

ADS IWG Working Document  
Change Proposal Form  
One major comment per form  
(Shaded blocks for use by the IWG Secretariat)

Document Reference

ADS-12-08

Date

18 June 2025

Agenda item

Proposed by (affiliation only—no personal information)  
ISMR OPI and ADS IWG secretary

Summary of Change (25 words or less)

General modification to the of text in Post-Deployment Safety

Reason for Change (Justification)

- 1) to remove duplications
- 2) to clarify the objectives of the reporting
- 3) to simplify the text

Note: this proposal amends the ADS-09-14 which can be considered superseded

Location

6.4 Post deployment safety

ADS-10-05	Proposals	Comments
6.4. Post-deployment safety		
6.4.1. The requirements of this section are without prejudice to applicable laws governing access to data, availability, and privacy and data protection.	<b>Move to Chapter 4 (General requirements)</b>	IWG agreement to move this provision to a more appropriate location (e.g., technical report, general requirements chapter, administrative procedures section).
6.4.2. The requirements of this section are without prejudice to applicable laws on provision of info to other authorities.	<b>Move to Chapter 4 (General requirements)</b>	IWG agreement to move this provision to a more appropriate location (e.g., technical report, general requirements chapter, administrative procedures section).
6.4.3. The manufacturer shall report, as required by the relevant authority, on the in-service safety performance of the ADS vehicle and provide confirmatory evidence of the audit results of the Safety Management System.	<b>6.4.1.</b> The manufacturer shall report, as required by the relevant authority, on the in-service safety performance of the ADS vehicle <b>to confirm the Safety Case's claims and confirmation that the processes of (SMS Section) have been implemented.</b>	to clarify that ISMR can provide confirmation on Safety case claims as well as confirmation of the use of SMS processes after the deployment
6.4.4. The reporting shall be carried out according to the laws applicable in each contracting party and according to the information available to the manufacturers.	<b>6.4.2.</b> The reporting by the manufacturer shall <b>be conducted in accordance with the laws of the Contracting Party or Parties with jurisdiction over the reporting, including but not necessarily limited to laws governing:</b> <b>(a) Data access</b> <b>(b) Data privacy</b> <b>(c) Data protection.</b>  <b>6.4.3.</b> The reporting by the manufacturer shall be based upon information known to the manufacturer.	To clarify that the reporting provisions shall not contravene the laws of each Contracting Party.  The provision has two distinct elements: conduct in accordance with prevailing laws and limited to information available to the manufacturer.
6.4.5. The reporting shall include:	<b>6.4.4.</b> The manufacturer shall provide <b>initial notifications, short-term reports, and periodic reports to the relevant authority.</b>	It might be useful to start with a top-level reporting requirements section where initial, short, and periodic become dedicated paras..
(a) Initial notifications		
(b) Short-term reports		
(c) Periodic reports.		
<del>6.4.6. The manufacturer shall provide the short term and periodic reports to the relevant authority in a report (according to reporting templates), that contains a summary and the information relevant to the requirements for reporting.</del>	<b>Delete.</b>	This is redundant since the short and periodic sections state that the manufacturer shall provide these reports using the templates.

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6.4.7. The manufacturer shall provide the supporting data underpinning the report by means of an agreed data exchange mechanism upon request by the relevant authority.	6.4.5.	
6.4.8. The manufacturer shall provide the relevant authority with a description of the data processing (for example: filtering and conditioning) procedure and agree on the steps undertaken to deliver the data supporting the report.	6.4.6.	
<del>6.4.9. The manufacturer shall report occurrences listed in Annex [x].</del>	Delete	This is already specified under short and periodic reporting.
6.4.10. The manufacturer shall report on occurrences when at least one of the following is fulfilled:	6.4.7.	
(a) The ADS feature was active when the ADS vehicle was involved in the occurrence, or		
(b) The ADS feature was active up to 30 seconds prior to the ADS vehicle experiencing the occurrence.		
6.4.11. Initial notifications	6.4.8.	
6.4.11.1. The manufacturer shall notify the relevant authority of a critical occurrence without unreasonable delay in accordance with the applicable laws after becoming aware of it.	6.4.8.1.	
6.4.11.2. The initial notification may be limited to high-level data (e.g., location, time, type of accident).	6.4.8.2.	
6.4.12. Short-term reporting	6.4.9.	
6.4.12.1. The manufacturer shall provide short-term reports for the significant and critical occurrences listed in Annex [occurrences list annex].	6.4.9.1.	
6.4.12.2. The manufacturer shall issue each short-term report within 30 days from the knowledge of the occurrence.	6.4.9.2.	
6.4.12.3. The manufacturer shall report the occurrences in accordance	6.4.9.3.	

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with the template provided in Annex [short-term reporting templates annex].		
6.4.13. Periodic reporting	<b>6.4.10.</b>	
6.4.13.1. The manufacturer shall undertake periodic reporting of occurrences to the relevant authority.	<b>6.4.10.1. The manufacturer shall provide periodic reports for the occurrences listed in Annex [occurrences list annex].</b>	OPI recommendation for consistency with the short-term reporting.
6.4.13.2. The periodic report shall provide evidence of the in-service ADS safety performance. In particular, it shall demonstrate that:	<b>6.4.10.2.</b>	
(a) The ADS fulfils the performance requirements as evaluated in the test methods and/or declared in the safety case.		
(b) No inconsistencies have been detected compared to the ADS safety performance declared prior to market introduction.		
(c) Any newly discovered significant ADS safety performance issues that pose an unreasonable risk to safety have been adequately addressed and how this was achieved, including how they were addressed.		
6.4.13.3. The manufacturer shall submit periodic reporting regularly, at least every year, in the form of aggregated data (e.g., per hour of operation and distance driven) for ADS-vehicle type and related to ADS operation.	<b>6.4.10.3.</b>	
6.4.13.4. The manufacturer shall report occurrences in accordance with to the periodic reporting template in Annex X, as required by the relevant Authority, for the occurrences flagged under “Periodic reporting” in [6.4.9]	<b>6.4.10.4. The manufacturer shall provide the periodic report in accordance with the template provided in Annex [periodic reporting templates annex].</b>	Occurrences list cited in revised 6.4.13.1., so provision can be shortened to align with the form used for short-term reporting.