



November 9, 2017

Ms. Heidi King
 Acting Administrator
 National Highway Transportation Safety Administration
 1200 New Jersey Ave., S.E.
 Washington, DC 20590

Dear Ms. King:

On behalf of SAE International, I would like to bring to your attention a correction that will be made to the definition of "ADS-dedicated vehicle (ADS-DV)" in an upcoming revision of SAE Surface Vehicle Recommended Practice J3016™SEP2016, "Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles" expected to be published in February 2018. This revised version of J3016 will contain numerous clarifications as well as several other corrections besides the one that is the subject of this letter, but the correction to the definition of ADS-DV is particularly important, since it affects policy development directly, including the subject document.

On page 4 of the September 2016, version of J3016, the definition of "ADS-dedicated vehicle" states: "A vehicle designed to be operated exclusively by a level 4 or level 5 ADS for all trips." The correct definition of ADS-DV is "A vehicle designed to be operated exclusively by an ADS for all trips." This corrected definition acknowledges that the fallback for an ADS-DV could be performed by a remote fallback-ready user (who then becomes a remote driver), and therefore this term and definition should include level 3 through 5. The fact that the fallback could in some cases be performed by a remote fallback-ready user /remote driver is already acknowledged in NOTE 4 to the current, un-corrected definition of ADS-DV, which states: "ADS-DVs might be operated temporarily by a conventional **or remote driver**: 1) to **manage transient deviations from the ODD**, 2) to **address a system failure** or 3) while in a marshalling yard before being dispatched" (emphasis added). This point is further emphasized in Table 3 on page 22 of J3016:SEP2016, which also indicates that a DDT fallback-ready user may be remote to the vehicle (see below)

Table 3 - User roles while a driving automation system is engaged

	No Driving Automation 0	Engaged Level of Driving Automation				
		1	2	3	4	5
In-vehicle User	Driver			DDT fallback-ready user		Passenger
Remote User	Remote Driver			DDT fallback-ready user		Dispatcher

We apologize for this error and the confusion it has created, and we want you to know that it will be corrected in the next revision of J3016, which we expect to be published by February 2018.

Thank you for this opportunity to comment.

Sincerely,



S. William Gouse

Director, Federal Programs
SAE International

cc: Jack Pokrzywa
Barbara Wendling
Daniel Bartz