

ADS IWG Change Request

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Date	22 April 2026	Please use month name (e.g., "January")
Document	ADS-20-18/Rev.1	
Agenda Item	5.2. DDT Performance	
Submitted by	SAE	Affiliation only—No personal information
Title	Clarification on crash causation	25 words or less (used to post document)
Location	6.1.2.1.	e.g., impacted section, paragraph number(s)
Summary	Provides further clarification on the need to resolve pre-approval crash causation issues during the approval process, and to defer to national ISMR processes to address post-deployment crash causation.	<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Accepted as amended <input type="checkbox"/> Deferred (further discussion) <input type="checkbox"/> Not accepted <input type="checkbox"/> Withdrawn
Original Text	This requirement has pre and post deployment implications, where there are collisions in which the ADS is involved during the approval process (e.g. during confirmatory testing) there is expectation that a root cause analysis is done to assess the causes of such collision and an explanation provided. Where a collision happens post deployment it is covered by the ISMR process. Causation can be determined by: <ul style="list-style-type: none"> • The manufacturer’s ISMR investigation, • Authority investigation or, • A court of law 	
Revised Text	This requirement has pre and post deployment implications. Where there are collisions in which the ADS is involved during the approval process (e.g., during the manufacturer’s on-road testing or confirmatory testing) there is expectation that a root cause analysis is done to assess the causes of such collision and an explanation provided. Where the ADS is determined to have played a role in causation, the manufacturer will provide evidence of how the related causal factors have been addressed in the final ADS prior to approval. Where a collision happens post deployment it is covered by the ISMR process as implemented within national law of the country in which the collision occurred concerning how to define relevant collisions; how and by whom causation is determined; and the consequences of post-deployment crashes in which the ADS played a causal role.	
Rationale	As the interpretation notes, the consequences of the ADS having played a causal role in a collision differ greatly depending on whether the collision occurs before or after type approval. If prior to type approval, the manufacturer would explain how it has addressed the matter to the approval authority and resolve any concerns so that the approval process can proceed. If the collision occurs during deployment, the national authority, pursuant to national law, will determine how causation is established and what consequences, if any, a conclusion of causation may entail. This is consistent with how the regulation addresses traffic law compliance: “6.1.2.6. The ADS shall comply with traffic rules in accordance with application of relevant law within the area of operation.”	

Discussion

UK: Two parts-pre-deployment provision fine. ISMR has more complexity. Reports to granting TAA which might not be incident in the country of TAA. Suggested text: "as implemented within national law" change to "taking into account applicable law"
EC: Similar to UK: Revise second sentence to say "real-world" (not "on-road") testing; ISMR provision too explicit/restrictive.

Collision here is intended to match recognized international use (i.e., involving an ORU or resulting in non-trivial physical damage).

This requirement has pre- and post-deployment implications. Where there are collisions in which the ADS is involved during the approval process (e.g., during the manufacturer's real-world testing or confirmatory testing), there is expectation that a root cause analysis is done to assess the causes of such collision and an explanation provided. Where the ADS is determined to have played a role in causation, the manufacturer will provide evidence of how the related causal factors have been addressed in the final ADS prior to approval.

Where a collision happens post-deployment, it is covered by the ISMR process taking into account the applicable law of the country in which the collision occurred concerning how to define relevant collisions, how and by whom causation is determined, and the consequences of post-deployment crashes in which the ADS played a causal role.