

Recommendations on the open items addressed by TF ADAS leadership in GRVA-20-21

Disclaimer upon first use of the system [Par. 5.5.3.2.1.]

Option 1

5.5.3.2.1. It shall only be possible to activate the system if the driver has acknowledged that they have read the information describing the functionality and its limitation and will maintain control of the vehicle while any feature is operating. This shall be performed on each activation of the powertrain while the vehicle is in a stopped position, unless it can be identified that the same driver has previously acknowledged this information.

Option 2

5.5.3.2.1. Latest upon its first activation in the drive cycle, the system shall once provide a driver-confirmed visual information to the driver requesting them to remain engaged with the driving task while using the system.

- OICA/CLEPA can accept to provide this information to the driver, but it needs to be ensured that the **driver actually understands its purpose and relevance, therefore we support Option 2.**
- Therefore **Option 1 is not feasible**, as it requires the information to be provided when the vehicle is powered up, **totally unrelated to the use of the system.**
- The possibility to not provide that information **provided the driver is recognized to have previously acknowledged this information** as outlined in Option 1 is also considered to cause problems from a **protection of personally identifiable information** point of view.
- Current implementations show that these type of messages can be phrased in a sufficiently short way to ensure not to distract the driver from the driving task, when given upon activation of the system.

Transitional Provisions for the 01 series of amendments

The draft text for the **01 series of amendments** not only includes provisions for previously unaddressed functionality like withholding of HORs and System Initiated Maneuvers, but it also **contains new requirements applicable to the system as a whole and features already addressed with the 00 series**, examples thereof:

- 5.3.6.3.2. ~~(Reserved)~~ **While the system is trying to maintain a constant speed without external disturbances, it shall aim to minimise unreasonable fluctuations in the vehicle's speed.**

- 5.3.7.2.3.5. The system shall **aim not to** initiate the proposed manoeuvre, even if already confirmed by the driver, unless the following conditions are met:
 - (a) The target area, lane or path ~~of the manoeuvre is not obstructed~~ **is determined by the system to be clear;**
[...]
 - (f) **The driver has been detected to have directed their gaze as appropriate to the proposed manoeuvre within an appropriate period before the manoeuvre commences.**

- 5.3.7.3. Driver Unavailability Response
- 5.3.7.3.1. The system shall comply with the technical requirements and transitional provisions of the 04 or later series of amendments to UN Regulation No. 79 with respect to the Risk Mitigation Function (RMF). [...]
- 5.3.7.3.2. **The system shall be designed to select an appropriate target stop area based on the system capabilities and current circumstances (e.g. traffic situation, road infrastructure) with the aim of minimising risk.**

- 5.5.3.2. Activation
- [5.5.3.2.1. **Latest upon its first activation in the drive cycle, the system shall once provide a driver-confirmed visual information to the driver requesting them to remain engaged with the driving task while using the system.]**

As these will **require significant changes** to the system's Longitudinal Control Strategy, Driver Monitoring ahead of the initiation of maneuvers, RMF control strategies and HMI, when approving to the 01 series of amendments, we will need to **ensure sufficient lead time** for adaptation in the transitional provisions, **OICA/CLEPA proposing 2028 as the respective date.**

Transitional Provisions for the 01 series of amendments

As any system approved to DCAS would be affected by the changes to the general requirements, introduced with the 01 series of amendments, the paragraph applying to systems not affected can be removed and the text simplified to read:

- 16. Transitional Provisions
- 16.1. As from the official date of entry into force of the 01 series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the 01 series of amendments.
- 16.2. As from 1 September [2028], Contracting Parties applying this Regulation shall not be obliged to accept type approvals to the preceding series of amendments, first issued after 1 September [2028].
- ~~16.3. Until 1 September [2028], Contracting Parties applying this Regulation shall accept type approvals to the preceding series of amendments, first issued before 1 September [2026].~~
- 16.4. Notwithstanding the transitional provisions above, Contracting Parties who start to apply this Regulation after the date of entry into force of the most recent series of amendments are not obliged to accept type approvals which were granted in accordance with the original version (00 series of amendments) of this Regulation.
- ~~16.5. Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the original version (00 series of amendments) of this Regulation, for the vehicles/vehicle systems which are not affected by the changes introduced by the 01 series of amendments.~~
- 16.3. Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the original version (00 series of amendments) of this Regulation first issued before 1 September [2028].
- 16.5. Contracting Parties applying this Regulation may grant type approvals according to the original version (00 series of amendments) of this Regulation.
- 16.6. Contracting Parties applying this Regulation shall continue to grant extensions of existing approvals to the original version (00 series of amendments) of this Regulation.

Transitional Provisions for the 01 series of amendments

Cleaned up version

As any system approved to DCAS would be affected by the changes to the general requirements, introduced with the 01 series of amendments, the paragraph applying to systems not affected can be removed and the text simplified to read:

16. Transitional Provisions
- 16.1. As from the official date of entry into force of the 01 series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the 01 series of amendments.
- 16.2. As from 1 September [2028], Contracting Parties applying this Regulation shall not be obliged to accept type approvals to the preceding series of amendments, first issued after 1 September [2028].
- 16.3. Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the original version (00 series of amendments) of this Regulation first issued before 1 September [2028].
- 16.4. Notwithstanding the transitional provisions above, Contracting Parties who start to apply this Regulation after the date of entry into force of the most recent series of amendments are not obliged to accept type approvals which were granted in accordance with the original version (00 series of amendments) of this Regulation.
- 16.5. Contracting Parties applying this Regulation may grant type approvals according to the original version (00 series of amendments) of this Regulation.
- 16.6. Contracting Parties applying this Regulation shall continue to grant extensions of existing approvals to the original version (00 series of amendments) of this Regulation.

New Approach to Defining a critical situation during a lane change [Par. 6.2.4.1.]

6.2.4.1. When there is an approaching vehicle.
[The system shall be designed to not make an approaching vehicle decelerate at a higher level than 3.0 m/s²,
1.4 seconds after the system starts the lane change manoeuvre, or
(a) 1.4 seconds after the system starts the lateral movement of the lane change procedure; and
(b) 0.4 seconds after the system starts the lane change manoeuvre, provided that the approaching vehicle was detected by the DCAS vehicle for a duration of at least 1.0 seconds immediately before the lane change manoeuvre starts, if applicable,
to ensure that the distance between the two vehicles is never less than that which the DCAS vehicle travels in 1 second.]

- OICA/CLEPA **supports this changed approach to defining a critical situation.**
- We believe **3.0m/s² or even 3.5m/s²** as originally proposed are **reasonable and do not pose a risk to safety**, because
 - This is the deceleration of another vehicle approaching from the rear, required to maintain that 1s remaining distance, so it is not dependent on the vehicle category of the ACSF C or DCAS vehicle.
 - As this is the **deceleration required to maintain that 1s remaining distance**, the vehicle approaching from the rear does not have to decelerate that much to avoid a collision, **there is plenty of safety margin**
- We would encourage one more improvement to the conditions as highlighted above to reflect the case, where the approaching vehicle was not detected for at least 1.0 seconds.