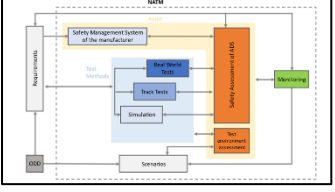
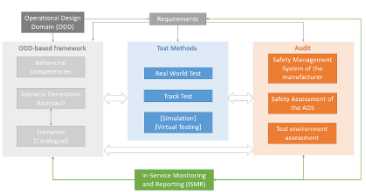


OICA-CLEPA Comments		
Integrated document original text	Proposed change	Justification
SECTION 3 - DEFINITIONS		
3.3 “ADS feature” means an ADS functionality designed specifically for use within an Operational Design Domain (ODD).	“ADS feature” means an Application of an ADS designed specifically for use within an Operational Design Domain	OICA-CLEPA Preference: to use VMAD definition of ADS feature: “ADS feature” means an application of an ADS designed specifically for use within an Operation Design Domain (ODD). Justification: <ul style="list-style-type: none"> • Definition proposed by OICA-CLEPA developed by VMAD • Current definition mentions “ADS functionality”, not defined in terms and definitions
3.11.1 The DDT is always performed in its entirety by the ADS in operation (“the entire DDT” as stated in the definition of an “Automated Driving System” under para. 3.2.) which means the whole of the tactical and operational functions necessary to operate the vehicle. These functions can be grouped into three interdependent categories: sensing and perception, planning and decision, and control.	3.11.1When the ADS is in operation The DDT is always performed in its entirety by the ADS in operation (“the entire DDT” as stated in the definition of an “Automated Driving System” under para. 3.2.) which means the whole of the tactical and operational functions necessary to operate the vehicle. These functions can be grouped into three interdependent categories: sensing and perception, planning and decision, and control.	OICA-CLEPA proposal of improvement: “ When the ADS is in operation the DDT is performed in its entirety by the ADS
3.13. “ADS fallback response” means an ADS transition of control or an ADS-controlled procedure to place the vehicle in a minimal risk condition.	3.13. “ADS fallback response” means a system-initiated deactivation to manual driving or an ADS-controlled procedure to place the vehicle in a minimal risk condition.	Definition updated during FRAV 43rd and not reflected in this document: “(ADS) fallback response” means an ADS system -initiated transition of control deactivation to manual driving or an ADS-controlled procedure to place the vehicle in a minimal risk condition.
3.14 “DDT fallback” means a response by the user to either perform the DDT or to achieve a minimal risk condition or a response by an ADS to achieve a minimal risk condition:	3.14 “DDT fallback” means a response by the user to either perform the DDT or to achieve a minimal risk condition or a response by an ADS to achieve a minimal risk condition, e.g:	OICA-CLEPA comments: 1) proposal to add "e.g." before the list points. Justification: OEM should be allowed to address a DDT fallback request in other cases in addition to the mentioned ones, i.e. safety relevant occurrences. Have the current listed

<p>(1) after the occurrence of one or more DDT performance-relevant system failures, or (2) upon an ODD exit.</p>	<p>(1) after the occurrence of one or more DDT performance-relevant system failures, or (2) upon an ODD exit.</p>	<p>points as examples would be more appropriate.</p> <p>2) to clarify the part of the sentence: "...or to achieve a minimal risk condition or a response by an ADS to achieve a minimal risk condition"</p>
<p>3.22 "Critical Occurrence" means an occurrence during which the ADS is performing the DDT: (a) at least one person suffers an injury that requires medical attention as a result of being in the vehicle or being involved in the event. (b) the ADS vehicle, other vehicles or stationary objects sustain physical damage that exceeds a certain threshold. (c) any vehicle involved in the event experiences an airbag deployment.</p>	<p>3.22 "Critical Occurrence" means an occurrence during which the ADS is performing the DDT and at least one of the following criteria is fulfilled : (a) at least one person suffers an injury that requires medical attention as a result of being in the vehicle or being involved in the event. (b) the ADS vehicle, other vehicles or stationary objects sustain physical damage that exceeds a certain threshold. (c) any vehicle involved in the event experiences an airbag deployment.</p>	<p>OICA-CLEPA comment: listed conditions are conditional terms.</p> <p>Alternative proposal to improve the text: 1) "... means an occurrence during which the ADS is performing the DDT and at least one of the following criteria is fulfilled:" 2) add "and/or" after the bullets (a) and (b)</p>
