

Proposal for amendments to ECE-TRANS-WP.29/GRVA/2020/32

This document proposes amendments to the proposed provisions for an increased maximum operational speed of an ALKS according to GRVA/2020/32, with the main aim to clarify the proposal. Any amendments to those already proposed in GRVA/2020/32e are marked in **red bold** for new text, and **red strikethrough** for deleted text.

1. Proposal

Paragraph 5.4.2., amend to read:

“5.4.2. The initiation of the transition demand shall be such that sufficient time is provided for a safe transition to manual driving.

~~Manufacturers shall declare during type approval that drivers' adjustments in and on the vehicle when the system is active (e.g. for the purpose of engaging in non-driving related activities) do not have negative consequences to a take-over in the manual driving phase.”~~

Paragraph 7.1.1., amend to read:

“7.1.1. Forward detection range

The manufacturer shall declare the forward detection range measured from the forward most point of the vehicle. This declared value shall be at least 46 metres **for a specified maximum speed of 60 km/h.**

A specified maximum speed above 60 km/h shall only be permitted to be declared by the manufacturer, only if the declared forward detection range shall fulfil the corresponding minimum value according the following table:

...”

2. Justifications

A. paragraph 5.4.2. – negative consequences of non driving related activities

1. ALKS already contains provisions that the manufacturer must ensure that the driver remains in a suitable seating position (par. 6.1.1.) and that the system shall take measures to guard against reasonably foreseeable misuse (par. 3.4.4. of Annex 4 and 5.1.8. of the core text), which already seems to address the concern brought forward by the amendment of par. 5.4.2. While implementing appropriate strategies to prevent negative consequences is reasonable, to declare that there are no negative consequences ever possible is impossible. Therefor the amendment is either not necessary to include, or alternatively should be clarified according to the proposal below:

“The ALKS shall implement strategies to minimize the risks related to necessary adjustments by the driver in and on the vehicle upon return to manual driving (e.g having to readjust the seat). These strategies shall be described by the manufacturer and assessed according to Annex 4.”

B. paragraph 7.1.1. “Forward detection range”

2. The proposal aims to clarify that a declaration of a maximum operational speed that exceeds 60km/h is possible, but not required.