

**Draft Text for  
FRAV Recommendations on  
ADS External Light-Signalling**

*[This text has been prepared for consideration by FRAV during its 31<sup>st</sup> session (September 2022). The text aims to summarize the consensus outcomes of FRAV deliberations on ADS external light signals for ADS vehicles to date.]*

**Commented [武内1]:** It is important to clearly state also that all CPs have freedom to consider both benefits and risks in external lighting and make decision to adopt/not adopt.

Summary

- FRAV does *not* recommend requirements for *mandatory* installation of additional light-signalling devices beyond those requirements established for manually driven vehicles for all countries/regions.
- FRAV recommends the use of existing light-signalling devices to signal initiation of an automated fallback response designed to place the ADS vehicle in a minimal risk condition.
- FRAV recommends the establishment of uniform provisions for a light signal to communicate the operational status of the ADS *if fitted on an ADS vehicle and under certain conditions*.

Background

Pursuant to deliberations during its November 2021 session, AC.2 tasked GRVA and its Informal Working Group on Functional Requirements for Automated Vehicles (FRAV) to determine the conditions, if any, under which an ADS external lighting signal should be activated and recommend to GRE to whom the signal should be displayed (drivers in other vehicles, other road users) and from where it should be visible (e.g., front, rear, side).

FRAV consulted with the GRE Task Force on Autonomous Vehicle Signalling Requirements (AVSR), reviewed outcomes of these and other deliberations and research projects, surveyed its experts, and deliberated on the issue across its sessions between March 2021 and September 2022.

Recommendations

1. FRAV does not recommend requirements for mandatory installation of additional light-signalling devices beyond those requirements established for manually driven vehicles for all countries/regions.

FRAV recommends that ADS be required to operate the vehicle in accordance with traffic laws. These laws prescribe requirements for signalling to other road users<sup>1</sup> (ORU) and are deemed sufficient to address road-safety needs.

Research and documented real-world cases indicate that identifiers unique to ADS vehicles may raise risks of changes in ORU behaviours that adversely impact road safety. ADS safety requirements ensure predictable ADS behaviours designed to prioritize collision avoidance. Foreknowledge of ADS operation of a vehicle has been shown to alter risk assessments of other road users, resulting in

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<sup>1</sup> FRAV defines “other road user” as any entity using a roadway and capable of safety-relevant interaction with an ADS vehicle.

higher-risk behaviours when interacting with these vehicles. ADS responses to mitigate these higher-risk ORU behaviours may result in traffic disruptions that may introduce further road-safety risks.

Commented [ 2]: Japan hopes you kindly provide data of this information.

At the same time, there are some observations that indication to ORU that this ADS is activated or not may have some benefits for traffic safety, because ORU can do proper reaction considering the unique movement of ADS vehicle. And indication of ADS may reduce some unnecessary surprise for ORU especially at the first stage of spreading ADS in the market.

2. FRAV recommends the use of existing light-signalling devices to signal initiation of an automated fallback response designed to place the ADS vehicle in a minimal risk condition (MRC).

Under certain conditions, an ADS may need to place the ADS vehicle in a stable and stopped condition that minimizes the risk of a crash. Depending upon the ADS configuration, such conditions may include fallback-user incapacitation (e.g., medical emergency), failed fallback-user response to an ADS transition demand, or a condition that prevents the ADS from safely performing the Dynamic Driving Task.

FRAV recommends that ADS signal initiation of a safety-critical automated fallback response to ORU in a manner consistent with similar expectations applied to human drivers (such as via activation of a hazard-warning signal).

3. FRAV recommends the establishment of uniform provisions for a light signal to communicate the operational status of the ADS if fitted on an ADS vehicle and under certain conditions.

While FRAV does not recommend mandatory installation of light-signalling devices unique to ADS vehicles for all countries/regions, neither does FRAV recommend a prohibition against the use of light-signalling to indicate the ADS operational status under certain conditions nor a prohibition against the mandatory installation of light-signalling devices at the each national/regional level.

As noted above, FRAV does not support ADS-specific light-signalling to all road users; however, FRAV notes instances where signalling to road-safety agents<sup>2</sup> such as law enforcement may-can be justified. For example, FRAV notes traffic laws that prohibit human drivers from engaging in certain non-driving-related activities (NDRA). However, FRAV anticipates traffic laws that may permit additional NDRA while an ADS is operating the vehicle. Means to enable law enforcement to determine whether a vehicle is under ADS operation may therefore be justifiable in order to facilitate enforcement of such laws regarding permissible NDRA Therefore, FRAV thinks it can be justified that some Contracting Parties request mandatory installment of light-signalling device in their countries/regions.

In this regard, FRAV does not exclude the potential usefulness of a light signal to address specific interactions with road-safety agents. FRAV notes that means other than a light signal may address such interactions. For example, telecommunications technologies may enable dissemination of information to designated or authorized recipient(s).

In the event that Contracting Parties wish to request permit the use of a light-signal to communicate the operational status of ADS vehicles in their countries/ regions at mandatory or if-fitted base, FRAV recommends the establishment of uniform provisions to facilitate harmonization of such

<sup>2</sup> “Road-safety agent” is defined by FRAV as a human being engaged in directing traffic, enforcing traffic laws, maintaining/constructing roadways, and/or responding to traffic incidents.

devices ~~if fitted on the vehicle~~. FRAV recommends that such signals avoid confusion or interference with other lighting or light signals and be:

- ~~Informative for ORU and Activated upon ADS detection of~~ the road-safety agent on whether ADS is activated or not involved in the interaction,
- Discretely positioned and/or activated to minimize ~~confusion for visibility by~~ other road users, and
- ~~Illuminated for a duration necessary to meet the relevant safety need,~~

**Commented [ 3 ]:** Japan proposes that this paragraph is not necessary because light signals can be illuminated anytime to inform ORU (not only road-safety agent) of whether ADS is activated or not, therefore duration of illumination should not be limited to the specific case.  
And from the technical point of view, it seems to be difficult for detecting existence of road-safety agent

Submitted by the experts from Japan

Document FRAV-31-13  
31<sup>st</sup> FRAV session  
13-15 September 2022

List of reference documents

*Reference documents in addition to those identified by the AVSR Task Force (see AVSR-05-06 for literature review and especially the 2<sup>nd</sup> AVSR session for studies).*

European Commission, Directorate-General for Mobility and Transport, Montalvo, C., Willemsen, D., Hoedemaeker, M. (2020). Study on the effects of automation on road user behaviour and performance: final report, Publications Office. <https://data.europa.eu/doi/10.2832/431870>.