<p>3.27 "Proving ground" and "Test track" mean a facility closed to public traffic and designed to enable physical assessment of an ADS and/or ADS vehicle performance, including via sensor stimulation and/or the use of dummy devices.</p>	<p>3.27 "Proving ground" and "Test track" mean a facility closed to public traffic and designed to enable physical assessment of an ADS and/or ADS vehicle performance, e.g. via sensor stimulation and/or the use of dummy devices.</p>	<p>OICA-CLEPA improvement proposal: to replace "...including .." with "e.g."</p> <p>Justification: text clarity improvement</p>
<p>3.30 "Safety case" means a compelling, comprehensible, and valid argument, supported by a body of evidence, documenting that a system is, or will be, adequately safe for a given application in a given environment.</p>	<p>3.30 "Safety case" means a compelling, comprehensible, and valid argument, supported by a body of evidence, documenting that a system is, or will be, adequately safe for a given application in a given environment.</p>	<p>OICA-CLEPA proposal: to delete "compelling, comprehensible and valid"</p> <p>Justification: quantitative terms that could be misleading</p>
<p>3.36 "Traffic scenario" means a description of one or more real-world driving situations that may occur during a given trip</p>	<p>3.36 "Traffic scenario" means a description of one or more real-world of a sequence of driving situations that may occur during a given trip</p>	
<p>3.38. "TOC request" means an alert issued by an ADS to an ADS vehicle user prompting the user to intervene in performance of the DDT.</p>	<p>PROPOSAL TO DELETE</p>	<p>OICA-CLEPA proposal: Delete.</p> <p>Justification: definition not used in the text.</p>

<p>3.39. <i>“TOC response” means an ADS vehicle user intervention in performance of the DDT pursuant to a TOC request.</i></p>		<p>Current text included HMI section refers to “user-initiated TOC” and a “system-initiated TOC”.</p>
<p>3.46 <i>“Hardware-In-the-Loop” (HIL) means the hardware of a specific vehicle subsystem running the software with input and output connected to a simulation environment to replicate sensors, actuators, and mechanical components in a way that connects all the I/O of the Electronic Control Units (ECU) before the final system is integrated.</i></p>	<p><i>“Hardware-In-the-Loop” (HIL) means the hardware of a specific vehicle subsystem running the software with input and output connected to a simulation environment to replicate sensors, actuators, and/or mechanical components in a way that connects all the I/O of the Electronic Control Units (ECU) before the final system is integrated.</i></p>	<p>OICA-CLEPA proposal: replace with “and/or”.</p> <p>Justification: not all of these parts must be simulated.</p>
<p>SECTION 4</p>		
<p>However, critical scenarios may present conditions where requirements must be prioritised and exceptions to requirements may be necessary.</p>	<p>However, defining performance criteria in critical scenarios may prove difficult, especially in those conditions where requirements must be prioritised</p>	<p>Text improvement</p>
<p>In these cases, the framework proposes safety models to enable assessment of ADS performance within the limits of the safety model(s). For example, an ADS might execute an evasive manoeuvre to avoid a collision or might not be able to avoid a collision given scenario parameters. The ADS performance can be evaluated against one or more safety models that establish the feasibility of collision avoidance and thresholds for prioritising avoidance over other requirements</p>	<p>In these cases, the framework introduces safety models to compare the overall ADS performance to those of the safety model(s). For example, it is recognised that the ADS may not be able to avoid a collision, so the ADS performance needs to be compared with safety model performance to set the threshold between where avoidance is required and where it is not feasible, and if mitigation may be possible</p>	<p>Text improvement</p>
		<p>OICA-CLEPA proposal for amendment of flowchart and text.</p> <p>The new proposed flowchart was already shared and optimized during Integration Drafting Group meetings.</p>
<p>Figure [1] below illustrates relationships across the ADS safety requirements, ODD analysis and scenario generation, and the validation pillars.</p>	<p>Figure [1] provides an holistic overview of the interconnections of the ADS functional requirements, the scenario generation approach and [applicable] validation pillars.</p>	<p>Justification:</p> <ul style="list-style-type: none"> Original proposal, being part of VMAD guideline, was mainly VMAD-oriented giving limited relevance to FRAV ODD-based framework

