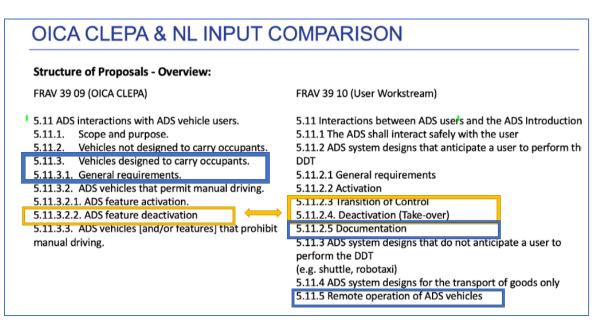
Preliminary information:

This document, in the original structure provided by Canada, aims to compare the User Workstream text section with the OICA-CLEPA proposal.

Preliminary background on the structure:

executed a comparison of the structure of the 2 proposals, resulted similar in structure except for some differences

- Different naming of similar sections (i.e. "ADS that permits a manual driving" vs. "ADS system design that anticipate a user to perform the DDT)
- OICA-CLEPA proposal having an additional layer for "Vehicle designed to carry occupants"
- User Workstream proposal having two additional sections: Documentation (that OICA-CLEPA proposes do move away from user section) and Remote operation of the ADS vehicles
- In OICA proposal, "ADS feature deactivation" includes manual and automatic deactivation, and the Transition of control requirements



Please find here some indication necessary for the understanding of the document:

- Column 1: User proposal
- Column 2: OICA-CLEPA proposal. Here you will find
 - In black: OICA-CLEPA requirements of the corresponding section
 - In Orange: OICA-CLEPA requirements from other section of the OICFA-CLEPA doc, recalled by Column 3 (OICA-CLEPA comments) that cover some in a straightforward way the User requirements
- Column 3: OICA-CLEPA comments

In addition, the necessary text color legenda:

- Highlighted green: text in common between User proposal end OICA-CLEPA proposal
- Green: text sections we agree on
- *Red:* text to delete
- Orange: see above
- Light Blue: requirements of OICA-CLEPA proposal reported 2 times in this document for coherence with sections

User Stream Text	OICA/Cle	pa Text	OICA-CLEPA comments
5.11.1 The ADS shall interact safely with the USEr A high-level commonality in the interaction processes and interface between the vehicle and a user for all brands and models will help drivers to develop and apply a mental model ¹ of how their responsibilities relate to the level of automation and of how to interact with the systems. It will also help to reduce the risk of user confusion (e.g., mode confusion) when changing between vehicles with ADS from different manufacturers. Such commonality cannot be defined now, but it is vital to establish it as a goal of future design.			5.11.1 red text: proposal to delete. The safety by design process of the OEM should establish the safety concept and fullfill the requirements in the FRAV document, identifying the relevant aspects to enable safe ADS feature interaction
5.11.2 ADS system designs that anticipate a user to perform the DDT 5.11.2.1 General requirements 5.11.2.1.1 These recommendations deal with the following user roles: driver, fall-back user (when applicable), passenger (in the	5.11.1. 5.11.1.1. recommends requirements safety of drive	ons with ADS vehicle users. Scope and purpose. This section functional with regard to the er, fallback-user, and eractions with an ADS.	5.112: OICA-CLEPA propose to replace the name of this section in the more straightforward way "
driver seat) 5.11.2.1.2 The interaction should be simplified: (a) When activating the ADS all features are activated	5.11.3. 5.11.3.1. [5.11.3.1.1.]	Vehicles designed to carry occupants. General requirements. [Subject to safety concept of the ADS, the ADS shall signal the presence of a	5.11.2.1.2. is contradict OICA-CLEPA approach, i.e.:

¹ A mental model is an explanation of someone's thought process about how something works in the real world.

