**关于L2与L3判定以及使用的建议**

**Suggestions on L2 and L3 determinations and application scenarios**

组合驾驶辅助（2级）和有条件自动驾驶（3级）在自动化等级上接近、特定条件下用户体验上类似，难以区分。但L2只是“帮手”，L3是替代驾驶员承担全部动态驾驶任务和责任的主体，起的是“替补”作用。驾驶员和驾驶自动化系统在动态驾驶任务中的角色和责任差别是区分L2和L3的核心要素。

Combined driving assistance system (Level 2 system) and conditional automatic driving system (Level 3 system) are difficult to distinguish , because they are similar in automation level and user experience under specific conditions. But to some extent, the Combined driving assistance system (Level 2 system) is more likely to be a helper of the driver, while the Level 3 system can replace the driver and shoulder all the dynamic driving tasks, in other words, the Level 3 system is more likely to be a backup of the driver.The different roles the two systems act as and the different responsibilities the two systems shoulder during dynamic driving tasks are the core elements to distinguish L2 and L3 system.

在中国，驾驶员双手离开方向盘的行为通常以危险驾驶行为进行处罚，在《关于加强智能网联汽车生产企业及产品准入管理的意见》中，同样明确要求L2系统“采取脱手检测及提醒等技术措施，保障驾驶员始终在执行相应的动态驾驶任务”，以体现L2系统驾驶员作为驾驶任务和责任承担主体这一原则。因此我们十分赞同目前法规草案中对于车辆至少具备驾驶员脱手检测能力的要求，支持将脱手检测及提醒作为L2的显性特征，要求驾驶员在系统使用过程中必须将双手放在方向盘上，进而能够清晰区分L2与L3。

In China, drivers who leave the steering wheel with both hands are usually punished for dangerous driving behaviors.In the regulation of “ Advices on strengthening access management of intelligent networked automobile products as well as enterprises”,it is clearly figured out that technical measures such as hand-off detection and reminder shall be taken to ensure that the driver is always performing corresponding dynamic driving tasks for L2 system, which conforms with the general principal that for a vehicle with L2 system,the driver mainly conducts dynamic driving task and shoulders the responsibility. Therefore, we fully agree with the requirements in the current draft that it is not permitted for the driver to leave both his hands off the steering wheel and the vehicle should at least has the ability of detecting the driver's hand off.So the L2 and L3 systems can be clearly distinguished.

此外，对于从技术及管理角度对组合驾驶辅助（2级）和有条件自动驾驶（3级）系统进行判定和分类管理外，我们建议采取宣传培训等综合手段使各环节相互衔接、协调配合。

In addition to distinguishing the L2 and L3 systems from the technical perspective, we also recommend that comprehensive means such as publicity and training should be adopted as well.

1. 明确产品功能的使用说明要求，规范组合驾驶辅助（2级）和有条件自动驾驶（3级）及以上汽车产品的使用说明，要求在使用说明中明确驾驶自动化系统对应的设计运行条件、用户在驾驶自动化系统不同工作状态下执行动态驾驶任务的角色及安全注意事项等。

1.Specify the requirements to use the system.Standardize the instructions for using the combined driving assistance (Level 2) and conditional automatic driving (Level 3) products. The design and operation conditions, the user's role in performing dynamic driving tasks under different working states of the driving automation system and safety precautions must be specified in the instruction.

2.确保真实、客观地宣传商品或者服务，准确、清楚地描述对车型功能、性能及使用限制，尤其是在描述汽车驾驶自动化功能时，避免将“辅助”和“自动”混淆在一起使用。

2.Ensure that the product and service are introduced objectively, and the the functions, performance and use restrictions of the vehicle are described accurately and clearly. The words of “assistance” and “automatic”can not be used confusingly driving-automation.

3.由企业采取多种手段在购车、保养等环节通过组织实车、视频培训、设置模拟驾驶测试等方式，帮助消费者正确、安全使用驾驶自动化系统。

Multiple means related to vehicle purchasement and maintenance should be taken by manufacturers to help consumers use the driving automation system correctly and safely, such as training, driving simulation and so on.