

**Guidelines and Recommendations
concerning
Safety Requirements for Automated Driving Systems**

1. Purpose of this document
 - 1.1. FRAV has established this document to facilitate and record its work in progress. Contents of this document may change in accordance with FRAV decisions.
 - 1.2. This document may inform interested parties on the status of work within FRAV.
 - 1.3. This document is for informational purposes and should be read as a work-in-progress, not as a formal or informal proposal to establish requirements under WP.29 procedures pursuant to the 1958, 1997, and/or 1998 Agreements.
 - 1.4. This document provides recommendations for ADS safety requirements intended to inform WP.29 discussions on future initiatives respectively under the 1958, 1997, and/or 1998 Agreements.
 - 1.5. Where applicable, the text uses the verbal forms “shall” and “may”; however, these paragraphs should be understood within the context of providing recommendations (paras. 1.3. and 1.4. above).
2. Definitions
 - 2.1. “Automated Driving System (ADS)” means the hardware and software that are collectively capable of performing the entire DDT on a sustained basis.
 - 2.2. “(ADS) feature” means an application of ADS hardware and software designed specifically for use within an ODD.
 - 2.3. “(ADS) function” means ~~an application~~ a capability of ADS hardware and software designed to perform a specific portion of the DDT.
 - 2.4. “ADS vehicle” means a vehicle equipped with an ADS.
 - 2.5. “Driver” means a ~~user~~ person who performs in real time part or all of the DDT and/or DDT fallback for a particular vehicle. Request to check WP.1 definition. 1949 Geneva Convention: “any person who drives a vehicle, including cycles, or guides draught, pack or saddle animals or herds or flocks on a road, or who is in actual physical control of the same”.
 - 2.6. “Dynamic Driving Task (DDT)” means the real-time operational and tactical functions required to operate the vehicle.
 - 2.6.1. The DDT excludes strategic functions such as trip scheduling and selection of destinations and waypoints.

Commented [DS1]: “Application” just does not seem correct and could cause confusion with ADS “feature.” Using “capability” is consistent with definition of “operational capabilities” below.

Commented [DS2]: The “ADS user” definition below seems to say that one is either a user or a driver. If so, the driver cannot be defined as a user. If “user” here means something different from ADS user (e.g., if “user” is the general term, as in J3016, and “ADS user” is just one type of user), then “user” would need to be defined.

- 2.6.2. The operational and tactical functions of the DDT can be logically grouped under three general categories:
 - 2.6.2.1. Sensing and perception, including:
 - 2.6.2.1.1. Monitoring the driving environment via object and event detection, recognition, and classification.
 - 2.6.2.1.2. **Perceiving other vehicles and road users, the roadway and its fixtures, objects in the vehicle's driving environment and relevant environmental conditions.** *Per the recommendation of the ORU workstream (FRAV-26-10) to replace "in the vehicle's path". The workstream further elaborated "driving environment" as (a) Across the full width of its own traffic lane, the full width of the traffic lanes immediately to its left and to its right, up to the limit of the forward detection range; (b) Along the full length of the vehicle and up to the limit of the lateral detection range.*
 - 2.6.2.1.3. Sensing the ODD boundaries, if any, of the ADS feature.
 - 2.6.2.1.4. Positional awareness.
 - 2.6.2.2. Planning and decision, including
 - 2.6.2.2.1. Prediction of actions of other road users.
 - 2.6.2.2.2. Response preparation.
 - 2.6.2.2.3. Maneuver planning.
 - 2.6.2.3. Control, including
 - 2.6.2.3.1. Object and event response execution.
 - 2.6.2.3.2. Lateral vehicle motion control.
 - 2.6.2.3.3. Longitudinal vehicle motion control.
 - 2.6.2.3.4. Enhancing conspicuity via lighting and signaling.
- 2.7. *"DDT fallback" means the response by the ADS vehicle user to either perform the DDT or achieve a minimal risk condition (1) after occurrence of a DDT performance-relevant system failure(s), or (2) upon operational design domain (ODD) exit, or the response by an ADS to achieve minimal risk condition, given the same circumstances.*
"ADS fallback response" means the response by an ADS vehicle user to assume the role of driver after an ADS-initiated transition of control if the ADS is not capable of achieving a minimal risk condition or an ADS-controlled procedure to place the vehicle in a minimal risk condition.
- 2.8. "Fallback user" means an ADS vehicle user *designated* able to assume the role of driver upon completion of a transition of control.
- 2.9. "Minimal Risk Condition (MRC)" means a stable and stopped state of the vehicle that reduces the risk of a crash.