 (b) The number of response options for critical events should be limited (c) An activated ADS is completely responsible for the DDT (d) A driver performing the DDT is completely responsible for the DDT (e) If an engaged feature reach the end of its ODD a 	[5.11.3.1.2.] 5.11.3.2.	fault that prevents the ADS from performing the DDT functions required by its feature(s) pursuant to para. 4.9.] [Subject to safety concept of the ADS, the ADS shall signal its intention to place the vehicle in an MRC to the ADS user or vehicle occupants.] ADS vehicles that	 (a) is not always valid (we can have highway chauffeur and AVP) (c) and (d) are not user-section related (b) covered by OICA-CLEPA 5.11.3.2.2.3 (a) contradicts with (e) and with 5.11.2.1.4.
transition of control will be initiated.	5.11.3.2.	permit manual driving.	
 5.11.2.1.3 The ADS HMI shall provide information and signals clearly noticeable under all operating conditions, multimodal, simple and understandable. (covered by 5.11.2.1.7) 5.11.2.1.4 The vehicle shall indicate its ADS capabilities in terms of their automated [features] and their ODD. 		ADS use-cases and/or features permitting manual driving, [in relation to their activation or deactivation, particularly in motion], shall have means to monitor parameters relevant to engagement or disengagement of [driver/user] for the DDT.	 5.11.2.1.3 This requirement is addressing ADS HMI in general without addressing what interactions is of concern. To require that any ADS interaction is multimodal is excessive. This section is covered later by User section 5.11.2.1.7, that's corresponds to OICA-CLEPA section 5.11.3.2.1.5
 5.11.2.1.5 The ADS shall inform the user on the current conditions (dependent on the activated or deactivated state): (a) ADS status information. (b) The availability of 	sections of O	equirements in other ICA-CLEPA proposal "OICA CLEPA olumn: ADS feature	5.11.2.1.4: agree 5.11.2.1.5 The safety relevant information
automated features (ADS). (c) Responsibilities for the user. (d) Permitted NDRA or not- permitted NDRA. (f) "Standard" safety related information. (i) e.g., range, speed, seat-belts, a.o. (g) Any failure of the ADS.	5.11.5.2.2.5.	deactivation may be delayed, suppressed, canceled, ignored, aborted or by other means prevented from being executed if it is estimated by the ADS that the situation is unsuitable for the subsequent	 provided by the ADS should be defined in manufactures safety by design process (a): covered by OICA-CLEPA 5.11.3.2.1.4 (b) covered by OICA-CLEPA 5.11.3.2.1.2, to discuss the impact on user annoyance (c) ADS should not address responsibility/liability, covered in

