## Reservation concerning the draft FRAV interim submission to GRVA/WP.29

- 1.5.7. The conditions under which an ADS is designed to operate are known as the Operational Design Domain (ODD), including aspects such as roadway speed limits, road designs (surface, geometry, infrastructure, etc.), weather conditions, and traffic densities. The ODD may include constraints or limitations on ADS use such as maximum vehicle speed, maximum rate of rainfall, or road type.
- 3.14. *"Operational Design Domain (ODD)"* means the operating conditions under which an ADS feature is specifically designed to function.

## Comments

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In addition to the external environment, ADS operation may also need to consider its own status as well as the status of the drivers or passengers, for example, the activation conditions of ALKS in R157 must take into account the status of the driver and the failure of the ALKS.

In order to better describe the operating conditions of ADS, ISO 34501 clearly defines ODC and distinguishes between ODD and ODC definitions. The definition of ODC in ISO 34501 is as follows:

Note 1 to entry: In this document, the ODD **only** refers to the vehicle's *external environment condition*. If all conditions are referred to, a different term can be defined. For example, the *operational design condition* then can be used to describe the *overall design constraints of ADS and can be divided into ODD (external environment condition), vehicle status, driver/passenger conditions and other necessary conditions.* 

Propose to define "ODD" as an external environment and add definition for "ODC".