

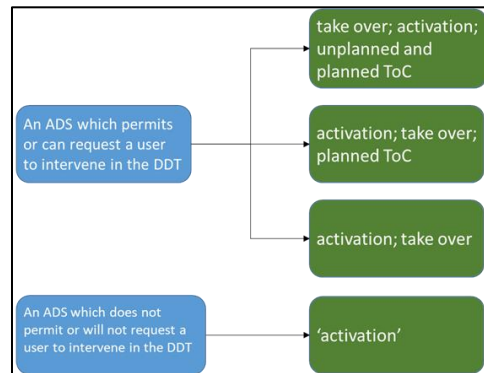
## Reservation concerning the draft FRAV interim submission to GRVA/WP.29

### Background

- 1.4.9. Although the DDT comprises individual functions (in some research, broken down into thousands of subtasks), the DDT itself refers to the whole of the functions required to operate the vehicle. In this aspect, performance of the DDT cannot be split or allocated. Either the ADS or the driver performs the DDT. A system that cannot perform the entire DDT can only assist the driver's performance of the DDT.

### Reservation

- 5.11.2. In vehicles that can still be driven by a human every part of the driving task that is not automated needs to be performed by a human and every part of the driving task that is not 'perfectly' automated needs to be compensated for by a human. It therefore has to be clear who performs which part of the driving task during a trip. **It has to be clear what a human can and cannot do while the ADS performs (a part of) the driving task.** It has to be clear when the ADS can no longer perform the driving task and **the human has to take over.** It has to be clear if the ADS is activated or can be activated. This kind of clarity is essential for safety, essential for a safe use of the ADS. And this clarity is provided through the interaction between the human and the ADS. The interaction is more than the interface and includes for example how an ADS 'behaves' in the perception of its user (e.g., if braking then standby mode; not only how much it decelerates).



### Comments

As stated in para. 1.4.9., DDT is indivisible, and for ADS, when ADS is working, all DDT should be performed. If only part of DDT should be performed, the system is a driver support system, not an ADS system. An ADS would not be performing a part of the DDT under any situation.

What is the difference between a transition of control (TOC) and a "take over"?