

# OICA/CLEPA Position on ADS feature type definitions (ADS-05-08)

IWG ADS , 9-13 DEC 2024  
Seoul, ROK

## *Position on ADS feature type 1 and 2 definitions (ADS-05-08)*

(1) OICA/CLEPA is concerned that the screening task forces may be encouraged or even may feel mandated to make use of the ADS feature definitions. It may lead to unnecessary differentiation of requirements whilst a general exclusion from requirements when referring to „when an ADS is active“ could be sufficient. It has to be noted that:

- Non ADS Regulations in any case shall not define requirements for an ADS, since the ADS Regulation is to be the single source for the approval of an ADS. If ADS requirements would be defined in Non ADS Regulations it will complicate the approvals for an ADS and require changes from outside the ADS regulation.
- The work in the IWG ADS has progressed with a safety case approach.
- Some of the most recent regulation amendments e.g. for R13, R13-H and R79 have shown that a differentiation was not necessary based on an ADS feature type.

(2) OICA/CLEPA is opposing the option 2 for the ADS feature definition (using levels) since definitions may clash with existing standards and create confusion. Consequently, levels have not been used so far. During discussion at IGEAD (WP.1) the use of levels was also rejected.