Commented [DS3]: I recommend leaving this portion of the agreed-upon DDT definition as it was. The recommended addition is more of a requirement than a definition. Requirements will eventually set the parameters for this one function (perception) that is part of the broader DDT.

Commented [DS4R3]:

Commented [DS5]: I've inserted this directly from J3016 to make clear that ISO/SAE use fallback to describe a particular situation that involves very specific circumstances (system failure or ODD exit). These definitions seem to use fallback in a different sense to refer to any situation entailing a transfer of control.

Commented [DS6]: This change tries to bring this closer to the ISO/SAE definition of fallback without specific reference to SAE levels. Under J3016, an L3 ADS requires a fallback ready user because the ADS cannot achieve a MRC, while an L4 ADS does not REQUIRE a fallback ready user because it can achieve a MRC.

Commented [DS7]: Not clear how a user would be "designated" but a person not able to assume the driving role cannot logically be considered a fallback user. Ability does not connote legal qualification to drive. If an ADS depends on a fallback user (making it L3), the user must be able to drive.

- 2.10. “Operational Design Domain (ODD)” means the operating conditions under which an ADS feature is specifically designed to function.
 - 2.11. “Operational functions” refer to basic capabilities such as the capacity to control lateral and longitudinal motion of the vehicle.
 - 2.12. “Other road user (ORU)” means any entity using a roadway and capable of safety-relevant interaction with an ADS vehicle.
 - 2.13. “Priority vehicle” means a vehicle subject to exemptions, authorizations, and/or right-of-way under traffic laws while performing a specified function.
 - 2.14. “Real time” means the actual time during which a process or event occurs.
 - 2.15. “Road-safety agent” means a human being engaged in directing traffic, enforcing traffic laws, maintaining/constructing roadways, and/or responding to traffic incidents.
 - 2.16. “Tactical functions” refer to the real-time planning, decision, and execution of maneuvers.
 - 2.17. “Transition of control (TOC)” means a procedure for the ADS to hand over dynamic control of the vehicle to ~~the fallback-an ADS vehicle~~ user such that the ~~fallback~~-user is given the role of driver upon completion. The transition may be initiated by the ADS when DDT fallback is required due to a system failure or ODD exit and the ADS is not capable of achieving a minimal risk condition, or it may occur upon the request of the ADS user if the ADS is designed to permit such a user-initiated takeover.
 - 2.18. “(ADS) Vehicle User” means a human being using an ADS vehicle where at a time in which the ADS is performing the entire DDT and includes a fallback user who may assume the role of driver after an ADS-initiated transition of control dynamic control of the vehicle is entirely maintained on a sustained basis by the ADS performance of the DDT.
- 3. Guidelines for ADS descriptions
 - 3.1. General considerations
 - 3.1.1. ADS may be designed for specific purposes and to operate under prescribed conditions.
 - 3.1.2. The conditions under which an ADS is designed to operate are known collectively as the Operational Design Domain (ODD).
 - 3.1.2.1. The ODD conditions include, but are not limited to, environmental, geographical, and time-of-day restrictions, and/or the requisite presence or absence of certain traffic or roadway characteristics.
 - 3.1.3. ADS may or may not be designed to transfer control to a qualified driver in the vehicle. The roles and responsibilities of an ADS user

Commented [DS8]: I think the recommended requirements envision proper TOC whether ADS-initiated in a fallback situation or user-initiated in normal situations, so these changes are intended to define TOC to cover both kinds of transitions.

