

- Message exchange technical (empty messages)
 - Exceptionlist (whitelist and blacklist), vehicle Passage Information, Adjustment request
- Message exchange functional
 - Exceptionlist (whitelist and blacklist), vehicle Passage Information, Adjustment request, BillingDetails, Invalidity of SC registration, Area Exemption, PaymentClaim, Certificate Exchange message
- End-to-End testing
 - Basic end-to-end test with contracts at the (E)ETS-provider and exchange of BillingDetails
 - End-to-end test with adjustment request and correction of passage information and BillingDetails



Message flows TC – TSP EN 16986



- Messages
- Standards
- Technical requirements
- Exception List with example
- Billing Details
- Payment Claim



Messages

- Exceptionlist (whitelist and blacklist)
- BillingDetails
- PaymentClaim
- Adjustment Request
- Response Adjustment Request
- Vehicle passage information
- Area Exemption
- Invalidity of SC registration



Requirements regarding the interface

Nr	Requirement
E01	The sessions are secured via HTTPS, TLS1.3 and mTLS including the associated checks.
E02	The TOLL-service can only be reached with the correct client certificate based on double sided TLS.
E03	The message meets the EN 16986.
E04	Class-3 ¹ certificates are used for acceptance and production environments.
E05	The used certificates are X.509 RSA 2048 bits
E06	Client certificates and Signing certificate are registered TOLL-system.
E07	W3C WS-* standards.
E08	The XML Encoding Rules (XER) according to the ISO/IEC 8825-4 will apply for the ASN.1 encoding
E09	For data integrity reasons the service is only available with the correct XML message based on XMLDSIG.
E10	Allowed cipher suites for the TLS connection: TLS_AES_128_GCM_SHA256 TLS_AES_256_GCM_SHA384 TLS_ECDHE_ECDSA_WITH_AES_256_GCM_SHA384 TLS_ECDHE_ECDSA_WITH_AES_128_GCM_SHA256 TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384 TLS_ECDHE_RSA_WITH_AES_128_GCM_SHA256
E11	The TOLL-gateway checks the XML-scheme, XSD check.
E12	The TOLL-gateway checks the certificates on validity, whether the certificate is revoked and if the certificate is issued by a TOLL trusted CA.
E13	Messages will be offered until the acknowledgement of receipt is received. This happens 3 times with a minute interval in between retries, and after that every half hour. After that the operator should check were the problem is raised and solved it.
E14	TOLL-response is sent later, asynchronous.
E15	TOLL-response is a signed XML message based on XMLDSIG.
E16	Message contains a unique identifier. (leverancierID+berichtID=correlatieid)
E17	Communication to the (E)ETS-provider is done synchronous



Technical requirements that apply to all messages

The following is required of the interface between the toll charger system and the (E)ETS-provider system.

Security	HTTPS, TLSv1.3 and 2-sided TLS
Signing	XML message is signed with a signing certificate. The signing certificate must be a different certificate than for TLS transport
Certificate	Client certificate of TLS and Signing certificate are registered with the toll charger
Handling	Guaranteed exactly one (1) time Continue to deliver message until a functional acknowledgment of receipt is received



Exceptionlist (whitelist)

Contracted holders for whom the (E)ETS-provider bears responsibility are passed on using the message “ExceptionList”.

Characteristics

Type of communication	Synchronous/Asynchronous; to be determined
Type of processing	Delivery by Motor Vehicle
Security	The service can only be accessed with the correct client certificate based on two-sided TLS (at least TLS 1.3 based on Public- Key - Infrastructure).
Authorization	(E)ETS-provider
Opening service	24 hours a day, seven days a week
Opening support	To be determined

