DECLARATION OF SCOTT ANDREWS

I, Scott Andrews, declare as follows:

1. I hold a B.Sc. degree in Electrical Engineering from University of California–Irvine and a M.Sc. degree in Electronic Engineering from Stanford University. In various positions at, among others, TRW and Toyota, I have been responsible for research and development projects relating to, among others, numerous vehicle navigation systems, information systems, and user interface systems. My qualifications are further set forth in my *curriculum vitae* (Exhibit A). I have been retained by Volkswagen Group of America, Inc. in connection with its petition for *inter partes* review of U.S. Patent No. 8,719,037 (the "'037 patent"). I have over 35 years of experience in fields relevant to the '037 patent, including telecommunications systems and navigation systems.

2. I have reviewed the '037 patent, as well as its prosecution history and the prior art cited during its prosecution. I have also reviewed U.S. Patent No. 6,249,740 ("Ito"), the Richard Lind et al. publication, *The Network Vehicle – A Glimpse into the Future of Mobile Multi-Media*, 17th DASC, The AIAA/IEEE/SAE Digital Avionics Systems Conference – Bellevue, WA – Oct. 31-Nov. 7, 1998 – Proceedings ("Lind"), European Patent Application Publication No. 0 829 704 ("Fujiwara"), U.S. Patent No. 5,274,560 ("LaRue"), U.S. Patent No. 5,574,443 ("Hsieh"), and "Plaintiff and Counter-Defendant West View Research,

LLC's Revised Disclosure of Asserted Claims and Infringement Contentions, Pursuant to Patent L.R. 3.1 and the June 10, 2015 Court Order" ("Infringement Contentions"), dated June 26, 2015.

The '037 Patent

3. The '037 patent describes an information system for use in an elevator, although it states that the disclosed systems and methods may also be useful in other similar types of personnel transport devices (i.e., devices that transport large numbers of people and equipment between two locations on a routine basis) such as trams, shuttles, and moving walkways. '037 patent, col. 6, lines 44 to 45, col. 2, lines 34 to 39, and col. 6, lines 34 to 39. The elevator information system is responsive to verbal commands. '037 patent, col. 6, lines 43 to 65. Signals captured by a microphone 118 as part of a speech recognition module 104 are digitized by an analog to digital converter 141 and processed using a speech recognition algorithm to produce digital representations of the user's speech. '037 patent, col. 7, lines 30 to 34. The digital representations are compared to a speech library to identify matching known words and the desired functionality is implemented. '037 patent, col. 7, lines 34 to 40.

4. One function of the display device includes accessing a network via a network interface 300 (such as an Internet or intranet data link) which permits the user to rapidly access updated information on a variety of predetermined topics of

interest. For example, URLs for news headlines, weather, sports scores, financial data, directions to local airports or public transportation, etc., may be provided. '037 patent, col. 11, lines 10 to 22.

The Disclosures of Ito and Lind – Claims 22, 37, 42, 48, 71, 72, and 77

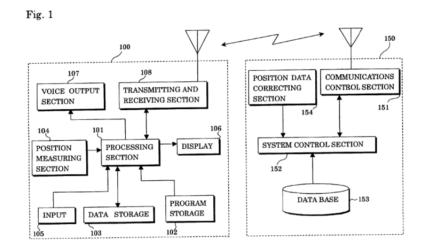
5. Ito and Lind disclose display systems used in "a transport apparatus" (claims 22 and 42), a "land-mobile transport apparatus" (claim 37), and a "land-mobile personnel transport device" (claims 48 and 77) "configured to transport one or more persons from one location to another" as claimed in claims 22, 37, 42, 48, and 77 of the '037 patent. Ito specifically discloses a display used for navigation in a vehicle, such as an automobile. Ito, col. 1, lines 19 to 21. Lind describes a display system used in an automobile, in particular, the "Network Vehicle," which it characterizes as a "convergence of computers, the communications infrastructure, and the automobile." Lind, page I21-1.

6. Both Ito and Lind disclose automotive vehicles equipped with display systems that provide drivers and/or passengers with various types of information, including geographical information. Ito, col. 1, lines 19 to 21; Lind, page I21-1. Ito and Lind specifically disclose a "computerized information and display apparatus disposed at least partly within the passenger compartment" as claimed in claims 22, 37, 42, 48, and 77 of the '037 patent. The computer and display disclosed in Ito are "disposed at least partly within the passenger compartment." The "processing

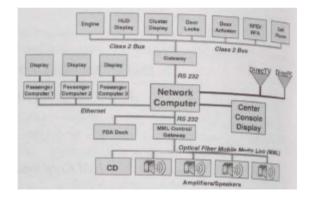
section 101" and the "display 106" are within the "vehicle navigation apparatus 100;" and the apparatus is both "computerized" and a "display apparatus." Ito, col. 9, lines 51 to 67. The vehicle apparatus 100 is "mounted in a vehicle." *Id.* at col. 8, lines 11 to 16. Lind discloses an "on-board system" which includes a network computer and a number of displays, and is located on-board the vehicle. The on-board system is a "computerized information and display apparatus," it is disposed at least partly within the passenger compartment, and at least one display is located in the center console. Lind, page I21-2.

7. Ito and Lind disclose "a wireless network interface" as claimed in claims 22, 37, 42, and 48 of the '037 patent and "a wireless network interface means" as claimed in claim 77 of the '037 patent. For example, Ito discloses a vehicle apparatus 100 that wirelessly communicates with a base station using a "transmitting and receiving section 108" that "includes devices such as a modem and the like." Ito, col. 10, lines 51 to 57. Ito discloses that this wireless connection may "utilize systems such as car phones, portable phones PHS or the like." *Id.* These systems are wireless. Lind discloses a vehicle that includes "smart' features" that "are enabled mainly because of the real-time data-streaming capabilities over a wireless network." Lind, page I21-2. Lind discloses that a "wireless modem" is used as part of the system that connects to this wireless network, as well as a "roof-mounted antenna." *Id.*

8. Ito and Lind disclose a "processing apparatus in data communication with the network interface" as claimed in claims 22, 37, 42, and 48 of the '037 patent and a "processing means in data communication with the network interface for processing data" as claimed in claim 77 of the '037 patent. For example, Ito discloses, in Figure 1, a "processing section 101," which includes a CPU being connected to and in data communication with the transmitting and receiving section 108. Ito, col. 9, lines 51 to 67, Figure 1:



9. Lind discloses that the Network Vehicle includes, for example, "microprocessors." Lind, page I21-1. Lind also discloses, in Figure 2, the "network computer" being connected to and in data communication with, for example, the DirecTV and DirecPC antennas:



10. Ito and Lind disclose voice recognition systems, and Lind discloses a "microphone" as claimed in claim 22 of the '037 patent. For example, Ito describes an input device that "us[es] voice recognition," Ito, col. 10, lines 39 to 47, and Lind discloses a speech recognition system that "allows the driver to access virtually all the vehicle's features through voice commands," Lind, page I21-3. Lind discloses that a "command and control application, ... running on the vehicle's main processor, ... controls devices such as ... microphone, ... and controls vehicle software, such as the voice recognition ... applications." Lind, page I21-6. As demonstrated, for example, by LaRue, at col. 5, line 17, voice recognition systems rely on microphones for obtaining voice or speech input. It is obvious from these disclosures that a microphone can be used to input a user's voice into an automotive voice recognition system, such as the navigation system disclosed in Ito and the ViaVoice speech recognition system disclosed in Lind. LaRue, col. 5, line 17.

Ito and Lind disclose "a display device" as claimed in claim 22 of the '037 11. patent, "a display device configured to be viewable by an occupant of the landmobile apparatus during use" as claimed in claims 37 and 48 of the '037 patent, "a display device configured to be viewable by an occupant of the transport apparatus during use" as claimed in claim 42 of the '037 patent, and a "display device means configured to be viewable by an occupant of the land-mobile apparatus during use for displaying information" as claimed in claim 77 of the '037 patent. For example, Ito discloses a display 106, equipped with a touch panel that is used to display information, such as travel route and/or travel directions. Ito, col. 10, lines 48 to 50 and col. 15, lines 22 to 26. The display is viewable by an occupant, e.g., the driver. Lind discloses display devices for use by the driver and additional display devices for use by the vehicle passengers. According to Lind, the center console additionally includes a touch-screen LCD display. Lind, pages I21-3, I21-4.

12. Ito and Lind disclose "a storage apparatus comprising at least one computer program" as claimed in claims 22, 37, and 42 of the '037 patent, "computerized logic" as claimed in claim 48 of the '037 patent, and "computerized logic means" as claimed in claim 77 of the '037 patent. Ito discloses a "program storage section 102," which serves as a memory for storing the programs that are executed by the processing section 101. Ito, col. 9, lines 51 to 67. The program storage section 102 and processing section 101 described by Ito constitute a storage apparatus

comprising at least one computer program, and also "computerized logic." Ito and Lind disclose voice recognition systems for inputting commands into the system. Ito, col. 10, lines 39 to 47, Lind, page I21-1. As West View has acknowledged (and I agree), "all speech recognition systems inherently digitize the speaker's analog voice" (Infringement Contentions, at 729), and the systems described by Ito and Lind include a "speech recognition module." Additionally, Ito describes a processing section including a CPU as its main component. Ito, col. 9, lines 53 to 67. Lind also discloses a "main processor" that executes a command and control application for managing various functions. Lind, page I21-6.

13. Ito and Lind disclose at least one computer program configured to "obtain digitized speech generated based on speech received from a passenger via the microphone, the digitized speech comprising an affirmative request for desired information which the passenger wishes to find via a network search, the desired information relating to at least one of a plurality of predetermined topics of interest" as claimed in claim 22 of the '037 patent, "obtain digitized speech generated based on speech received from the occupant, the digitized speech comprising a request for desired information which the occupant wishes to obtain," as claimed in claim 37 of the '037 patent, "obtain digitized speech generated based on speech received from the occupant wishes to obtain," as claimed in claim 37 of the '037 patent, "obtain digitized speech generated based on speech received from the occupant wishes to obtain," as relating to a desired information which the occupant wishes to obtain.

claimed in claim 42 of the '037 patent, and "obtain digitized speech generated based on speech received from the occupant, the received speech comprising a request for desired information which the occupant wishes to obtain" as claimed in claims 48 and 77 of the '037 patent. For example, Ito discloses that, among the inputs the user may enter into the system, are "information about the destination, such as the facility name, telephone number and address thereof, and a route search request." Ito, col. 15, lines 47 to 58. This input of information about the destination is related to both a "request for desired information," an "affirmative request for desired information," and also "one or more terms relating to desired information," with the desired information being, e.g., navigation data. The network search, which Ito describes takes place when the system searches a remote database of location data (Ito, col. 8, lines 28 to 40), is a search "relating to at least one of a plurality of predetermined topics of interest," such as the facility name. Lind also discloses that the user may use voice commands to, e.g., "locate a restaurant or hotel" and "ask for navigation help," Lind, page I21-2, and to "request travel directions and traffic updates from the Web or other sources," Lind, page I21-3. As discussed above, West View has also acknowledged (and I agree), "all speech recognition systems inherently digitize the speaker's analog voice." Infringement Contentions, at 729.

Ito and Lind disclose at least one computer program configured to "cause, 14. based at least in part on the digitized speech, search of a remote network entity to cause retrieval of the desired information" as claimed in claim 22 of the '037 patent, "cause, based at least in part on the digitized speech, access of a remote network entity via the network interface to cause retrieval of the desired information" as claimed in claim 37, 48, and 77 of the '037 patent, "cause, based at least in part on at least one of the one or more terms, access of a remote network entity via the network interface to cause retrieval of the desired information" as claimed in claim 42 of the '037 patent, "receive the desired information via the network interface" as claimed in claims 37, 42, and 48, and "receive the desired information via the network interface means" as claimed in claim 77 of the '037 patent. For example, Ito discloses that the user inputs, including one or more terms, are used to search the database of navigation data which is located remotely from the vehicle. Ito, col. 8, lines 28 to 50. The vehicle transmits location data as well as the request for a route search to the base apparatus, which includes the database. Id. at col. 10, line 64 to col. 11, line 30 and col. 15, lines 30 to 37. The map and guidance data are transmitted via the network interface back to the navigation apparatus. Id. Ito discloses both that the navigation database is "searched" for navigation data, and also "accessed." Id. Lind discloses that the driver can use the

advanced speech recognition system of the Network Vehicle to "request travel directions and traffic updates from the Web or other sources." Lind, page I21-3.

Ito and Lind disclose that an "apparatus is further configured to display 15. content on the display device, the content received via the network interface and selected based at least in part on the digitized speech" as claimed in claim 22 of the '037 patent, that "the apparatus is further configured to display at least a portion of the desired information on the display device, the information received via the network interface and selected based at least in part on the digitized speech" as claimed in claim 37 of the '037 patent, that "the computerized information and display apparatus is further configured to display at least a portion of the desired information on the display device, the information received via the network interface and selected based at least in part on the digitized speech" as claimed in claim 42 of the '037 patent, that "the information and display apparatus is further configured to display at least a portion of the desired information on the display device, the information received via the network interface and selected based at least in part on the digitized speech" as claimed in claim 48 of the '037 patent, and that "the information and display apparatus is further configured to display at least a portion of the desired information on the display device means, the information received via the network interface means and selected based at least in part on the digitized speech" as claimed in claim 77 of the '037 patent. For example, Ito

discloses that the navigation information ("desired information" or "content") is received via the network interface and displayed on the display 106 as a recommended route in the form of an outline map. Ito, col. 16, lines 21 to 27. Lind also discloses that navigation information can be displayed on the display. Lind, page I21-3 and Fig. 9.

16. Ito and Lind disclose that "the desired information comprises at least one of a map and/or directions to a particular organization or entity accessible by the transport apparatus" as claimed in claim 37 of the '037 patent, and that "the desired information comprises at least one of a map and/or directions to a particular organization or entity accessible by the occupant" as claimed in claim 48 of the '037 patent. For example, Ito discloses that a map and directions can be displayed on the display device, in Figure 9(A). As one example of a possible destination, Ito discloses "one's own house." Ito, col. 27, lines 6 to 9. One's own house is accessible by a transport apparatus (an automobile), by parking it in the garage. One's own house is also accessible by the occupant, by walking inside. According to Lind, the Network Vehicle "can display the appropriate maps or simply provide route directions on the head-up display, command console or as spoken instructions." Lind, page I21-7. Figure 9, for example, of Lind shows "an example of such a display."

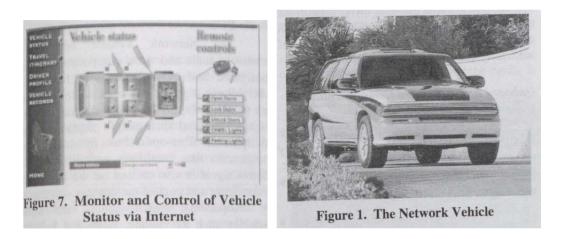
17. Ito and Lind disclose that "the desired information comprises at least one of a map and/or directions to a particular organization or entity accessible by the transport apparatus, the at least one map and/or directions comprising a graphical representation of the organization or entity and its surroundings" as claimed in claim 42 of the '037 patent. For example, Ito discloses that the map displayed in Figures 9(A), 40(C), and 44 include a "graphical representation of the entity and its surroundings." In addition to displaying a representation of the destination, Figures 9(A), 40(C), and 44 of Ito also display the roads and intersections that surround it.

18. As stated above, according to Lind, the Network Vehicle "can display the appropriate maps or simply provide route directions on the head-up display, command console or as spoken instructions," Lind, page I21-7, and Figure 9 of Lind, for example, shows "an example of such a display."

19. Ito discloses that "the desired information comprises a map and visual directions to a particular organization or entity accessible by the transport device, the visual directions comprising at least a visually differentiated line or arrow showing a direction of travel from one location to the organization or entity via one or more pre-established travel infrastructure" as claimed in claim 77 of the '037 patent. For example, Ito discloses, in Figures 9(A) and 9(B), visually differentiated lines and arrows showing the direction of travel between the departure and the destination using pre-established travel infrastructure, or roads.

20. Lind discloses that "the display device is mounted substantially flush with a surface of the interior of the passenger compartment so as to be visible by at least the occupant, yet mitigate incidental contact therewith" as claimed in claim 71 of the '037 patent. For example, Lind discloses a touch screen display mounted in the center console. Lind, page I21-3. This display is visible by an occupant, e.g., the driver, in order to allow the occupant to view what it is displaying, and to utilize the touch screen. The display in the center console in Lind is "substantially flush" with a surface of the passenger compartment, and to mount it in such a way would mitigate incidental contact therewith as compared to locating it, e.g., on the steering wheel or on top of the dashboard.

21. Ito and Lind disclose "a plurality of doors which provide access to the passenger compartment" as claimed in claim 72 of the '037 patent. Automobiles and other vehicles include one or more doors that provide access to the passenger compartment. For example, Ito discloses "a moving body such as a vehicle, Ito, col. 1, lines 9 to 17, and Lind discloses an SUV that includes multiple doors which provide such access, Lind, pages I21-1, I21-5. Multiple doors are shown, for example, in Figures 1 and 7 of Lind:



The Level of Skill in the Art

22. Several years before the earliest filing date claimed as priority by the '037 patent, as well as contemporaneously with filing of the application for the '037 patent, other automotive industry companies had already developed, and were developing, vehicles with Internet connectivity (allowing users to, for example, retrieve information wirelessly from remote databases while inside their vehicles), speech-recognition functionality, and navigation functionality.

23. As described by Lind, the Network Vehicle was designed and developed by Delphi Delco Electronics Systems, IBM, Netscape Communication, and Sun Microsystems. The Network Vehicle developers loaded several computing and communications devices into a vehicle, to demonstrate that the technology could successfully be used in a variety of ways. The Network Vehicle included a roofmounted antenna to provide a satellite connection to the Internet. Lind, page I21-2. The system associated with the Network Vehicle included an off-board network architecture, including, for example, a home/office computer and an IBM web server. Lind, page I21-2. As described by Lind, the Network Vehicle developers provided a Website for users of the Network Vehicle to remotely access the computing systems located in the vehicle. The vehicle Website allowed users to "plan trips on the vehicle web site, then download them to your vehicle." Lind, page I21-7.

24. Lind also describes systems in which a user can receive various types of information inside the vehicle, including e-mail. The Network Vehicle was demonstrated at the Computer Dealer's Exhibits (COMDEX '97) conference in Las Vegas, Nevada on November 17-19, 1997. At this demonstration, the use of the Network Vehicle Website described by Lind, as noted above, was demonstrated to attendees of the conference.

25. I have reviewed screenshots of the Network Vehicle Website; those screenshots are attached as Exhibit B. I acquired these screenshots pursuant to my work as an expert witness engaged by Volkswagen Group of America, Inc. in connection with the litigation *Affinity Labs of Texas, LLC v. BMW North America, LLC, et al.*, Case No. 9:08-cv-00164 (E.D. Tex.).

26. In 1997, I personally attended a demonstration of the Network Vehicle, conducted by Delphi and a Delphi supplier, at Toyota's headquarters in Toyota City, Japan. At that event, the features of the Network Vehicle were demonstrated and the system operation was explained.

27. Referring to Exhibit B, as illustrated on, e.g., the "Driver profile" page, the Network Vehicle maintained a set of profiles for each driver, including personal data, entertainment preferences, information preferences, vehicle preferences, and a personal address book.

28. Referring to Exhibit C (*VW is working on a multimedia car*, Reuters AG, April 22, 1996), Volkswagen had also designed a "multimedia car" and presented an "Infotainment Car" at a conference in Hannover, Germany in 1996; the Infotainment Car included, for example, a PC with Internet connectivity.

29. In 1997, for example, in the Connected CarPC described in Exhibit D (*In-Car Computing and Communication Enables Entertainment, Productivity and Information*, Dedicated Conference on ATT/ITS Advances for Enhancing Passenger, Freight & Intermodal Transportation Systems, p. 411-417 (1997)), communication links were already available for use in automobiles to provide traffic information, Internet access to find hotels, restaurants, and travel guides, and to schedule maintenance, perform remote diagnostics and receive software updates. The "Connected CarPC environment" at that time included both speech recognition functionality and Internet access.

30. The Daimler-Benz Internet Multimedia on Wheels Concept Car, also referred to as the Internet Car, and described in Exhibit E (Jameel et al., *Internet Multimedia on Wheels: Connecting Cars to Cyberspace* (IEEE 1998)) and Exhibit

F (Jameel et al., *Web on Wheels: Toward Internet-Enabled Cars* (IEEE January 1998)), included "an on-board, integrated wireless communication system and the computing infrastructure to provide Internet connectivity from the car to any specific server on the Internet while stationary or in motion." The Internet Car included "Personal device (smart cards, HPCs) [to] be used to personalize car seats, climate, phone numbers, Internet services bookmarks, and computing man machine interface." The Internet Car also permitted drivers to "access … voice-mail, e-mail, and travel-related information such as restaurant guides and movie theater locations" "in a hands-free, eyes-free manner through voice commands and speech technology."

31. Microsoft's Auto PC, described in Exhibit G (Jost, *The car as a mobile-media platform*, Automotive Engineering International, pp. 49-53 (May 1998)), included "the benefits of interactive speech technology, connectivity, information on demand, and enhanced entertainment to the automobile."

32. Visteon's ICES system, described in Exhibit G, included a voice-activated control system that permitted "drivers to control vehicle functions that are usually operated manually," and "[t]hrough speech recognition, the driver can send e-mail, obtain turn-by-turn Global Positioning Satellite (GPS)-based navigation to a specific destination, ask for traffic and weather conditions, locate a restaurant or hotel, or change the musical selection on the stereo." Wireless Internet connectivity

was included in Visteon's ICES system and "used for vehicle-to-roadside assistance or to receive e-mail and Internet information."

Obviousness in View of Ito and Lind

33. The systems described in claims 22, 37, 42, 48, 71, 72, and 77 of the '037 patent were obvious from the disclosures of Ito and Lind.