Commented [DS9]: Adding “vehicle” fits with how this term is used in our recommendations below and is a bit more clear, because the user is using the vehicle, not just the ADS.

- differ depending upon the ADS configuration, intended uses, and limitations on its use.
- 3.1.4. ADS safety requirements need to address the diversity of configurations, intended uses, and limitations on use while addressing usage specifications of individual ADS.
 - 3.1.5. Therefore, FRAV intends to provide guidelines for the manufacturer's description of an ADS, including measurable/verifiable ODD specifications, to enable the application of safety requirements to the ADS under assessment.
 - 3.2. The manufacturer shall describe the ADS configuration and the intended uses and limitations on the use of its feature(s).
 - 3.2.1. The manufacturer shall list the potential faults ~~covered~~ identifiable by the diagnostic system(s) of the ADS.
 - 3.3. The manufacturer shall establish the ODD conditions and boundaries of each ADS feature in measurable and/or verifiable terms.
 - 3.3.1. The ODD conditions addressed by the manufacturer shall, at a minimum, include:
 - 3.3.1.1. Precipitation (rain, snow).
 - 3.3.1.2. Time of day (light intensity, including the case of the use of lighting devices).
 - 3.3.1.3. Visibility.
 - 3.3.1.4. Road and lane markings.
 - 3.3.1.5. Road surface adhesion
 - 3.3.1.6. Country of operation.
 - 3.3.1.7. V2x dependencies, if any.
 - 3.4. The manufacturer shall establish terms for the correct use of the ADS.
 - 3.4.1. The manufacturer shall provide written information on the intended uses and limitations on the use of the ADS feature(s).
 - 3.4.2. The manufacturer shall describe means made available to the public to promote a correct understanding of the intended uses and limitations on the use of the ADS.
 - 3.4.3. The manufacturer shall provide the following information for ADS designed to interact with an fallback-ADS vehicle user.
 - 3.4.3.1. The manufacturer shall provide written information on the roles and responsibilities of the fallback-ADS vehicle user, including activities other than driving.
 - 3.4.3.2. The manufacturer shall provide written instructions for the activation and deactivation of the ADS.

Commented [DS10]: "Covered" seems vague.

Commented [DS11]: Some of the information required below should go to any ADS vehicle user regardless of whether they are a fallback user.

- 3.4.3.3. The manufacturer shall provide written information on ADS responses to ~~fallback-ADS vehicle~~ user interventions in the dynamic control of the vehicle.
- 3.4.3.4. The manufacturer shall provide written descriptions of the transfer of control procedures, including ADS notifications and fallback user responses.
- 3.4.3.5. The manufacturer shall provide information detailing the human-machine interactions, including HMI tell-tales, indicators, and displays.
- 4. ADS safety recommendations
 - 4.1. ADS performance of the DDT
 - 4.1.1. The ADS shall be capable of performing the entire Dynamic Driving Task (DDT) within the ODD of its feature(s).
 - 4.1.2. The ADS shall recognize the conditions and boundaries of the ODD of its feature(s) pursuant to the manufacturer's declaration under paragraph 3.3.
 - 4.1.3. The ADS shall detect and respond to objects and events relevant to its performance of the DDT.
 - 4.1.4. The ADS shall comply with safety-relevant traffic laws according to the ODD of the feature in use.
 - 4.1.5. The ADS shall interact safely with other road users.
 - 4.2. ADS interactions with **ADS vehicle users**
 - 4.2.1. User interaction with and the interface of ADS (features) shall have a high-level commonality of design.
 - 4.2.2. The ADS HMI shall provide clear and unambiguous information to the user.
 - 4.2.3. The ADS shall be designed to prevent misuse and errors in operation.
 - 4.2.4. The ADS shall ensure safe ADS feature activation.
 - 4.2.5. An ADS which permits a transition of control shall be designed to ensure safe transitions of control.
 - 4.2.6. An ADS which permits user takeovers of control shall be designed to ensure safe user-initiated takeovers.
 - 4.2.7. The use of the ADS shall be supported by documentation and tools to facilitate user understanding of the functionality and operation of the system.
 - 4.3. ADS management of safety-critical situations
 - 4.3.1. The ADS shall execute a fallback response in the event of a failure in the ADS and/or other vehicle system that prevents the ADS from performing the DDT and in the event of exit from the ODD.