[no text]	<p>In the figure above, the operational design domain underpins the application of relevant requirements and provide an input to the scenario generation approach.</p> <p>It is recognised that some requirements are specific enough and/or ODD independent and therefor can be assessed directly by means of one of the test methods and/or audit, as shown.</p> <p>Besides, others need to be further specified, in relation to the operational design domain of the ADS, including e.g. relevant elements and their attributes, and specific rules of the road. Therefore, these requirements need to be specified through the application of the ODD based framework approach and relevant scenarios identified (Annex 2 “ODD Framework”).</p>	<ul style="list-style-type: none"> OICA-CLEPA flowchart proposal intends to equalize the relevance of the overall ADS assessment process, from the ODD framework to requirements, test methods and validation
<p>In-Service Monitoring and Reporting In addition to initial assessments of ADS safety, the guidelines also recommend post-deployment validation</p>	<p>In-Service Monitoring and Reporting In addition to initial assessments of ADS safety, the guidelines also recommend post-deployment assessment</p>	<p>OICA-CLEPA comment: proposal to replace "validation" with "assessment"</p> <p>Justification:</p> <ul style="list-style-type: none"> - Validation will be done before deployment, while the assessment will continue in post deployment. - Use of word "validation" can let intend that a validation is not complete before deployment
SECTION 5		
<p>“FRAV” and “VMAD” term use in the chapter</p>	<p>OICA-CLEPA: proposal to delete references to FRAV and VMAD. This comment is valid for all the amendment proposed in the following chapter 5 sections related to FRAV-VMAD</p>	<p>OICA-CLEPA general comment: consider the goal of the guideline to be readable to who is potentially not knowing in detail the FRAV-VMAD works (except for what said in introduction), is preferable to not refer to FRAV and VMAD. It does not adding clarity: proposal to refer to “ADS functional requirements” and “ADS validation methods”</p> <p>Several amendments proposed in the OICA-CELPA Position Document shared on Nov 20th</p>

<p>The purpose of the audit pillar is to assess/demonstrate that:</p> <p>(a) The manufacturer has the right processes to ensure operational and functional safety during the vehicle lifecycle, and</p> <p>(b) The vehicle design is safe by design and that the design has been sufficiently validated before market introduction.</p>	<p>The purpose of the audit pillar is to assess/demonstrate that:</p> <p>(a) The manufacturer has the right processes to ensure operational and functional safety during the vehicle lifecycle, and</p> <p>(b) The ADS is safe by design and that the design has been sufficiently validated before market introduction.</p>	<p>OICA-CLEPA comment: replace "vehicel's design" with "ADS"</p> <p>Justification:</p> <ul style="list-style-type: none"> - As reported in 5.1, the assesement regards the ADS and not the vehicle - Assessment of the whole vehicle not in scope of this guideline
<p>The auditor should perform an assessment of the application of these analytical approach(es), including:</p> <p>(a) Inspection of the safety approach at the concept (vehicle) level.</p>	<p>The auditor should perform an assessment of the application of these analytical approach(es), including:</p> <p>(a) Inspection of the ADS safety approach at the concept vehicle level.</p>	<p>OICA-CLEPA proposal for amendment.</p> <p>Justification: related to ADS safety approach, not to the vehicle</p>
<p>The documentation should allow the relevant authority to test and verify the safety concept</p>	<p>The documentation should give to the Authorities sufficient information to verify the manufacturer ADS safety concept.</p>	<p>OICA-CLEPA proposal for amendment.</p> <p>Justification:</p> <ul style="list-style-type: none"> •Those elements are in the pillar and in the multipillar approach of the manufacturer. •Excessive expectation or a documentation to give Authorities information about how reproduce every single test (also virtual validation test)
<p>5.5.7. Information Provision to Users</p> <p>(a) The distinction between maintenance and an operational manual,</p>		<p>OICA-CLEPA general comment: maintenance and repair manual should not be given to the user.</p> <p>Many of the points in 5.5.7. "Information Provision to Users" will be related to maintenance and not in scope of the documentation to provide to the User.</p> <p>OICA-CLEPA propose to review the currently approved text</p>
<p>(b) A safety precaution manual that includes safety-relevant information for the user</p>	<p>(b) safety-relevant information for the user</p>	<p>OICA-CLEPA comment: proposal to delete, information mode should be neutral.</p> <p>Justification:</p> <ul style="list-style-type: none"> •relevant to inform the user, but up to the manufacturer to provide information in the better modality
