

Comments from Jaguar Land Rover

JOHN VEASEY, 19. FEB 2019

Comments to Draft Document Arguments-REV-0.docx

Hi Lukas,

At the present time I am unable to be involved in the activities of the above group, but I am still most interested and I am asking you as the secretary to ensure that the points below are fully considered when this group comes to making any recommendations to WP.29 & GRVA.

In making these comments I am not standing as a supporter or an opponent of the proposal to have some sort of visual device to alert other road users, just an interested by-stander to ensure that what ultimately is fitted has been correctly purposed for the job it might need to do.

Comment 1.

The studies I have seen on the need for a lamp have been skewed such that when the question is asked of a respondent the answers forthcoming are predictably in favour of an autonomous lamp being present. Of itself this is not an issue but the Human Factor element for the benefits of a light is not clear or evident. This issue needs to be addressed before any proposal should be made to WP.29.

Comments to Draft Document Arguments-REV-0.docx (cont'd)

Comment 2.

The decision to have a lamp has lead to the question of where other road users need to be able to see it from; but the answer to this question is in the question itself, as other road users will approach an autonomous vehicle form any angle within a 360 degree range then a light must be visible to all of those users.

Comment 3.

This is my real worry. When an autonomous vehicle shows a light then it could become the target for anti-social behavior, from children running into the street to see if the car will stop to much worse. It needs to be considered that the first group of vehicles on the street will be high end product and the users will be wealthy people, it will be easy for the criminal element to use the illumination as a target for street crime effectively mugging the vehicle user to obtain high value personal items such as jewelry and watches. This is an undesirable side effect of having a lamp with invites such crime.

Comments to Draft Document Arguments-REV-0.docx (cont'd)

Comment 4.

In addition currently the presence of a light on an autonomous car would provide no mitigation with regard to the liability in the event of an accident; national laws will need to be changed to cater for such factors, which may require the luminous intensity to be quite significant or attention grabbing perhaps even by a flashing light, this has to be carefully considered when thinking about any performance specification.

As I said I have no position either in favour or against the proposed light, but I do want to ensure that due consideration is given to the effectiveness of the solution. I would be grateful if you could capture these comments in your discussions.

Thanks in advance

Best Regards

John

