

ADS IWG Working Document
Change Proposal Form
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Document Reference

ADS-17-16

Date

3 December 2025

Agenda item

6.13.

Outcome

Proposed by (affiliation only—no personal information)

SAE

Summary of Change (25 words or less)

The change would make clear that (1) if an approval authority or technical service determines that the manufacturer's scenario testing was insufficient, the authority or service will contact the manufacturer and agree on additional testing, and (2) in conducting confirmatory testing, the authority or service will, except for on-road testing, use the same test methods and protocols as those used by the manufacturer in its original testing or any agreed-upon additional testing.

Reason for Change (Justification)

The safety case approach requires the ADS manufacturer to provide evidence that the ADS meets the regulation's requirements based on the testing done by the manufacturer, and requires that the assessment of the test environment and safety case include a determination of the adequacy of the manufacturer's selection of scenario tests conducted to support the claims made in the safety case. If the assessor determines that the manufacturer's testing was not sufficiently inclusive, the assessor can provide the manufacturer the opportunity to supplement its testing by including additional scenarios. Confirmatory testing by the authority or service would then focus on confirming the results of the manufacturer's tests using the manufacturer's original and supplemental test scenarios and protocols rather than devising wholly new tests for which the manufacturer had no opportunity to conduct testing and provide evidence. The exception would be on-road testing, where the randomness of events makes precise replication of the manufacturer's testing scenarios and protocols difficult.

Location

8.3.2.2.3 and 8.3.3.1 (UNR)

Original text

- 8.3.2.2.3. The approval authority or its designated technical service shall verify that the set of scenarios and situations resulting from the manufacturer's scenario generation and identification process is suitable for demonstrating the ADS safety case. This includes covering reasonably foreseeable situations and conditions that the ADS will encounter during its real-world operations. In particular, the approval authority or its designated technical service shall verify that the set of scenarios and situations selected as evidence to support the ADS safety case includes:
- (a) Scenarios and situations in which the ADS needs to initiate a fall-back response (e.g., approaching the ODD limits), and
 - (b) Reasonably foreseeable situations that are not deemed to be preventable by the ADS (e.g., related to unsafe behaviour by other road users or by infrastructural failures)
- 8.3.3.1. Confirmatory testing conducted or required by the approval authority or its designated technical service shall use one or more test methods and pre-defined and repeatable test protocols to confirm that the evidence provided by the manufacturer accurately represents the ADS performance. The confirmatory tests shall cover a range of driving conditions representative of the ODD, including at least and as appropriate:¹⁷
- 17 [The information reported in Annex 7 may be used to extend the list of scenarios that can be selected for confirmatory testing.]

Revised text

- 8.3.2.2.3 [same as original text but at the end:]
- XXXXX **If the approval authority or its designated technical service has concerns about the suitability of the test scenarios used by the manufacturer, the authority or its designated technical service will address those concerns with the manufacturer and agree on any supplemental testing necessary and allow the manufacturer to conduct such supplemental testing and amend the safety case accordingly, including by providing results of such supplemental testing.**
- 8.3.3.1. Confirmatory testing conducted or required by the approval authority or its designated technical service shall use one or more test methods and pre-defined and repeatable test protocols to confirm that the evidence provided by the manufacturer accurately represents the ADS performance. **Except for on-road testing, the test methods and protocols used by the approval authority or its designated technical service shall be the same as those used by the manufacturer, including test methods and protocols developed for use in supplemental testing agreed upon with the manufacturer in accordance with 8.3.2.2.3. Given the randomness of conditions that may be encountered in on-road testing, confirmatory on-road testing need not duplicate the manufacturer's test methods and protocols**

but must be performed within the ODD of the ADS or at its boundaries. The confirmatory tests shall cover a range of driving conditions representative of the ODD, including at least and as appropriate:¹⁷

~~17[The information reported in Annex 7 may be used to extend the list of scenarios that can be selected for confirmatory testing.]~~