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.

Proposal #1

3.11. "Operational Design Domain (ODD)" means the operating conditions under which an ADS feature is specifically designed to function.[5]

[5] 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.

Justification

It's suggested to give some flexibility in terms of ODD definition. For example, in the relevant Chinese national standards, ODD (external environment condition) is part of Operational Design Condition (ODC) alongside with vehicle status, driver/passenger conditions and other necessary conditions. This proposal is also aligned with ISO 34501:2022, in which:

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. [source: ISO 34501:2022]

Proposal #2

~~4.8.~~ **4.9.** The manufacturer shall establish the ODD conditions and boundaries of each ADS feature in measurable and/or verifiable terms in accordance with Appendix A.

~~4.9.~~ **4.8.** The manufacturer shall list the potential faults identifiable by the diagnostic system(s) of the ADS.

Justification

It's suggested to renumber these two paragraphs since in the following 5.8.5. and Appendix A are linked with renumbered 4.9., e.g. in the original text:

5.8.5. The ADS shall recognise the conditions and boundaries of the ODD of its feature(s) pursuant to the manufacturer's declaration under paragraph 4.9.

Proposal #3

5.8.19. ~~The ADS shall signal its intention to place the vehicle in an MRC.~~

Justification

5.8.19. and 5.9.5. both paragraphs are the same requirements which refer to the MRC. It's suggested to only keep 5.9.5. under critical traffic scenarios.

Proposal #4

5.8.21.   The ADS shall avoid collisions with safety-relevant objects where possible.

Justification

Editorial issue, it is a repetition of the paragraph 5.8.17.

Proposal #5

Move the following paragraphs to 5.10 section.

5.9.4.   The ADS shall execute a fallback response in the event of a failure in the ADS and/or other vehicle system that prevents the ADS from performing the DDT.

5.9.4.1.   In the absence of a fallback-ready user, the ADS should fall back directly to an MRC.

5.9.4.2.   If the ADS is designed to request and enable intervention by a human driver, the ADS should execute [an MRM] in the event of a failure in the transition of control to the user.

5.9.4.2.1.   Upon completion of [an MRM], a user may be permitted to assume control of the vehicle.

5.9.4.2.2.   The user should be permitted to [override] the ADS to assume full control over the vehicle.

Justification

5.9.4. and its sub-paragraphs are related to the failure situation which more relevant for 5.10. section, i.e. ADS Performance of the DDT under System Failure Scenarios.