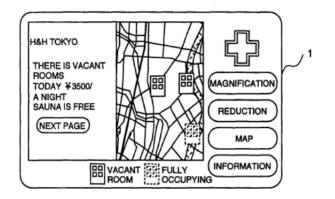
34. Both Ito and Lind describe systems that provide information to the driver of an automobile. Lind, page I21-1; Ito, col. 2, lines 65 to 67 and col. 3, lines 2 to 3. Both of these systems also address problems related to providing a user of an automobile with navigation information, and displaying that information in a useful manner. Id. The '037 patent purports to address problems related to "obtaining and displaying information" ('037 patent, Abstract) and to "allow the occupants of the elevator ... to use their time more efficiently and obtain needed information" (Id. at col. 3, lines 36 to 41). Ito and Lind disclose the necessary hardware to receive voice inputs, wirelessly connect to a remote database, and retrieve navigation information including maps. Ito, col. 9, lines 51 to 67, col. 10, lines 51 to 57; Lind, pages I21-1 to I21-3, I21-7. Maps, such as those shown in Figures 9(A) and 9(b) of Ito, can be displayed in the Network Vehicle disclosed by Lind in order to address problems related to "obtaining and displaying information" as stated in the '037 patent. And selecting a destination that is accessible by the transport apparatus or accessible by the occupant is no more than

a particular implementation of the geographic database disclosed in Ito, as well as the databases used in the automotive industry vehicles and systems that preceded the application for the '037 patent.

The Disclosures of Ito, Lind, and Fujiwara – Claim 1

35. Fujiwara discloses that "the computerized information and display apparatus is further configured to display advertising content on the display device, the content received via the network interface and selected based at least in part on the digitized speech" as claimed in claim 1 of the '037 patent. For example, Fujiwara discloses the display of advertising content, such as information relating to the hotel "H&H Tokyo," such as room rates, vacancy information, and a free sauna, in Figure 22 and at 5:53-6:2.





36. This advertising information is displayed on a display device, and also received via a network interface. Fujiwara, col. 4, lines 14 to 22 and col. 5, line 53 to col. 6, line 7.

37. The system claimed in claim 1 of the '037 patent is obvious from the disclosures of Ito, Lind, and Fujiwara. It is obvious that advertising information, as disclosed by Fujiwara, can be used in the systems of Ito and Lind, to "provide a navigation system, by which much information is capable to be accessed so as to suitably control the amount of information to be communicated and the received information is capable to be displayed intelligibly." Fujiwara, col. 1, line 55 to col. 2, line 2. Modifying the systems of Ito and Lind, which already transmit map and navigation information to the vehicle, and display map and navigation information in the vehicle, to also transmit the advertising information disclosed in Fujiwara, would require no structural modifications of the system and would not provide unexpected results. Providing advertising information, as disclosed by Fujiwara, in the systems of Ito and Lind benefits the user by providing useful information, such as room rates, vacancy information, etc., such that users can be alerted of services of which they might not otherwise be aware.

The Disclosures of Ito, Lind, and Hsieh – Claims 73 and 75

38. The systems claimed in claims 73 and 75 of the '037 patent are obvious from the disclosures of Ito, Lind, and Hsieh.

39. It is obvious that the CCD video cameras of Hsieh may be placed in data communication with the processing apparatuses disclosed in Ito or Lind. Hsieh discloses a "video data apparatus in data communication with the processing

apparatus and configured to enable video data to be generated and displayed on the display device, the video data generated by one or more cameras associated with the personnel transport device so as to enable monitoring of one or more portions of an area surrounding the personnel transport device" as claimed in claim 73 of the '037 patent. Hsieh discloses CCD video cameras that are mounted on the rear of a car, and a control system connected to those cameras. Hsieh, page 2, line 7, lines 18 to 20, and lines 60 to 62. The video data generated by these cameras is displayed on a display device (Hsieh, page 1, lines 7 to 11) and is used to monitor an area behind the car in order to prevent a collision when backing up the car (Hsieh, page 1, lines 12 to 13). These video cameras are also the same type as those described in the specification of the '037 patent (see '037 patent, col. 17, lines 4 to 32).

40. It is obvious that the vehicle monitoring apparatus, rear view camera, and television disclosed by Hsieh may be used in the systems described in Ito and Lind to "provide a vehicle monitoring apparatus" to display a picture on a television placed inside the vehicle (Hsieh, page 1, lines 39 to 53), e.g., a backup camera. Providing a known backup camera as disclosed in Hsieh in the computerized information and display systems disclosed in Ito and Lind would have required no major modifications to those systems, because they already included displays

capable of displaying videos generated by CCD cameras and would have provided only expected results.

41. Lind discloses "a communication apparatus configured to enable at least voice communication by a passenger with a remote monitoring station while the transport device is in operation" as claimed in claim 75 of the '037 patent. Lind discloses, for example, that the Network Vehicle includes cell phone and in-vehicle audio system that is used as a speakerphone, allowing hands-free communication, Lind, page I21-7, and that a customer service representative can be contacted using the Network Vehicle's customer service application, Lind, page I21-5.

I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under §1001 of Title 18 of the United States Code.

Dated: _______10/30/15

Scott Andrews

EXHIBIT A

Scott Andrews

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Summary

Creative, energetic, and innovative internationally recognized executive experienced in general management, systems engineering, advanced product development, advanced technology, business development, strategic planning, and program management

- Vehicle Electrical/Electronics Systems
- Vehicle Information Systems
- Communications Systems
- ITS and Related Industries
- Program and Project Management
- Enterprise Software
- Multimedia/Internet Computing
- Vehicle Safety and Control Systems
- Spacecraft Electronics
- Mobile Information Technology

Experience

12/2001-Present Consultant

Systems engineering, business development and technical strategy consulting supporting automotive and information technology.

Current Engagements:

- Technical consultant to ARINC for connected vehicle application systems engineering and development of high precision connected vehicle test bed for FHWA (Federal High Way Admin.)
- Technical consultant to Booz Allen for connected vehicle performance measures development project for NHTSA (National Highway Traffic Safety Admin.)
- Technical consultant to Booz Allen for connected vehicle standards for FHWA
- Technical consultant to American Association of State Highway Transportation Officials (AASHTO) for connected vehicle deployment analysis and strategy
- Technical consultant to Michigan State DOT (Enterprise Pooled Fund) to develop a system architecture and deployment strategy for Rural ITS
- Expert witness for Toyota in a case brought by American Vehicular Sciences (AVS)
- Expert witness for Toyota in a patent case brought by Affinity Labs
- Expert Witness for TomTom in a patent case brought by AVS
- Expert witness for Liberty Mutual, Geico and Hartford in a patent case brought by Progressive Insurance
- Expert witness for Ford in a patent case brought by Medius.
- Expert witness for Ford in a patent inventorship case brought by Berry.
- Expert witness for Ford and GM in a patent case brought by Affinity Labs
- Expert witness for M/A Com in a patent case against Laird
- Expert witness for VW/Audi in a patent case brought by Velocity
- Expert witness for VW/Audi in a case brought by Beacon, GmbH.
- Expert witness for Wasica in a patent case against Shrader and Continental

Recent Engagements:

- Expert Witness for Samsung, Nokia, ZTE and Sony in an ITC patent case brought by Pragmatus
- Expert Witness for TomTom in a case brought by AOT/Adolph
- Expert Witness for TomTom in a case brought by Cuozzo
- Expert Witness for Navico in a case brought by Honeywell

Scott Andrews

- Expert witness for Bentley in a case brought by Cruise Control Technologies.
- Expert witness for Google in a case brought by Walker Digital
- Expert witness for Emtrac in a case brought by GTT (3M)
- Expert witness for Motorola in a case brought against Microsoft
- Co-Principal investigator for Integrated Advanced Transportation System; research program funded by FHWA
- Expert Witness for Volkswagen/Sirius-XM in patent infringement case relating to traffic information systems
- Expert Witness for Pioneer in patent infringement related International Trade Commission matter
- Expert Witness for Volkswagen in patent infringement case relating to the iPod interface
- Chief System Architect for the Vehicle Infrastructure Integration (VIIC) program (BMW, Chrysler, Daimler Benz, Ford, GM, Honda, Nissan, Toyota, VW);
- Expert Witness for Honda in patent infringement lawsuit); 14 asserted patents dealing with telematics equipment interfaces and functions
- Expert Witness for Alpine, Denso and Pioneer Corporation in patent infringement related International Trade Commission matter relating to navigation systems
- Telematics delivery architecture development for a Fortune 100 service provider
- Technical consultant to the Vehicle Safety Consortium developing Dedicated Short Range Communications (DSRC) standards for safety systems;
- Expert Witness for BMW in patent infringement lawsuit (American CalCar, Inc. v BMW) included prior art search, invalidity & non-infringement reports, rebuttals reports, depositions, etc for 12 patents with 200+ asserted claims.
- Toyota Motor Sales 10 year technology survey;
- Connected Vehicle Trade Association- Transferred AMI-C specifications to ISO TC 22, TC 204 AND OSGi. Developed OSGi Vehicle Interface Specification;
- Personal navigation device product feature and opportunity analyses for Thales-Magellan and Rand McNally

4/2000 to 12/2001 Cogenia, Inc.

President and Chief Executive Officer, Founder

Founded company in 2000 to develop enterprise class data management software system. Responsibilities included development of business concept and plan, corporate administration including financial and legal management, leadership of executive team in product development, fundraising, business development, organizational development, and investor relations. Raised \$2.2M between 8/00 and 5/01 from individuals and funds;

1996 to 4/2000 Toyota Motor Corporation, Japan

Project General Manager, R&D Management Division

Responsibilities included the conceptualization and development of multimedia and new technology products and services for Toyota's future generations of passenger vehicles in the United States and Europe, Heavy emphasis on strategy for information systems, and on development of technical concepts for computing and Internet oriented systems. Working under direction of Toyota board members, established the Automotive Multimedia Interface Collaboration (AMI-C), a partnership of the world's car makers to develop a uniform computing architecture for vehicle multimedia systems, and led all early technical, planning and legal work. Past responsibilities included leading Toyota's US Automated Highway Systems program, management of technical contracts with Carnegie Mellon University Robotics Lab (Image based collision warning systems), and the development of Toyota's position on the US Intelligent Vehicle Initiative.

Scott Andrews

1983 to 1996 TRW, Inc.

Held a series of increasingly responsible positions in program management, technology development and business development.

1993 to 1996 TRW Automotive Electronics Group

Director, Advanced Product Planning/Development

Specific responsibilities included leadership and overall management of advanced development programs such as Automotive Radar, Adaptive Cruise Control, Occupant Sensing, In Vehicle Information Systems, and other emerging transportation products; Managed remotely located advanced development laboratory performing approximately \$6M in annual development projects.

1983 to 1993 TRW Space & Electronics Group

Manager, MMIC Products Organization

Developed TRW's commercial GaAs MMIC business. Responsibilities included development of business strategy and business plan, and overall management of customer and R&D programs. Developed extensive international business base and took operation from start-up to \$5M sales per year in under two years. Developed the first single chip 94 GHz Radar (Used for automotive cruise control and anti collision systems).

1979-1983 Teledyne Microwave

Developed high reliability microwave components. Developed CAD tools. **1977-1979 Ford Aerospace, Advanced Development Operation** Designed, tested and delivered microwave radar receiver systems

Education

MSEE Stanford University, 1982 BSEE University of CA, Irvine 1977 TRW Senior Leadership Program 1992

Publications

- Two Dimensional Vehicle Control for Obstacle Avoidance in Multi-Lane Traffic Environments; Published in the proceedings of the 1998 IEEE International Conference on Intelligent Vehicles.
- Automotive Multimedia Interface Collaboration; Briefing Presented to the 9th VERTIS Symposium, April 1999, Tokyo Japan.
- Privacy and Authenticity in Telematics Systems; Published in the Proceedings of the Society of Automotive Engineers World Congress, 1999
- Automated Highway Systems Acceptance and Liability; Briefing presented to the Automated Vehicle Guidance Demo 98 Conference, Rinjwoude, The Netherlands, June1998.
- What is Telematics? Briefing presented at IIR Telematics Conference Scottsdale, AZ, December 2001

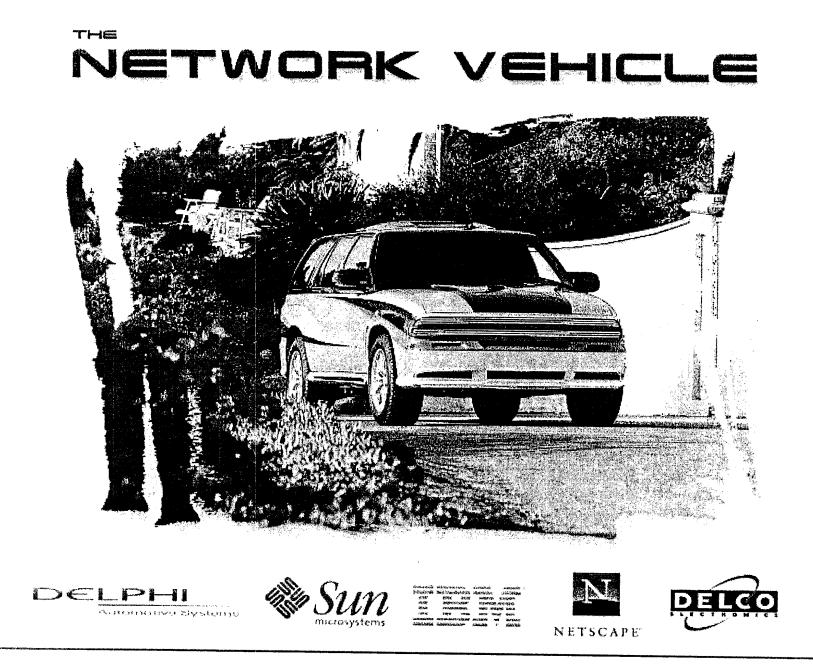
- Advanced Telematics Services: A Hard Look at Reality; Briefing presented at IIR Telematics Conference Scottsdale, AZ, December 2001
- Consumer Electronics and Telematics; Briefing presented at Eye For Auto Telematics Update Conference Las Vegas, NV, January 2003
- The Automotive Multimedia Interface Collaboration Software and Network Architecture: Extending the Concept of Platform Independent Computing; Briefing Presented to the Future Generation Software Architectures in the Automotive Domain Conference, San Diego, CA, January 2004
- 9. Quality, Choice and Value: How New Architectures are Changing the Vehicle Lifecycle; Briefing presented at IEEE Convergence Conference, October 2004
- Critical Standards for the Next Generation of Telematics Systems and Services;
 Briefing presented at the Telematics Update Conference, December 2004
- VII System Overview; Briefing presented To Transportation Research Board, ITS and V-HA Committees 2007 Mid-Year Meeting; July 2007
- Testing and Development of In-Vehicle Equipment and Private Applications (P08-1634); Briefing presented to the Transportation Research Board Annual Meeting, Washington, DC, January 2008
- A Comparison of Communications Systems for VII; Presented at the ITS World Congress, New York, NY, October, 2008
- Vehicle Infrastructure Integration Systems Overview; Presented at the ITS America Annual Meeting, June 1 2009, National Harbor, Maryland
- 15. Telematics Standards: Logical Next Steps; ITS International, August 2009
- 16. IntelliDriveSM Overview; ITS International, May 2009
- Time Synchronization and Positioning Accuracy in Cooperative IntelliDriveSM Systems; Presented at the 2010 ITS America Annual Meeting, June 2010, Houston, Texas

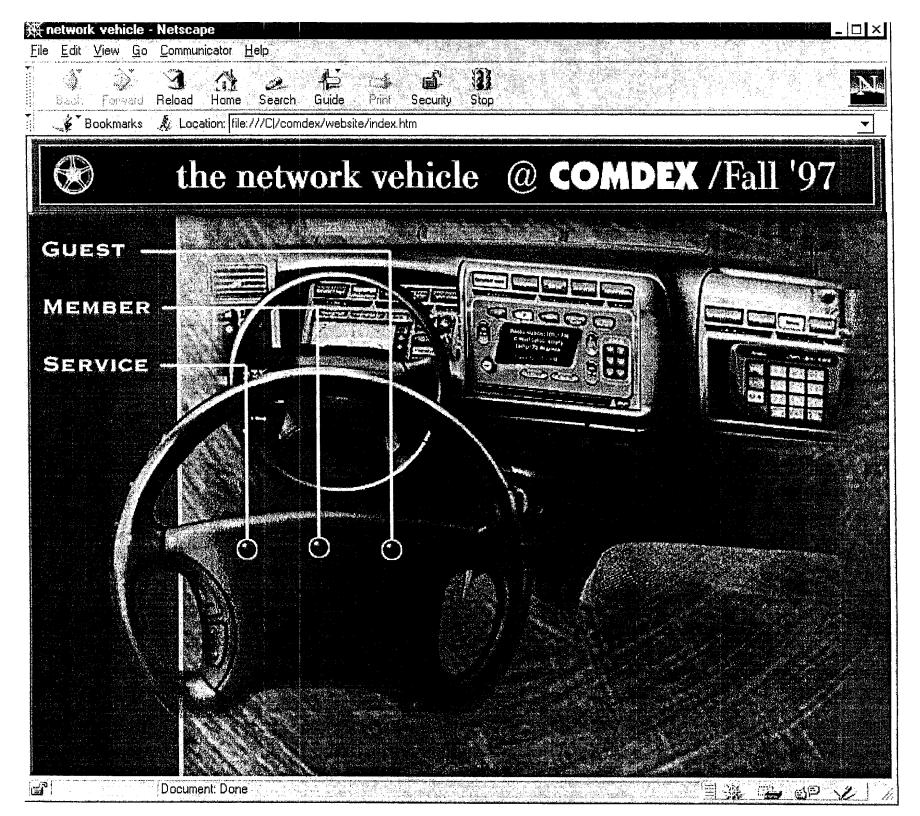
Patents

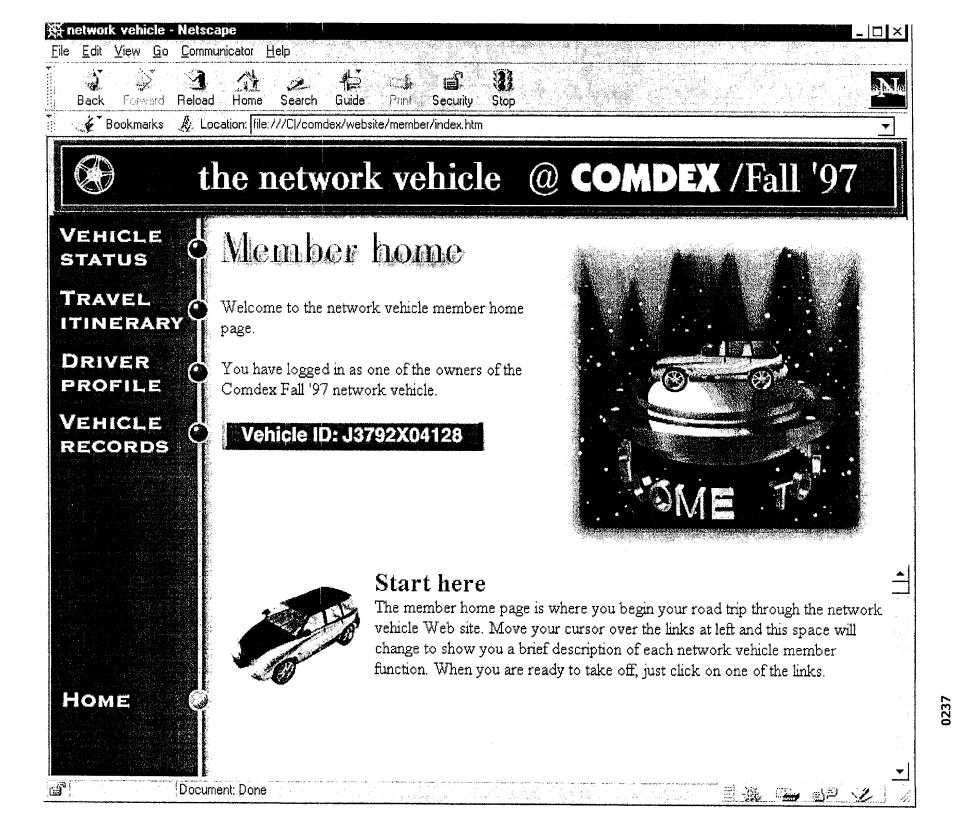
- Mobile Body Reporting Device And Its System; Patent Number: JP11118902; 4/30/1999
- Multiformat Auto-Handoff Communications Handset; Patent Number: US5649308; 07/15/1997

- A Communications Terminal Device, A Communications System, And A Storing Medium For Storing A Program To Control Data Processing By The Communications Terminal Device; Patent Number: EP0867850, A3; 09/30/1998
- Communication System For Controlling Data Processing According To A State Of A Communication Terminal Device; Patent Number: US 6122682 3/23/1998
- Method And Apparatus For Controlling An Adjustable Device; Patent Number: US5864105; 01/26/1999
- 6. Automatic Brake Device; Patent Number: JP2000108866; 4/18/2000
- 7. Visual Field Base Display System; Patent Number: JP2000029618; 01/28/2000
- 8. Intersection Warning System; Patent Number: US5926114; 07/20/1999
- Security For Anonymous Vehicular Broadcast Messages; Patent Number: US 7742603 3/27/2006
- 10. Digital Certificate Pool; Patent Number: US7734050 3/27/2006
- System, Method And Computer Program Product For Sharing Information In A Distributed Framework; Patent Number: US 7802263 12/15/2003

