Canada comments on the structure of FRAV 33-04 Introduction, Scope and Definitions sections.

It is clear that a great deal of work and effort has been put into creating FRAV 33-04 and we thank the secretariat for preparing this document. We also recognize that it is difficult to piece together various sources of information from various working groups. Canada would like to propose some suggestions to improve the structure of the document to make it as clear as possible for the reader.

It was noted that the introduction has a length nearing 5 pages which consists of various background, definitions and other useful information. It is our position that the introduction should introduce the document itself rather than the various background concepts and we thus put forward the suggestions in this document. While the suggestions are not complete and only cover the introduction, scope and definitions, we believe it is a first step to refining the document structure and improve readability.

We would also suggest considering using the principles in scope of the Framework document on automated/autonomous vehicles (ECE/TRANS/WP.29/2019/34/Rev.2) (ie. *a. System safety*, *b. Failsafe Response*, *c. HMI /Operator information* and *d. OEDR (Functional Requirements)*) as headings in subsequent sections to further enhance readability and clarify applicability to readers who are not in the FRAV group.

Section 1: Introduction

- Propose to rework introduction to introduce the document, its intent and scope and move other definitions/background to respective sections or annex.
- Remove 1.1 – Introduces a section which does not exist
- Remove 1.3 – Introduces a section which does not exist
- Move 1.4 to the Definitions, background or annex
    - This is more a definition/background than an introduction to the document
- Move 1.4.7 to the end of 1.4.2 to expand on explanation
- Move 1.4.10 to end of 1.4.4 to expand on explanation, rename functions to actions
- Move 1.4.11 to end of 1.4.5 to expand on explanation, rename functions to actions
- Move 1.4.8, 1.4.9 under new DDT section and move to definitions, background or annex
    - They are more relevant to DDT but also more of a definition/background than an intro to the document
- Remove 1.4.12 – very similar to 1.4.9 above
- remove 1.5.1 – due to removal of other paragraphs and expanding in subsequent paragraphs
- Move 1.5.7, 1.5.8, 1.5.9 under new ODD section and move to definitions, background or annex
    - They are more relevant to ODD but also more of a definition/background than an intro to the document
- 1.5.11 generalize ADS-specific wording and move under DDT section – This applies to humans as well
- Move 1.6 to the Definitions, background or annex
    - This is more a definition/background than an introduction to the document
- Move 1.7 to 1.7.7 to the Definitions, background or annex

- Remove 1.7.8.1 – This should be captured in the scope along with other items from the Safety Vision and Key Principles of the WP29 Framework Document on automated/autonomous vehicles
- Move 1.8 to the Definitions, background or annex
- Move 1.8.5 under 1.5 – This is relevant to the intro and ADS

Section 2: Purpose & Scope

- **Add between 2.1 and 2.2** "The recommendations in this document take into consideration the key principles for the safety and security described in the Revised Framework document on automated/autonomous vehicles (ECE/TRANS/WP.29/2019/34/Rev.2). More specifically the principles in scope are: *a. System safety*, *b. Failsafe Response*, *c. HMI /Operator information* and *d. OEDR (Functional Requirements)*."
    - o **Justification:** The driver of this document is the Framework document. Rather than referring to it from various paragraphs, we believe it is best to state it in the purpose section. This also covers scope and suggest changing the title of the section to cover this aspect as well.

Section 3: Definitions

- **Rename 3.6** "Critical scenario" to "Critical Traffic Scenario" and **move as a sub-bullet of 3.21** Traffic Scenario
    - o **Justification:** "Critical scenario" is not used in the document but "Critical Traffic Scenario" is used. Traffic scenario is in the definition. Multiple different types of traffic scenarios should be grouped together
- **Rename 3.8** "Failure Scenario" to "Failure Traffic Scenario" and **move as sub-bullet of 3.21** Traffic Scenario (**5.10 should be amended** to match the definition)
    - o **Justification:** The definition points to it being a traffic scenario, maintain consistency. Multiple different types of traffic scenarios should be grouped together
- **Remove 3.9** "(ADS) fallback response"
    - o **Justification:** it is not used in the document
- **Remove 3.11** "Fallback-user response"
    - o **Justification:** it is used only 1x, Fallback-user is defined in 3.10 and there is not enough ambiguity to require the definition
- **Rename 3.13** "Nominal Scenario" to "Nominal Traffic Scenario" and **move as a sub-bullet of 3.21** Traffic Scenario
    - o **Justification:** "Nominal Scenario" is not used in the document but "Nominal Traffic Scenario" is used. Traffic scenario is in the definition. Multiple different types of traffic scenarios should be grouped together