

## Proposal for amendments to document EDR-DSSAD-03-06 (Japan)

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The modifications to the existing text of the proposed document EDR-DSSAD-03-06 (Japan) are marked in bold for new text and strikethrough for deleted text.

### Proposal for DSSAD Section in ALKS requirements

#### Section XX: DSSAD

##### 1. Purpose (to be discussed)

##### x. Definitions (to be combined with Definition Part)

- x.1. *“Data Storage System for Automated Driving (DSSAD)”* means a system which aims at giving a clear picture of the significant interactions between the driver and the ADS by storing a set of data.
- x.2. *“Data”* means a series of timestamped information entries related to a logic signal indicating that the ADS was switched ON or OFF, or a specific significant interaction between the driver and the system occurred at a precise time.
- x.3. *“Storing data”* : means collecting and keeping the collected data for future retrieval or “read only” access.
- x.4. ***“Backend”* is an external storage location regulated by national or regional law where data elements of the DSSAD are stored and maintained in accordance with national or regional legislation and makes the data available to authorized parties.**
- x.5. *“Data transmission”* is the process of sending data over a communication medium directly from the vehicle to a backend.
- x.6. ***“Data set”* is a data matrix containing all contiguous data elements listed in paragraph 6.2. that were triggered from the time the ALKS was activated until it was manually or automatically deactivated.**
- x.7. ***“Over the air (OTA) interface”* means an interface that can establish a wireless connection with a backend and allow data transfer thereto wirelessly instead of using a cable or other local connection.**

##### 2. Specifications

- 2.1. Each vehicle equipped with a DSSAD complying with the definition of Paragraph x.1. shall meet the requirements specified in paragraph 2.2 for data elements, paragraph 2.3 for data format,

paragraph 2.4 for data storage, paragraph 2.5 for retrievability, and paragraph 2.6 for information to the driver.

~~2.1.1. Data shall be available by using a dedicated retrieval tool or any other solution.~~

**Commenté [SK1]:** See no. 2.5.1.

2.1.2 The data shall be stored on-board **and on a backend**, ~~unless it ensures that there is adequate protection against manipulation.~~

2.2. Data elements

2.2.1 Each vehicle equipped with a DSSAD shall store information which be able to determine elements listed below; (If duplicate, record in combined is allowed.)

- ✧ **Position and Time** stamped switches of the ADS from a status to another status
- ✧ **Position and Time** stamped Transition Demand by the ADS
- ✧ **Position and Time** stamped Minimal Risk Maneuver engagement by the ADS
- ✧ **Position and Time** stamped Override through steering, brake, and accelerator control by the driver
- ✧ **Position and Time** stamped Driver not available
- ✧ **Position and Time** stamped System failure
- ✧ ODD status information (road condition, vehicle condition, environmental condition) when the system defines that vehicle will exit or exits the ODD limits)
- ✧ *(Position and Time stamped C-ITS signals)*

2.3. Data format

Each data element listed in Paragraph 2.2 shall be recognized ~~without any possible confusion by~~ **standardised format**, ~~codification that will be chosen by the manufacturer.~~

Each time stamp attached to this data shall enable to determine when the significant interaction (change of ADS status, Transition Demand release, Minimum Risk Maneuver or Emergency Manoeuver or Override by the driver) occurred with a resolution of [1 second] in GMT time.

