

ADS IWG Change Request

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Date	23 April 2026	Please use month name (e.g., "January")
Document	ADS-20-40/Rev.1	
Agenda Item	5.14.	
Submitted by	OPI-ISMR (EC/JRC)	Affiliation only—No personal information
Title	EDR thresholds	25 words or less (used to post document)
Location	Annex 4 4.1 (c) (GTR) / Annex 6 4.1 (c) (UNR)	e.g., impacted section, paragraph number(s)
Summary	The proposal is intended clarify that the EDR triggers as per UNR169 are no representative for critical occurrences	<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 Withdrawn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	For vehicle categories M2, M3, N2, and N3 , the UN Regulation No. 169 may be considered as reference. However, this regulation does not include a representative delta V threshold (neither the last stop or sudden deceleration triggers are delta V thresholds). Anyway, an appropriate delta V threshold, which fulfils the EDR requirements, may be selected as a trigger by the manufacturer in agreement with the GTAA	
Revised Text	For vehicle categories M2, M3, N2, and N3 , the UN Regulation No. 169 may be considered as reference. However, this regulation does not include a representative delta V threshold (neither the last stop or sudden deceleration triggers are delta V thresholds). The manufacturer could determine their own delta-V trigger for a critical occurrence, including one based on a subset of EDR triggers (e.g., a subset of existing sudden deceleration triggers). However, there is no obligation to do this. Anyway, an appropriate delta V threshold, which fulfils the EDR requirements, may be selected as a trigger by the manufacturer in agreement with the GTAA	
Rationale	Based on the discussion held in the ISMR small drafting groups. It was acknowledged that the triggers included in the in the UN R169 are not always representative of the critical occurrences events (e.g. acceleration rate 3.5 m/s ² , 0.7 sec). So, the modification clarifies this concept, but also acknowledges that manufacture can rely on the information collected by the EDR to identify a representative delta-V threshold	
Discussion		