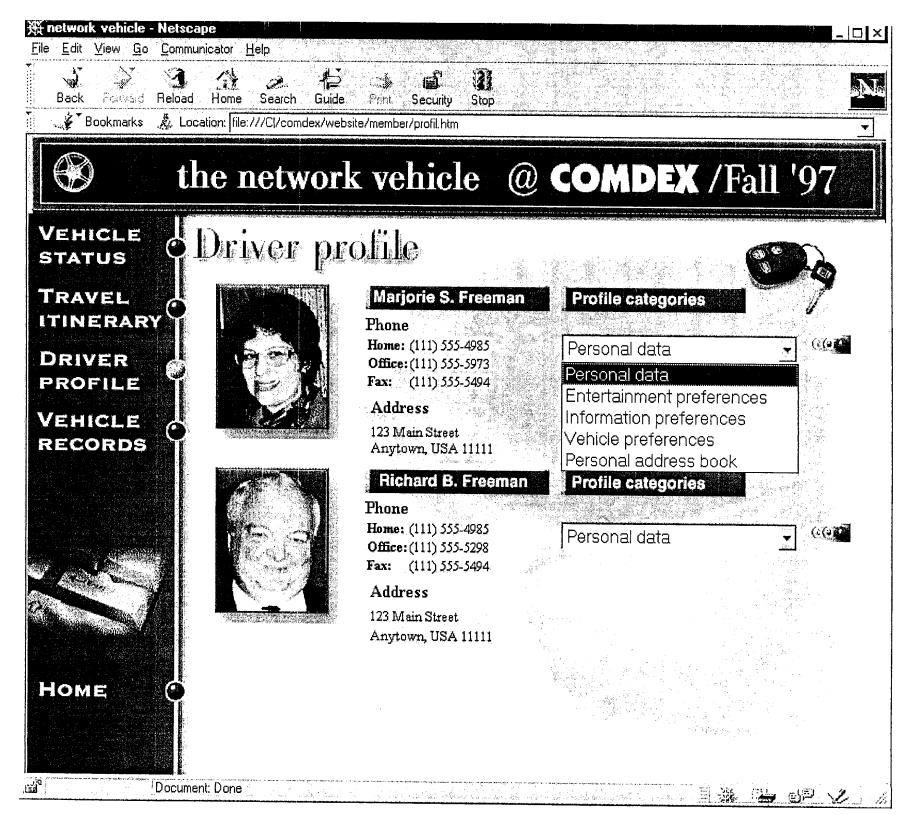
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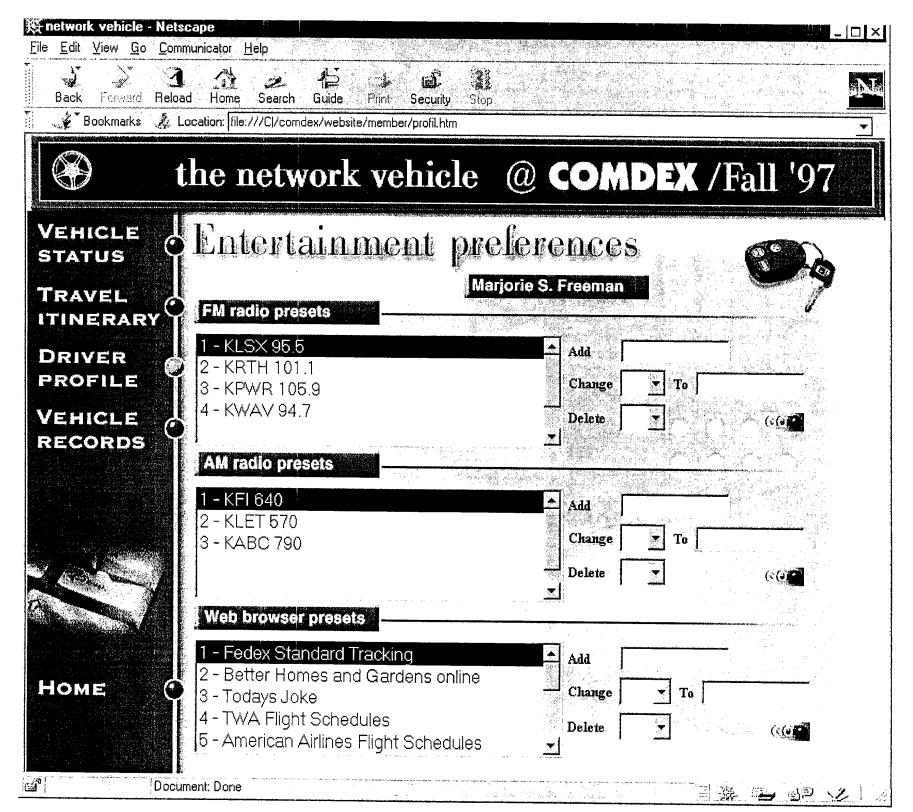


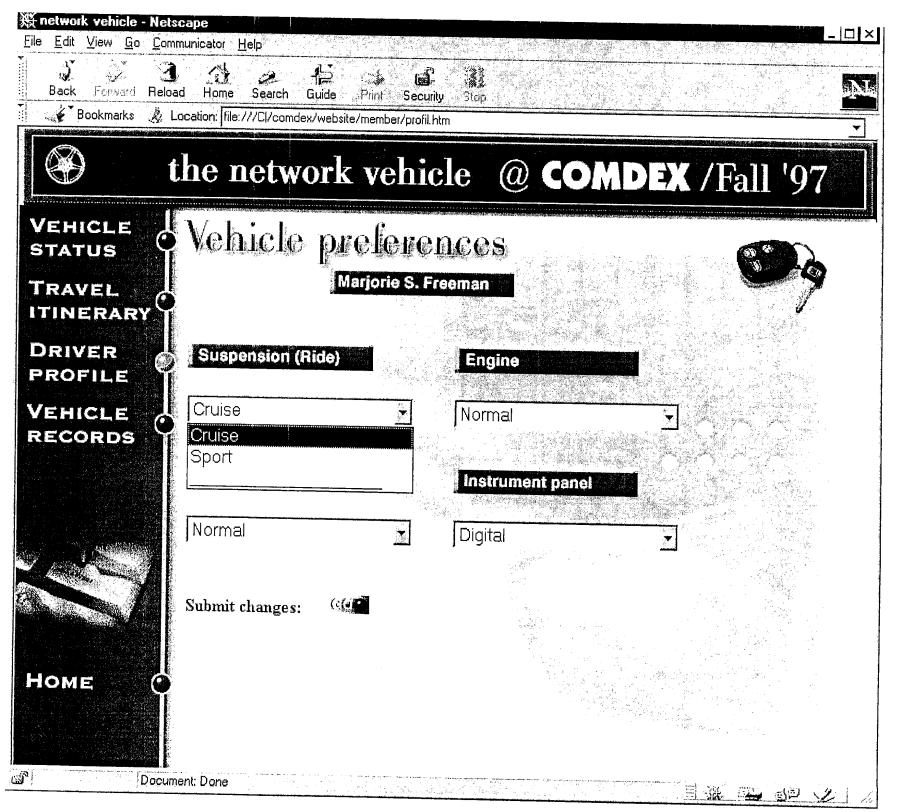


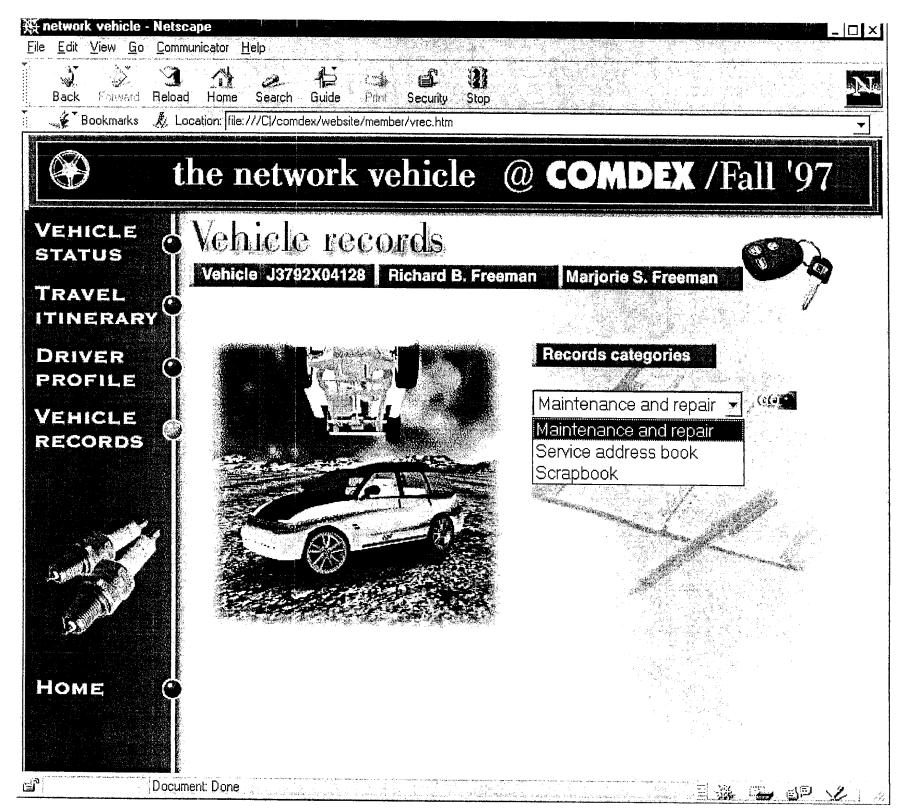


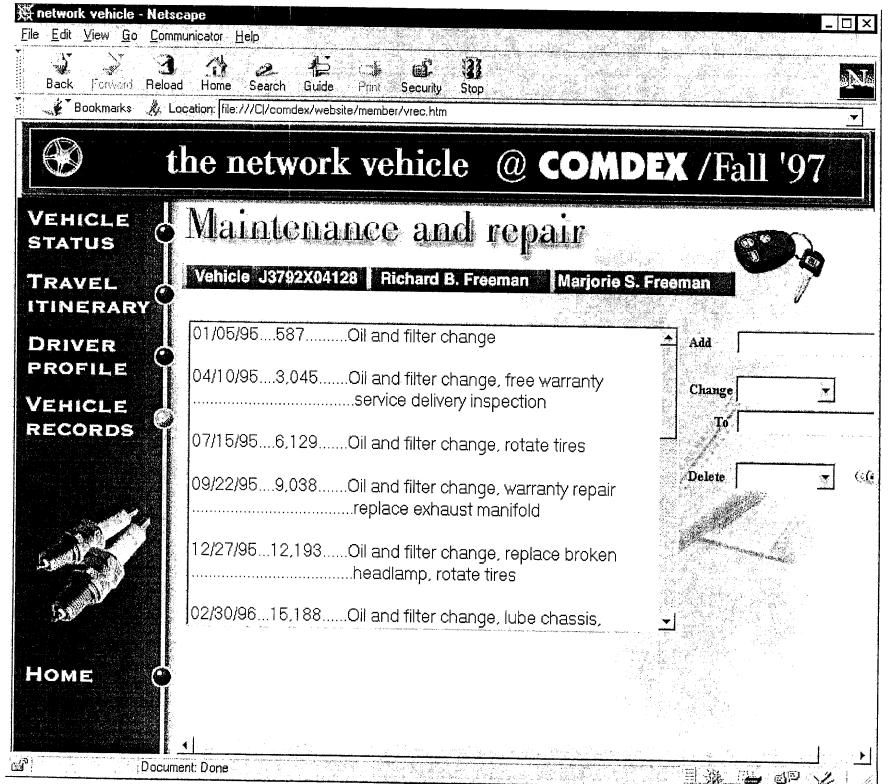
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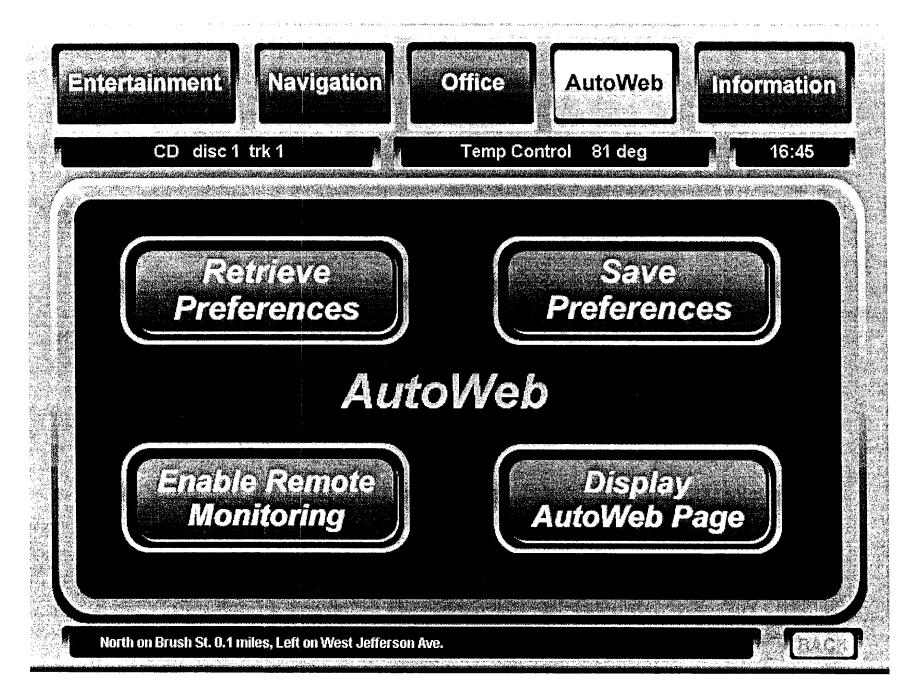


