

ADS IWG Working Document  
Change Proposal Form  
One major comment per form  
(Shaded blocks for use by the IWG Secretariat)

Document Reference

ADS-14-34

Date

13 October 2025

Agenda item

Proposed by (affiliation only—no personal information)

SC OPI

Summary of Change (25 words or less)

Review of provisions in Safety Case Assessment robustness paragraph (8/6.3.1.4)

Reason for Change (Justification)

In the previous iterations some of the sub-bullets were inadvertently removed, they were re-inserted but not reviewed with several provisions having square brackets.

- a) Modified based on suggestion by SAE to clarify intent (ADS-14-23)
- c) has been focused on testing tools as f) covers testing evidence
- d) Suggested text for choice of test methods to be adequately explained (i.e. likely less real-world/track testing and more virtual testing – explanation on why the combination was chosen) to replace the placeholder.
- e) removed square brackets
- f) removed square brackets
- g) modifications to link to the additions in the SC safety concept at the 12<sup>th</sup> IWG – scenario identification, generation and selection

Location

8/6.3.1.4

Original text

8/6.3.1.4. The assessment shall review the manufacturer's safety case for robustness to verify that at least the following criteria have been met:

- (a) All identified risks in the safety concept have been reduced, mitigated or accepted and the sum of risk (quantitative or qualitative) is below the unreasonable risk threshold,
- (b) The integrity level used for development, verification and validation of the ADS and its features is appropriate to reduce the risk below the unreasonable risk threshold,
- (c) [Testing evidence and the tools by which they are obtained achieve an acceptable level of credibility and demonstrate stability of performance when subjected to variations as per 6.2,]
- (d) [Acceptable mix of physical, track and virtual testing – as part of credibility? Manufacturer justification?],
- (e) [The manufacturer has taken steps to limit the potential for unintended functions in the ADS or for unintended functions to be induced in interfacing systems,]
- (f) [Testing evidence provided can be repeated and reproduced with consistency of safety objectives as per 6.3.2,]
- (g) The testing evidence demonstrated by the manufacturer provides reasonable coverage of foreseeable operating conditions and events in the intended area of operation, including conditions consistent with the ODD of the ADS and conditions that may involve ODD exit, and
- (h) The manufacturer has conducted one or more self-assessments and has taken steps to remediate any findings as per 5.3.4.

Revised text

The assessment shall review the manufacturer's safety case for robustness to verify that at least the following criteria have been met:

- (a) All identified risks in the safety concept have been reduced, mitigated or accepted and the **aggregate residual** risk (quantitative or qualitative) is below the unreasonable risk threshold,
- (b) The integrity level used for development, verification and validation of the ADS and its features is appropriate to reduce the risk below the unreasonable risk threshold,
- (c) The tools by which **testing evidence is** obtained achieve an acceptable level of credibility and demonstrate stability of performance when subjected to variations **in accordance with** 6.2,
- (d) **Testing evidence was obtained from an adequately explained combination of virtual, track and real-world testing and shows consistency of results between those test methods.**
- (e) The manufacturer has taken steps to limit the potential for unintended functions in the ADS or for unintended functions to be induced in interfacing systems,
- (f) Testing evidence provided can be repeated and reproduced with consistency of safety objectives as per 6.3.2,
- (g) The testing evidence demonstrated by the manufacturer provides reasonable coverage of foreseeable operating conditions and events in the intended area of operation **in alignment with the approaches described in 5.3.2.16 and 5.3.2.17**, including conditions consistent with the ODD of the ADS and conditions that may involve ODD exit, and
- (h) The manufacturer has conducted one or more self-assessments and has taken steps to remediate any findings as per 5.3.4.