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5.11.2.1.6 The ADS shall inform	mode of vehicle	transition of control section and
the user in time on the	operation.	covered by OICA-CLEPA 5.11.3.2.2.5
upcoming events:		
	5.11.3.2.1.5. Upon feature	
(a) Upcoming actions or	activation, indicators, tell-tales,	(d) The safety relevant
	and warnings not related to the	•
change in roles.	operation of ADS feature may be	information provided by the ADS
(b) Estimated time until		should be defined in
transition of control in nominal	disabled, deactivated, inhibited,	manufactures safety by design
conditions (when applicable).	or by other means be made	process
	unavailable to the user	process
5.11.2.1.7 The ADS shall		
ensure that safety related		
information is prioritised and	5.11.3.2.1.4. An ADS feature	(f) covered by USER proposal
presented in a clear and	activation intended to change the	5.11.2.1.7. or OICA-CLEPA
•	user role shall signal its activation	5.11.3.2.1.5
unambiguous manner.	state.	(a) covered by QICA CLEDA E 11.2.1.1
Indicators, tell-tales and		(g) covered by OICA-CLEPA 5.11.3.1.1
warnings not related to the	[E 11 2 2 1 2] [Cubiect to cofety	
operation of ADS (feature) may	[5.11.3.2.1.2]. [Subject to safety	
be disabled, de-activated	concept of the ADS, the ADS shall	5.11.2.1.6 OICA-CLEPA proposal to
inhibited or by other means be	signal the availability of a feature	cover this in deactivation section, with
made un-available to	for activation.]	5.11.3.2.1.2
support user (vehicle mode)		
understanding.	5.11.3.2.2.5. ADS features using	
	_	
5.11.2.1.8 The ADS shall be	automatic deactivation in motion,	
designed to prevent misuse	when the subsequent mode of	
and errors in operation by the	operation is not ADS, should use a set	5.11.2.1.8: proposal to cover with
	of conditions to support an	OICA-CLEPA 5.11.3.2.2.2 in
user.	assessment of readiness to re-engage	"deactivation" section, reason why
	in the driving task and if the	· · ·
5.11.2.1.9 The controls	conditions cannot be fulfilled, the	proposal to delete
dedicated to the ADS shall be	ADS shall trigger a fallback to an MRC	
clearly distinguishable from		
other controls to	5.11.3.1.1. [Subject to safety concept	5.11.2.1.9: proposal to cover with
accommodate the appropriate	of the ADS, the ADS shall signal the	OICA-CLEPA 5.11.3.2.1.5 (feature
interactions.	presence of a fault that prevents the	activation), reason why proposed to
	ADS from performing the DDT	delete
5.11.2.1.10 The ADS shall be	functions required by its feature(s)	11 2 1 10; covoring 5 11 2 1 7 and
designed to prevent	pursuant to para, 4.9.	5.11.2.1.10: covering 5.11.2.1.7, and
inadvertent activation or	pursuant to para. 4.5.]	present in OICA-CLEPA 5.11.3.2.1.5,
deactivation.	5442222	delete
	5.11.3.2.2.2. Controls enabling	
(a) The vehicle controls should	ADS feature deactivation, shall, at	
be disabled, suppressed, de-	least when the vehicle is in motion,	
activated, inhibited or by other	also be associated with additional	
means made un-available, as	conditions for the purpose of	
needed to limit errors in	enabling protection for unintended	
operation, misuse and	deactivation in motion.	
reduce ambiguous states of		
vehicle control.		
	5.11.3.2. ADS use-cases and/or	
	features permitting manual driving,	
	reactives permitting manual unving,	

 (b) Indicators, tell-tales and warnings not related to the operation of the ADS should be disabled, de-activated inhibited or by other means be made un-available to support user vehicle mode understanding. 5.11.2.1.11 The ADS shall provide prompt feedback when the user attempts to enable unavailable features. 5.11.2.1.12 The ADS shall have a Driver Monitoring System to support correct engagement of the [fallback] user. 5.11.2.1.13 The HMI of an ADS shall be consistent with the entire vehicle HMI. 5.11.2.1.14 The vehicle and ADS HMI need to take into account potential impairments of users (such as colour blindness, impaired hearing) which do not require specific hardware adaptations of the vehicle. 	[in relation to their activation or deactivation, particularly in motion], shall have means to monitor parameters relevant to engagement or disengagement of [driver/user] for the DDT.	 5.11.2.1.11: we are not displaying feedback for what is unavailable, but just indicating what is activating. Driver monitoring system will reduce the risk of driver disengagement that could be, i.e., driver activationg ADS outside of ODD. Covered by OICA-CLEPA 5.11.3.2 (DMS) 5.11.2.1.12: to be covered in deactivation section 5.11.2.1.13 the HMI should be covered by the OEM safety by design process 5.11.2.1.14 not possible evaluate all the potential impairment exixting. This is a requirement not present in todays

5.11.2.2 Activation 5.11.2.2.1 The ADS shall	5.11.3.2.1.	ADS feature activation.	5.11.2.2: not related to HMI section but to operational
ensure safe ADS activation. 5.11.2.2.2 The ADS shall inform the user that preconditions for activation are met. 5.11.2.2.3 The activation shall	5.11.3.2.1.1.	The ADS controls relevant to safety shall accommodate the appropriate interactions for that ADS feature.	safety 5.11.2.2.2: not safety relevant to communicate the meeting of preconditions. Indication of
follow a common sequence of actions and states. 5.11.2.2.4 The ADS shall provide confirmation that the system is activated.	[5.11.3.2.1.2].	[Subject to safety concept of the ADS, the ADS shall signal the availability of a feature for activation.]	activation is safety relevant, and covered by OICA-CLEPA 5.11.3.2.1.3 5.11.2.2.3: feature activation is safe by definition. Feature
	5.11.3.2.1.3.	If an ADS feature activation changes a user role, and the ADS feature has controls relevant to safety, the controls shall be [identified] in the context for the user relevant to safety.	activation will be part of OEM ADS design safety content. 5.11.2.2.4: proposal to delete because covered by OICA-CLEPA 5.11.3.2.1.4
	5.11.3.2.1.4.	An ADS feature activation intended to change the user role shall signal its activation state.	
	5.11.3.2.1.5.	Upon feature activation, indicators, tell-tales, and warnings not related to the operation of ADS feature may be disabled, deactivated, inhibited, or by other means be made unavailable to the user.	
	5.11.3.2.1.6.	Upon feature activation, vehicle controls not related to the operation of the ADS feature may be disabled, suppressed,	