<p>(d) Information on how to use the ADS, o Transition of Control (ToC), where applicable o Take over o ADS activation o</p>	<p>(d) If applicable, Information on how to use the ADS, o Transition of Control (ToC), where applicable</p>	<p>OICA-CLEPA proposal for amendment</p> <p>Justification:</p>

ODD o Role of the user after regaining control	o Take over o ADS activation o ODD o Role of the user after regaining control	•use-case related
(i) Role of the user within the ADS' ODD 21	Delete	OICA-CLEPA proposal to delete. Justification: duplication of © or (d)
(l) Safety measures to be taken in the event of malfunctioning of the ADS	Delete	OICA-CLEPA proposal to delete, Safety-by-design covers this point and in case of communication to the user of malfunctioning, covered by (b)
(m) Extent, timing and frequency of maintenance operations	Delete	OICA-CLEPA proposal to delete. Justification: • not safety relevant • Use-case specific • need to clarify the sentence, not clear
(r) List of system fault codes	Delete	OICA-CLEPA proposal to delete. Justification: •As above, information not related to the user
5.5.8. ... (c) For periodic technical inspections, the documentation should describe how the current operational status of the ADS can be checked	Delete	Proposal to delete. Justification: • Not clear the PTI need information on operational status •ADS self-diagnosis capability of normal operation status seems obvious, no check needed.
(d) Documentation about how the software version(s) and the failure warning signal status can be readable in a standardized way via the use of an electronic communication interface (i.e., using a standard interface, such as the OBD port).	(d) Documentation about how the software version(s) and the failure warning signal status can be readable in a standardized way via the use of an electronic communication interface (i.e., using a standard interface, such as the OBD port).	OICA-CLEPA proposal to delete. Justification: Failure warning signals should not be required to be read through interface. Warning signals are provided to users, and no need to have electronic interface.
Documentation should be made available in three parts: (b) The formal documentation package annexed to the information document, which should be supplied to the Authority for the purpose of conducting the safety assessment.	Documentation should be made available in three parts: (b) The formal documentation package annexed to the information document, which should be supplied to the Authority for the purpose of conducting an evaluation of the manufacturer safety assessment.	OICA-CLEPA proposal for amendments Justification: Is the OEM performing the safety assessment, Authorities can evaluate the assessment.

SECTION 6		
6.8 Multi pillar approach		<p>OICA-CLEPA comment: Structure and reading issue: the current structure sees topic in this order:</p> <ul style="list-style-type: none"> - DDT requirements (chapt 6.3 to 6.7) - Multipillar approach (chapt 6.8) - User requirements (chapt 7) <p>There is inconsistency in the stucture above, Multipillar Approach is "collapsed" between requirements.</p> <p>Proposals:</p> <ol style="list-style-type: none"> 1) Move the Multipillar approach section (chapter 6.8) at the end of chapter 4, or 2) Move the Multipillar approach section (chapter 6.8) at the end of chapter 7
6.9 Considerations for specific requirements		<p>OICA-CLEPA comment: FRAV-VMAD invited to consider if effectiveness to have 2 chapters for the requirements (6 and 7).</p> <p>Merging Chapter 6 and 6 together could bring to have only one section including all the "considerations for specific requirements" covering chapter 6.9 and 7.5</p>
<p>6.9.2 Application of the validation pillars to critical traffic scenario requirements</p> <p>The requirements of section 6.4 cover difficult and/or unsafe scenarios that would be dangerous to be sought out amongst naive traffic...</p>	<p>6.9.2 Application of the validation pillars to critical traffic scenario requirements</p> <p>The requirements of section 6.4 cover difficult and/or unsafe scenarios that would be dangerous to be sought out amongst naive traffic...</p>	<p>OICA-CLEPA proposals:</p> <p>Delete "naive" <u>wherever present in the document</u>, "traffic" already covers the definition.</p> <p>Justification:</p> <ul style="list-style-type: none"> • "naive" term not present in the document and its definition not clear. We understood that in HMI research context "naive" is intended for "traffic/road users not aware of a testing in place", but this could be misunderstood from the common reader of the FRAV-VMAD document • "Traffic" is already a generic definition including generic ORU. "ORU" definition already includes all kind of road users, aware or not of testing in place: "Other road user (ORU)" means an entity in the ADS vehicle environment capable of motion and of coordinated interaction with the ADS vehicle."
