

ADS IWG Change Request

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Date	22 April 2026	<i>Please use month name (e.g., "January")</i>
Document	ADS-20-21/Rev.1	
Agenda Item		
Submitted by		<i>Affiliation only—No personal information</i>
Title		<i>25 words or less (used to post document)</i>
Location	Annex 3	<i>e.g., impacted section, paragraph number(s)</i>

Summary	Annex 3, item 4 lists several possible indicators of unreasonable risk as if they always constitute reportable instances of unreasonable risk. This change corrects that.	<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 Withdrawn
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Original Text	<p>“Performance issues constituting an unreasonable risk to safety”</p> <p>This occurrence should be understood as deviations, degradations, or limitations in the ADS capabilities that affect its ability to perform its intended driving task safely within the declared ODD and is beyond the expected variability or acceptable degradation. This occurrence is intended to complement more specific reportable occurrences by capturing safety-relevant performance concerns that may not be directly associated with a single discrete failure or event.</p> <p>The following are examples of this type of issue:</p> <ul style="list-style-type: none"> • Violation of performance thresholds as indicated in the Safety case • An identified reduction in the safety margins • Exceeding overall hazard exposure thresholds • An increase in the rate of hazardous event occurrences <p>These may not be “serious”, but the increase suggests some underlying problem.</p>
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Revised Text	<p>“Performance issues constituting an unreasonable risk to safety”</p> <p>This occurrence should be understood as deviations, degradations, or limitations in the ADS capabilities that affect its ability to perform its intended driving task safely within the declared ODD without presenting an unreasonable risk to safety and is beyond the expected variability or acceptable degradation. This occurrence is intended to complement more specific reportable occurrences by capturing safety-relevant performance concerns that, based on analysis of their frequency and severity, constitute an unreasonable risk but that may not be directly associated with a single discrete failure or event.</p> <p>The following are examples of this type of issue factors that should be considered in determining whether an unreasonable risk may exist, but do not necessarily constitute such a risk:</p> <ul style="list-style-type: none"> • Violation of performance thresholds as indicated in the Safety case • An identified reduction in the safety margins • Exceeding overall hazard exposure thresholds • An increase in the rate of hazardous event occurrences <p>These may not be “serious”, but the increase suggests some underlying problem.</p>
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Rationale	<p>A determination that a risk is unreasonable requires analysis of the frequency and severity of relevant occurrences. The requirement is to report performance issues that “constitute” an unreasonable risk, not to report circumstances that would be considered in determining the existence of such a risk. This makes clear that a determination of unreasonable risk must have occurred to trigger the requirement to report.</p>
Discussion	<p>Revised text as accepted:</p> <p>This occurrence should be understood as deviations, degradations, or limitations in the ADS capabilities that affect its ability to perform its intended driving task safely within the declared ODD and is beyond the expected variability or acceptable degradation. This occurrence is intended to complement more specific reportable occurrences by capturing safety-relevant performance concerns that, based on analysis of their frequency and severity, constitute an unreasonable risk but that may not be directly associated with a single discrete failure or event.</p> <p>The following are examples of factors that should be considered in determining whether an unreasonable risk may exist, but do not necessarily constitute such a risk:</p> <ul style="list-style-type: none">• Violation of performance thresholds as indicated in the safety case• An identified reduction in the safety margins• Exceeding overall hazard exposure thresholds• An increase in the rate of hazardous event occurrences <p>These may not be “serious”, but the increase suggests some underlying problem.</p>