

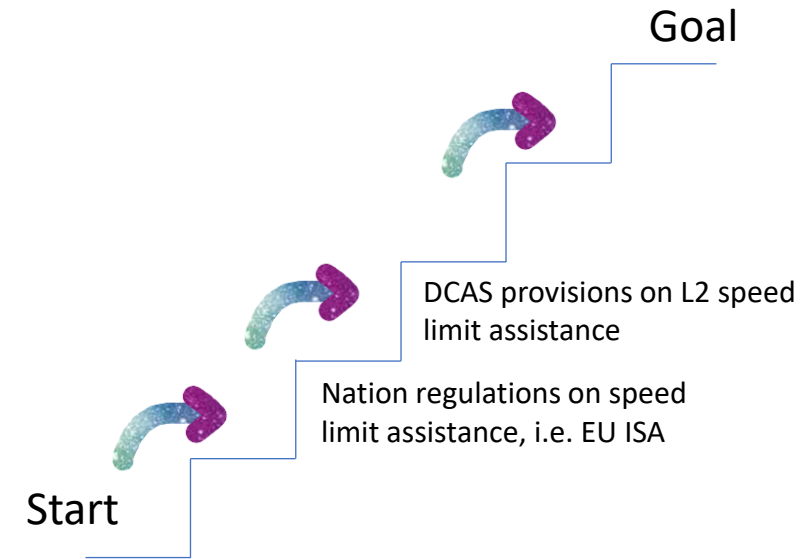


In Response to GRVA-17-11  
(TF ADAS issues to seek guidance from GRVA)

# DCAS Speed Limit Compliance

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- **Option 1:** Take significant measures to encourage speed limit compliance but acknowledge that the final decision over the speed of the system remains with the driver.
- **Option 2:** Prohibit the driver to set the operating speed to a value above the system determined road speed limit.



**Let's define appropriate steps to achieve speed limit compliance, instead of taking one huge leap.**

# Option 1 already significantly encourages speed limit compliance

Requirements reflected in Option 1 on Speed Limit Compliance:

- DCAS shall automatically adjust the vehicle speed to not exceed the system determined road speed limit
- Warning to be given whenever the driver overrides the system determined road speed limit
- Setting a permanent offset above the system determined road speed limit is prohibited

**The Regulation already proposes significant measures to encourage speed limit compliance beyond what is currently implemented in L2 vehicles or required by any consumer rating.**

# An L2 system should not pretend to know it better than the driver.

The reasons for the driver to overrule a system determined speed limit are various:

## Misdetection

e.g. mistaking an 80kph sign for a 60kph sign

## Poor infrastructure

e.g. speed limit signs not properly restored after construction work

## Ambiguous Situations

e.g. the left-hand speed limit of the exit lane being mistaken for applying to the motorway lane

## Traffic Flow

- Mixed (automated and manually driven) traffic
- How road speed limits are determined and fined is extremely inhomogeneous

**Pedal override is not an adequate alternative to speed limit override.** Only permitting override through accelerator pedal input is not considered the safest option, because it creates control ambiguity between driver and system that could potentially be in conflict with safety principles (e.g. undercut of following distance, interpretation of driver intention etc.).

**There are numerous reasons for the driver to overrule a system determined speed limit, let's acknowledge them appropriately.**

# Conclusion

- The measures proposed for DCAS Option 1 (permitting the driver to set the max. speed) already go way beyond current system design and anything required by consumer ratings.
- Prohibiting the driver from overruling the maximum operational speed is neglecting the reality of system capabilities, infrastructure and traffic flow.
- If Option 2 (no operation above the system determined road speed limit) was implemented, DCAS would impose much stricter rules around speed limit compliance than recently adopted national regulations, i.e. EU ISA. This would not be a consistent message to drivers.
- Instead of putting system acceptance at risk, we should find a proper balance between encouraging speed limit compliance and respect for the driver's decisions.

**Option 1: Requesting significant measures to encourage speed limit compliance but leaving the final decision on the speed of the system with the driver, is the appropriate step to take in an assistance system regulation.**