SECTION 7		

<p>To further detail some of the recommendations it is recommended to draw on Human Factors knowledge, which is an established multidisciplinary science that applies knowledge of human abilities and limitations to the design and evaluation of technology for improved safety and usability.</p> <p>It has to be noted that knowledge on testing the interaction between user and ADS including pass/fail criteria partly still needs to be developed. It also relevant to aim for a certain level of ‘commonality’ in the user interactions with the ADS for all brands and models. This will help users to develop and apply a single mental model and 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.</p>	<p>To further detail some of the recommendations it is recommended to draw on Human Factors knowledge, which is an established multidisciplinary science that applies knowledge of human abilities and limitations to the design and evaluation of technology for improved safety and usability.</p> <p>It has to be noted that knowledge on testing the interaction between user and ADS including pass/fail criteria partly still needs to be developed. It also relevant to aim for a certain level of ‘commonality’ in the user interactions with the ADS for all brands and models. This will help users to develop and apply a single mental model and 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.</p>	<p>OICA-CLEPA proposal: Delete these sections.</p> <p>Justifications:</p> <ol style="list-style-type: none"> 1) OICA-CLEPA agree on the importance of avoiding mode confusion, but the recommendation to have "commonality of solutions" could limit the improvement of clear solutions itself. We should ensure that the HMI of our system are clear, and we do this optimizing the ADS design. 2) To have "commonality established as goal of future design" is not a FRAV/VMAD goal, never agreed in the group. 3) Relevant HMI concepts already covered by previous paragraph "For a safe use of the ADS.." 4) Agreed in FRAV to not have commonality of design requirements, they are not present in requirements list: including this wording in the section 7 introduction is misleading for the readers. 5) This section from 7.1.2 clearly reports HMI requirements agreed, not in line with what reported by the section proposed to be deleted.
<p>7.5 Testing User interaction requirements</p>		<p>Same comment of chapter 6.9:</p> <p>OICA-CLEPA comment: FRAV-VMAD invited to consider if effectiveness to have 2 chapters for the requirements (6 and 7).</p> <p>Merging Chapter 6 and 6 together could bring to have only one section including all the "considerations for specific requirements" covering chapter 6.9 and 7.5</p>
<p>SECTION 8</p>		
<p>8.2.6. Unanticipated situations, risks and hazards might be identified during real-world ADS operation, and this information could be used to develop new scenarios for the common scenario catalogue</p>	<p>8.2.6. Unanticipated situations, risks and hazards might be identified during real-world ADS operation, and this information could be used to develop new scenarios for the common [for a]/[to contribute to a future] oscenario catalogue</p>	<p>OICA-CLEPA: proposal of amendment.</p> <p>2 alternative proposals:</p> <ol style="list-style-type: none"> 1) to reword "a scenario catalogue", or 3) "to contribute to a future [scenario] catalogue" <p>Justification:</p> <ul style="list-style-type: none"> - No common scenario catalogue existing or agreed at the moment, preferable to have a more neutral wording

<p>8.5.2.2. Following the results obtained from the monitoring, the Manufacturer should evaluate:</p> <p>...</p> <p>8.1.1.1.1. the adequacy of the metrics and thresholds</p>	<p>8.5.2.2. Following the results obtained from the monitoring, the Manufacturer should evaluate:</p> <p>...</p> <p>8.1.1.1.1. the adequacy of the related metrics and thresholds</p>	<p>OICA-CLEPA proposal for amendment:</p> <ol style="list-style-type: none"> 1) Add "related" 2) Delete "and thresholds" <p>Justifications:</p> <ol style="list-style-type: none"> 1) Add clarity to the sentence. 2) Threshold are part of the metrics
