

## ADS GID Change Request

*One request per form  
Please submit requests as separate documents  
Shaded blocks for use by secretariat*

Date	22 April 2026	<i>Please use month name (e.g., "12 January 2026")</i>
Document	ADS-20-26	
Agenda Item	5.14.	
Submitted by	SAE	<i>Affiliation only—No personal information</i>
Title	Failure to achieve MRC	<i>25 words or less (used to post document)</i>
Location	Annex 3, item 2	<i>e.g., impacted section, paragraph number(s)</i>
Summary	The interpretation adds requirements not included in the regulatory text. This corrects that.	<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 Withdrawn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>2. “ADS failure to achieve a mitigated risk condition when necessary” Such an occurrence is expected to be reported when an MRC is required, but:</p> <ul style="list-style-type: none"> <li>• The ADS does not initiate any fallback to MRC when required (e.g., ODD exit, significant ADS failure, collision detected, detection that fallback user is not available, failure of the fallback user to take control following a system-initiated deactivation of the ADS)</li> <li>• The ADS does not complete the fallback response to an MRC when required</li> <li>• The ADS performs the MRC, but an unsafe stop location is selected</li> <li>• Conflicts occur during the MRC (e.g., collision takes place as part of performing the MRC)</li> </ul>	
Revised Text	<p>2. “ADS failure to achieve a mitigated risk condition when necessary” Such an occurrence is expected to be reported when an MRC is required, but:</p> <ul style="list-style-type: none"> <li>• The ADS does not initiate any fallback to MRC when required (e.g., ODD exit, significant ADS failure, collision detected, detection that fallback user is not available, failure of the fallback user to take control following a system-initiated deactivation of the ADS)</li> <li>• The ADS does not complete the fallback response to an MRC when required</li> <li>• <del>The ADS performs the MRC, but an unsafe stop location is selected</del></li> <li>• <del>Conflicts occur during the MRC (e.g., collision takes place as part of performing the MRC)</del></li> </ul>	
Rationale	<p>The regulatory text does not require reporting when an MRC is achieved but in “an unsafe stop location” (which is not defined in the regulation). Nor does it require reporting when an MRC is achieved but conflicts occur during the MRC. The example given involves a collision, which would be reportable otherwise if it is a critical occurrence.</p>	

Discussion