	deactivated, inhibited, or by other means made unavailable to the user.	
5.11.3.2.1.7	The ADS may control the operation of closures, if available, as relevant to occupant safety, or to restrict or enable access to compartments. Controls related to closures may be disabled by the ADS.	

 5.11.2.3 Transition of Control 5.11.2.3.1 A transition of control in nominal situations should be indicated in timely manner to support that the fallback user may re-engage to the driving task as appropriate. 	5.11.3.2.2.6. [For ADS allowing manual driving], an automatic ADS feature deactivation in normal use, such as ODD exit, should be indicated in timely manner to support that the user may re- engage to the driving task as appropriate.	OICA-CLEPA proposal covers TOC section in "Deactivation"
5.11.2.3.2 The Transition of control process shall follow a common sequence of actions and states.	5.11.3.2.2.5 "ADS features using automatic deactivation in motion, when the subsequent mode of	5.11.2.3.2: delete, see comment above.
5.11.2.3.3 Transition of control shall return control of the DDT to the driver without any continuous control assistance (temporarily intervening safety systems such as ESC will remain activated).	operation is not ADS, should use a set of conditions to support an assessment of readiness to re- engage in the driving task and if the conditions cannot be fulfilled, the ADS shall trigger a fallback to an MRC."	5.11.2.3.3: ADS goal shall be to have DMS ensuring that the driver is engaged to allow the TOC (refer to OICA-CLEPA 5.11.3.2)
 5.11.2.3.4 The ADS shall (a) continuously verify whether the fallback user is available for the Transition of Control and (b) adapt the Transition of Control process, including the time budget where feasible, to the state of the fallback user and/or to the ADS. (and suggest a minimum time budget) (c) provide a warning when the user is not available when required. 	5.11.3.2.2.5. ADS features using automatic deactivation in motion, when the subsequent mode of operation is not ADS, should use a set of conditions to support an assessment of readiness to re-engage in the driving task and if the conditions cannot be fulfilled, the ADS shall trigger a fallback to an MRC.	 5.11.2.3.4: covered by OICA- CLEPA 5.11.3.2.2.5 (1) better covered by OICA- CLEPA proposal above (b) no added safety value (C) covered by OICA-CLEPA 5.11.3.2.2.5
 5.11.2.3.5 The ADS shall verify that the fallback user is in stable control of the vehicle to complete the Transition of Control process. 5.11.2.3.6 During transition, the ADS shall remain active until the Transition of control has been completed or the 		5.11.2.3.5: creating a circular reference, ADS shall verify the driver engagement, not the stable control (stable control can be evaluated only if ADS is deactivate, not before). Better covered by OICA-CLEPA 5.11.3.2.2.5