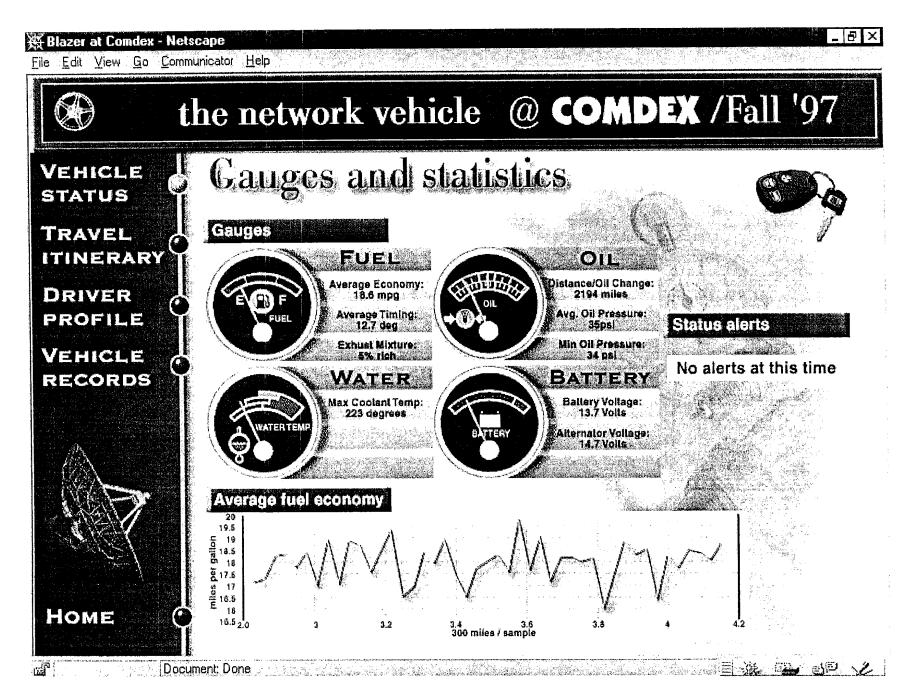


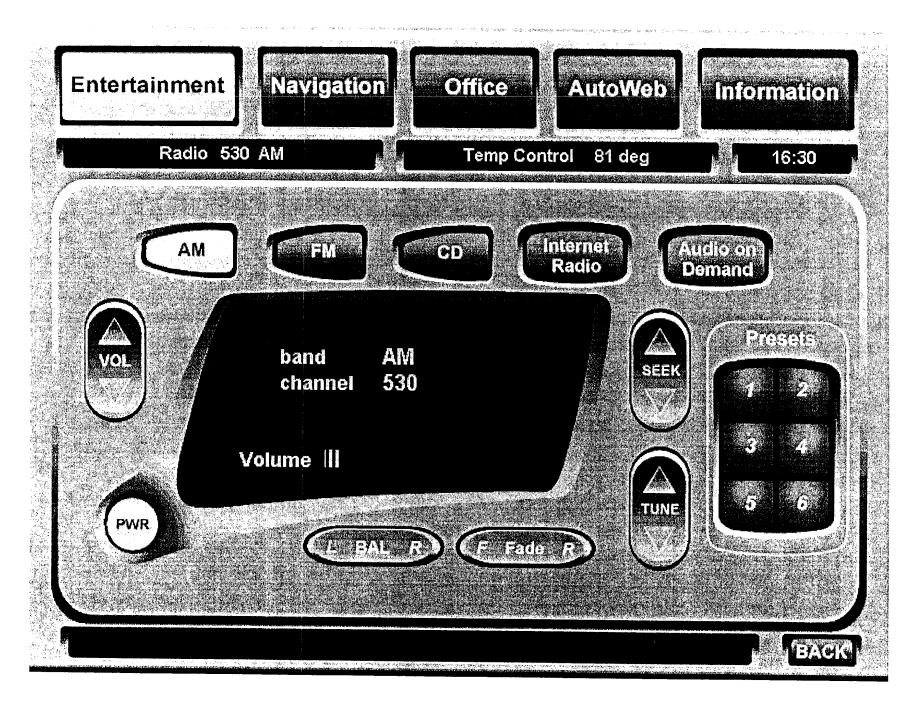


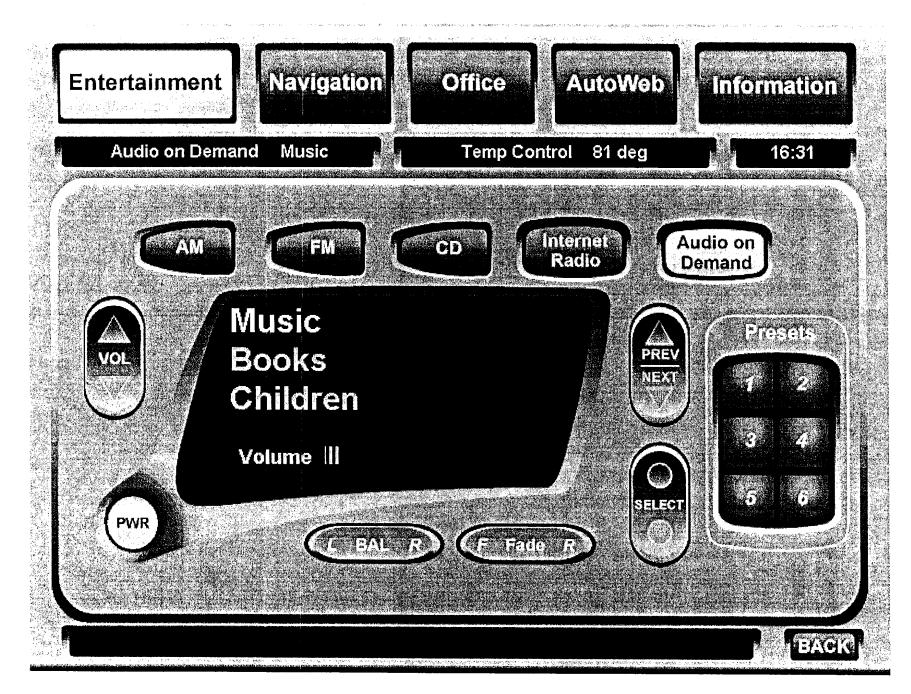


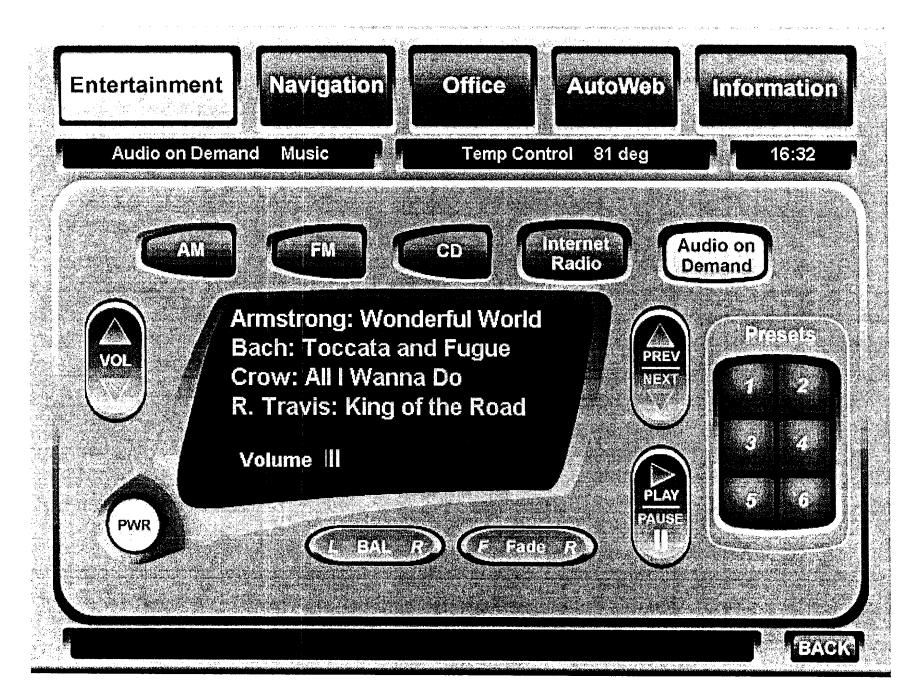


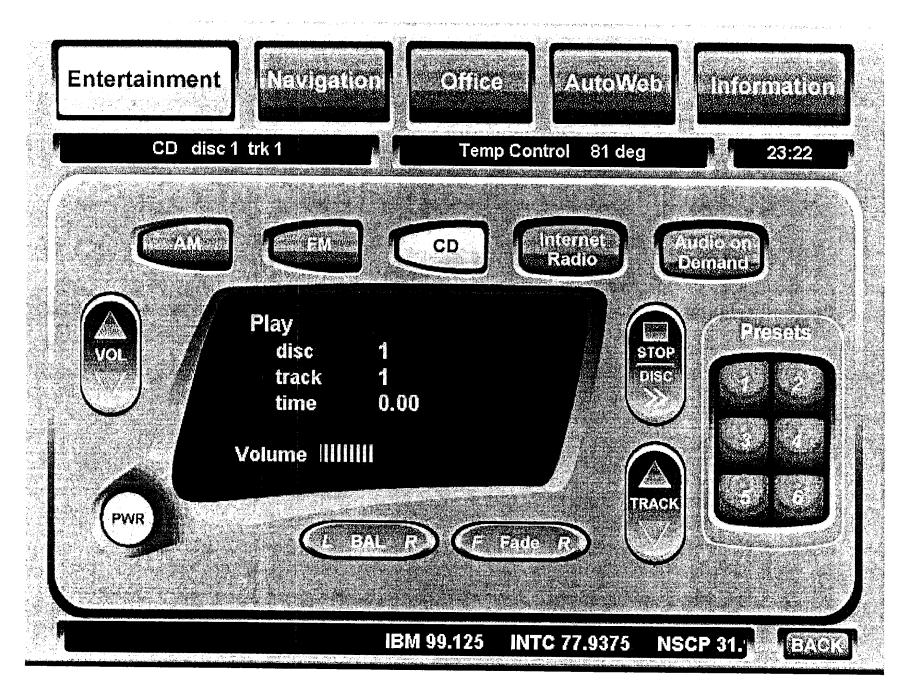


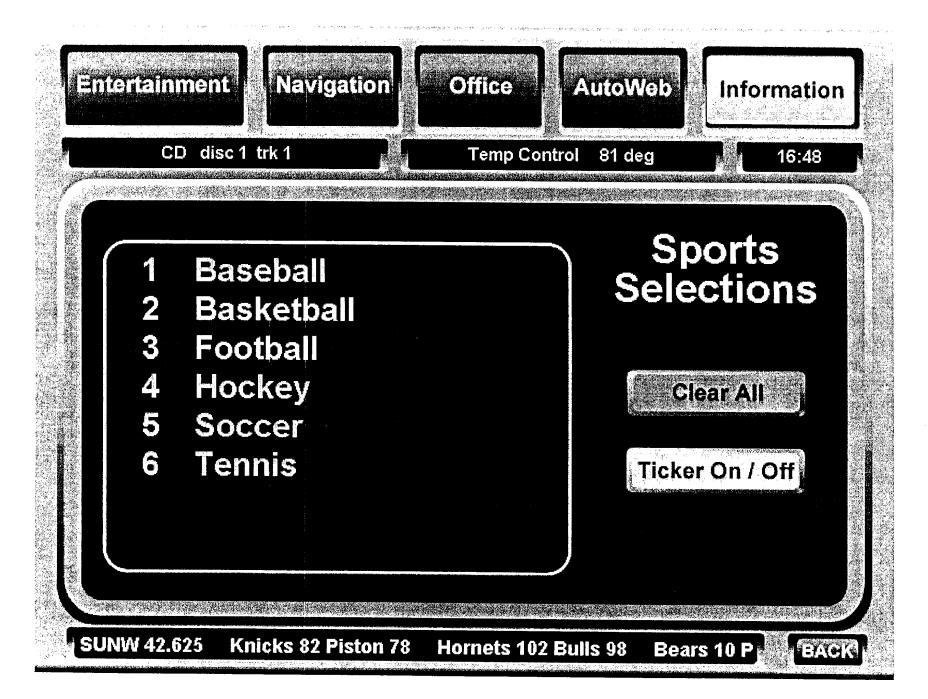


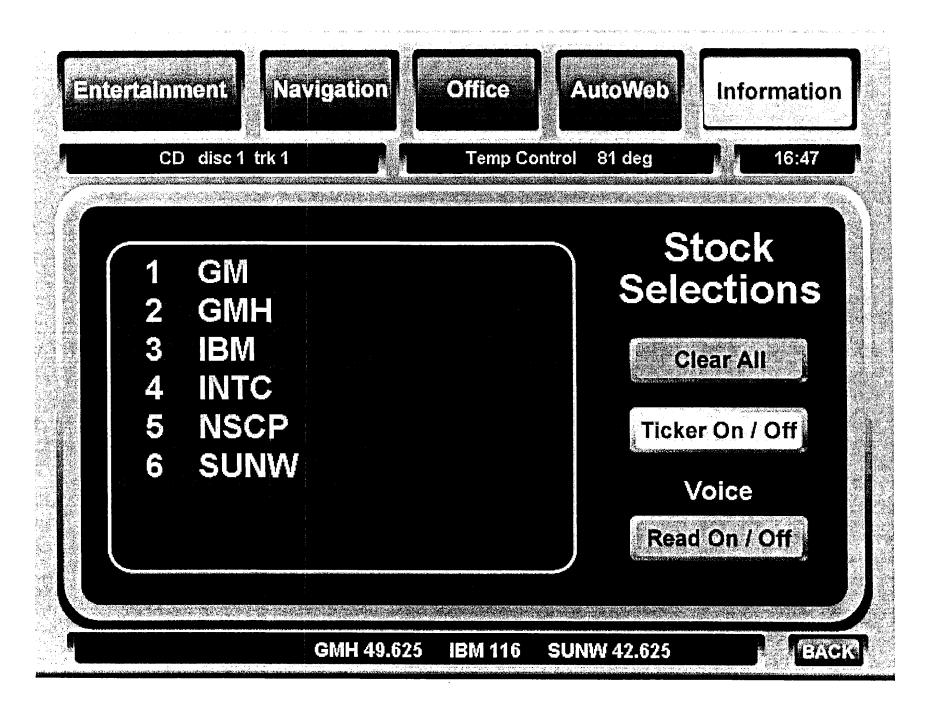


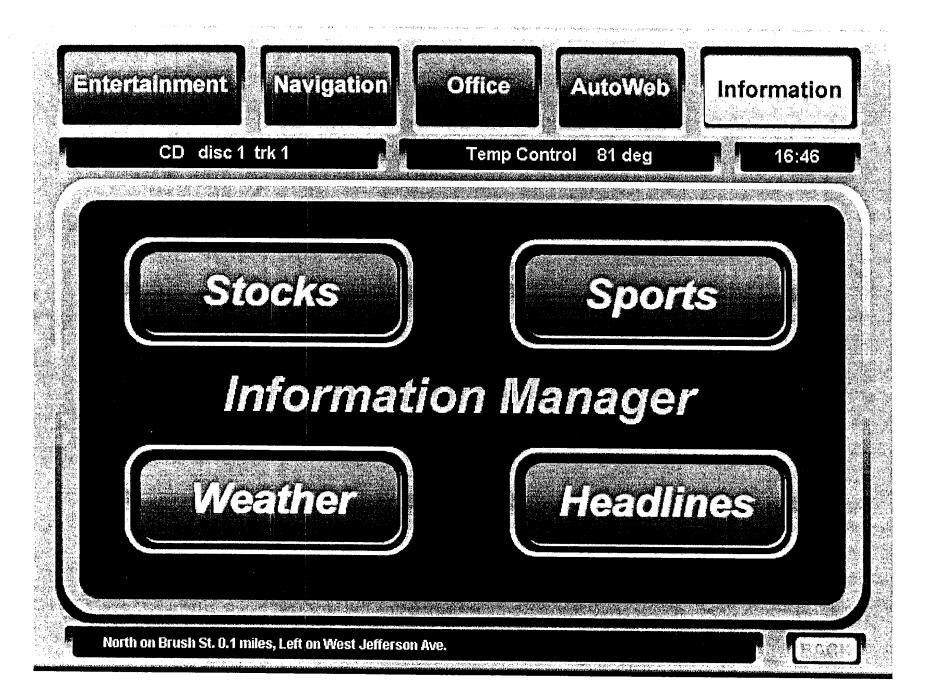




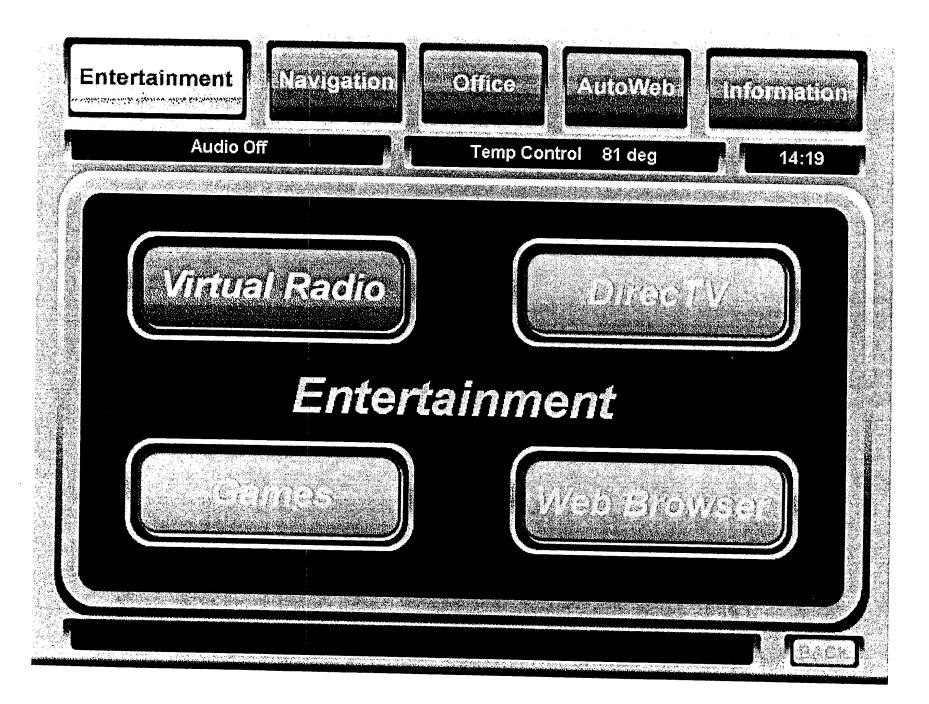


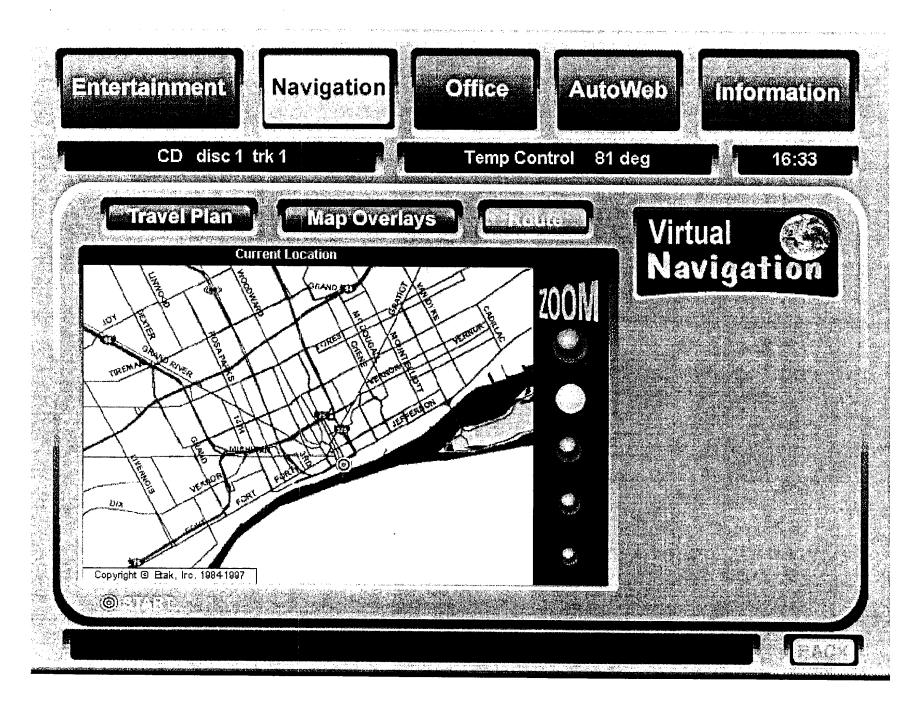




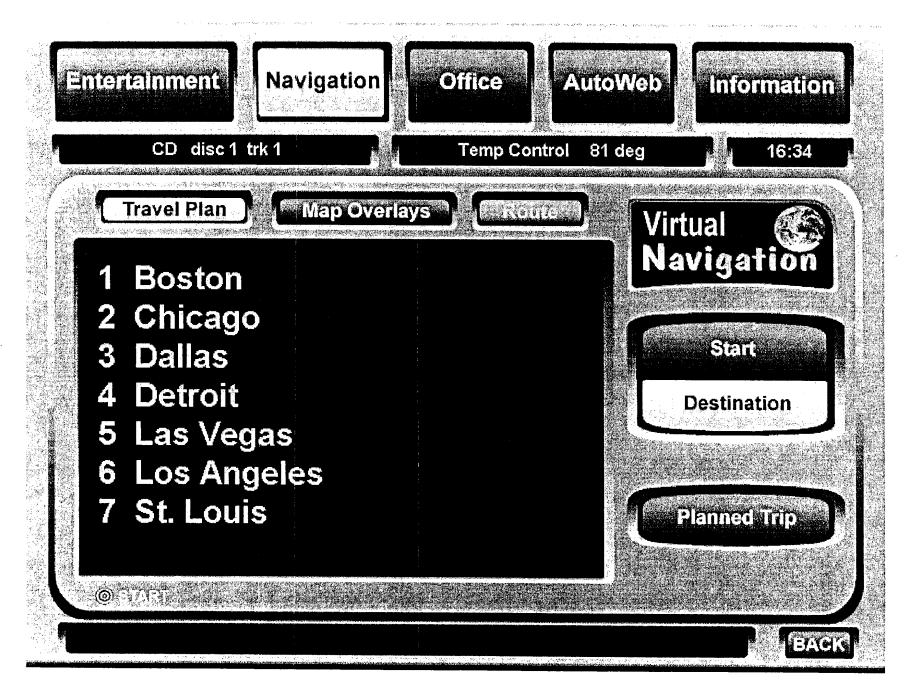


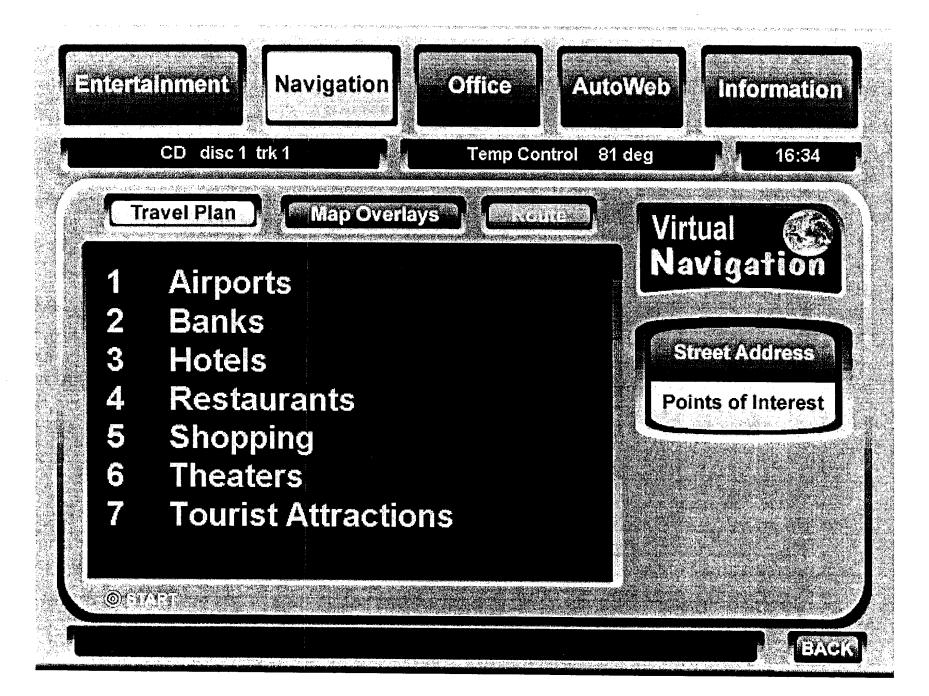


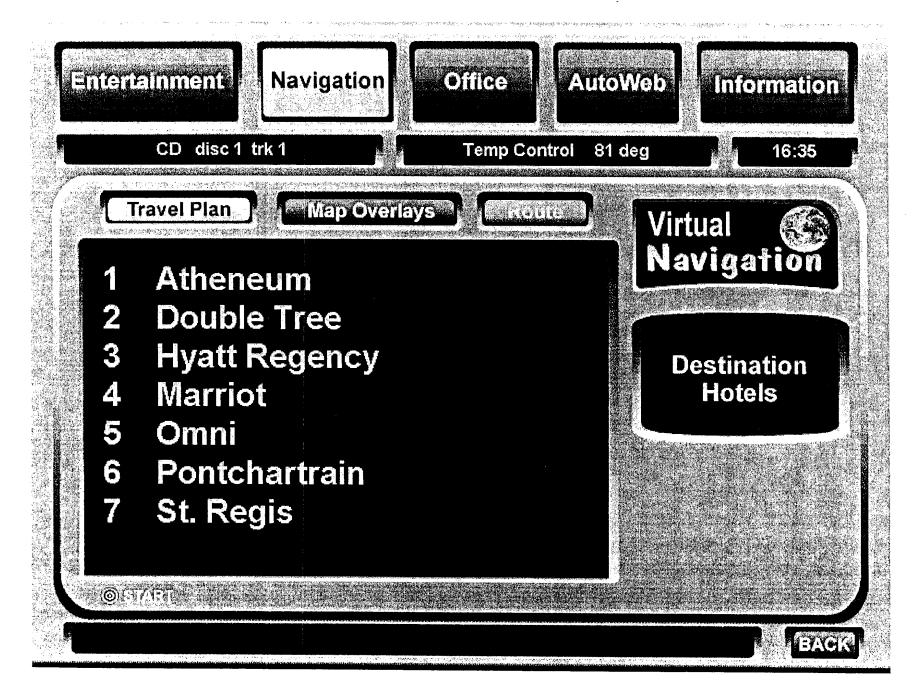


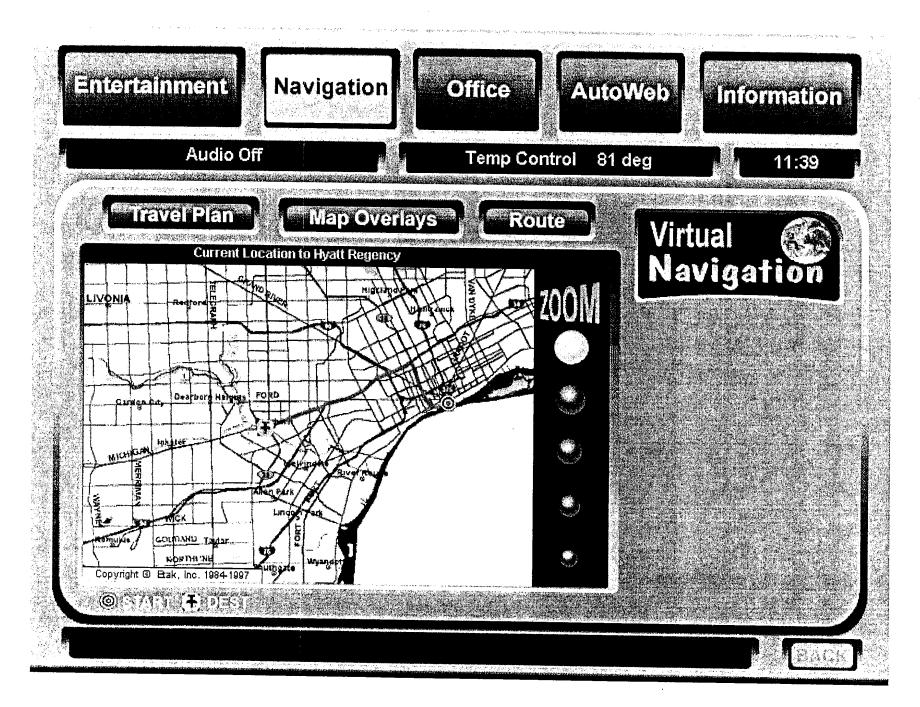


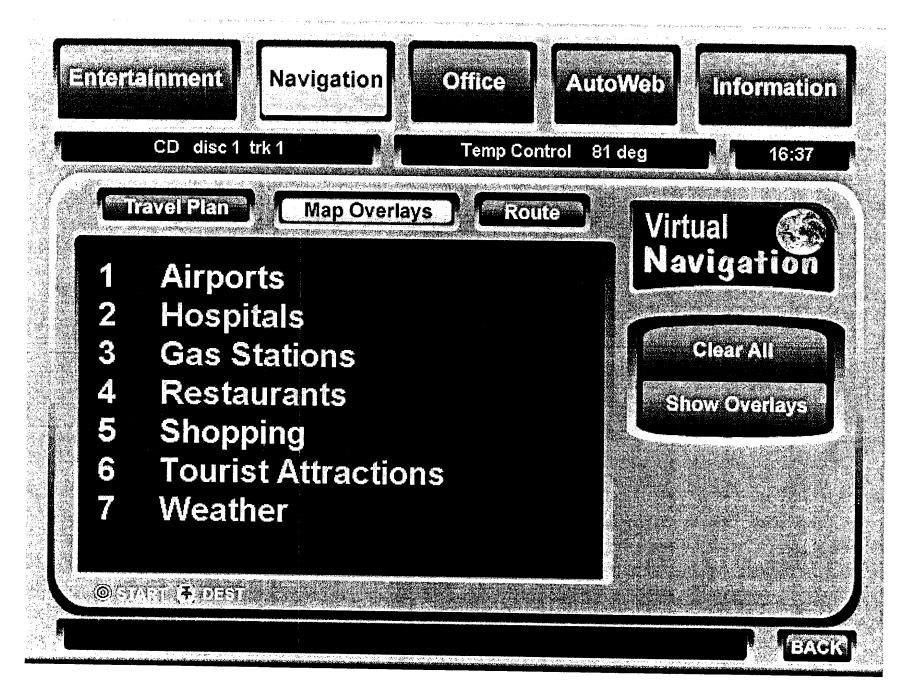


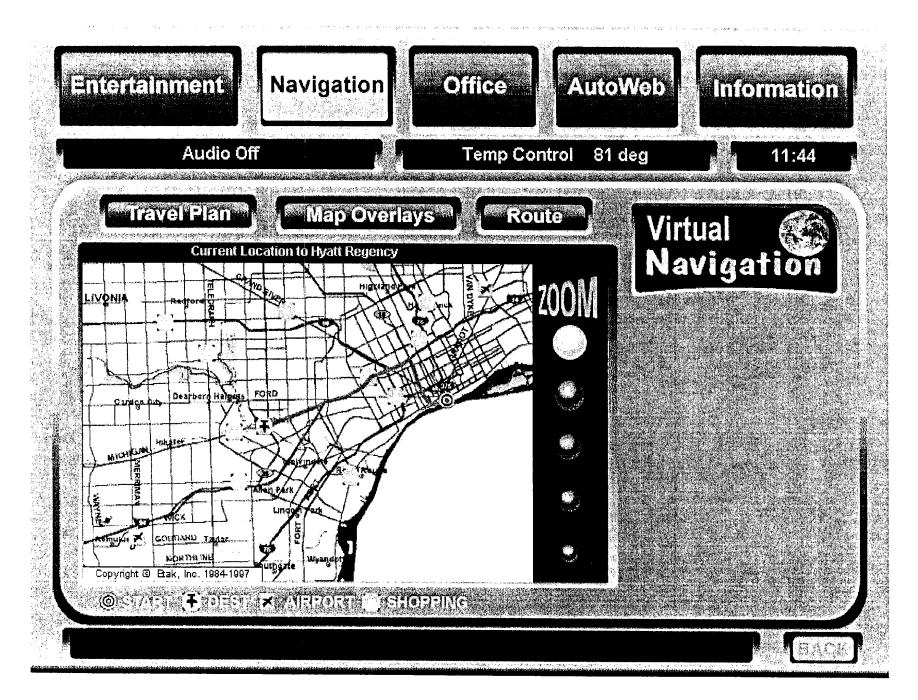


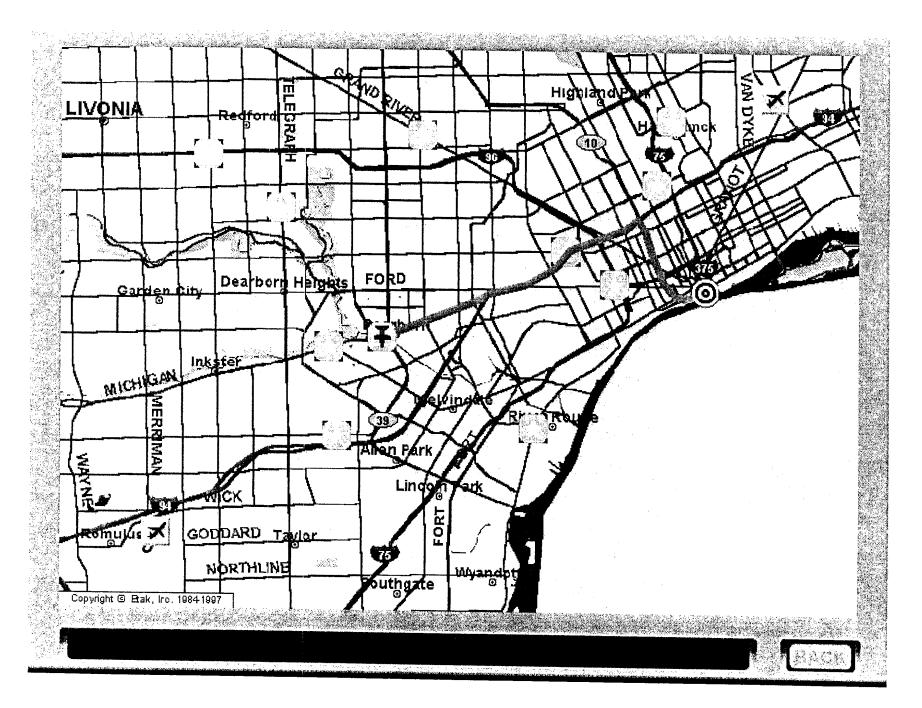


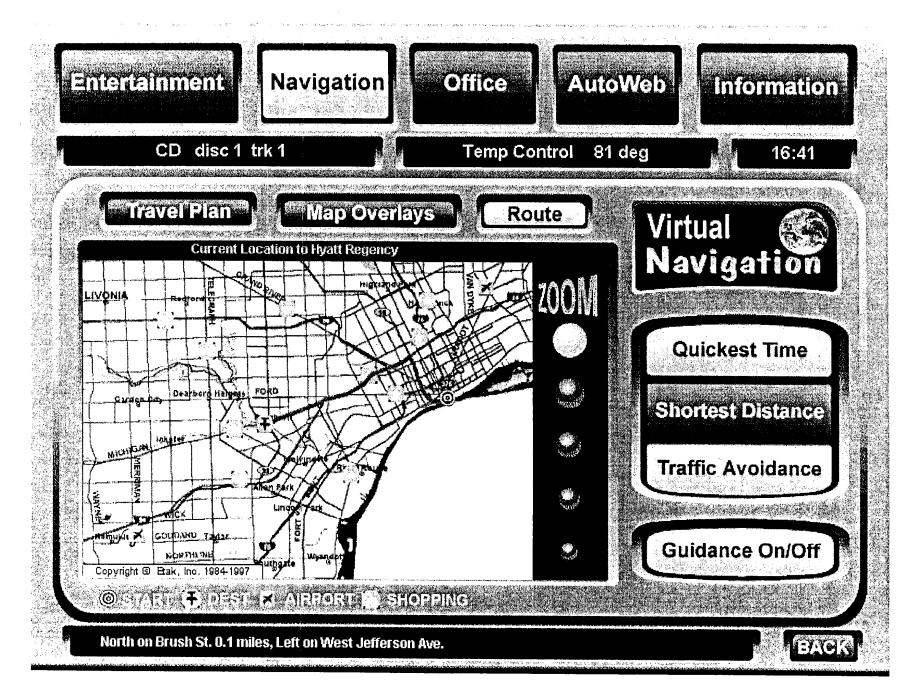


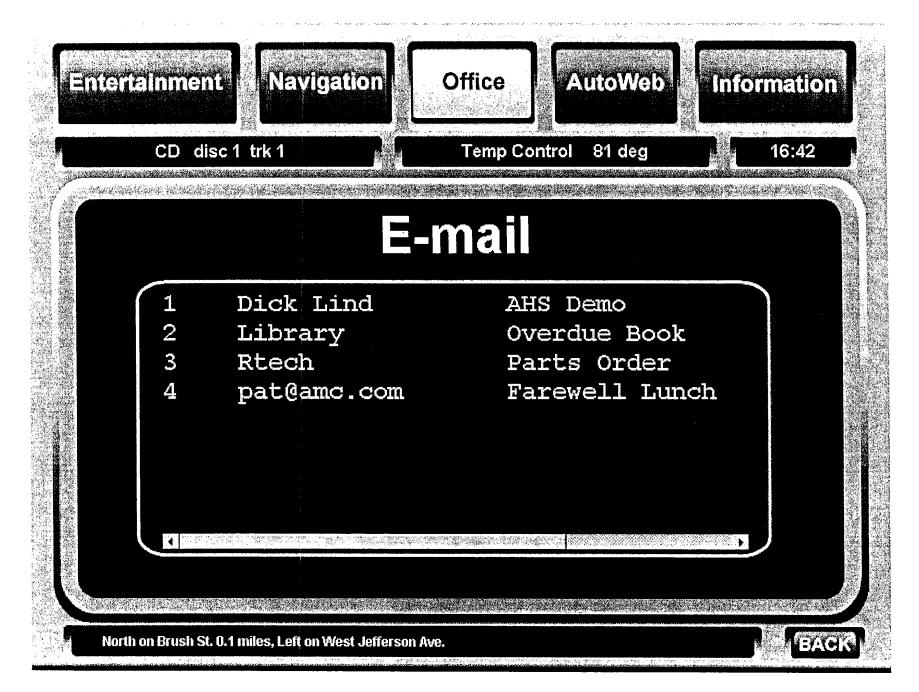


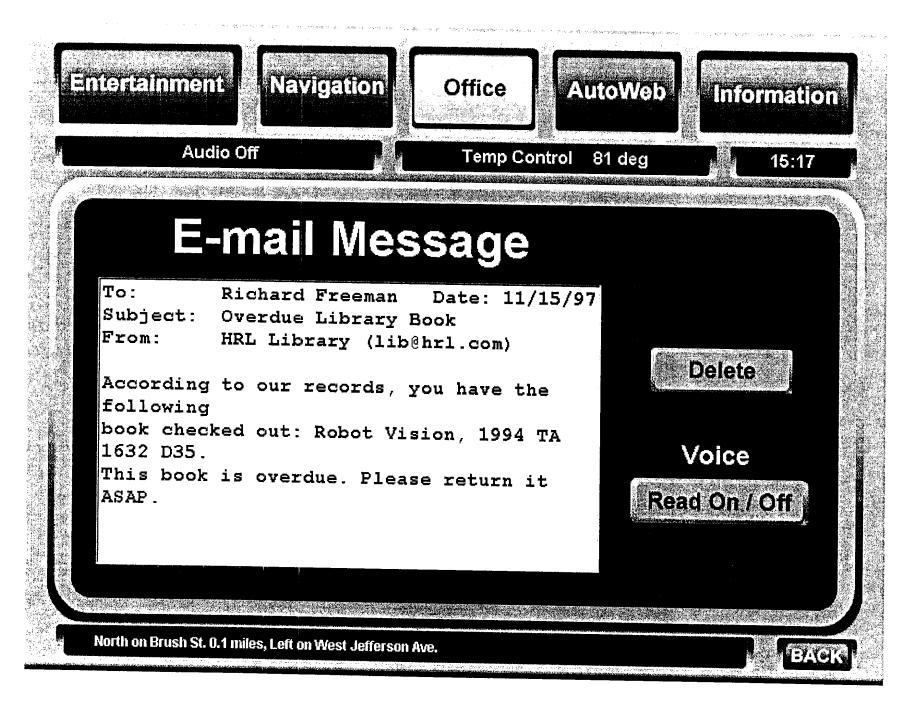


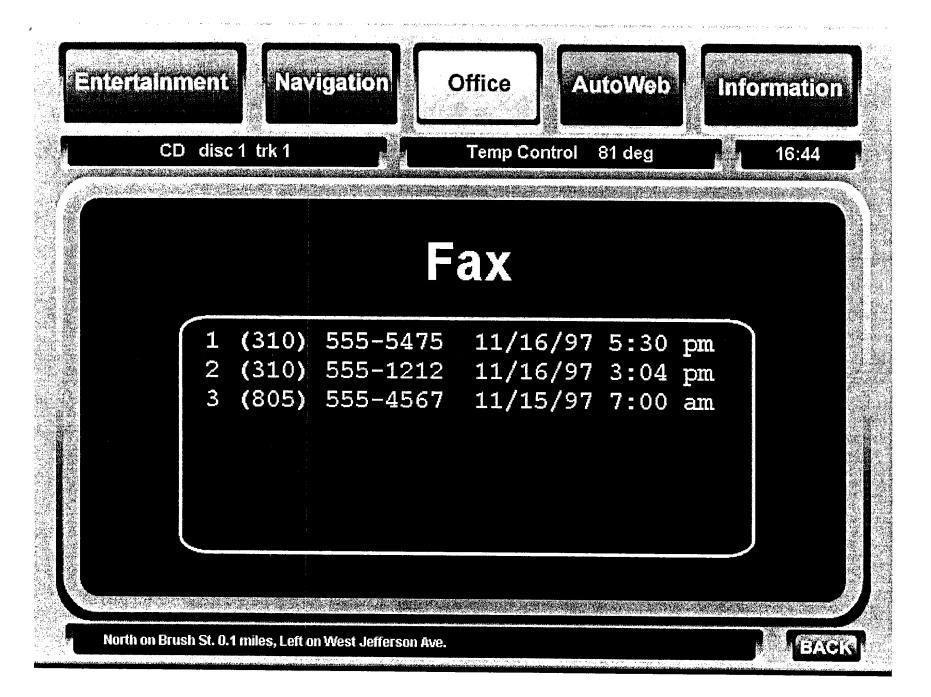


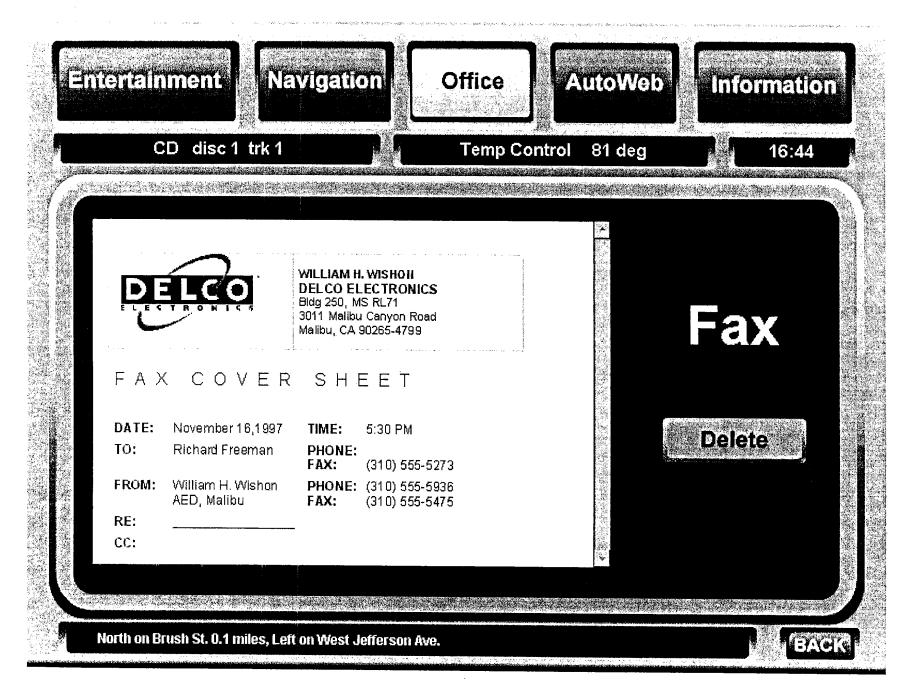


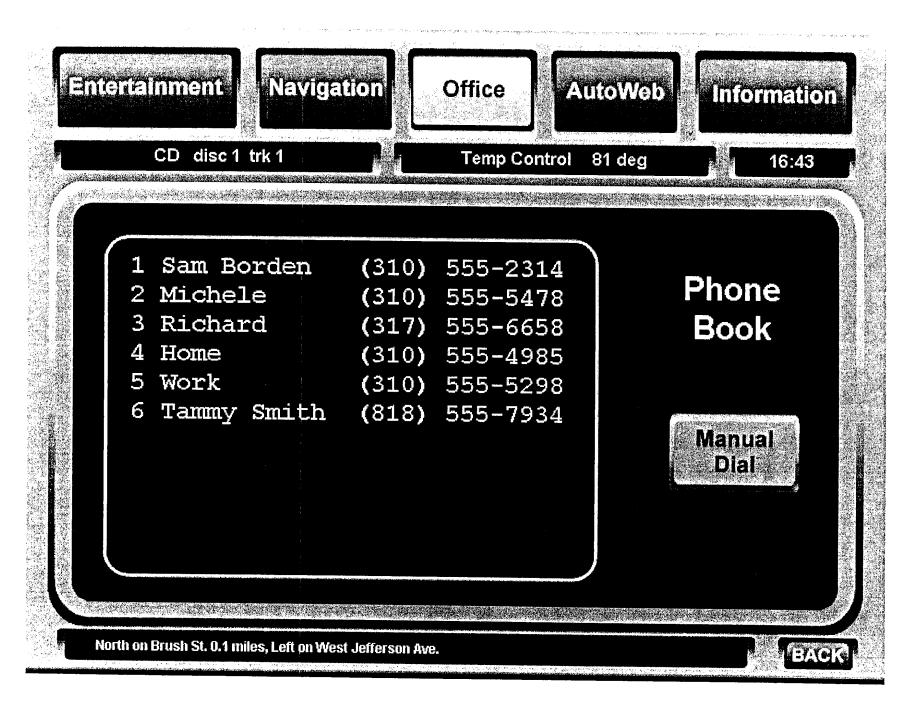


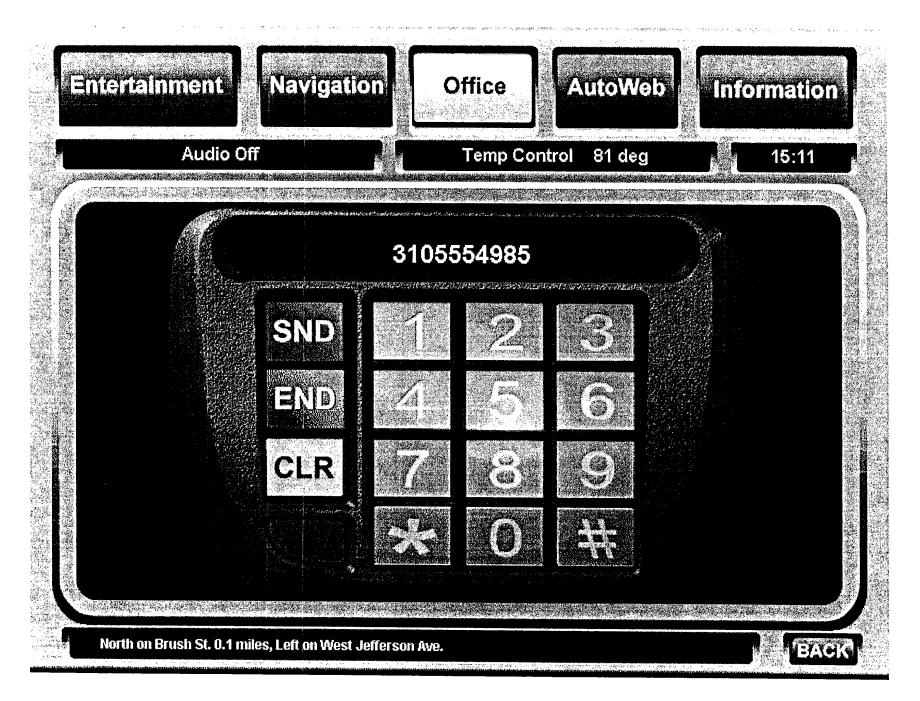


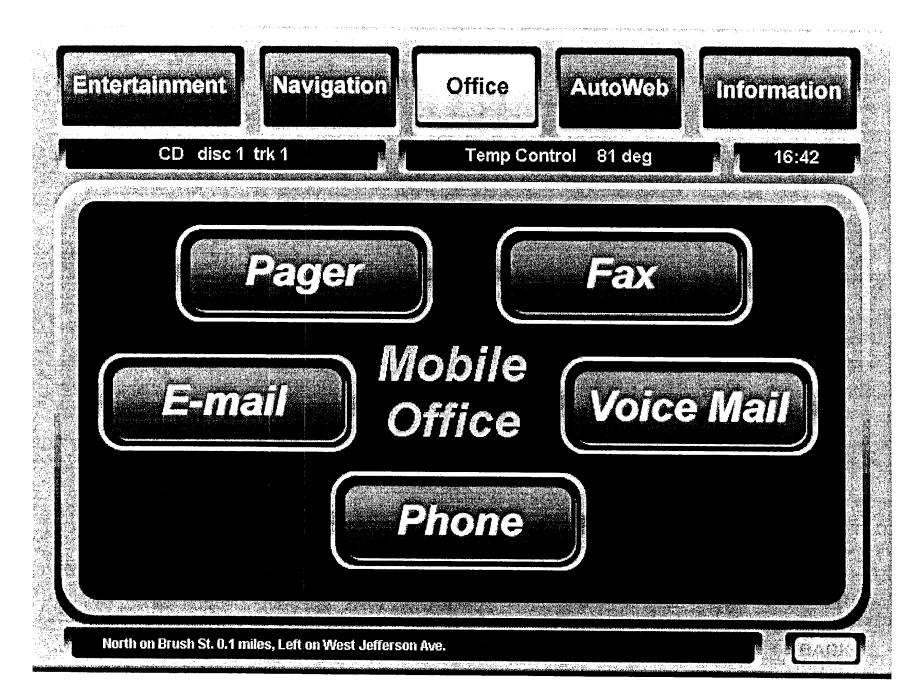












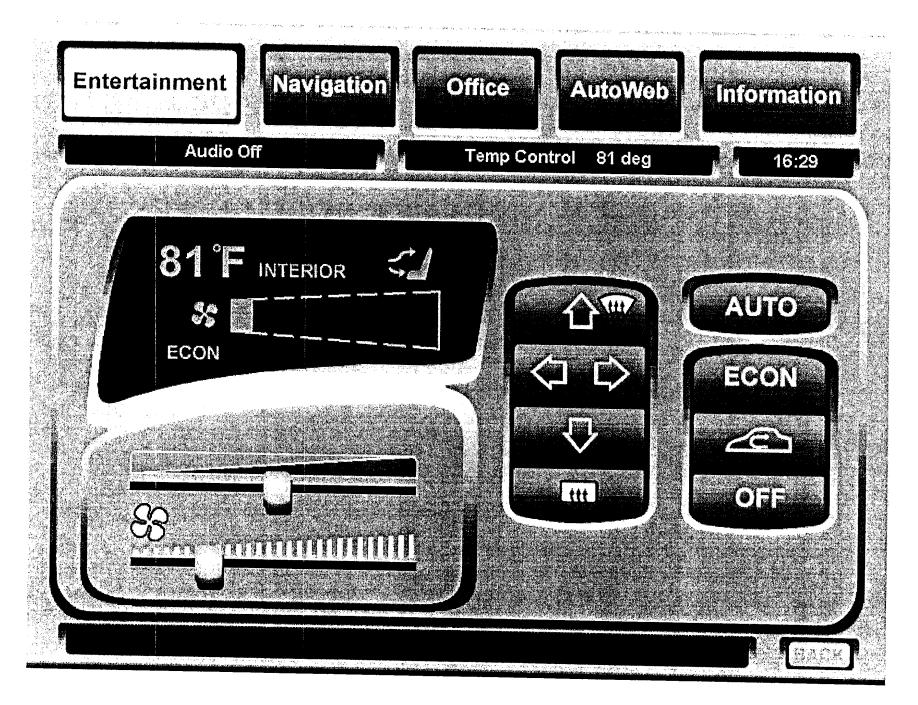


EXHIBIT C

REUTERS AG

Monday, 22 April 1996 15:58:11

S.2

3:45 P.M. Apr 22 VW <VOWG.F> is working on a multimedia car

Hanover(Reuter) - Engineers of the Volkswagen company are working on a multimedia car. In addition to the traffic radio that today is considered standard equipment already, the vehicle, which is filled with high-tech components, will be fitted with CD player, video recorder, telephone, navigation system, a notebook computer, as well as external cameras, according to the manager of Electronic Research, Ralf Bergholz, speaking on Monday at the Hanover fair. The Wolfsburg company presented an "infotainment car" based on a "Sharan" at the trade show, which is equipped with monitors for the front seat passenger and the rear seats.

