



UNR157-04-10

OICA/CLEPA Input
to the
Special interest group on UN-R 157
In response to
„alternative assessment of ALKS performance“

Observations on the Alternative Approach to assess ALKS performance proposed by EC

Points to be considered

1. Possible adverse affect on the surrounding vehicles' traffic flow
 - The proposed conditions don't take false reaction avoidance sufficiently into account
 - When braking earlier, it is natural, that more collisions could be avoided, but this could be detrimental to many other aspects of road safety, (e.g. rear end collision by a following vehicle)
 - When ALKS vehicles are forced to brake too strongly too early, this will likely disrupt traffic flow
2. Design constraints (not technology neutral)
 - In order to meet the required performance, the underlying approach would likely need to be implemented into the system software when assessing the criticality of a situation
 - So instead of setting a performance expectation, the approach is so detailed, that it would likely be a technical requirement on implementation
3. Possible Intel patent conflicts
 - The proposed approach could require the use (see 2.) of certain potentially protected IP, as some aspects of the RSS are protected by international patents (WO2018115963, WO2019180506, WO2020035728, WO2020245654)

Industry considers the proposed concept not mature enough to replace the recently introduced provisions for ALKS. The discussion should first be finalized within FRAV/VMAD, then a comparison between the new approach and what is established for ALKS shall be made and if necessary the new approach can be used to provide guidance within ALKS on how to assess the performance of the system.