Exceptionlist (whitelist) example

Seq	Lvl	Occ	Data item	Impl.	Value collection
1	0		infoExchange		
2	1		infoExchangeContent		
3	2		apci		
4	3		aidIdentifier	NUM 19	0-9223372036854775807
5	3		apduOriginator		
6	4		countryCode	BIN 10	
7	4		providerIdentifier	NUM 5	
8	3		informationSenderID		
9	4		countryCode	BIN 10	
10	4		providerIdentifier	NUM 5	
11	3		informationRecipientID		
12	4		countryCode	BIN 10	
13	4		providerIdentifier	NUM 5	
14	3		apduIdentifier	NUM 19	0-9223372036854775807
15	3		apduDate	DAT	
16	2		exceptionListADUs		
17	3	-1	exceptionListADU		
18	4		exceptionListVersion	NUM 19	0-9223372036854775807
19	4		exceptionListType	NUM 3	1, 2
20	4		exceptionValidityStart	DAT	
21	4		exceptionListEntries		
22	5	-1	exceptionListEntry		
23	6		userId		
25	7		vehicleLicencePlateNumber		
26	8		countryCode	BIN 10	
27	8		alphabetIndicator	NUM 2	
28	8		licencePlateNumber	HEX 15	
29	6		statusType	NUM 3	0, 1, 2, 3
30	6		reasonCode	NUM 3	0, 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18
31	6		entryValidityStart	DAT	
32	6		vehicleParameters		
33	7		dateAndTime	DAT	
34	7		vehicleClass	NUM 1	1, 2
35	6		actionRequested	NUM 3	1, 2, 3, 4

BillingDetails

Each vehicle passage that the toll charger allocates to the (E)ETS-provider is passed on to the (E)ETS-provider using the message “BillingDetails”.

Characteristics

Type of communication	Synchronous/Asynchronous; to be determined
Type of processing	Delivery per vehicle passage
Security	The service can only be accessed with the correct client certificate based on two-sided TLS (at least TLS 1.3 based on Public- Key - Infrastructure).
Authorization	(E)ETS-provider
Opening service	24 hours a day, seven days a week
Opening support	To be determined

PaymentClaim

All vehicle passages sent by the toll charger to the (E)ETS-provider using BillingDetails are aggregated per day per EETS domain within TTH. This total amount is sent to the (E)ETS-provider on a daily basis using the “PaymentClaim” message.

Characteristics

Type of communication	Synchronous/Asynchronous; to be determined
Type of processing	Delivery per EETS domain, per date
Security	The service can only be accessed with the correct client certificate based on two-sided TLS (at least TLS 1.3 based on Public- Key - Infrastructure).
Authorization	(E)ETS-provider
Opening service	During office hours from 08:00 – 18:00 Central European Time
Opening support	To be determined



Requirements EETS domain statement



Three types of requirements for TSP's: operational phase

1. General and technical requirements, including
 - Requirements for the message exchange (previous section)
 - Operation, risk- and compliance and information security (hereafter)
 - Remittance requirements
 - Implementing changes
2. Monitoring, reporting and auditing requirements, including
 - Cooperation in favor of compliance with temporary toll by holders
 - Timely provision of information for the purpose of determining the amount of the bank guarantee
 - Participation in periodic and ad-hoc technical and contract management meetings (live and/or digital) with the toll charger
3. 5 Key Performance Indicators
 - Measurable requirements with penalty regime (hereafter)

Requirements



- Assurance statement
- Data exchange
- Information obligation service agreement
- Invoice
- Information obligation cancellation/termination of agreement
- Reporting obligations
- Risk analysis





(1) Assurance statement

Each year the (E)ETS-provider provides an assurance statement drawn up by an independent external auditor, demonstrating that the (E)ETS-provider complies with the data protection requirements, requirements and measures for cybersecurity, information security and requirements for (KPI) reporting.

To measure

- assurance statement must be submitted to the toll charger



(2) Data Exchange

The data exchange is guaranteed, as elaborated in the service description data exchange and KPIs .

To measure

- Is part of the description of the back office (candidate may be asked to make additions)
- Is part of the interface tests, to be performed during the accreditation process
- Is part of the described KPIs (availability, payment of tolls, notification of service agreement)





(3) Information obligation service agreement

The up-to-date status of service agreements is of great importance for the correct allocation of a passage to a (E)ETS-provider or the direct payment channel. An incorrect status of a service agreement leads to complaints from holders with the toll charger and/or (E)ETS-providers. The toll charger therefore wants to receive 'near real-time' service agreements that have been concluded (new), modified, terminated, suspended or that the suspension has ended.