<p>8.5.4.2. Short term reporting is expected to be submitted for each critical occurrences [GRVA-16-39e Annex IV].</p>	<p>8.5.4.2. Short term reporting is expected to be submitted for each the critical occurrences related to ADS performance of the DDT</p>	<p>OICA-CLEPA comment: Industry proposal improvement of the short term reporting cases, highlighting the need to report the safety-critical occurrences when related to ADS performance.</p> <p>Details of the Industry proposal reported in ISMR Templates annex (VMAD Annex IV, future annex VII or Integrated document): for reference, please refer to the SG3 email submission of November 9th, 2023.</p>
<p>Occurrence table</p>	<p>OICA-CLEPA proposal for amendments submitted in the last SG3 session, but no time to introduce to the group. OICA-CLEPA Proposal will be introduced in next SG3 (date TBC)</p>	<p>OICA-CLEPA general approach:</p> <ul style="list-style-type: none"> • All the occurrences in the list are potentially safety critical: proposal to delete the columns "short term" and "periodic reporting" from the table to improve the understanding and simplify • Monitored occurrences identified as safety-critical and related to the ADS performance will be reported in short-term
	<p>1) Occurrence related to ADS performance of the DDT</p>	<p>Proposal to add Section heading in the table</p> <ol style="list-style-type: none"> 1) Occurrence related to ADS performance of the DDT
<p>1.a. Safety-critical occurrences known to the ADS manufacturer or OEM</p>	<p>1.a. Safety-critical occurrences related to ADS performance known to the ADS manufacturer or OEM not covered from following points 1.(x) of the list</p>	<p>OICA-CLEPA proposal:</p> <ol style="list-style-type: none"> 1) delete "safety-critical" <p>Justification:</p> <ul style="list-style-type: none"> • The current wording potentially covers all the following elements of the list if safety-critical • covered by new introductory text and table structure based on monitoring. <p>2) add "related to ADS performance"</p> <p>Justification:</p> <ul style="list-style-type: none"> • ISR concept goal to <i>"addresses the in-service safety of automated vehicles after market introduction"</i> : safety critical occurrences not related to ADS safety performance are out of scope for the reporting. • Recommending the reporting indiscriminately all the safety critical occurrences, included ones not related to ADS safety performance, jeopardize the identification of ADS-related issues

		<p>3) add "not covered from the following 1.(x) points of the list"</p> <p>Justification: With the new wording proposal (points 1 and 2 above), this wording identifies all the occurrences not covered from the other occurrences Of the section "Occurrence related to the ADS performance of the DDT"</p>
1.f. Interaction with remote operator if applicable	Proposal to delete	<p>OICA-CLEPA comments: Remote operator not defined in the document and in FRAV-VMAD Integration Document. Premature for the time being.</p> <p>Integration Group (FRAV/VMAD cochairs) specifically instructed the experts to omit references to users not covered by the requirements (i.e., remote operation is presently outside the scope of this document)</p>
	2) Occurrences related to ADS interaction with ADS vehicle users	Proposal to add section heading in the table
2.a. Driver unavailability (where applicable) and other user-related occurrences	2.a. Driver unavailability (where applicable) and other user-related occurrences	<p>OICA-CLEPA comment:</p> <p>1) Proposal to delete "driver unavailability". Difficult for Industry to understand the justification to have this report, asked context to SG3.</p> <p>Justifications for deletion:</p> <p>Driver (more proper: fall-back user) unavailability not related to ADS behavior, so not needed to be considered an occurrence Driver unavailability relevant only in case of ADS failure, e.g. failure in MRM, but failures are already covered by point 3.a. Driver unavailability detection possible only if ADS DMS if working properly (à not an ADS occurrence to be reported) covered by ADS TOC/MRM design safety requirements.</p> <p>2) "other user-related occurrences" OICA-CLEPA comment: not clear which occurrence can be, asking VMAD for examples</p>
2.c. Prevention of takeover under unsafe conditions	2.c. Prevention of takeover under unsafe conditions	OICA-CLEPA comment: Proposal to delete.