(2.3.2. *Position determination*

2.3.2.1. *Horizontal position error shall not exceed:*

- (a) *Under open sky conditions: 15 m at a confidence level of 0.95 probability with Position Dilution of Precision (PDOP) in the range from 2.0 to 2.5;*
- (b) *In urban canyon conditions: 40 m at a confidence level of 0.95 probability with PDOP in the range from 3.5 to 4.*

2.3.2.2. *Sensitivity at receiver input shall be:*

- (a) *GNSS signals detection (cold start) do not exceed 3,600 s at the signal level on the antenna input of the AECC of minus 144 dBm;*
- (b) *GNSS signals tracking and navigation solution calculation is available for at least 600 s at the signal level on the antenna input of the AECC of minus 155 dBm;*
- (c) *Re-acquisition of GNSS signals and calculation of the navigation solution is possible and does not exceed 60 s at the signal level on the antenna input of the AECC of minus 150 dBm.*

2.3.2.3. *Cold start time to first fix shall not exceed*

(a) 60 s for a signal level down to minus 130 dBm;

(b) 300 s for a signal level down to minus 140 dBm.

2.3.2.4. GNSS signal re-acquisition time after a block out of 60 s at a signal level down to minus 130 dBm shall not exceed 20 s at the recovery time of the navigation satellite visibility.

2.3.2.5. The GNSS receiver shall be able to obtain a position fix at least for every second.

2.3.2.6. Accuracy shall be provided for the complete speed range of the automated driving function.)

#### 2.4. Data storage

DSSAD shall be able to store a minimum of [X.000] timestamped significant interactions or cover a minimum period of [6] months of use, whichever is achieved first.

Once these storage limits of the DSSAD are achieved, additional data storage may erase the previous data, following the "First In / First Out" rule, and data over these limits may be impossible to retrieve.

2.4.2. Notwithstanding paragraph 2.4.1. data shall be retrievable by the methodology described in paragraph 2.5.1. within the national or regional legislative storage periods. After these storage periods, data shall be impossible to retrieve.

2.4.3. The DSSAD shall be fitted with an embedded hardware, allowing authentication on, and access to the over the air (OTA) interface.

2.4.4. The DSSAD shall be able to recognize, when a data transmission (to a backend) is successfully completed.

2.4.5. After the end of a position and timestamped event, the DSSAD shall send the data set to a backend over an end-to-end protected wireless connection.

2.4.6. If the sending of data failed or is not possible, then the DSSAD shall retry sending the data, if a secure and active wireless connection is available.

2.4.6. Notwithstanding paragraph 2.4.1. stored data in the DSSAD shall be deleted after the DSSAD has registered a successful data transmission to the backend.

#### 2.5. Data retrievability

2.5.1. The data set shall be retrievable via the electronic vehicle interface (OBD and OTA).

If the main onboard vehicle power supply is not available, it shall be possible to retrieve stored position and timestamped data from the DSSAD with the appropriate tool or method provided by the manufacturer.

After a UN Regulation No. 94 (Frontal collision) impact test, it shall be possible to retrieve position and timestamped data stored prior to the impact, from the DSSAD via the electronic vehicle interface (OBD and OTA) with the appropriate tool or method provided by the manufacturer.

- 2.5.3. For the purpose of type approval it shall be possible for Type Approval Authorities and Technical Services to access and read data via the electronic vehicle interface (OBD and OTA).**
- 2.5.4. At Roadworthiness testing, including the periodic technical inspection, it shall be possible for responsible authorities to access and read at least the most recent data set via the electronic vehicle interface (OBD and OTA) to test the storage functionality and the plausibility of the data set.**
- 2.5.5. The manufacturer shall provide an information package to Type Approval Authorities, Technical Services and authorities responsible for Roadworthiness testing which includes the information how to grant access and retrieve the data stored in the DSSAD required by this regulation.**
- 2.6. Protection against manipulation  
DSSAD should be ensured that there is adequate protection against manipulation of stored data such as anti-tampering design.
- 2.7. Information to the driver  
The manufacturer shall provide in the vehicle owner's handbook, or by any other communication means in the vehicle, the necessary information about DSSAD.  
The manufacturer shall provide the following information in the vehicle owner's handbook, or by any other communication means in the vehicle.
- ✧ The vehicle is equipped with DSSAD
  - ✧ The purpose of DSSAD
  - ✧ No personal information is included
  - ✧ The way to retrieve data