ADS reaches a minimal risk condition.		5.11.2.3.6 as above, covered by OICA-CLEPA 5.11.3.2.2.5
 5.11.2.3.7 The ADS shall provide clear, specific feedback of the completion of the transition of control. 5.11.2.3.8 After the transition of control the ADS shall have no control at all over the vehicle and shall only indicate relevant status information. 	5.11.3.2.2.10. If fitted, indicators, tell-tales, warnings not related to the operation of the ADS feature, that were disabled, de-activated, inhibited or by other means made unavailable when the ADS feature was activated, shall no longer be influenced by the ADS feature.	5.11.2.3.7 Upon deactivation all controls are set again to allow manual driving; all previously disabled information (OICA-CLEPA 5.11.3.2.2.10) will become available as per the safety concept; additional
	5.11.3.2 ADS use-cases and/or features permitting manual driving, [in relation to their activation or deactivation, particularly in motion], shall have means to monitor parameters relevant to engagement or disengagement of [driver/user] for the DDT.	assessments on driver engagement are done on as defined by OICA-CLEPA 5.11.3.2 5.11.2.3.8 better covered by OICA-CLEPA 5.11.3.2.2.7, 5.11.3.2.2.8, 5.11.3.2.2.9 and 5.11.2.3.3.10
	5.11.3.2.2.7. ADS features operating control of closures, shall no longer influence closures or the controls associated with closures.	
	5.11.3.2.2.8. If fitted, controls associated with the operation of the ADS feature shall no longer influence the ADS feature.	
	5.11.3.2.2.9 If fitted, controls inhibited or suppressed by the ADS feature shall not be influenced by the ADS feature after deactivation.	
	5.11.3.2.2.10. If fitted, indicators, tell-tales, warnings not related to the operation of the ADS feature, that were disabled, de-activated, inhibited or by other means made unavailable when the ADS feature was activated,	

shall no longer be influenced by	
the ADS feature	

5.11.2.4. Deactivation (Take-over)	5.11.3.2.2.	ADS feature deactivation	
 5.11.2.4.1 The ADS shall be designed to ensure a safe user-initiated takeover process. 5.11.2.4.2 The ADS shall allow the user to initiate a take-over process 		This section covers manual and automatic ADS feature deactivation [including the case resulting in Transition of Control].	5.11.2.4.2 proposal to have "may" instead of "shall", base on feature design (i.e a feature deactivating controls to bring children to school)
5.11.2.4.3 The take-over process shall follow a common sequence of actions and states 5.11.2.4.4 The ADS shall momentarily delay deactivation of driving control when immediate human	5.11.3.2.2.1.	Controls that enable ADS feature deactivation, shall provide an indication signaling attempt to deactivate and or deactivation, when operated.	5.11.2.4.3 delete, see previous comments5.11.12.4.4. proposal to delete and to cover with OICA-CLEPA5.11.3.2.2.3
resumption of control could compromise safety 5.11.2.4.5 The ADS shall verify that the user is in stable control of the vehicle to complete the user-initiated takeover of control process. 5.11.2.4.6 The ADS shall provide clear, specific feedback of the completion of a user initiated take over.	5.11.3.2.2.2.	Controls enabling ADS feature deactivation, shall, at least when the vehicle is in motion, also be associated with additional conditions for the purpose of enabling protection for unintended deactivation in motion.	5.11.2.4.5: duplicated, same requirements of User proposal 5.11.2.3.5 (reason why OICA-CLEPA did not distinct in 2 section manual and automatic deactivation). Creating a circular reference, ADS shall verify the driver engagement, not the stable control (stable control can be evaluated only if ADS is deactivate, not before). Better covered by 5.11.3.2.2.5
 5.11.2.4.7 The user initiated take over shall return control of the DDT to the driver without any continuous control assistance. 5.11.2.4.8 The ADS shall provide clear, specific free last fibe second fibe	5.11.3.2.2.3.	ADS feature deactivation may be delayed, suppressed, canceled, ignored, aborted or by other means prevented from being executed if it is estimated by the ADS that the	 5.11.2.4.6: duplicated, redundant with User proposal 5.11.2.3.7, (reason why OICA-CLEPA did not distinct in 2 section manual and automatic deactivation). 5.11.2.4.7 duplicated, redundant
feedback of the completion of the deactivation of the ADS. 5.11.2.4.9 Upon ADS deactivation, the vehicle		situation is unsuitable for the subsequent mode of vehicle operation.	with User proposal 5.11.2.3.3, (reason why OICA-CLEPA did not distinct in 2 section manual and automatic deactivation).
controls, indicators, warnings and tell-tales shall be restored to an activated state.	5.11.3.2.2.4	If a feature allows an initiation of transfer of controls through the driver controls or	5.11.2.4.8 duplication of User requirement 5.11.2.4.6

