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Dear Mr. Wani:

Following some Canadian discussions on the role of WP29 with respect to the Intelligent Transport Systems (ITS), we would like to provide you with our views and indicate our support for the proposed terms of reference document for the WP.29/ ITS informal group.

Most of the ITS technology appearing on the market is entirely vehicle based. While there are various organizations concerned with ITS, including standards, etc. none are developing safety related motor vehicle regulations. WP.29 is the only group that is responsible for, and can promote, the development of global technical regulations for ensuring high levels of safety in vehicle-based ITS.

We support the ongoing role of the ITS informal group as an advisory group to coordinate ITS-related matters. As such it will need to establish a good liaison with existing GRs. We agree that an important role for the Informal Group would be to make sure there are no regulations that impede ITS introduction. However, we also believe the Informal Group should consider regulations concerning ITS that are specifically intended to improve safety through controlling the functional characteristics of ITS, when appropriate. This technology will have a significant impact on future vehicles and WP.29 must have a central role in the regulation of ITS.

With respect to the proposed Terms of Reference, we have a number of comments. While advanced driver assistance systems (ADAS) are a major component of ITS technology, they are not the only component. ITS technology can provide information as well as support and although the distinction between support and information may become seamless in integrated systems, information systems should feature throughout these Terms of Reference. This more comprehensive understanding of ITS is clearly indicated in the Scope Section (3.1), however it is lost subsequently in the document. For example, Attachment 1 should also mention advanced driver information systems.

Another comment concerns the statement "other means than regulations" that is listed among the Points to be Considered (page 2). It is not clear what these "other means" are and furthermore these are most likely beyond the scope of WP.29.

The acronym HMI is never cited in its complete form. This is important because the term Human-Machine Interaction (HMI) is often misinterpreted. People think of only Interfaces (i.e., controls and displays) rather than Interaction, which is a more complex and broader issue of the performance implications of integrating new technology and functions into driver-vehicle system. The document would benefit from having a definition and discussion of HMI.

Lastly, we would like to indicate our firm support for the proposal that the ITS Informal Group work closely with IHRA to ensure that WP.29 regulatory initiatives benefit from ITS research. It should act as liaison between IHRA and GRs to identify issues where IHRA could assist WP.29. It should also be the conduit for IHRA to propose regulatory initiatives. An elaboration on this proposal could be given at the end of section 4 on the Current Situation of ITS Activities and could be repeated later in the section on Information Exchange.

We hope that this indication of support is clear and that our comments are helpful in completing the Terms of Reference for the ITS Informal Group.

With kind regards,

Ian Noy
Director
Standards Research and Development