

ADS IWG Change Request

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Date	30 April 2026	Please use month name (e.g., "January")
Document	ADS-20-53	
Agenda Item	5.18	
Submitted by	OPI	Affiliation only—No personal information
Title	Testing GID – 'Representativeness'	25 words or less (used to post document)
Location	8.3.2.4.1.4.	e.g., impacted section, paragraph number(s)
Summary	Suggested alternative to the representativeness of other road users and ADS users to acknowledge feedback received	<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 Withdrawn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

The concept of representativeness aims to ensure that tests involving other road users provide credible, generalizable evidence about ADS behaviour in real traffic. The reference to “representative of the expected general population of ADS users and other road users” is intended to prevent safety claims being based on narrowly selected participants, atypical or overly compliant behaviour, or participants making choices that do not reflect the diversity of behaviours encountered in the real-world. Testing involving other road users is intended to capture the spectrum of normal and unusual behaviours that the ADS might encounter in real traffic so that the response of the ADS can be properly investigated.

In this context, representativeness does not mean a perfect demographic mirror of society. Instead, it means that the characteristics and behaviours of other road users involved in testing are diverse but sufficiently typical of those the ADS can reasonably be expected to encounter, such that conclusions drawn from the tests are valid.

Representativeness has three complementary dimensions:

- 1) Behavioural representativeness, which ensures behavioural patterns of other road users reflect real traffic behaviour (e.g., compliance and non-compliance with traffic rules, reaction times and decision-making variability, assertive, cautious, inattentive, or ambiguous behaviour, natural interaction dynamics (e.g., gap acceptance, yielding, hesitation). Assuming all other (mainly human) road users follow “traffic rules” is unlikely to be a realistic assumption unless the ODD is limited. Animal behaviour may also be complex, e.g., moving as a pack, herding, pack splitting up, etc.)
- 2) Population representativeness, which ensures that the group of other road users is representative of the expected population (e.g., age range, etc.), physical characteristics relevant to perception (e.g., height, clothes, etc.), mobility characteristics (e.g., walking speed, cycling style, etc.), driving experience and style of driving. Animals also come in many shapes and sizes and may present different aspects to the vehicle or be covered in “materials”, e.g., hair, fur, etc. with different material properties.
- 3) ODD-specific relevance, which ensures that the representativeness is always relative to the declared ODD.

Revised Text	<p>On a)</p> <p>For ADS users, representativeness could mean including a range of ADS users whose behaviours, skills, and characteristics reflect those reasonably expected to use the ADS. For example, testing should not be conducted only with engineers. Likewise, if a vehicle is expected to be driven by professional drivers (e.g., a coach) that should also be taken into account.</p> <p>Other road user representativeness could mean capturing a sufficiently broad range of real-world behaviours and characteristics (e.g. compliant and non-compliant actions, interaction styles, physical and mobility variation) relevant to the ODD, such that the ADS is exposed to realistic interaction scenarios.</p> <p>On b)</p> <p>With respect to ‘statistically significant’, statistical methods have been developed to assess whether the sample size is ‘sufficient’ to reach statistical significance. These methods focus on the sample size in terms of the number of participants. The manufacturer is encouraged to provide calculations that determine and explain its choice for the number of participants in their user tests and what assumptions are used in the calculations.</p>
Rationale	<p>The original text suggested by the OPI was not able to achieve consensus as it was deemed too close to regulatory wording despite some key concepts were acknowledged. The revised proposal provides a clearer structure by dividing guidance between the ORU and the ADS users. The OPI suggest to include also sub-bullet 8.3.2.4.1.4. b) in the interpretation.</p>
Discussion	