Each passenger was said to be able to select an individual program in the vehicle and listen to it with headphones. Available as image sources are a TV receiver, a video recorder, a CD player as well as a PC with Internet connection. Only the driver is prevented from watching TV, for reasons of safety. Instead, an on-board computer informs him about vehicle data such as the gas level, speed, or the engine's rotational speed. If desired, a navigation system may be displayed on the screen instead of the engine speed. Two cameras in each bumper also make it easier to park in small parking spaces.\

According to information from Bergholz, there are currently no specific plans for a market introduction of the multimedia car with the "feel of a living room". However, VW is assuming that such a vehicle could exist in certain market areas.

sei/fgc *For related news, double click: [DE][AUT] *For additional company news, double click: [VOWG.F] *For stock quotes and prices, double click: <VOWG.F>

Monday, April 22 1996 3:45:28 P.M. ENDS [nFJ2200797]



NG KARA GODATA

16:06

\$02

DECLARATION

I, Judith E. Taddeo, declare that I am well qualified as a translator of German to English and that I have carefully prepared the attached English language translation from the original document:

VW arbeitet an Multimedia-Auto

[VW is Working on A Multimedia Car]

written in German and that the attached translation is an accurate English version of such original to the best of my knowledge and belief.

I certify under penalty of perjury that the foregoing is true and correct.

