ADS IWG Working Document
Change Proposal Form
One major comment per form
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Document Reference	ADS-14-06/Rev.1	Date	6 October 2025
Agenda item			

Proposed by (affiliation only—no personal information)

United Kingdom

Summary of Change (25 words or less)

Remove ambiguous language from the confirmatory testing section

Reason for Change (Justification)

The current text uses "should" which is not regulatory language and potentially ambiguous. The intention was to capture that not all of these tests would always be appropriate due to the use case or ODD of the ADS or during an approval extension.
The revised text (for the slightly different language of both the GTR and UNR) merges the text to a single requirement to remove that non regulatory language.

If there is time in the meeting other uses of "should" should be examined and changed but this usage is very important to address.

Location: 6.3.3 / 8.3.3

Original text

GTR
6.3.3. Confirmatory testing
6.3.3.1. Confirmatory testing shall use one or more testing methods and pre-defined and repeatable test protocols to confirm that the evidence provided by the manufacturer accurately represents the ADS performance. The test protocols shall cover a range of driving conditions representative of the ODD.

6.3.3.1.1. This should include at least and as appropriate[12]:
(a) Failure situations,
(b) Behaviours in the presence of vulnerable road users,
(c) Situations with a large number of other road users, unlikely road infrastructure, or abnormal geographic/environmental conditions,

(d) User interactions,
(e) Compliance with traffic rules,
(f) Collision avoidance and mitigation,
(g) ODD boundaries and fallbacks to MRC, and
(h) DSSAD and ISMR capabilities.

UNR

8.3.3. Confirmatory testing
8.3.3.1. Confirmatory testing conducted or required by an approval authority or its designated technical service shall use one or more testing methods and pre-defined and repeatable test protocols to confirm that the evidence provided by the manufacturer accurately represents the ADS performance. The test protocols shall cover a range of driving conditions representative of the ODD

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Revised text
<u>GTR</u>
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<u>UNR</u>

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