To measure

- In operation monthly report (KPI – Announcement of service agreement)



(4) Invoice

The (E)ETS-provider must generate an invoice and charge it to its contracted holders. The invoice must state at least the following:

License plate(s)	Date and time of the passages
Applicable toll rate	Total amount of toll due
Period covered by the invoice	Distinguish between tolls and service charges
Number of passages	



(5) Information obligation cancellation/termination of agreement

Upon cancellation or termination of the EETS agreement, the (E)ETS-provider immediately informs the contracted holders that they can no longer use the services of this (E)ETS-provider, also stating how the contracted holders can otherwise meet their payment obligation.

To measure

- Active control if this situation arises



(6) Reporting Obligations

The (E)ETS-provider must provide a number of reports based on the requirements in the EETS domain statement, which are listed below

Month	Quarter	Ad hoc
KPIs	KPIs	Within 5 working days of request
	#contracted holders	
	Total tolls due	
	Risks and problems	
	Compliance with obligations by holders	
	Fulfillment of obligations by TSP	

Measurement by the toll charger

- Reports delivered on time, according to a model to be determined by the toll charger





(7) Risk analysis

The (E)ETS-provider carries out a risk analysis aimed at risks or potential breaches regarding the processing of personal data at least annually and in the event of major changes to the service or its design.

To measure

- The (E)ETS-provider shares the results of the risk analyzes with the toll charger and the reports drawn up for this purpose are made available to the toll charger by the (E)ETS-provider



Risk and compliance



- Compliance
- Cyber security
- Privacy





Compliance

Law and regulations, amongst others:

- General Data Protection Regulation GDPR (2018)
- General Data Protection Regulation Implementation Act (uAVG)
- Implementing Regulation (EU) 2020/204
- Delegated Regulation (EU) 2020/203
- Blankenburg Connection Temporary Toll Act and ViA15
- EETS Directive Implementation Act

Ensuring compliance Laws and regulations

- The (E)ETS-provider and the toll charger proactively keep each other informed of changes in legislation, regulations and policy.





Compliance (2)

Standards

Comply or explain

- NEN-EN-ISO/IEC 27001: Information security management systems Requirements , Stichting Koninklijk Nederlands Normalisatie-instituut (2017) or a certification of an equivalent nature to this standard;
- NEN-EN-ISO/IEC 27002:



Cyber security

Components

Asset management	Protective technology
Governance	Anomalies and Events
Risk management strategy	Security Continuous Monitoring
Supply Chain risk management	Detection Processes
Identity Management and acces control	Response Planning
Awareness and training	Communications
Data security	Analysis
Information Protection Processes and Procedures	Mitigation
Maintenance	Improvements
Recovery Planning, Communications, Improvements	





Privacy

Components

- Amongst others: General Data Protection Regulation
- Storage and processing of data (including passage data): within the European Union or European Economic Community
- Customer contact center may be located in United Kingdom (with restrictions)
- Data leaks are also reported to the toll charger if they (possibly) affect the toll charger
- The holder is informed about his rights: right of inspection, correction , deletion, etc.



KPIs



- Availability
- Review correction requests
- Payment of tolls
- Announcement service agreement
- Complaint handling time





KPI scheme

- A penalty is applied when the performance requirements, as stated in the KPIs, are not met
- A penalty will be imposed a maximum of 1 (one) time per quarter
- Currently foreseen is a penalty of € 2,500 every occurrence
- No bonus is awarded for “overperformance”.
- In the event of repeated non-compliance with KPIs, the agreement **can** be terminated by the toll charger
- Template for reporting to the toll charger





KPI 1: Availability of the TSP system

The (E)ETS-provider system is considered available if at least the following functions are operational:

- The ability of notifying the toll charger of new service agreements, termination of service agreements, suspension and termination of suspension of service agreements
- Being able to receive and process BillingDetails and PaymentClaim received from the toll charger
- Being able to pay the tolls
- The ability to submit complaints by holders and to record these with the (E)ETS-provider





Availability of the TSP system(2)

Required performance

- At least 99.8% availability

To measure

- Monthly
- $\text{Number of minutes of availability} / \text{number of minutes in the reporting month}$

Repeat errors: sanction possibility to terminate the agreement

- Failed for 2 consecutive months
- 3* not met in one calendar year





KPI 2: Assessment of adjustment requests

Submitted adjustment requests are randomly checked by the toll charger. The result of the random checks, positive and negative, is reported back to the (E)ETS-provider. When the maximum percentage of rejected adjustment requests is exceeded, a penalty is imposed.