Date: <u>9/22/2015</u> Signature <u>Mai7ll C. Coddes</u> Name <u>Judi7th E. TAJJFO</u>

REUTERS AG

Monday, 22 April 1996 15:58:11

S.2

15:45 22 Apr VW <VOWG.F> arbeitet an Multimedia-Auto

Hannover (Reuter) - Ingenieure des Volkswagen-Konzerns arbeiten an einem Multimedia-Auto. Das mit High-Tech vollgestopfte Gefährt solle über die bereits heute üblichen Verkehrsfunkradios hinaus mit CD-Player, Videorecorder, Telefon, Navigatonssystem, einem Notebook-Computer sowie Außenkameras ausgestattet sein, sagte der Leiter der VW-Elektronikforschung, Ralf Bergholz, am Montag auf der Hannover Messe. Die Wolfsburger präsentieren auf der Industrieschau ein "Infotainment Car" auf der Basis eines "Sharan", das mit Monitoren für den Beifahrer und die hinteren Sitzreihen ausgestattet ist.

In dem Fahrzeug könne jeder Passagier individuell ein Programm wählen und mit Kopfhörern abhören. Als Bildquellen stünden ein Fernsehempfänger, ein Videorecorder, ein CD-Player sowie ein PC mit Internetanschluß zur Verfügung. Nur dem Fahrer sei es aus Sicherheitsgründen verwehrt, dem Fernsehen zu frönen. Dafür werde er über einen Bordcomputer mit Fahrzeugdaten wie Tankinhalt, Geschwindigkeit oder Motordrehzahl informiert. Auf Wunsch könne statt der Drehzahl ein Navigationssystem eingeblendet werden. Jeweils zwei Kameras in den Stoßstangen erleichterten zudem das Einparken in engen Parklücken.

Nach Bergholz' Angaben gibt es bisher keine konkreten Pläne zur Markteinführung des multimedialen Autos mit dem "Ambiente eines Wohnzimmers". VW gehe allerdings davon aus, daß ein solches Gefährt in bestimmten Marktbereichen bestehen könne.

sei/fgc

* Für verwandte Nachrichten, Doppelklick auf: IDEIIAUTI

* Für weitere Firmenmeldungen, Doppelklick auf: [VOWG.F]

* Für Kurse und Preise, Doppelklick auf: <VOWG.F>

Monday, 22 April 1996 15:45:28 ENDS [nFJ2200797]



- 10 RIAI 073878

EXHIBIT D

Edited by: **Prof. Dr. Dieter Roller** Institut für Informatik Universität Stuttgart Chairman, ISATA Scientific Programme Committee. .

Published by: Automotive Automation Limited 32A Queen Street Croydon CR0 1SY England Tel: +44 181 681 3069 Telefax: +44 181 686 1490 E.Mail: 100270.1263@compuserve.com Website: http://www.isata.com

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IN-CAR COMPUTING AND COMMUNICATION ENABLES ENTERTAINMENT, PRODUCTIVITY AND INFORMATION

Mr JAltnether, Intel Corporation, USA

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Abstract: PC technology and applications continue to expand at an exponential rate. Many of these elements can be adapted to the automobile to provide new levels of entertainment, productivity and communication. In addition, new application requirements for the automobile such as navigation and real time traffic information are rapidly evolving. A system incorporating the Intel architecture provides the performance and flexibility to implement these functions. Examined in this paper are the architectural requirements and how they can be satisfied with the established Intel Architecture. Other factors, such as tools, and existing applications that can be utilised for quick development time and time-to-market will also be investigated.

Introduction: A number new applications and appliances are beginning to find their way into the automobile. Some of them are portable, allowing their use within the automobile. Each is a stand alone unit offering a dedicated service with little or no interaction with the other appliances. This not only limits the functionality but increases the cost because many of the functions are duplicated within each unit. For example, each usually has an embedded processor and a man-machine-interface such as a display.

The first is the cellular telephone. According to Datatquest, approximately 60 million cellular phones will be shipped in 1997 with a 22% CAGR. This is fueled by the decreasing costs of equipment and air time. In the beginning, standard personal cellular were used in the automobile. This provided both business and personal communication and is also used for emergency services. Currently cellular telephones are being integrated into the automobile with hands free operation. With services such as GSM, both voice and data can be transmitted, but few applications currently exist for digital data communication. This will change dramatically over the next few years.

Navigation systems are also beginning to be integrated into automobiles. Based on GPS technology many systems incorporate accelerometers or gyros to augment the accuracy of the GPS. In Europe alone this segment has grown at a 36% CAGR since 1993 (source: Dataquest). Navigation has two components: location and route planning. Location defines where the car is and establishes the beginning point for navigation. In addition, the location can be used as part of the safety component. Emergency road service would also require this information, as could the theft monitoring.

Today, route planning is static. This feature is available with a number of GPS system or navigation systems such as the "Never lost" system in Hertz rental automobiles. The assumption is that the stored information is current and no changes have occurred in the physical streets. If road construction closes a road and forces the automobile to deviate from the system's expected route, a new route will be recalculated usually through the same closed road. Real time information is required to eliminate this problem. Here is the beginning of integrating functionality. Information is received through the communication link. Real time traffic information is provided via one of the communication links. Information has a broader meaning than traffic information. Both voice 83

and data information are réquired. Voice for the normal human communications and messaging and data for a variety of functions: traffic information, internet access to find hotels, restaurants, travel guides and electronic forms of communication such as faxes. At another level, the data communication channel can be used by the automobile to schedule maintenance, perform remote diagnostics and receive software updates for various components.

Another application that is being incorporated within the automobile is entertainment capability. This in the form of games, movies and television. Systems by Clarion and Fujitsu Ten are already on the market. These are proving indispensable on long trips or to occupy children.

In vehicle applications are comprised of four segments: information, safety, infotainment and productivity. Information includes trip guidance, route planning, points of interest and congestion avoidance. Safety comprehends: emergency location, vehicle immobilization, operator identification, and weather information. Infotainment for the driver provides user delectable news and music on demand; while for the passenger there are PC games, movies, news and internet surfing. Productivity is provided by hands free phone, FAX/modem, voice and email messaging and personal itinerary.

Discussion: All of these applications and functions can be satisfied with a PC. Several environmental trends are validating this. First there is a decreasing cost for communication and computing. PCs that one year ago cost \$4000 now sell for \$2000 with twice the performance. Secondly, there is a universal acceptance of portable computing. This segment is growing faster than the desktop. Next, there is a convergence of computing and communication. All new PCs sold now contain a modem, cellular phone interface or a wire connection. Finally, the information services available via internet continues to accelerate. The cost, mobility, communication and portability of PCs can be effectively used in the automobile to meet the emerging requirements. The PC technology offers a number of reasons to be migrated into the automobile: established base easy to integrate existing hardware and software, existing hardware and software standards, existing relationship between home and office PCs, ever expanding market that can be followed for low cost advantage, and existing tools and development environment.

The PC began as a tool to enhance productivity in the office and business environment. Many of the application suites were developed to provide word processing, document control, financial analysis and inventory control. Made possible by the PC was distributed processing, which made the PC a tool of individuals increasing their productivity. This individual productivity was carried into the home both as a spill-over from work and because the home is a small business and can take advantage of the office applications. Because the PC is not 100% utilised at home, entertainment's such as games were a natural filler for this free time. Today a link exists between the home and office computers and the natural extension is into the automobile.

The automobile did not participate in the PG revolution because the applications required were different that those of the office and home environment and required higher performance and functionality. Also, the simultaneous operation of two machines (the automobile and the personal computer) that each required attention was thought of as a safety hazard. Personal computers and their software have advanced to a stage where they can meet the automotive requirements.

The advent and enthusiastic acceptance of the personal computer has enabled information on demand, both processed or communicated information. The populace has accepted this, and is recognizing the necessity for this functionality in the automobile. The automobile has been the last bastion of unstructured time. The necessity for these functions is becoming apparent in four types of applications which are evolving: navigation, information, entertainment and safety.

A number of valid reasons have kept the PC from entering the automobile environment, but the primary reasons were limited technology capability and lack of application software. The technology and software exists today to implement such a system. There are a number of compelling reasons to draw from the PC and adapt technology and software to the automobile both from the stand point of technology and business.

By today's standards the first Personal Computers were primitive machines. They were 8-bit machines operating at 5 Mhz providing .33 MIPS. By contrast today's machines are 32- or 64-bit machines operating at 200+ Mhz and execute 220 MIPS. What the early systems did was to provide were platform standards. An open architecture fueled a plethora of applications and hardware peripherals enhancements. Standards emerged providing a number of advantages: low risk for the manufacturer, increased market size and market growth.

At this point in time there are no standards for the "computer platform" in the automobile. Several are being discussed in committees such as ITS but have not been ratified. In the meantime, the market is ripening and could be ready before the standards. One method to safeguard investment is to embrace existing popular standards. The Personal Computer offers such a standard. In addition, there is an existing infrastructure of hardware and software to be applied.

The size of the PC market continues to grow at an 18-20% per anum rate with no reasons to abate. As shown in Figure 1, as of 1996 there are over 250 million PCs installed. As of 1996 there are 250 million PCs installed and over 65% of those are Pentium® processor based.

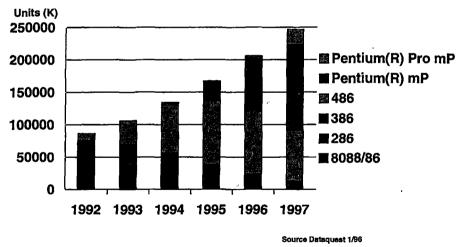


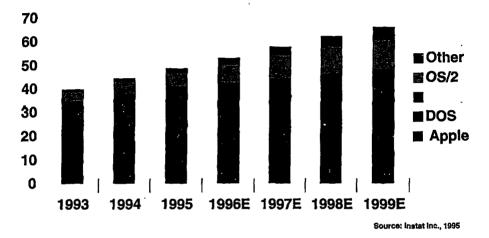
Figure 1. Installed PCs

Software too, advanced. The growth in personal computer performance is coupled to a correspondingly evolution in S/W and OS making them easy to use and efficient. The hardware and software exist in a constantly expanding upward spiral. Software pushes the hardware to its limits and new hardware is created to handle the increasing s/w requirements. Again, new s/w will stretch the limits of this new hardware on an ever upward spiral. In the beginning, what little software there was, had a clumsy man-machine interface (MMI). Often it required arcane commands to perform functions. Rather than requiring many hours to study manuals, hardware has become self-installing 85

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and programs are intuitive in their operation. Added to this is the capability to perform applications once thought of as exotic such as speech recognition, full motion video and high speed communications. As a result, the computers have moved from the domain of the highly skilled users to that of everyday unsophisticated users.

Here again, standards play an important role. Operating systems such as Microsoft Windows* 95 or NT are shipped with almost every PC. Any application that wants market acceptance or any peripheral expecting to be used, has the interface and drivers for this most popular operating system. As shown in Figure 2 this is the de facto standard and it runs on the Intel Architecture.



** Other brands and trademarks are the property of their respective owners includes Windows 3.1, Windows 95 and Windows NT

Figure 2 Operating systems

Because the PC has become a standard tool all development tools have been designed to run on the PC. This is true from Microsoft Developers Network to Psoft, to QNX to C and C++ compilers. Many of these tools have tracked the development of the PC and are very mature and stable. Another advantage of using the PC platform in the automobile is that the target is also the development platform, permitting native debugging.

The question then becomes, "How to integrate the PC to the automobile space?" To answer this, we must look at the automobile architecture. At present it is a multiprocessor distributed system on a bus such as CAN. To provide functions to the driver and the passengers, the PC functionality will; be distributed also. The GPS, radio, wireless communication, displays, and all of the MMI will be distributed throughout the automobile. The PC bus will be a separate bus to avoid any interference with the functions on the CAN bus. On the CAN bus, many dedicated processors perform their local functions such as ABS, engine control, etc. and communicate to the other components via the bus. All of the information here should be considered mission critical and not disturbed. The system operates in real time and must be deterministic. This precludes using this bus for the PC system in the car. There is however information on this bus that is of interest and a gateway should be provided. Information such as wheel speed and engine performance can be monitored as well as sending information to the devices on the CAN bus Attaching the peripherals to the PC platform and defining two bus structures, the system takes shape as in Figure 3. While the previous discussion mention two buses, this system provides for three: CAN/J1850, a USB for the PC peripherals and 1394 for high speed data transfers such as full motion video.

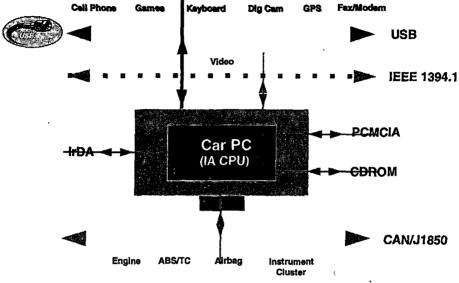


Figure 3. Connected CarPC Platform

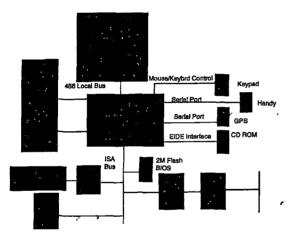
USB is selected because it has become a standard on PCs. USB propagates a 12M/s differential data stream over a shielded twisted pair. Many peripherals are USB ready. Windows 95 supports hot plug-and-play of peripherals. This permits using existing peripherals in the automobile. For example, if one of the children has a favorite joystick, it can be used at any station without rebooting the system to recognise the peripheral. Because Windows 95 recognises USB, most if not all application programs can be used. USB is also used to interface to the car environment such as seat sensors, window and door controls. Slow data, level signals, switches and lamps are best interfaced to microcontroller rather than tying up valuable processor resources. Each element of the automobile should be thought of as a module, for example the driver's door. Intel offers the 8x930Ax microcontroller that has USB capability. Thus, the door locks, door ajar sensor, window controls and sensors and even the mirror can be interfaced to the microcontroller and it interfaces to the processor via USB. Up to 256 such modules can be incorporated. The 1394 bus is included to provide future high speed transmissions. This will permit full motion video (for movies) to be displayed at all passenger stations.

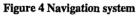
The PC platform is built around the Intel Architecture for technical reasons as well as the business reasons previously discussed. It provides continuous performance enhancements on a well defined road map. Each new generation offers greater that 2:1 performance enhancements. The product rich roadmap permits the platform architecture to be scaleable from low end price and performance to high end leading edge performance. Platforms can be scaled from i486® processor through Pentium processors up to the current generation Pentium Pro processor. This provides an order of magnitude range in the performance of systems. In addition, they bring with them complementary

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technology to further enhance the system performance. Two such examples are USB bus and MMXTM technology. MMX technology is a single instruction, multiple data operation. The latest version of the Pentium processor incorporated 57 new instructions to implement MMX technology. As a result, high performance digital signal processing is feasible on the Pentium processor. In the Connected CarPC environment, this could be used for image processing - MPEG2 decoding of movies, noise cancellation, soft communication devices to name a few uses.

This scalability of the architecture permits a range of systems for the automobile. As an example, three systems are shown: a navigation system, an internet system and a multimedia system. These systems are shown in Figures 4-6. The Navigation system is built around the Intel i486 processor and provides: position, navigation, vehicle control, audio entertainment. The Internet system uses a Pentium processor with MMX technology and provides: position, navigation, vehicle control and audio entertainment as does the navigation system but it also includes: speech recognition, communications. The Multimedia system provides all of the functionality of the Internet system but also adds: multimedia and games. This enhancement is due primarily to the salability of the processor that allows upgrading to a Pentium processor with MMX technology.





As can be seen in the two systems built around the Pentium processor, there is a large degree of commonality between the systems. The primary difference is in the performance and features of the Pentium processor. The Internet system uses a 133 MHz processor while the Multimedia system incorporates a 166 MHz Pentium Processor with MMX technology. Systems can easily be - differentiated on performance and features while retaining commonality over a family of systems.th This core platform can be expanded and extended in the future as more performance and features are required from the system. It is designed to follow the high volume PC components for upgradability and protection for legacy issues. The designer has the choice to incorporate higher speed Pentium processors as they become available or to incorporate the Pentium Processor.

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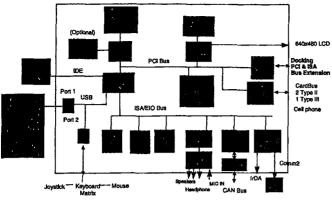
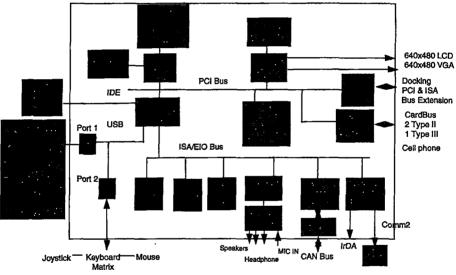


Figure 5 Internet system





Conclusion: In addition to the technical advantages, Intel Architecture provides a number of business advantages. These are quick time-to-market and low investment costs. Quick time to market is possible because the architecture is established and familiar. There are time proven, familiar, robust hardware and software packages available. Native debugging is accomplished on the PC. The solutions are low cost because they use the same high volume processors that are used in the desk top and laptop computers. PC peripheral components are widely available, eliminating the need to develop new peripherals. The tools are low cost and off-the shelf O/S and application software exist.

*Other brands and trademarks are the property of their respective owners.

EXHIBIT E

INTERNET MULTIMEDIA ON WHEELS: CONNECTING CARS TO CYBERSPACE

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Keywords: Mobile Communication, Road vehicles, Internet, and Multimedia systems

ABSTRACT

An integrated solution to seamless connectivity and innovative in-trip services is being researched at the Daimler-Benz Research and Technology Center in Palo Alto. The Internet Multimedia on Wheels Concept Car has an onboard, integrated wireless communication system and the computing infrastructure to provide Internet connectivity from the car to any specific server on the Internet while stationary or in motion. Essentially, the car is like any other node on the Internet with a unique Internet Protocol (IP) address such as the Vehicle Identification Number (VIN). Thus, an entirely new type of services can be delivered to cars in an efficient and secure way through increasingly less expensive wireless data connectivity over the Internet.

INTRODUCTION

With the advancement of the computing and communications revolution, the Internet is becoming more and more part of our daily life. We send e-mail, check our bank account, read newspapers, and "surf" the net just for fun. New multimedia applications even allow us to listen to "Internet-Radio," watch "Internet TV," make phone calls, and do videoconferencing over the Internet. By contrast, this communications revolution has yet to reach the automobile. Drivers and passengers in cars typically enjoy access only to radio broadcasts and occasionally television. To reduce the unproductive driving time, people use their cellphone for voice communication. Moreover, today information cannot be personalized or adapted to the driver's and passenger's needs. The challenge is to provide the Internet's multimedia capability in the automobile with varying and limited environment bandwidth, thereby, enable a whole new class of services to and from the car.

At the same time, there is a strong effort in the Intelligent Transportation Systems (ITS) community to stimulate research and industry to build an infrastructure which will lead to better traffic and transit resources management and enhanced safety. From cost and reusability perspectives, it is necessary that a single infrastructure provides most of the functionality building a separate instead of system infrastructure for each service. Internet has the potential to be such an infrastructure. The car is essentially a probe in this model collecting and sending data to service centers, which in case of future navigation systems will be used for building dynamic real-time traffic models that would be used for on-demand route guidance by individual vehicles.

VISION

First we define the term "Internet Car":

An Internet Car is one which is like any other node on the Internet. Although it is highly mobile, it uses standard TCP/IP protocols to communicate with the other nodes on the Internet. An Internet car can be an Internet client as well as an Internet server. The car in essence becomes an open platform for services to be delivered over the Internet.

Some scenarios where the Internet car would be useful for drivers and passengers are:

- Services from Internet service providers e.g. safety, security, news, stock, city guide, navigation, email, and movies.
- Seamless access to office or home computer from the car.
- Personal devices (smart cards, HPCs) can be used to personalize car seats, climate, phone numbers, Internet services bookmarks, and computing man machine interface.
- Interactive audio/video games over the Internet for passengers.
- Personalized Internet based services e.g. "my" commute traffic information.

- Geo-specific information access on demand e.g. "nearest" Chinese restaurant.
- Internet based roadside assistance and remote diagnostics.

It is an open question what impact Internet content will have on the car, but it is our belief that ultimately it will be used to optimize the safety and security of the car along with comfort and convenience. Figure 1 illustrates a systems view of the Internet Multimedia on Wheels concept including a number of components that may be included in a full implementation.

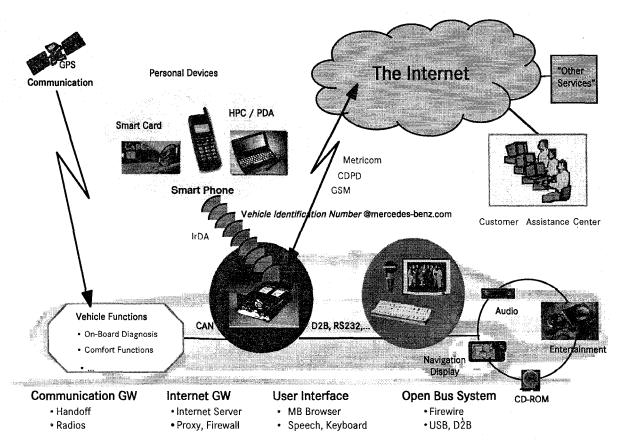


Figure 1: A systems view of the Internet Multimedia on Wheels concept.

There are a number of ways to bring the Internet connectivity and content into a car. These methods differ widely in terms of functionality, connectivity, in-car infrastructure and system requirements. The strength of connectivity to the Internet may range from a fully connected model where data and services are available all the time down to a disconnected model which requires the drivers/passengers to bring Internet data on a storage media with them.

MAJOR CHALLENGES

An overarching challenge for connecting cars to the Internet is to define a system architecture with flexible distribution of computing power and communication between the automobiles and the infrastructure. The answer may be as simple as the cost of wireless communication. At one end, the car may only have the input/output devices and a modem to request and receive information. On the other hand, the car may have state-of-the-art computing power with on-board storage media to receive raw data, and to process it. Clearly, the form of the final architecture will depend on costs and business models. In all cases it will always be necessary to maintain the integrity, security, reliability and speed of communication.

Wireless communication is expensive and the bandwidth is quite restrictive for applications requiring transfer of other than a few hundred bytes of text data. There are a number of wireless service providers using different flavors of communication protocols and bandwidth to support the Internet protocol e.g., the frequency hopping spread spectrum Ricochet network, Cellular Digital Packet Data (CDPD), and Personal Communication Services (PCS). The challenge is to provide the basic infrastructure that can provide national or global coverage without employing a whole array of modems.