	controls that enable ADS feature deactivation, the deactivation conditions in Requirements 5.11.3.2.2.1, 5.11.3.2.2.2 and 5.11.3.2.2.3 above continue to apply.	5.11.2.4.9 alternative to OICA-CLEPA requirements 5.11.3.2.2.7, 5.11.3.2.2.9, 5.11.3.2.2.10
5.11.3.2.2.5.	ADS features using automatic deactivation in motion, when the subsequent mode of operation is not ADS, should use a set of conditions to support an assessment of readiness to re- engage in the driving task and if the conditions cannot be fulfilled, the ADS shall trigger a fallback to an MRC.	
5.11.3.2.2.6.	[For ADS allowing manual driving], an automatic ADS feature deactivation in normal use, such as ODD exit, should be indicated in timely manner to support that the user may re- engage to the driving task as appropriate	
5.11.3.2.2.7.	ADS features operating control of closures, shall no longer influence closures or the controls associated with closures.	
5.11.3.2.2.8.	If fitted, controls associated with the operation of the ADS feature shall no	

5.11.3.2.2.9.	longer influence the ADS feature. If fitted, controls inhibited or suppressed by the ADS feature shall not be influenced by the ADS feature after	
5.11.3.2.2.10.	deactivation. If fitted, indicators, tell-tales, warnings not related to the operation of the ADS feature, that were disabled, de- activated, inhibited or by other means made unavailable when the ADS feature was activated, shall no longer be influenced by the ADS feature.	

Not pooded		
Not needed	Not needed	

544.0400			
5.11.3 ADS system	5.11.3.	Vehicles designed to	5.11.13 proposal to use a
designs that do not		carry occupants.	straightforward naming as per OICA-
anticipate a user to	5.11.3.1.	General requirements.	CLEPA proposal "ADS
perform the DDT			vehicles that prohibit
(e.g. shuttle, robotaxi)	[5.11.3.1.1.]	[Subject to safety concept of the ADS,	manual driving"
5.11.12 The following recommendations apply to ADS vehicles with a system design that does not anticipate a user to perform the in the vehicle.		the ADS shall signal the presence of a fault that prevents the ADS from performing the DDT functions required by	
5.11.12.1 The user in the vehicle is a passenger (in a passenger seat).		its feature(s) pursuant to para. 4.9.]	
5.11.12.2 The ADS vehicle shall provide safety-related information to the passengers. (e.g., emergency stop instructions(MRM), communication to remote	[5.11.3.1.2.]	[Subject to safety concept of the ADS, the ADS shall signal its intention to place the vehicle in an MRC to the ADS user or	5.11.12.1 a passenger could be located in any seat or standing
operator for assistance)		vehicle occupants.]	5.11.12.2 green part supported
5.11.12.3 ADS features may control the operation of closures, if available, as relevant to occupant safety, or	5.11.3.3.	ADS vehicles [and/or features] that prohibit manual driving.	
to restrict or enable access to compartments. Controls related to closures may be disabled by the ADS feature whilst the vehicle is in motion.	5.11.3.3.1.	The ADS shall provide vehicle occupants with means to request to stop the fully automated	5.11.12.3 agree to add, relevant for all the ADS
 5.11.12.4 The ADS vehicle shall provide users with means to request a minimal risk manoeuvre to stop the ADS vehicle. (a) MRM request shall be accessible to the users (b) The MRM request shall automatically alert the remote operator 		vehicle.	5.11.12.4 covered by OICA-CLEPA 5.11.3.3.1

5.11.4 ADS system designs for the transport of goods only Systems designed for the transport of goods only will not have a user in the vehicle and have no need of in-vehicle user-vehicle interaction. This section does not cover external human machine interaction (f.ex. for intervention of humans that are near the automated vehicle and should see a need for an emergency stop).	 5.11.2. Vehicles not designed to carry occupants. 5.11.2.1. ADS vehicles designed without accommodations for a driver or passengers shall be exempt from requirements under para. 5.11.3. 	
5.11.5 Remote operation of ADS vehicles To be determined.		