Required performance

- For NL license plates a maximum of 5% of the adjustment requests are rejected
- For foreign license plates a maximum of 15% of the adjustment requests are rejected

To measure

- Quarterly
- Number of rejected adjustment requests / total verified adjustment requests

Repeat errors: sanction possibility to terminate the agreement

- 2* not met in one calendar year



KPI 3: Payment of tolls

The tolls must be paid on time and in full to the toll charger. The payment term as included in the ministerial regulation applies (not yet known at this time).

Required performance

- At least 100% of the payments have been transferred to the toll charger in full and on time.

To measure

- Monthly
- Number of payments on time and in full / Total number of payments in period

Repeat errors: sanction possibility to terminate the agreement

- 2* not met in one calendar year



KPI 4: Announcement of service agreement

The up-to-date status of service agreements is of great importance for the correct allocation of a passage to a (E)ETS-provider or the direct payment channel. An incorrect status of a service agreement leads to complaints from holders with the toll charger and/or (E)ETS-providers. The toll charger therefore wants to receive 'near real-time' service agreements that have been concluded (new), modified, terminated, suspended or that the suspension has ended.

Required performance

- In at least 99.8% of the cases, the report was made to the toll charger within 60 seconds
- In at least 100% of the cases, the report was made to the toll charger within 20 hours





Announcement of service agreement (2)

To measure

- Monthly
- Customer confirmation date/time – date/time message to toll charger
 - Total number within 60 seconds / total number of reports
 - Total number within 20 hours / total number of reports

Repeat errors: sanction possibility to terminate the agreement

- 3* not met in one calendar year





KPI 5: Processing time for complaint handling

A fast and careful complaints procedure is essential for a high-quality service. Fast means the duration of the complaints procedure with which the contracted holder has the answer to his complaint. For this KPI, it concerns complaints related to:

- disputed passage
- wrong toll rate
- already paid
- other: vehicle stolen, for example

Required performance

- At least 99.8% of the number of complaints is handled within 48 hours





Processing time for complaint handling (2)

To measure

- Quarterly
- Number of complaints handled within 48 hours / total number of complaints (belonging to the list of descriptions above)

Repeat errors: sanction possibility to terminate the agreement

- 2* not met in one calendar year





Communication

BBV and ViA15
Temporary toll



Recap: communicative challenges of temporary toll

No toll plaza, no toll booths,
customers must take the initiative to pay themselves

So as always in free flow toll: The convenience of free flow toll is the challenge for communication

Communicative goals:

- Confidence, support and understanding this new technological and the payment system
- Informed customers (system and choices)
- Other behaviour (paying in time)
- Positive perception



Recap: target groups, messengers and strategy

Primary target group: users of the toll road(s)

Secondary target groups: intermediaries in communication to road users

Main messengers: e-TOL, main (E)ETS-provider, other (E)ETS-providers, BBV

Main communication strategies:

- Involve, inform, facilitate
- Uniform information, phased approach, autonomous communication by (E)ETS-providers



National and international, focus on regions (<50km)



Phasing/timeline

Aligns with construction of Blankenburg connection. Back planning based on expected delivery BBV incl. tolls: **Q4**

- Stakeholder management to industry associations and region just launched
- April '23: communication around test track and sinking tunnel sections
- Summer '23: website with basic information live and start a limited KCC (web form)
- Aug '23: advertising agency selected
- Autumn '23: meeting with industry and trade association
- Spring '24: press event tolling with announcement of (accredited) (E)ETS-providers
- **6 months before opening**: launch toll charger campaign to business, regional and overseas
- **4 months before opening**: campaign private target groups (inform)
- **2 months before opening**: private target groups campaign (activate)
- **2 weeks in advance**: campaign private target groups (reminder)
- **2 months after opening**: end of launch campaign

Dates are indicative



Will be available in
English too

 Ministerie van Infrastructuur en Waterschap

[Home](#) [Hoe werkt e-TOL](#) [Automatisch betalen](#) [Contact](#) [Language](#)





Tol betalen zonder stoppen

Samen voor een snelle, duurzame en goedkopere weg naar onze eindbestemming.

