

*Secretary's note: The following is excerpted from an email submitted by the experts.*

Below is the Japan comments about ODD and request

<Japan comment about ODD>

Japan recognize with regard to ODD that “ADS shall satisfy the requirements within ODD” and “ADS shall not be activated outside ODD”, NOT “ADS shall be activated under ODD”

On the base of this recognition, “internal” condition (e.g. under the use of seat belts) does not need to be excluded from ODD description.

ODD should consist of “external condition (e.g. environment, road condition)” and “internal condition (e.g. use of seat belts)”.

However, description like “condition that system can detect properly” is not appropriate for ODD description because misdetection by system becomes automatically out of ODD and it is impossible to assess whether detection is appropriate or not.

<Request for FRAV>

As we submitted in the past (as attached), Japan would like to discuss the concept of “reasonably foreseeable and preventable” in framework document as well as “required safety level (e.g. driver level or state of the art)” in FRAV, because these issues are key element of VMAD from our understanding.