Commented [DS12]: Note that I have suggested using this general term above rather than ADS user. This is more accurate.

- 4.3.2. The ADS shall signal its intention to place the vehicle in an MRC.
- 4.3.3. Pursuant to a traffic accident, the ADS shall stop the vehicle.
- 4.4. ADS management of system failures
- 4.4.1. The ADS shall detect and respond to system malfunctions and abnormalities relevant to its performance of the DDT.
- 4.4.2. The ADS shall be designed to protect against unauthorized access to vehicle controls, including ADS activation.
- 4.4.3. The ADS shall signal [faults/failures] compromising its capability to perform the entire DDT relevant to the ODD of its feature(s).
- 4.4.4. The ADS shall be designed to protect against unauthorized modifications to safety-critical hardware and software.
- 4.4.5. The ADS may continue to operate in the presence of [faults/failures] that do not prevent that ADS from fulfilling the safety requirements applicable to the ADS.
- 4.4.6. ~~The ADS shall signal [faults/failures] compromising its ability to execute the DDT.~~
- 4.5. ADS maintenance of a safe operational state.
- 4.5.1. The ADS should signal required system maintenance to the user.
- 4.5.2. The ADS should be accessible for the purposes of maintenance and repair to authorized persons.
- 4.5.3. ADS safety should be ensured in the event of discontinued production/support/maintenance.
- 4.6. The following table provides additional information on the elaboration of ADS safety requirements for use under the New Assessment/Test Method (NATM).
- 4.6.1. The table is structured in accordance with five core safety aspects:
 - 4.6.1.1. The ADS should drive safely.
 - 4.6.1.2. The ADS should interact safely with the ADS vehicle user(s).
 - 4.6.1.3. The ADS should manage safety-critical traffic situations.
 - 4.6.1.4. The ADS should safely manage failure modes.
 - 4.6.1.5. The ADS should maintain a safe operational state.
- 4.6.2. The left column (“safety requirements”) reproduces ADS safety recommendations presented above (paras. 4.1-4.5. inclusive).
 - 4.6.2.1. These recommendations have been generally accepted by FRAV as a basis for further elaboration of safety requirements.
- 4.6.3. The right column (“detailed provisions”) provides additional information concerning the elaboration of the safety recommendations in the left column.

Commented [DS13]: I thought “access” was ambiguous and could refer to anti-theft features, etc. I think this is about preventing unauthorized takeover of control.

Commented [DS14]: This seems to duplicate 4.4.3.

- 4.6.3.1. ADS safety requirements shall be verifiable and/or measurable under the NATM tools and methods.
- 4.6.3.2. The right column highlights aspects that may be suitable for the development of such measurable/verifiable criteria for assessing ADS fulfilment of the safety requirements. These items are all under discussion and not yet agreed by FRAV.
- 4.6.3.3. The elaboration of these safety requirements involves collaboration with the Validation Methods for Automated Driving informal working group and consideration of the following factors.
- 4.6.3.3.1. Consideration of traffic scenarios that define conditions the ADS may encounter, including nominal performance of the DDT, ADS responses to safety-critical traffic situations, and ADS responses to system failures.
- 4.6.3.3.2. Consideration of the assessment methods to be used in evaluating ADS performance against the safety requirements such as virtual testing, track tests, and under real-world driving on public roads.
- 4.6.3.3.3. Consideration of the procedures for determining ADS configurations, intended uses, and limitations on use to ensure assessments appropriate across the diversity of ADS.
- 4.6.3.3.4. Consideration of procedures for monitoring the performance of ADS in the field, including attention to data collection and analysis to provide appropriate reporting on performance metrics.
- 4.6.3.4. Based on the above, FRAV anticipates the development of measurable/verifiable criteria for application of ~~the safety requirements to~~ the NATM methods and tools to the recommended requirements set out in Table 1.

