

## **Position of CITA and EVU on current EDR-Proposal of OICA and EU (29.11.19)**

**OICA Proposal** (EDR-DSSAD-03-03) to introduce EDR gradually is welcomed (EDR 1. Generation: 2022 / EDR 2. Generation: 2025)

**EU Proposal** (EDR-DSSAD-03-02) is also to be welcomed, but - from a technical point of view - some of the demanded Data-Elements in this proposal for an EDR can realistically not be implemented until 2022.

Thus there is a need for a second Generation of EDR in 2025 to keep to the scheduled introduction for EDR in 2022, which seems to be most important for improvement of legal certainty and road safety.

### **Required Amendment for 1. Generation of EDR from 2022 vs. CFR 49 Part 563:**

- a) Save pre-collision acceleration in longitudinal and transversal direction over a period of 5 seconds before collision (start of algorithm) with a resolution of at least 100 Hz
- b) Save interventions of automated assistance functions (AAC, ABS, ESC, AEB, ALK, etc.) and steering angle sensor data, if the vehicle is equipped with it
- c) Triggering of an overwriteable data-set, so-called non-deployment event, by manual trigger or lower acceleration values or intelligent acceleration analysis (jerk detection) for detection of relatively slight impacts against vulnerable road users
- d) Retrieval of standardized stored data via local vehicle interface by a generic scan tool; in case of a malfunction of the retrieval process, a manufacturer-specific procedure can be used. Access rights are to be regulated nationally.

### **Proposal for 2. Generation of EDR from 2025:**

- a) Addition of data sets according to proposal of the European Commission as well as sensor data for AD functions in the future (i.e. C-ITS signals)
- b) Detection of accidents with vulnerable road users
- c) Storage of environment sensors (possibly raw data)
- d) Data retrieval by Over the Air (OTA) interface, if vehicle is equipped with OTA