**Comments from SG4 Leadership on
FRAV-24-06, FRAV-25-08 and FRAV-25-11**

**FRAV-24-06**

We note that the scope and complexity of this scenario (highway lane keeping) is rather limited, and the selection of FRAV safety requirements and their detailed provisions focus only on those that concern the interaction between the human/user and the vehicle.

Therefore, we note that important safety requirements and their detailed provisions are missing, e.g. those applicable to the scenario listed under the header “The ADS should drive safely”.

(We furthermore question whether the verification of safety requirements 6 and 11 and their greenly highlighted detailed provisions are applicable to a lane keeping scenario. Instead, we would argue that the verification of compliance with such provisions merit their own scenarios.)

**FRAV-25-08**

VMAD SG4’s small drafting group has completed a similar exercise, although from the perspective of whether the respective FRAV safety requirement and detailed provisions could be validated using track testing, real world testing, or both or neither. We therefore refer to the informal document submitted by the small drafting group of SG4 for the 26th VMAD session on 16 May 2022.

It is important to underline in this regard that the informal document merely sets out the technical possibility to conduct such physical tests to validate the requirements/provisions. On occasion it was noted by the small drafting group that VMAD may consider that additional validation methods are required in order to ensure the verification of compliance (i.e. physical pillars alone are not sufficient). Similarly, it was noted for some requirements that, while it would be technically possible to validate them using physical testing methods, track and real world testing methods might not be the most suitable/efficient/effective tool to verify compliance.

Therefore, we support the suggestion in this document to conduct a review of the applicability of the VMAD pillars for each FRAV safety requirement and detailed provision. On the one hand, we believe such exercise would show whether there are any gaps in the current structure of VMAD pillars, when mapping them to FRAV requirements and seeing whether the VMAD pillars could provide sufficient coverage of compliance for each of the provisions separately. On the other hand, such exercise would help at least VMAD’s SG4 in further developing both the general matrix as well as the test matrices for track testing and real world testing, as it would become clear which safety requirements would need to be verified using the physical testing methods, and subsequently develop them accordingly.

**FRAV-25-11**

Please see the separate excel file. This review was based on the previously mentioned informal document submitted by the small drafting group of VMAD SG4.