Commented [DS15]: Spell out and perhaps make first reference to VMAD.

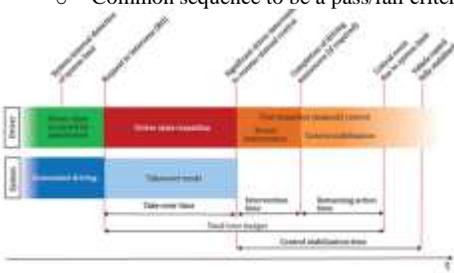
Commented [DS16]: The next four paragraphs are not sentences and not introduced.

Table 1. ADS Safety Recommendations and Development of Detailed Provisions

	Safety Recommendations	Detailed Provisions (under discussion)
The ADS should drive safely.		
1.	The ADS shall be capable of performing the entire Dynamic Driving Task (DDT) within the ODD of its feature(s).	<ul style="list-style-type: none"> • The capability of the ADS to perform the entire DDT should be determined in the context of the ODD of the ADS • As part of the DDT, the ADS should be able to: <ul style="list-style-type: none"> ○ Operate at safe speeds. ○ Maintain appropriate distances from [other road users] by controlling the longitudinal and lateral motion of the vehicle. ○ Adapt its behaviour to the surrounding traffic conditions (e.g., by avoiding disruption to the flow of traffic). ○ Adapt its behaviour in line with safety risks (e.g., by giving all road users and passengers the highest priority).
2.	The ADS shall recognize the conditions and boundaries of the ODD of its feature(s) pursuant to the manufacturer's declaration under paragraph 3.3.	<ul style="list-style-type: none"> • The ADS should be able to determine when the conditions are met for activation. • The ADS should detect and respond when one or more ODD conditions are not or no longer fulfilled. • The ADS should be able to anticipate planned exits of the ODD • The ODD conditions and boundaries (measurable limits) should be established by the manufacturer. • The ODD conditions to be recognized by the ADS should include: <ul style="list-style-type: none"> ○ Precipitation (rain, snow) ○ Time of day (light intensity, including the case of the use of lighting devices) ○ Visibility ○ Road and lane markings

3.	The ADS shall detect and respond to objects and events relevant to its performance of the DDT.	<ul style="list-style-type: none"> • Objects and events might include, but are not limited, to: <ul style="list-style-type: none"> ○ Vehicles, motorcycles, bicycles, pedestrians, obstacles ○ Road accidents ○ Road safety agents / enforcement agents ○ Emergency vehicles • The ADS shall detect objects in and around its path of travel that exceed a minimum size. • The ADS shall recognize objects as static or mobile. • The ADS shall recognize markings and signals used to indicate priority vehicles within the ODD of its feature(s). • The ADS shall classify priority vehicles within the ODD of its feature(s) in accordance with the relevant traffic law(s). • The ADS shall yield the right of way to priority vehicles in service in accordance with the relevant traffic law(s).
4.	The ADS shall comply with safety-relevant traffic laws according to the ODD of the feature in use.	<ul style="list-style-type: none"> • ADS should comply with the traffic laws in nominal conditions, except when in specific circumstances or when necessary to enhance the safety of the vehicle's occupants and/or other road users.
5.	The ADS shall interact safely with other road users.	<ul style="list-style-type: none"> • The ADS shall avoid collisions with safety-relevant objects where possible. • The ADS shall signal intended changes of direction. • The ADS shall signal its operational status (active/inactive) as needed.

