**Suggestions for ADAS Task Force Discussions**

“Dynamic Control Assistance System (DCAS)” means the vehicle hardware and software collectively designed to assist the driver with dynamic control of the vehicle.

“Driver” means the human operator of the vehicle and its subsystems.

“Dynamic control” means the real-time execution of operational and tactical functions required to operate a vehicle in traffic.

* Operational functions refer to basic skills to operate the vehicle.
* Tactical functions refer to application of the skills (maneuvering the vehicle)

“Driver engagement” means continuous driver perception, information processing, and decision-making in the operation of the vehicle and its subsystems.

Remove DDT from the text: DDT is specific to automated driving. A system either performs the DDT or it does not. Assisted driving systems are not capable of performing the DDT. “Dynamic control” is a useful term (used by WP.1) when referring to driver control of the vehicle. We lower the risks of confusion between assisted and automated driving by removing “DDT” from the text. We also increase the focus on ensuring that the systems improve driver control over the vehicle without introducing unreasonable safety risks by using “dynamic control” as a core concept.

Place “road safety” in brackets for now. It is not clear why a safety regulation would define “safety”. “Safety” goes beyond a vehicle system. The regulation provides requirements that ensure safety with regard to assisted driving systems. The regulation as a whole defines safety, so it seems strange to define “safety” as a term within the regulation.

Place “OEDR” and “System Boundaries” in brackets for now. It is not yet clear whether these terms are needed or appropriate in regulating assisted driving systems. An assisted driving system is not able to perform OEDR without driver support (otherwise it would rise to the level of an ADS). “System boundaries” seems prone to confusion with ODD. The systems have ODD (conditions under which the system is designed for use), but their use still requires continuous driver supervision of the system and monitoring of the road. In effect, the driver operates the vehicle, including the assisted driving system.

Focus requirements on driving actions rather than driving maneuvers. As noted in the draft text, a lane change consists of specific actions (detection of objects, signaling, lateral acceleration, etc.). A lane-change scenario enables the assessment of the system performance of these actions under a set of conditions (traffic situation). Vehicle control actions are well-known and stable where driving maneuvers are more complex, involving virtually infinite combinations of conditions. The text suggests performance ranges for control actions such as deceleration, acceleration, signaling, etc. with separate classes for nominal driving and responses to safety-critical situations. It seems more feasible to specify requirements for the driving actions and then apply the actions as relevant to various maneuver scenarios. For example, a signaling requirement would be applicable to any changes of direction under nominal conditions (lane change left, lane change right, left turn, right turn, etc.). In this way, one requirement can be applied across multiple scenarios/maneuvers.