

## ADS GID Change Request

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Date	22 April 2026	<i>Please use month name (e.g., "12 January 2026")</i>
Document	ADS-20-24	
Agenda Item	5.2.	
Submitted by	SAE	<i>Affiliation only—No personal information</i>
Title	MRC in ADSF-2	<i>25 words or less (used to post document)</i>
Location	6.1.5.4.1	<i>e.g., impacted section, paragraph number(s)</i>
Summary	<p>The text goes well beyond interpreting the regulatory language and incorrectly asserts that the presence of a fallback user in an ADSF-1 means the MRC by such a feature can meet a lower standard. This corrects that assertion.</p>	<input type="checkbox"/> Accepted <input type="checkbox"/> Accepted as amended <input type="checkbox"/> Deferred (further discussion) <input type="checkbox"/> Not accepted <input type="checkbox"/> Withdrawn
Original text	<p>As ADSF-2 features by definition do not have a fallback user so there is no guarantee any human driver will be able to take over the performance of the DDT following a MRC. As such a higher standard is expected for an acceptable stopping point following an ODD exit, in order to prevent the MRC resulting in the vehicle blocking the road or being parked illegally. The use of "aim to" acknowledges that some conditions may prevent a legal parking space being achieved in some specific circumstances but that the ADS is still "aiming" to park legally. The fallback to MRC in both an ADSF-1 or ADSF-2 may be interrupted by the user taking over if the design of the ADS allows. For both feature types the ADS feature is required to be free from unreasonable risk (see 5.2) and the MRC should reflect that.</p>	
Revised Text	<p>As an ADSF-2 feature <del>s</del> by definition <b>"does not include an ADS fallback response requiring do not have a fallback user"</b> so there is no <b>expectation that guarantee</b> any human driver will be able to take over the performance of the DDT following a MRC. <b>Of course, depending on the vehicle design, an ADSF-2 feature may be present in a vehicle with a human user who could take control after an MRC is achieved.</b> <del>As such a higher standard is expected for an acceptable stopping point following an ODD exit, in</del> order to prevent the MRC resulting in the vehicle blocking the road or being parked illegally, <b>the requirement states as a goal that the ADSF-2 feature " shall aim to bring the ADS vehicle to a stop in a safe location that complies with traffic rules."</b> The use of "aim to" acknowledges that some conditions may prevent a legal parking space being achieved in some specific circumstances but that the ADS is still "aiming" to park legally. The fallback to MRC in both an ADSF-1 or ADSF-2 may be interrupted by the user taking over if the design of the ADS allows. For both feature types the ADS feature is required to <b>be</b> designed to be free from unreasonable risk (see 5.2) and the MRC should reflect that.</p>	
Rationale	<p>Although an ADSF-1 feature "includes an ADS fallback response requiring a fallback user," there is no "guarantee" that a human driver will be able to take over after an MRC. As noted in the interpretation concerning 6.1.6.2, the need for such a feature to achieve an MRC "could be due to fallback user not responding in the transition period." If the fallback user is not responsive at that time, the user may also not be responsive upon the feature's achievement of an MRC. In such a case, there is a similar goal for the MRC to occur in a safe location. Therefore, expressing in an</p>	

interpretation that there is a “higher standard” for an MRC in the case of an ADSF-2 feature is both misleading and amounts to imposition of a new requirement not found in the regulatory text.

Discussion