The ADS should interact safely with the ADS vehicle user(s).		
6.	User interaction with and the interface of ADS (features) shall have a high-level commonality of design.	<ul style="list-style-type: none"> • The ADS should be designed to foster a level of trust that is aligned with its capabilities and limitations to ensure proper use of the system. • The operation of the interaction shall have in common: <ul style="list-style-type: none"> ○ use of common sequence of states in the transition/activation/overriding/... • The interaction should be simplified: <ul style="list-style-type: none"> ○ Limit the number of roles ○ Limit the number of potential transitions ○ Limit the number of settings ○ Limit the number of different interaction modes
7.	The ADS HMI shall provide clear and unambiguous information to the user.	<ul style="list-style-type: none"> • The vehicle shall indicate its ADS capabilities in terms of their automated features and their ODD. • The ADS shall inform the user on the current conditions: <ul style="list-style-type: none"> ○ ADS status information ○ The availability of ADS features ○ User Role ○ Responsibility ○ Permitted NDRA ○ Potential roles to activate ○ “Standard” information: <ul style="list-style-type: none"> ▪ Vehicle speed, range and Time to Fuel ○ ADS failure information • The ADS shall inform the user on the upcoming conditions: <ul style="list-style-type: none"> ○ ODD boundaries ○ Upcoming actions or change in roles ○ Oncoming decisions/manoeuvres ○ Estimated time until take over in normal conditions ○ Transition related communication. • The ADS shall ensure that safety related information is prioritized and presented in a clear and unambiguous manner.
8.	The ADS shall be designed to prevent misuse and errors in operation.	<ul style="list-style-type: none"> • The ADS shall be designed to prevent inadvertent activation or deactivation. • The controls dedicated to the ADS shall be clearly distinguishable from other controls. • The ADS shall provide feedback when the user attempts to enable unavailable functions.

<p>9.</p>	<p>The ADS shall be designed to ensure safe ADS feature activation.</p>	<ul style="list-style-type: none"> • The ADS shall inform the user that preconditions for activation are met. • The activation should follow a common sequence of actions and states: <ul style="list-style-type: none"> ◦ Common sequence to be a pass/fail criterion. • The ADS shall provide confirmation that the system is activated.
<p>10.</p>	<p>An ADS which permits a transition of control shall be designed to ensure safe transitions of control.</p>	<ul style="list-style-type: none"> • The interaction shall follow a common sequence of actions and states in the Transition of control (change of user roles): <ul style="list-style-type: none"> ◦ Common sequence to be a pass/fail criterion.  <p style="text-align: center;">Figure 2 – System-initiated transition from automated to manual driving</p> <ul style="list-style-type: none"> • Transition of control shall return to a common default user role (to prevent mode confusion and other risks): <ul style="list-style-type: none"> ◦ This shall normally be fully engaged driving (conventional driver). ◦ Common default user to be a pass/fail criterion. • The ADS shall continuously verify whether the user is available for the transition of control and warn the user if not available when required. • The ADS shall verify that the driver is in stable control of the vehicle to complete the transfer of control to the user. • During transition, the ADS shall remain active until the transition of control has been completed or the ADS reaches a minimal risk condition.