Tol betalen voor de Blankenburgverbinding: snel, gemakkelijk en veilig.

Vanaf september 2024 opent de Blankenburgverbinding (A24), een nieuwe verbinding tussen Vlaardingen en Rozenburg. Voor het gebruik van de weg ga je tol betalen.

- Geen tolpoortjes en dus geen wachttijden.
- Minder files en minder milieuschade
- Je betaalt e-TOL makkelijk, snel en veilig online.



Attention and communication

- Low press coverage and attention on free flow tolling
- Press attention for delay sinking tunnel segments (apr 2023)
- Communication about test location A12 (may 2023)

🕒 01 april 2023 - 10:16 uur 🔁 01 april 2023 - 10:26 uur

Lekkage na afzinken tunnel Blankenburgverbinding

Vrijdag is een deel van de Maasdeltatunnel op de juiste plek afgezonken. Maar een dag later blijkt dat er een lekkage is ontstaan in een deel van de tunnel.

De Maasdeltatunnel is onderdeel van de Blankenburgverbinding tussen Maassluis en Rozenburg. Door lekkage bij het kopschot is kortsluiting ontstaan, waardoor de pompen niet werken. Het kopschot is het deel waar over twee weken het tweede tunneldeel aan gekoppeld moet worden.



Facts and figures: your businesscase



- Passages per year
- Renumeration and expenses



Indicative numbers of passages BBV

Annual passages	2025	2026	2027	2028	2029	2030
=< 3.500kg	14.216	15.396	16.576	17.756	18.936	20.117
> 3.500kg	1.492	1.589	1.687	1.784	1.881	1.978

- Numbers *1.000
- =< 3.500kg: Dutch license plate: 94,5%; Foreign license plate: 5,5%
- > 3.500kg: Dutch license plate: 86%; Foreign license plate: 14%
- Source: '*effectstudie verkeer BBV 2015*'
(<https://openarchivaris.nl/blob/ce/e5/89a01e2d3a1f08950a43c78b822b.pdf>)
- Numbers based on 24-hour estimates





Remuneration and expenses

Fixed fees (from the toll charger to the (E)ETS providers)

- One-time fee of € 10.000 after start of service (to cover accreditation fee – see below)
- Fixed annual fee of € 10.000

Variable remuneration

- 2.5% of the amount of toll revenue actually remitted in the previous quarter

Expense

- To be paid (once only) to the toll charger at the start of accreditation: € 10.000



Enforcement

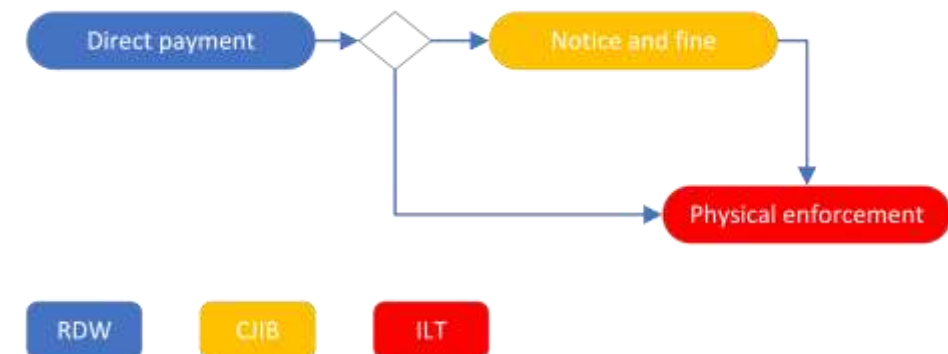


Enforcement

- With direct payment it is possible for the holder to still conclude a service agreement and assign passages (up to a maximum of 72 hours back) to this service agreement.
- What is your opinion on this?

The toll charger will, in a socially responsible manner, enforce non-payment or late payment

- CJIB handles the administratively enforcement
 - ILT handles the physical enforcement
- Planning: October 2023 enforcement policy to the minister



Closure and questions

- How does the foregoing resonate?
- Which parts need to be further clarified before publication of the EC? or have not been addressed?
- Which topics should be included in the Q and A in October?





Thank you

Contact through: algemenezakenTOL@rdw.nl