The presence of multimedia information in a moving vehicle can be a potential hazard to safety of the car. It is essential that the software architecture is open for development of new services and benefits from being easily adaptable to new and evolving Internet technologies. At the same time a metric that will define what services are deliverable to drivers under what mobility conditions, and which services can be used by passengers should be established to optimize the safety in the car.

BENEFITS

Automobile access to the Internet opens up a wide range of new opportunities for drivers, passengers, and customer assistance centers. It also increases the security and safety of the car. The quality of travel can be improved by personalized route plans delivered to the car with up to the minute road and traffic information.

Drivers will be able to access their voice-mail, email, and travel-related information such as restaurant guides and movie theater locations. The driver will have access to these services in a hands-free, eyes-free manner through voice commands and speech technology.

Passengers can additionally access richer interactive applications such as on-board or Internet games, audio-on-demand, and web surfing. They can access information about cities and historical places during a drive as they pass them.

Drivers and passengers can also use their personal devices like Smart Phones, Personal Digital Assistants (PDAs), Hand-held PCs (HPCs), etc., in an integrated fashion. Also, by integrating GPS and mapping technologies, the Internet car becomes "location aware" which will be used for a new class of services that will go well beyond classical navigation.

For the customer assistance centers that currently rely on a "telephony-based" service, the Internet car will provide a richer "datacentric" multimedia environment to deliver new services including operator's help manuals and intelligent roadside travel assistance. For these new services, user interfaces will be designed that allow easy and safe handling of the interactive media.

By grounding the concept and architecture of information technology for a car around the Internet and open standards, the Internet car can take full advantage of the tidal wave of Internet based services, technologies, and devices for many years to come, thereby transforming driving and riding into a completely new experience.

MOBILE SYSTEMS DESIGN

Inherently, the design of a system to provide access to Internet from cars must take into account the mobility aspect. Mobility in the system needs to be handled at two places. First, at the point of attachment (for example, at home or office), and secondly, during the time of travel. There are standardization efforts in this area already in the Internet community such as the Mobile IP proposal [1,2] along with the IPv6 proposal to Internet Engineering Task Force (IETF). In summary, Mobile IP assigns temporary care-off addresses to visiting hosts and directs Internet packets addressed to them at the home location to be forwarded to the point of attachment when a mobile (in this case the car) moves from one subnet to another.

Networking may be carried out using a variety of wireless technologies. Metricom, CDPD and Satellite based systems are the most attractive technologies in the US for connectivity to the Internet from the road. The 19.2 kbit/s bandwidth, CDPD wireless data service is already available in nearly 80 cities and may be used in conjunction with Circuit Switched CDPD to provide national coverage. Code Division Multiple Access (CDMA) is still being tested as a viable alternative for wireless Internet access. For short range data transaction, high bandwidth is typically the primary requirement. WaveLAN, IR or RF based solutions are most appropriate here. Finally, the new Java based smart card technologies will link personal information to cars. They will, in essence, provide a new way to communicate the identity of drivers/occupants to the car in an unobtrusive manner over the Internet. This information may then be used by the car to provide personalization of the seat position, climate, user interface in the car. The ramifications of such personalization features would include improved safety while driving, because mundane information for access to information services can be individually filtered out.

Internet communication is based on standard TCP/IP stack. However, TCP [3] does not have any special provisions to work over wireless connections. It's congestion control algorithm assumes that a time-out in transmission is due to congestion but not to the loss of a packet. So, when a timer goes off, TCP slows down and sends less packets to avoid the congestion. In wireless networks it is very likely that the timer went off because of the loss of the packet, so the proper way to deal with this problem would be to send the packet again as soon as possible. Currently there are two major ways to improve the performance of TCP over wireless [7]:

- Indirect TCP [4] splits the TCP connection into two separate connections. The first connection goes from the sender to the base station and the second from base to mobile station over the wireless link. The drawback of this scheme is that the semantics of TCP as an end-to-end protocol are hurt. The base station acknowledges (Ack) each received packet in the usual way but this is no guarantee for the sender that the packet has reached the receiver.
- Snooping Agents [5,6]. The basic idea behind this agent is that it observes and caches TCP segments going out to the mobile host and Acks coming back from it. Therefore, it sits in the link layer of the base station. When it sees a packet going out to the mobile host but sees no Ack coming back in a relatively short time, it just retransmits the packet without telling the source sender that it is doing so. When it sees a duplicate Ack from the mobile host going by, it also generates a retransmission meaning that the mobile host has missed something. The duplicate Acks are discarded to avoid a source of misinterpretation by the sender as being a sign of congestion. One drawback of this solution is that the system is implicitly aware that TCP is used as the transport protocol. Also, when the link is very lossy, it will run into the same problems as without the system. This can be fixed by a selective repeat mechanism which is applied when the base station notices a gap in the inbound sequence numbers. It requests a selective repeat of the missing bytes using a TCP option. The findings in [6] strongly suggest that such a TCP aware link layer algorithm improves the throughput and the goodput over wireless links substantially without compromising the end-to-end semantics of TCP.

Our research would focus on the questions, whether the snoop agent can be placed anywhere in the network and how this would change the performance of snooping.

IMPLEMENTATION

In the first implementation of the Internet Multimedia on Wheels concept, we have designed multimedia units for two different zones with the user interfaces as shown in the following figures. In these units, there is a color screen, channel select buttons, IrDA (Infrared) transceiver to support hand-held devices, and an audio outlet.

The access to applications is different in these two zones. The driver and the navigator have access to a single multimedia unit in the front (Figure 2), and the passengers in the back seat have access to individual multimedia units (Figure 3). The applications in the front zone are more traffic and navigation driven. In the rear zone, there is access to navigation, office applications, interactive games, and infotainment.

The driver has access to the navigation system and local or Internet based services. He will be able to use voice commands to access these services from the Internet.

The passengers in the rear can enjoy a richer multimedia environment on their multimedia sets for navigation, games, stereo, or Internet access. The built-in IrDA transceivers will allow HPCs/PDAs to interact with the systems in the car.

In addition, the hand-rest in the driver's zone has a slot for a personal device to enable the driver to bring in personal preferences to the car.

TODAY'S RESEARCH SCENARIOS

Drivers and passengers will use the Internet car for both fun and productivity. The Internet based navigation unit will plan a route which takes into account real-time traffic information and traffic history. Drivers will access news, voice mail, email, stock quotes, weather information all through a hands-free, eyes-free audio interface. Co-passengers will access rich multimedia information from various domains as infotainment, office work, such and entertainment. The car will empower the driver and passengers to choose the way they would like to spend their time from a large selection of options and services.

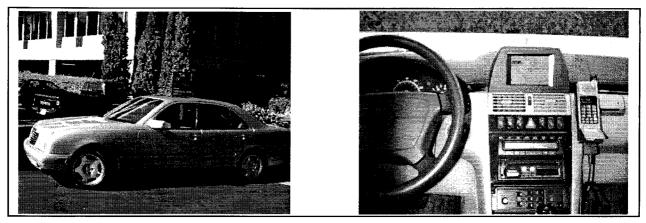


Figure 2: The E 420 Internet Multimedia on Wheels Concept Car and the front multimedia zone.



Figure 3: The rear passengers multimedia units with screens, channel selectors for games, computer, navigation, IrDA and Audio outlets

Furthermore, safety and security will be enhanced because Customer Assistance Centers will be always connected to the car. Services such as remote door unlocking, warning for bad road conditions, weather, accidents, and remote diagnostics, will add to the safety and security of cars.

THE FUTURE

Having an Internet address, the car becomes an integral part of cyberspace. Not only can

passengers request information but also fleet owners and customer assistance centers can request information from the car or even modify the car's behavior. This ultimately leads to a network-centric solution where the car can be continuously monitored, and where in essence every Electronic Control Unit (ECU) will be addressable through the Internet protocols. In fact, the very concept turns every car into a probe with vast implications for traffic guidance and control. It will be possible to analyze driving habits and optimize engine performance. Customer assistance technicians can download code to the vehicle to perform diagnostic tasks or upgrade the software version.

ECU's can use external data from the infrastructure to adapt in an optimal way to weather conditions, road conditions, and traffic to provide new safety services.

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EXHIBIT F



Web on Wheels: Toward Internet-Enabled Cars

An open system that conforms to standard Internet protocols for communication to and from automobiles could greatly enhance driving. Existing Internet resources can be leveraged to integrate a car into the Internet. Service providers will subsequently produce innovative services for drivers and passengers that will improve safety and security as well as provide infotainment.

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he services provided to customers through the Internet can be extended to the automobile. Early versions of Internet-enabled cars might hit the road in five years or less. Portions of the technology could be available to customers in as little as two years as an after-sales solution. Indeed, such integration could become essential, given the constant access to information our just-in-time world seems to require. Integration could also be two-way: Your car might also provide information to the Internet for the purposes of remote diagnostics, among other things. Unlike the portable method of accessing the Internet with a laptop computer, an Internet-integrated vehicle is truly mobile. Mobility serves as both a challenge and a distinguishing factor in the design of our communication and service architecture.

With the advancement of the Global Positioning System (GPS) and other position-tracking technologies, *location awareness* emerges as a distinctive characteristic of combining mobile computing and automobiles. This knowledge will be used to build communication and service architectures. For example, a service could provide information about the nearest gas station or restaurant.

A safe and easy-to-use human interface for drivers and passengers must be designed to bring Internetbased services to moving vehicles. For example, an email service must not require that drivers take their eyes off the road. We employ various alternatives, such as speech-based technologies, to address safety concerns.

SCENARIOS

Our overall goal is to provide "telematik" (telecommunications and computer science) services to drivers and passengers. What types of services are interesting to our customers and how we serve them are open questions. The Internet appears to be the most appropriate infrastructure through which to conduct car-based services.

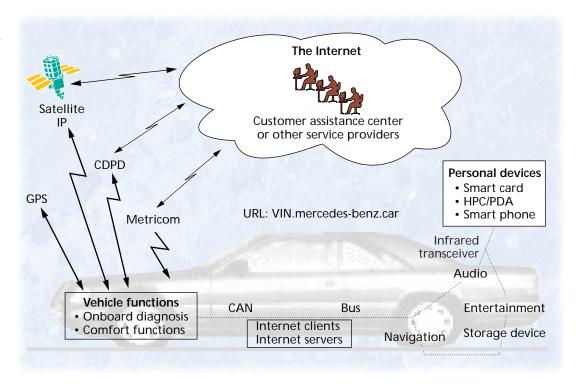
Services range from the obvious to the innovative, and include the following:

- Integration of personal data to the car using personal devices such as smart cards and handheld personal computers.
- Interactive audio and video games for passengers.
- Personalized services on demand, for example, personalized commuting information.
- Location-based information on demand, for example, the nearest Chinese restaurant.
- Seamless access to office or home computers.
- · Roadside assistance and remote diagnostics.

These services can be grouped as generic and location based. Generic services, for example, real-time stock quotes, are not directly car-related but are of interest to drivers and passengers. In general, the infrastructure for such services can be supported in the same way as a desktop environment.

Location-based services directly relate to the car-driving experience. Because the car moves, its location changes and thus brings new demands for services: Where is the nearest gas station? Location-based services are possible because a car's position can be known at all times with current GPS technology.

An Internet car is similar to any other node on the Internet. Although highly mobile, an Internet car can use the standard transmission-control protocol/ Internet protocol (TCP/IP) to communicate with other nodes on the Internet. The Internet car can be a client and a server, and in essence becomes an open platform for services to be delivered over the Internet. Figure 1. The Interneton-wheels concept car integrates a mobile vehicle with services available on the Internet.



CHALLENGES

The design of Internet access for automobiles involves three major issues: mobile wireless communications, system architecture, and user interface design.

Mobile wireless communications

Networking requires a variety of wireless technologies.

In a local area, infrared (IR) and radio frequency (RF) technologies generally provide high-speed wireless access of several megabits per second at relatively small or no cost.

At the metropolitan level, technologies such as Metricom's Ricochet network are capable of access speeds of tens of kilobits per second with a flat monthly fee.

For a wide area, cellular digital packet data (CDPD) and emerging standards, such as the General Packet Radio System (GPRS), achieve speeds of about 10 kilobits per second at a higher cost. Furthermore, a plethora of new satellite-based systems are proposed. When realized, these satellite systems will deliver globally from a few kilobits per second up to one megabit per second at a premium. Of course, when all else fails, the wireless modem over the Advanced Mobile Phone System (AMPS) cellular system is still available.

These technologies provide the basic infrastructure for maintaining access to and from a vehicle. The main challenge lies in selecting the appropriate technology according to such factors as cost, performance, and availability.

System architecture

In connecting cars to the Internet, a system architecture must provide a flexible distribution of computing power and communication between the automobile and the infrastructure. Basically, a car could be treated as either a thin or thick client. Cars with only input/output devices and a modem to request and receive information are thin clients; cars with stateof-the-art computing power and onboard storage media to receive raw data and to process it are thick clients. The key factor influencing this overall architectural choice is the cost of wireless communication.

The form of the final architecture will be determined by technologies and business models. In any case, the integrity, security, reliability, and speed of communication must be maintained. The software architecture should also allow for the development of new services and benefits that adapt easily to new and evolving Internet technologies.

User interface

Introducing multimedia information in a moving vehicle creates a potential hazard. A human interface both safe and convenient while mobile at vehicular speeds significantly challenges the utility of services to be delivered over the Internet to drivers. The requirements for a safe human interface also have a drastic impact on the design of services for vehicles.

SYSTEM DESIGN

The initial intent of the project was to design a system to meet the challenges of wireless communication and the issues relating to a user interface in a car. At the same time, the growth of the Internet and the Web brought to the fore a new way of network computing. The design that emerged from these factors led to the concept of total integration of vehicle functions, personal data, position awareness, seamless access, and Internet-based services. Figure 1 shows this concept, which we call Internet-on-wheels.

Our system design has three major components: the communication layer, the service infrastructure, and the user interface. The reliability, security, performance, and scalability of the system are also essential aspects of our design but are beyond the scope of our discussion here.

Communication layer

The communication layer must be both open and convenient:

- Openness. In today's networking world, TCP/IP is the de facto standard for communication. Most applications use TCP/IP for communication, and many resources and services available on networks are accessible through TCP/IP, including the Web. It therefore must be used in any open networking solution. TCP/IP enables the use of many of today's existing applications, provides access to numerous resources, and encourages new service development. Furthermore, it does not make sense to require the current servers on the Internet to change their software or hardware.
- Convenience. Many wireless data communication technologies exist and more are coming. We need to support these technologies without additional burden. First, we need to work with the availability of a technology in a particular geographical region. Second, customers should not have to change the technology they currently use. For example, a user might be a Global Standard for Mobile Communications (GSM) subscriber, in which case the GSM handset should plug into the user's car to enable communication through the GSM network. To provide connectivity anywhere and to account for the coverage of different technologies, one wireless network should be able to hand off to another. We cannot expect a customer to have the technical understanding to manage the handoff, nor can we expect a driver to have the time or attention to deal with such details. Furthermore, a constant identity needs to be maintained. Therefore, the necessary handoff among various wireless networks must be seamless and transparent.

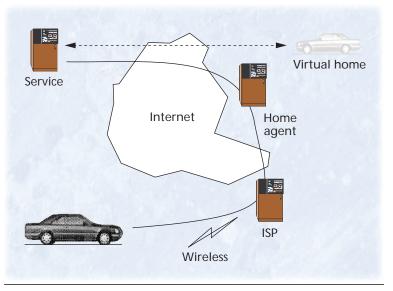


Figure 2. A typical Mobile IP communication network has a virtual home address.

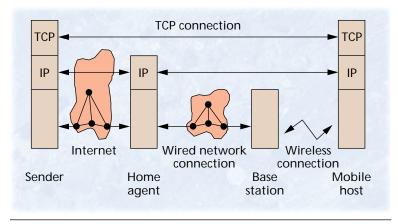


Figure 3. The basic Mobile IP architecture seamlessly hands off among interfaces.

We omit performance as a basic requirement of the communication layer. Although we want as much networking performance as possible, our ability to provide this in the communication layer is limited by available technologies and wireless service providers. So we try to provide an architecture that supports as many existing or emerging wireless technologies as possible, but we cannot dictate the performance of those wireless channels directly. Therefore, the application design should adapt to the communication layer's capabilities rather than the other way around. Of course, we will try to improve the networking performance as much as possible in our capacity.

Basic communication architecture. With augmented handoff support, the Mobile IP's capability of maintaining the same identity over various network access points provides a natural solution.¹²Mobile IP supports

Services for an Internet car are bidirectional. In the more common services, the car acts as a client and the service infrastructure supports such services. a seamless handoff among multiple wireless interfaces in a manner that is transparent to the higher layers.

Figures 2 and 3 show the workings of the proposed Mobile IP. As Figure 2 shows, the vehicle has a virtual home IP address. Any service provider or corresponding host would always see the vehicle at that IP address, which is connected to the Internet at large via a home agent.

The vehicle connects through a particular wireless network and an Internet service provider (ISP) and uses an IP address issued by the ISP. The vehicle registers its current address with a stationary host known as its *home agent*. In communicating with a service provider, the incoming IP traffic from the service provider

would be intercepted by the home agent and forwarded to the current address of the vehicle. Likewise, all traffic to the service provider would be sent to the home agent before being forwarded to the service provider.

In the event of a handoff from one wireless network or ISP to another, the actual IP address of the vehicle changes. Such a change would be reported to the home agent, and all subsequent IP traffic would be routed to the vehicle at the new address. None of these activities is visible from the applications that use the communication layer.

Communication performance. Two issues affect performance in this environment: TCP performance over wireless links and the handoff from one wireless network provider to another.

TCP³ was designed to work for the wire-line-based Internet, which rarely creates errors in the transmission of IP packets. In such an environment, TCP assumes that failure to receive a packet results from congestion. In the event of a packet loss, TCP slows and sends fewer packets to lessen the congestion. Such an algorithm works well in the wire-line network, but not so well over the wireless link. However, when a TCP connection includes a wireless link, packet loss is far more likely to be caused by errors in a wireless channel. Consequently, TCP data should be sent faster, not slower.

The networking research community has done much to improve performance over lossy wireless links. In general, the proposed solutions fall into three groups:

- An end-to-end connection is intended to improve TCP performance relative to that of wireless communication.
- A split TCP connection divides a TCP connection into two end-to-end parts.
- The reliable link layer has some knowledge of the TCP.⁴

The end-to-end and link-layer solutions work com-

paratively well. However, any end-to-end solution requires changes at the TCP layers of both the sender and the receiver. All servers on the Internet that our customers might contact cannot be expected to upgrade their TCP software, leaving the link-layer solution as the most feasible measure for improving TCP performance.

One link-layer solution employs a *snooping agent*.⁵ A snooping-agent observes and caches the TCP packets going out to the mobile host on the wireless link. When the agent senses that some packets are lost (by monitoring the acknowledgment packets coming back from the mobile host), it retransmits the cached TCP packets. In this way, the snooping agent effectively prevents the effect of packet loss on the wireless link from being propagated to the TCP sender and triggering a TCP slowdown.

The snooping-agent method works well in a wireless local area network (LAN), in which the snooping agent sits in the wireless base station. For wireless wide area networks (WANs), the snooping agent must be placed a little further away from the wireless link. The logical location would be that of the home agent through which all traffic goes. Our research will focus on the snooping agent's impact on performance relative to its distance from the vehicle.

The issues concerning handoffs and their effect on communication performance are twofold. First, handoffs exist among cells in a wireless network infrastructure. Although transparent to the mobile host, the handoff's impact on the communication layer performance is unclear. Second, the handoff from one wireless network provider to another has a much larger effect. During the change of an actual IP address, the registering of the change to the home agent, and finally the rerouting of traffic to reflect the change, some IP packets might be lost.

The impact of such a handoff could be lessened by holding onto the existing wireless connection and simultaneously routing the same packets to the new address as well as the existing one. With the new connection fully operational, the previous connection closes. The vehicle has the advantage of knowing where it is and where it is going to be and at what time.

Combining such information with the knowledge of where the coverage of a wireless network begins and ends, a new connection can be preestablished before the current connection runs out of coverage. Such information might be cached by the vehicle through the experience of driving in a familiar region, for example, a daily commute from home to work, or it could be provided by service providers that measure and collect the coverage of various wireless data networks.

In-car network. Most of the automotive industry supports some types of bus architectures for control

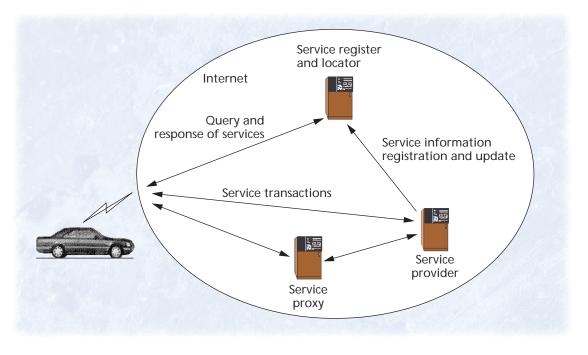


Figure 4. The service architecture design contains these highlevel components.

and data transmission. A bus system with bandwidth large enough to support multiple video and audio channels is needed to support the Internet-based multimedia information in the car. The Universal Serial Bus (USB), the IEEE 1394 standard Firewire, or the Intelligent Transportation System Data Bus (IDB-I and IDB-II) could be considered for such a task.

Multiple inputs and outputs—such as screens, control units, and audio channels—must be available for use by all occupants in a car without any interference with each other. This flexibility is relatively easily achieved for screens and control units, but it is harder to separate audio sources without using headphones.

Merging the in-car network with Internet communication services will provide an integrated internal and external environment for the occupants. A multimedia infrastructure in a vehicular environment challenges the design. The storage media is an essential component of an Internet information-based multimedia environment in a car. At a basic level, the media might be just a cache or simply a readable media such as the minidisc or digital video disc, but the ultimate solution will be a hard-disk-like unit for storing large amounts of data that can be dynamically changed.

Docking of personal devices has wide acceptance in the personal computing arena. People will likely use devices such as smart phones, smart cards, and personal digital assistants (PDAs) to integrate with the car's multimedia system. These devices might also be a means through which to exchange personal information between the occupants and the car for seat adjustment, climate, and computer interface.

Service infrastructure

Services for an Internet car are bidirectional. In the more common services, the car acts as a client and the service infrastructure supports such services.

Service infrastructure functions. The service infra-

structure has four main functions: It must search for service providers, manage the user profile, deliver the service, and use the service. Here we will not discuss issues like billing and so on.