11.	An ADS which permits user takeovers of control shall be designed to ensure safe user-initiated takeovers.	<ul style="list-style-type: none"> • Under safe conditions the user is allowed to initiate a takeover of the ADS. • The deactivation should follow a common sequence. <ul style="list-style-type: none"> ○ Common sequence to be a pass/fail criterion. • The ADS should prevent and warn a user for a user-initiated takeover that would likely lead to an unsafe situation. • The ADS should provide a clear feedback of the successful user initiated takeover. <ul style="list-style-type: none"> ○ The clear feedback should be a pass/fail criterion. • The user-initiated takeover should return to a common default user role (to prevent mode confusion and other risks) <ul style="list-style-type: none"> ○ This should normally be fully engaged driving (conventional driver). ○ Common default user role to be a pass/fail criterion.
12.	The use of the ADS shall be supported by documentation and tools to facilitate the user in understanding the functionality and operation of the system.	<p>Documentation:</p> <ul style="list-style-type: none"> • The following information should be documented: • description of the possible educational approach: • Theoretical and practical training • How it aligns with common HMI and interaction • Operational Description of ADS (features) capabilities and limitations (the information should also refer to specific scenarios) • Description on roles and responsibility of driver/user and ADS when ADS (feature) is on/off • description of allowed transition of roles and procedure for the transition (activation/deactivation, ToC, Override) • general overview list of NDRA allowed when an ADS feature is active. <p>Tools:</p> <ul style="list-style-type: none"> • The ADS supports the user in correct operation (coaching). • The ADS gives prompt feedback on erroneous operation.

The ADS should manage safety-critical situations.		
13.	The ADS shall execute a fallback response in the event of a failure in the ADS and/or other vehicle system that prevents the ADS from performing the DDT <u>and in the event of exit from the ODD.</u>	<ul style="list-style-type: none"> • In the absence of a fallback-ready user, the ADS should fall back directly to a Minimal Risk Condition (MRC) • If the ADS is designed to request and enable intervention by a human driver, the ADS should execute an MRM in the event of a failure in the transition of control to the user <ul style="list-style-type: none"> ○ Upon completion of an MRM, a user may be permitted to assume control of the vehicle ○ The user should be permitted to override the ADS to assume full control over the vehicle
14.	The ADS shall signal its intention to place the vehicle in an MRC.	<ul style="list-style-type: none"> • The ADS should signal its intention to place the vehicle in an MRC to: <ul style="list-style-type: none"> ○ ADS user or vehicle occupants ○ Other road users (e.g., by hazard lights)
15.	Pursuant to a traffic accident, the ADS shall stop the vehicle.	<ul style="list-style-type: none"> • ADS reactivation should not be possible until the safe operational state of the ADS has been verified.
The ADS should safely manage failure modes.		
16.	The ADS shall detect and respond to system malfunctions and abnormalities relevant to its performance of the DDT.	<ul style="list-style-type: none"> • The ADS should perform self-diagnosis of faults in accordance with the OEMs prescribed list • The ADS should detect system malfunctions/abnormalities and evaluate system's ability to fulfill the entire DDT
17.	The ADS shall be designed to protect against unauthorized access <u>to vehicle controls, including ADS activation.</u>	<ul style="list-style-type: none"> • The measures ensuring protection from an authorized access should be provided in alignment with engineering best practices.
18.	The ADS shall signal [faults/failures] compromising its capability to perform the entire DDT relevant to the ODD of its feature(s).	
19.	The ADS shall be designed to protect against unauthorized modifications to safety-critical hardware and software.	
20.	The ADS may continue to operate in the presence of [faults/failures] that do not prevent that ADS from fulfilling the safety recommendations applicable to the ADS.	<ul style="list-style-type: none"> • The limited operation of the ADS should comply to the normally applicable safety requirements. • For situations where the ADS is not able to perform the DDT safely, the ADS should have the function to prevent activation. If the ADS has OTA functionality, this function may be activated remotely if the authorities or the vehicle manufacturer determine that the ADS is unsafe.

Submitted by the expert from SAE

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21.	The ADS shall signal [faults/failures] compromising its ability to execute the DDT.	<ul style="list-style-type: none">The ADS should signal [faults/failures] affecting the ability to execute the DDT.
The ADS should maintain a safe operational state.		
22.	The ADS should signal required system maintenance to the user.	
23.	The ADS should be accessible for the purposes of maintenance and repair to authorized persons.	
24.	ADS safety should be ensured in the event of discontinued production/support/maintenance.	

Commented [DS17]: Isn't this the same as item 18 above?