

Japanese comments on AEBS-HDV homework

a) the possibility to approve M2/N2 (possibly only with hydraulic brakes?) alternatively according to R152, latest revision (including pedestrian + bicycle AEB, not including speeds > 60 km/h)

(Japanese comments)

- Basically, it is acceptable to this idea.
- However, the purpose of this idea being how to treat vehicles derived from M1/N1, it is preferable to limit this rule to M2/N2 derived from M1/N1 (where most of the vehicles are sold as M1/N1 except for a few vehicles of minor specifications classified as M2/N2).

b) the proposal from Industry to reduce the active speed range for M2/N2 to 10-60 km/h

(Japanese comments)

- We are opposed to the change that reduces the active speed range to 10-60 km/h, considering that the current active speed is up to the maximum design speed and that M2/N2 also travel on highways as well as city road. We find it appropriate to maintain the current provision that limits the active speed range to the maximum design speed.
- At the same time, we understand OICA's concern that preventing accidents on city roads is most important area for M2/N2. Therefore we find it acceptable to study how to specify the performance requirements for speeds above 60 km/h.

c) Target specifications:

Currently, the scope speaks about "collisions with passenger cars", and 5.2.1.1. requires a warning for a possible collision with vehicles of Cat. M1. 5.2.1.2. speaks about an imminent collision without specifying the collision opponent. Please make up your mind about whether it should be required to address other vehicles as well, such as M2+, N1+, O vehicles or others.

(Japanese comment)

- In principle, we believe that the system should respond to the vehicles regardless of the vehicle category, so we find it better not to specify the target category as a requirement.