

Proposal to amend the draft FRAV interim submission to GRVA/WP.29

Modifications to the existing text are marked in **bold** for new or ~~striketrough~~ for deleted characters.

- 1.7.8.3. These recommendations intentionally omit specifications for individual DDT functions. **For example, the recommendations do not include specific specifications for lateral or longitudinal control as a general matter.** As noted above, performance of the DDT is dependent on traffic conditions where such functions cannot be limited to representative specifications. For example, ~~a representative crash test at 56 kph ensures safety at lower speeds~~ **there is no way to specify a particular measure of lateral control that would be appropriate in all circumstances.** ~~This approach cannot be applied to driving where~~ ADS safety involves real time tactical and operational adaptation to dynamic road conditions **in the ODD.** Tactical and operational functions are interdependent where the complexity of their interactions needs to be assessed under diverse traffic conditions.
- 1.7.8.4. By ensuring that an ADS will be subjected to traffic scenarios ~~covering~~ **fairly representative of what the ADS is reasonably likely to encounter in** its ODD, the assessment of the behavioural competencies demonstrated by the ADS under those scenarios verifies the capability of the ADS to perform the entire DDT necessary to navigate its ODD.

Justification

Para. 1.7.8.3., introduces a new example to aid reader's understanding and replaces the crashworthiness example which is confusing in this context with a point clearer in the ADS context.

Para. 1.7.8.4., the word "covering" implies that all scenarios in an ODD can be known and be tested; the suggested language indicates the realistic goal of testing a set of scenarios reasonably likely to occur.