

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

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

### Original Proposal (at FRAV-38th@Coventry)

- 1.7.8.2. **The safety benefit from ADS is achieved when ADS performance is safer than conventional human driver performance. From this perspective, in general, the safety level of ADS performance shall be equal to or higher than the safety level of careful and competent human driver performance.**

### Additional Proposal

- 1.7.8.2. ~~The safety benefit from ADS is achieved when ADS performance is safer than conventional human driver performance.~~ **In order to ensure vehicle safety, the safety level of ADS performance shall satisfy the criteria that meet the requirements taking into account of safety level of functions which are already available in the market.** ~~From this perspective, in general,~~ **The safety level of ADS performance shall be at least** equal to or higher than the safety level of careful and competent human driver performance.

### Justification

Japan believes that high-level safety concept is necessary in this document. Basically, Japan thinks that careful and competent human driver “concept” is the minimum safety criteria which ADS performance should satisfy with. However, in case that there are some functions which are safer than careful and competent human driver already in the market, Japan thinks that the safety level of ADS performance should satisfy that criteria.