		<p>Justification: prevention of takeover is a “may” requirement (FRAV 5.13.3.5.1. (b)) Prevention of takeover is based on safety concept of the ADS: identify it as an occurrence is not appropriate and subjective to ADS design. What is this information used for?</p>
3.b. Maintenance and repair problems	3.b. Maintenance and repair problems related to the ADS system	<p>Proposal for amendment.</p> <p>Justifications: ADS-related document, not in scope to report maintenance/repair vehicle problem not ADS related</p>
3.d. Modifications made by the ADS manufacturer or OEM to address an identified and significant ADS safety issue	Proposal to move	<p>OICA-CLEPA comment: Misplaced, the response action to an occurrence is appropriate to be considered an occurrence to report?</p> <p>Open question to SG3 if placing somewhere else.</p>
<p>8.5.5.1 The reporting templates aim to assuring the harmonization of the information to be reported and facilitating the information sharing.</p> <p>The reporting templates aims at ensuring that a consistent and comprehensive set of information is delivered to the safety authority to foster an effective application of reporting scheme. Further granularity of the information can be considered depending on the ADS use cases.</p>	<p><u>The templates proposed aim to promote uniformity across reporting and to facilitate sharing of nonconfidential information.</u></p> <p>The reporting templates aims at ensuring that a consistent and comprehensive set of information is delivered to the safety authority to suggest the collection or relevant information available to the manufacturer and to other stakeholders to foster an effective application of reporting scheme. Further granularity of the information can be considered depending on the ADS use cases.</p>	<p>OICA-CLEPA proposal for improvement of the wording</p>
<p>8.5.5.5: In particular, the short term reporting provisions shall contribute to identify:</p> <p>a. Safety-relevant occurrences caused by an ADS</p> <p>b. Traffic situations unforeseen in the original validation that resulted in ADS behaviors inconsistent with the expected behavioral competencies</p>	<p>8.5.5.5: In particular, the short term reporting provisions shall contribute to identify: Based on the monitoring and analysis performed by the manufacturer in accordance with Table 1 above, these guidelines recommend that manufacturers report the following:</p> <p>a. Safety-relevant critical occurrences caused by an ADS related to ADS performance</p> <p>b. Traffic situations unforeseen in the original</p>	<p>OICA-CLEPA Proposal for amendment.</p> <p>Justification:</p> <ul style="list-style-type: none"> Point a. “relevant/critical”: Safety-relevant occurrence are in scope of the periodic reporting, but not necessarily of the short term. Point a. “caused by an ADS”: Not in Integration Document scope to address the liability Point b. - The initial assessment checks how the ADS responds to traffic (scenario) conditions to verify that the responses meet the safety requirements. The aim here is to identify cases where an

	<p>validation that resulted in ADS behaviors inconsistent with the expected behavioral competencies demonstrated during the original validation</p>	<p>ADS does not behave as expected (e.g., fails to stop for a stop sign).</p>
<p>ANNEX 3 - REPORTING TEMPLATE</p>		<p>OICA-CLEPA proposal to reorganize the “short term” and “Periodic” templates sections, submitted to SG3.</p> <p>The amendment proposal in this annex, not reported in this table but available in Word document (see details later) highlights <u>information that will be available to the OEM and ones available to other stakeholders</u> that will provide at first-hands.</p> <p>Rules used for the reorganization:</p> <ul style="list-style-type: none"> • <u>Not added</u> new rows in the templates • Reorganized current templates contents in 3 categories: <ol style="list-style-type: none"> 1) Safety relevant Info Available to the OEM 2) Additional Info available to other stakeholders 3) Manufacturer and other stakeholders information reporting” • Proposed to delete some rows not safety relevant. <p>Please refer to OICA-CLEPA text submitted as comment to the IG leadership (.docx) on Nov 20th. In alternative, same proposal also submitted to SG3 (<u>sent by SG3 leadership on Nov 9th</u>): ppt and word doc.</p>