

OICA/CLEPA Input

to the

Special interest group on UN-R 157

with regard to

**Potentially required LC capabilities of the ALKS for
maximum operational speeds >60km/h**

LC capabilities for increased maximum operational speeds

What is **already/commonly accepted**:

Stopping in any lane in slow-moving traffic

(as defined in UN-R157)



Stopping in the slowest lane when there is no hard shoulder



There are circumstances in which a LC is not going to be possible, even if the system is capable of it (e.g. with a stopped line of vehicles on the slowest lanes, or in case of severe failure)

What are the **points of concern** in the discussion now:

Stopping the vehicle in the slowest lane in free flowing traffic

Industry is convinced there is no safety concern related to this, as this

- (a) occurs today as well and
- (b) the MRM will hardly ever bring the vehicle to standstill

Stopping the vehicle in any other than the slowest lane in free flowing traffic

Agreement from Industry that this should not occur and should be addressed in the regulatory provisions.

A slow moving vehicle in a fast lane of travel could be an obstacle.

Agreement from Industry that this should not occur.

This is already prevented by requesting the ALKS to comply with traffic rules (e.g. obligation to drive in the slowest lane where applicable + obligation to not drive unreasonably slow)

But we have one **assumption that applies to all of these aspects and resolves any safety concern**:

As numerous studies have shown **the driver can be expected to resume control within 10s** after the initiation of the transition demand. So the **driver will almost always have resumed control before the MRM would have brought the vehicle to standstill!**

LC capabilities for increased maximum operational speeds

- As we are aware that maximum operational speeds of only **up to 60km/h will permit for very limited durations of ALKS availability**, we should try to find a way to permit operation above that speed also for systems without any lane change capability to make operation more robust and reduce the number of speed related transition demands.
- As we are considering even LC to the hard shoulder during an MRM under very restrictive assumptions, it cannot be guaranteed that a lane change to the hard shoulder will be possible under all conditions anyhow.
- **Industry sees no safety concern in permitting operation of the ALKS in the slowest lane of travel at speeds above 60km/h with an MRM that would eventually stop the vehicle in lane.**

5.2.3.1. Speed

The manufacturer shall declare the specified maximum speed based on the forward detection range of the system as described in paragraph 7.1.1.

The maximum speed up to which the system is permitted to operate is ~~60~~**130** km/h.

Operational speeds of more than [60 km/h] are permitted either

- **exclusively in the slowest lane of travel or**
- **in all lanes of travel, if the ALKS is capable of changing lanes to bring the vehicle to a standstill outside of the regular lanes of travel during an MRM according to par. Xxx.**