A location-indexed database is necessary if the car occupants are to easily search geographical locationbased services. The database must contain things like service providers, Web pages, and other information, indexed by the relevant geographical area. The vehicle's location determines the scope of the search.

A service profile specifies what and how services will be delivered to the customers in an Internet car. The service infrastructure provides storage and management of a customer's service profile.

After selecting a service provider, the communication layer offers data transport functions. However, the ability of the devices in the car to use the service content must be determined. For example, large images of a Web page cannot be displayed on a tiny PDA screen. Service delivery also needs to adapt to wireless link capabilities. A service proxy works well in such a situation.⁶ By doing data transformation at the well-connected side of the Internet, the data load can be reduced and something easy to present can be created. By symmetry, a car-side proxy for the vehicle must act as a server in certain applications like remote diagnostics.⁷

The need to support ad hoc service types and service providers means that we need to support automated downloading, installation, and update of client software for future, unknown services.

Service architecture design. Figure 4 diagrams the high-level components in the service architecture.⁸ The service register and locator is essentially the location-indexed database. This database accepts and responds to queries from the vehicle for services and service providers. Once a customer finds a service provider, services can be requested and transactions begun. Such service transactions might go through a proxy.

Figure 5. The front multimedia zone of the Internet car is accessible to both the driver and the navigator.

Figure 6. The rear passengers have access to multimedia units that contain screens, channel selectors for games, a computer, navigation tools, infrared transceivers, and audio outlets.





Placement of the user profile and determination of the component responsible for the profile management must be determined. This is essentially the issue of how to distribute the intelligence in the system.

User interface design

There is no precedent for the user interface of a Web car. Obviously, there are safety issues involved in the placement of screens, hand control units, hands-free phones, and buttons.

User interfaces can range from a simple one-touch operation to a fully interactive audio and video experience. Clearly, the driver, navigator, and passengers have differing circumstances when the vehicle is parked or in motion. A taxonomy of the driver, navigator, and passengers with different human interface needs is a good starting point to understand the basic differences in the design of interfaces for these positions.⁹

Drivers might find a primarily speech-driven interface most suitable, whereas passengers and navigators can use a richer and more interactive interface. We expect that a conversational, dialogue-based speech system will be used in the future.

Large speech-recognition systems, especially those that support natural-language processing, are expen-

sive and difficult to support in cars. Therefore, a network-based solution makes sense. Such a solution is well suited to a dynamic, on-the-fly vocabulary, and conversational natural-language processing approach, and it is cheaper to maintain and upgrade. A hybrid between in-car recognition for the car controls and a network-based approach for external informationbased services would be ideal.

The type of user interface chosen will be closely tied with the nature and type of services that can be delivered to drivers and passengers. Mobility is no longer only driving the car but incorporates also the states of being at home, in the garage, on the road, and at the destination. A driver's *safety* depends on the state of *mobility*, the *time* available, and the driver's *goals*. We intend to define a metric on the basis of the relationship between these four human factors and the services that can be delivered to car drivers and passengers.⁹ This metric will be used to define user interfaces that are safe and match the measures used by Mercedes-Benz, the Society of Automotive Engineers, or similar established safety standards. See Figures 5 and 6.

The presentation and user interface architecture shown in Figure 7 assumes that content providers supply the data and the semantics to describe the architecture's structure. The presenter uses this information along with the user input and status information (vehicle speed, user being the driver or passenger) to render and deliver content to appropriate output devices.

CONCEPT DEMONSTRATION

In the first implementation of the Internet-on-wheels concept car, ¹⁰ we designed multimedia units for two different zones (*drivers* and *passengers*) with the user interfaces as shown in Figures 5 and 6. Each of these has a color screen, channel select buttons, an infrared transceiver to support handheld devices, and an audio outlet.

Access to applications differs in these two zones. The driver and the navigator have access to a single multimedia unit in the front (Figure 5), and the passengers in the back seat have access to individual multimedia units (Figure 6). The demonstrative applications in the front zone access information related to traffic and navigation. In the rear zone, access expands to include navigation tools, office applications, interactive games, and infotainment.

Drivers can access voice-mail, e-mail, and travelrelated information such as restaurant guides and movie theater locations. By integrating the GPS and mapping technologies, the Internet car becomes location-aware, which allows for a new class of services that go well beyond classical navigation. The driver will have access to these services in a hands-free, eyesfree manner through voice commands and speech technology. In addition, the armrest in the driver's zone has a slot for a personal device to enable the driver to bring in personal preferences.

Passengers can access richer interactive applications such as onboard or Internet games, audio-on-demand, and the Web. They can access information about cities

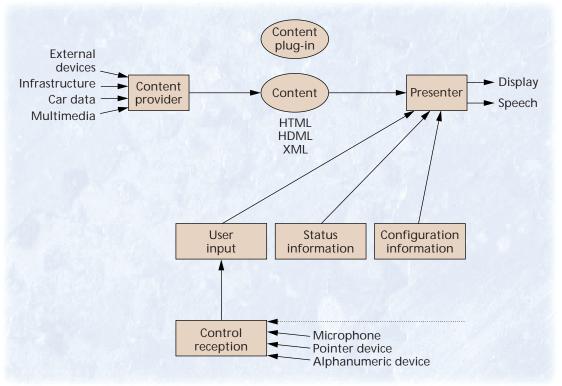


Figure 7. Content providers define the data and semantics for the presentation and user interface architecture.

and historical places during a drive as they pass them. Passengers can also enjoy an enhanced multimedia environment for navigation, stereo, or streaming audio and video. The built-in infrared transceivers will allow PDAs, handheld PCs (HPCs), and smart phones to interact with the systems in the car and the Internet. For these new services, user interfaces will allow easy and safe handling of the interactive media.

For the customer assistance centers that currently rely on telephony-based service, the Internet car provides an expanded datacentric multimedia environment to deliver new services, including operator's help manuals, intelligent roadside travel assistance, and remote diagnostics.

he intelligent transportation systems community intends to stimulate research and industry to build an infrastructure that will lead to better traffic and transit resource management and enhanced safety. From the perspectives of cost and reusability, a single infrastructure must provide most of the functionality as opposed to a separate infrastructure for each service. The Internet has the potential to be such an infrastructure. The car acts essentially as a probe in this model, collecting and sending data to service centers, which in future navigation systems will be used to build dynamic real-time traffic models for on-demand route guidance for individual vehicles.

The spectrum of service possibilities ranges from a highly integrated, PC-like environment to a fully autonomous network computer-like system. A safe and convenient human interface design will leverage the vast pool of potential services from the Internet for drivers and passengers. Our research aims to investigate and prototype future Internet-based services for cars. By grounding the concept and architecture of information technology for a car around the Internet and open standards, the Internet car can take full advantage of the tidal wave of Internet-based services, technologies, and devices for many years to come. ◆

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EXHIBIT G

The car as a mobile-media platform



by Kevin Jost, Associate Editor

Vehicle and computer technologies are merging as the automotive industry scrambles to provide consumers with PC functionality in their vehicles.

The average automobile user spends about seven hours per week of largely unproductive time behind the wheel. Automakers are looking at this as an opportunity, anticipating driver needs by providing information technology to extend the electronic environment of the home and office to the automobile. Industry engineers are designing systems that provide safe, affordable, and valuable information, communication, entertainment, and security features. However, their ability to do this is dependent on building the right hardware and software infrastructure.

One of the chief proponents of such offerings is Microsoft. In January, the company announced the Auto PC, the latest member of its PC Companion line of products powered by the Windows CE operating system. It brings the benefits of interactive speech technology, connectivity, information on demand, and enhanced entertainment to the automobile.

Microsoft's interactive-speech technology user interface enables the Auto PC to respond to oral commands and communicate information to drivers, allowing them to keep their hands on the wheel and eyes on the road. Microsoft expects the technology to become widely accepted as the primary way of interacting with automotive computing devices.

The Auto PC displayed by Microsoft is the size of a car stereo system, so it can be easily installed in the instrument panel. It provides drivers access to personal information and driving directions as well as wireless services such as e-mail, paging, and traffic alerts; a digital audio system; an AM/FM radio; and a CD player. PC Companion devices are designed to work together, so users can share information between their Auto PC and Handheld and Palm PCs.

The Auto PC platform is expandable and upgradeable. The latest example, version 2.0, allows a variety of third-party applications such as enhanced navigation, wireless data capabilities, cellular telephone integration, and vehicle diagnostics.

The list of automotive manufacturers, suppliers, and aftermarket electronics vendors supporting the Auto PC platform includes Alpine, Clarion Corp., Daewoo Telecom, Hyundai Electronics Industries Company, IAV GmbH, Infinity Systems, JBL, Magneti Marelli, MD-Co., Nissan Motor Corp. U.S.A., PSA Peugeot Citroen, Samsung Electronics Company, United Technologies Automotive, Visteon, and Volkswagen AG. The first units on the market are expected to be from electronic aftermarket companies in the second quarter of 1998.

Clarion to market first unit

Clarion Corp. of America is expected to be the first car audio manufacturer to bring the Auto PC platform to market this spring or summer (see sidebar). In early February, the Clarion AutoPC was showcased in an Infiniti concept car called the I30 Executive Luxury Special Edition (ELSE). The concept-car unit takes the core Windows CE 2.0 operating system and adds speech recognition, a car-stereosized visual interface, and other car-oriented features to create an information and entertainment device for the car.

The Clarion AutoPC fits within a car's instrument panel. It allows drivers to keep their eyes on the road and their hands on the wheel while receiving e-mail alerts, dialing a cell phone, navigating to a specific destination, locating a restaurant or hotel, accessing traffic and weather conditions, or changing the musical selection on the stereo.

"Microsoft's open, expandable Auto PC platform will bring a new level of excitement and opportunity to the in-vehicle systems market," said James Minarik, president, Clarion Sales Corp. "Clarion is bringing to market the first product in this category, the Clarion AutoPC, demonstrating our commitment to developing mobile multimedia products that converge car audio and personal computing — allowing consumers to drive smarter and safer."

OEM suppliers develop production Auto PCs

A number of automotive original equipment suppliers have announced plans for development of Auto PCs, including UT Automotive, Visteon, and Delphi.

UT Automotive announced in November that it would use the Windows CE operating system to develop an architecture for in-vehicle use, starting with multimedia, information, communication, and entertainment (MICE) applications. The development agreement with Microsoft will help UT Automotive influence and pioneer product development, expand its product lines, and position the company to be the preferred supplier in the future for in-vehicle operating platforms, according to Roch Basson, UT Automotive's vice president of electrical and electronic products. Development of a computer operating system is being driven by the number of comfort and convenience functions being offered in automobiles, Basson said.

In January, Visteon Automotive Systems announced it was joining forces with Microsoft and Intel to develop a computing platform for vehicles designed to



Visteon's Windows CE-based ICES multimedia system has information, communication, entertainment, safety, and security features.

"keep drivers safely connected to the information they need and want on the road." The platform is based on the Microsoft Windows CE operating system and Intel Architecture microprocessors. Visteon expects to be first-to-market with its version of Auto PC technology in a production vehicle and will pilot a dealerinstalled version of the system this summer.

At the 1998 SAE International Congress and Exposition, Visteon unveiled its Auto PC-based multimedia system. Called ICES, the electronics infrastructure hardware and software architecture supports information, communication, entertainment, safety, and security features. Visteon says that ICES extends the electronic environment of the home and office to the vehicle, delivering Internet access, an emergency service, and other features such as a cell phone, climate control, highquality audio, and even movies for rearseat passengers.

By using state-of-the-art voice and navigation technology, ICES can tell a driver about traffic snarls as they occur and suggest time-saving alternate routes. More importantly, the system can also listen to and understand the driver's requests to map new routes.

"Our research shows that customers want the time in their vehicles to be productive, entertaining, and, most of all, safe," says Charles W. Szuluk, President, Visteon. "With ICES we've answered the customer's call. Drive time will never be downtime again."

Safety was an important consideration

for the ICES development team. For instance, drivers will be able to retrieve and respond to e-mail, voice mail, and pages using simple voice commands.

ICES is powered by Intel Architecture microprocessors and the Microsoft Windows CE operating system. Bv maximizing integration, Visteon engineers developed a system that is said to offer automotive manufacturers significant cost savings and a compact, lightweight package that is easy to install.

Drivers will be able to tailor ICES to the features they want and add more features by installing new software — as they do with their home and office PCs. Key technologies of Visteon's system include a voice-activated control system and a Remote Emergency Satellite Cellular Unit (RESCU).

The voice-activated system allows drivers to control vehicle functions that are usually operated manually — such as climate control and audio — with simple voice commands to help alleviate distractions while driving. The voice system recognizes natural language commands, including a wide range of voices, languages, and dialects.

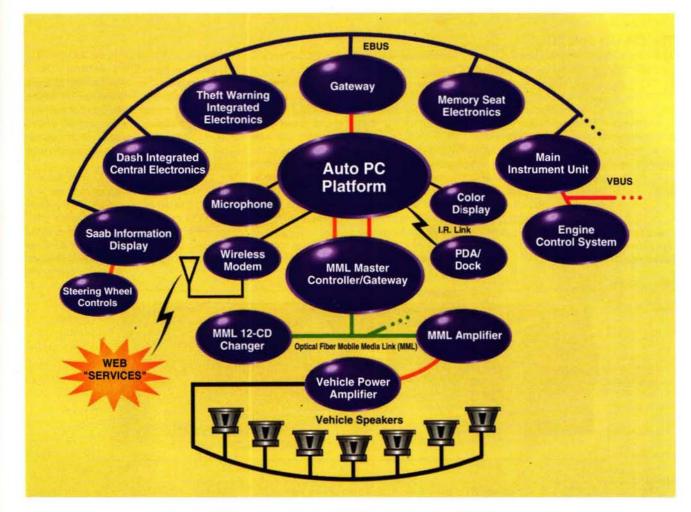
Visteon's RESCU is a factory-installed system that combines Global Positioning System (GPS) technology and the cellular telephone network to aid drivers in distress. It activates automatically upon air bag deployment and includes new convenience features such as route assistance and concierge services.

Also at SAE '98, Delphi and Saab introduced a Saab 9-5 concept called the Personal Productivity Vehicle said to feature the most advanced mobile office technology — including communication, entertainment, and computer desktop functions. Developed at Delphi Delco Electronics System's Mecel AB subsidiary in Goteburg, Sweden, the Personal Productivity Vehicle uses the Microsoft Windows CE-based Auto PC platform. It integrates an AM/FM receiver, CD-ROM, IrDA, serial port interface, universal serial bus, COMPACTFLASH expansion slot, and a high-resolution display.

The vehicle features steering wheel controls, interactive speech technology to respond to driver commands, and speech synthesis to communicate text information - again "allowing drivers to keep their hands on the wheel and eyes on the road." Through speech recognition, the driver can send e-mail, obtain turn-byturn Global Positioning Satellite (GPS)based navigation to a specific destination, ask for traffic and weather conditions, locate a restaurant or hotel, or change the musical selection on the stereo. The concept vehicle also offers wireless features in which a cellular modem connection can be used for vehicle-to-roadside assistance or to receive e-mail and Internet information. An infrared data link connects to Windows CE-based devices, such as Handheld and Palm PCs or another personal handheld Data Assistant, for transferring data to and from the vehicle.

High-bandwidth connectivity is achieved in the vehicle with a unique, ultra-high-speed, fiber-optic serial data link called Mobile Media Link (MML), which





The Delphi/Saab Personal Productivity Vehicle uses the Microsoft Windows CE-based Auto PC platform.

is capable of providing multiple-channel digital audio and video. MML also can connect and control inputs and outputs to facilitate a variety of consumer electronic products such as head-up display, television antenna and tuner, DVD player, compact disc player, digital stereo audio, and digital speaker amplifiers.

Data are transmitted and distributed from network nodes via a plastic-optical-fiber physical layer, passive star, and optoelectronic devices developed by Delphi Packard Electric Systems. Delphi Delco Electronics Systems provided the hardware, standard link protocol, and integrated circuit design.' The MML fiber-optic bus is capable of signal transmissions rates of up to 110 Mb/s and can support up to 50 channels of audio and 20 channels of TV-quality compressed video.

"Because the fiber-optic cable is immune to electromagnetic interference (EMI) and generates no emissions, MML provides vehicle occupants with crystal-clear audio and video without negatively affecting other vehicle systems increasing functional reliability," said Jim Crouse, director of engineering at Delphi Packard Electric Systems. Compared with other systems, MML also can provide higher performance. While other fiber-optic

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systems currently feature only audio capability, MML offers both audio and video.

Delphi and others offer alternative

In addition to the Windows CE-based Personal Productivity Vehicle, at SAE '98 Delphi introduced another technology initiative concept called a Network Vehicle that it is working on with IBM, Sun Microsystems, and Netscape. With the concept, the four companies demonstrated how existing hardware and software technology — including wireless communications, global positioning via satellite, head-up displays, voice recognition, Java technology, microprocessors, Web access and collaboration, and other Internet/intranet features — can be integrated.

"Much of the technology to do this, including our head-up displays, steering wheel-mounted controls, and man-machine interface in the passenger compartment, exists today," said Dave Wohleen, general director of engineering for Delphi Delco Electronics Systems. "Working with vehicle manufacturers, these technologies could be integrated into all types of vehicles."

The Network Vehicle receives direct broadcast reception from Hughes DirecTV and DirecPC satellites by use of an innovative flat antenna embedded in its roof, which provides the driver and passengers with route and travel information, to movies and real-time stock quotes. Existing services that could be integrated in the future include theft-deterrent technologies and the ability to contact emergency services. Future features include dictating and electronic distribution of memos; setting work schedules; listening to, and dictating a response to, faxes; and viewing videos.

The Clarion AutoPC

At the Consumer Electronics Show in January, Clarion Corp. of America introduced the first Auto PC. The 1-DIN unit fits in an automobile's instrument panel and is built on an open architecture platform powered by the Microsoft Windows CE operating system. It integrates car audio, computing functions, navigation, and wireless communications via hands-free voice activation.

A key innovation of the Clarion AutoPC is its use of Universal Serial Bus (USB) architecture, allowing for compatibility with other USB products. This provides numerous opportunities for hardware and software developers to create and market customized products for consumers. speech application, the AutoPC can provide status information and assistance, such as turn-by-turn directions or e-mail alerts, through speech synthesis and text information presented on the unit's display. To make finding destinations easier, the Clarion AutoPC comes standard with a basic point-to-point navigation system that provides route calculation from a userspecified starting location and destination, as well as accurate turn-by-turn directions. Other built-in applications include an address book, mileage log, and a hands-free voice memo feature.

The unit supports an optional compact flash memory card that can be used to exwhen lost and pinpointing the location of a 911 call for immediate assistance. Using wireless "push" technology, the Clarion AutoPC's wireless receiver option allows consumers to receive an array of customized information, such as real-time traffic, news updates, numeric paging, voice and email alerts — all using text-to-speech technology.

To protect the car and Clarion AutoPC inside it, an optional Clarion/Ungo security system is under development. This system has USB connectivity and provides consumers with all the features found in other high-end Ungo security products such as Electronic Logicsensor and Motion/Impact



The Clarion AutoPC is a high-powered AM/FM stereo with integrated digital signal processing (DSP) equalization and a built-in 35 W x 4-channel amplifier. It comes with a Hitachi SH3 processor, 8 MB DRAM/8 MB ROM, and the first in-dash Clarion quality USB CD audio and CD-ROM drive, which supports an optional six-disc CD/CD-ROM changer. The backlit, 8-color LCD screen provides consumers with an easy-to-read, icon-driven user interface.

The AutoPC unit recognizes over 200 simple voice commands, allowing consumers to interact with the unit without taking their eyes from the road. With its text-topand the onboard memory as well as provide an interface for other products such as paging and hardware accessories. Also included is an infrared data port, enabling easy exchange of data to and from a handheld PC.

A number of hardware accessories will also be available. The optional Global Positioning System (GPS) receiver works in conjunction with the built-in navigation system to provide automatic starting point identification and location updates. The GPS accessory, coupled with the cellular phone interface, enables access to roadside emergency services, such as providing directions detector. When combined with the cellular telephone interface and GPS, this system also provides easy tracking of stolen vehicles.

The Clarion AutoPC will be shipping in limited quantities in spring 1998, with mass production beginning in June 1998. Suggested retail price for the base unit is \$1299. Clarion also announced at the Consumer Electronics Show that it would supply the new mobile-media product to Citroen, which will be the first in Europe to offer the Clarion AutoPC.

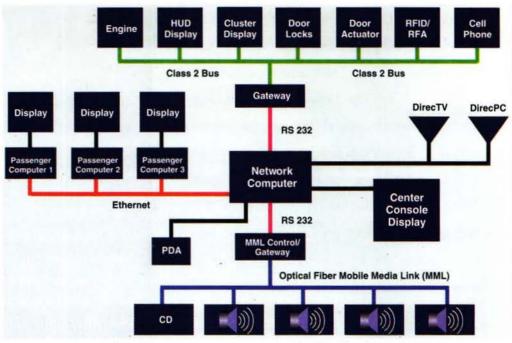
For more information, circle 103





These "smart" features are enabled in large measure by the real-time data-streaming capabilities over a wireless network made possible through IBM's Java-based technology. Java enables the rapid development and prototyping of applications that run within the vehicle. With the technology, automakers also have the flexibility to create a Network Vehicle using a variety of hardware and operating system platforms.

The Network Vehicle has voice-recognition technology for drivers and passengers to request and listen to e-mail messages, locate a restaurant or hotel, receive navigation help or specific music and sports scores, and use voice-activated telephone services — all without interfering with driving. Drivers can use a Delphi head-up display projected



On-Board Architecture

Amplifiers/Speakers

Delphi collaborated with IBM, Sun Microsystems, and Netscape on the Network Vehicle, which uses Java-based technology.

onto the windshield to navigate while keeping their eyes on the road. Passengers using individual terminals next to their seats can use the Internet, watch high-resolution television, or play computer games.

The use of Java allows for an open, scalable platform to deploy cutting-edge content and applications in vehicles, according to Jim Mitchell, vice president of technology and architecture at JavaSoft, a business unit of Sun Microsystems, Inc.

"As Internet-based services add new dimensions to the daily lives and work of millions of people, we see great value in extending network access beyond the home, classroom, or office by making it easily accessible from anywhere," said Netscape's vice president of technology, Mike McCue. "Our participation in this technology initiative underscores our vision of a network world where our products run across computing platforms and the new portable devices that serve a mobile lifestyle. Access will be from anywhere — including vehicles."

> Interesting? Circle 17 Not interesting? Circle 18