

ADS IWG Working Document
Change Proposal Form
One major comment per form
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Document Reference

ADS-17-14/Rev.2

Date

8 December 2025

Agenda item

5.6.

Outcome

Adopted

Proposed by (affiliation only—no personal information)

OICA CLEPA

Summary of Change (25 words or less)

Remove ambiguity within the introductory text.

Reason for Change (Justification)

There is confusion that the second sentence of the original text may limit the use of artificial intelligence (AI) within an ADS.

The focus of this requirement ensures that systems will not develop while in use beyond what was tested and certified to this regulation. The proposed amendment maintains this while removing ambiguity over where AI can be used. AI may be used by a manufacturer in many components of an ADS, not only for offline improvement of a model in an engineering environment.

Requirements are in place for both the UNR and GTR to manage the updating of software in a safe and traceable process.

This proposal also ensures text used in the UNR and GTR is aligned and uses the same terminology ensuring expectations are the same regardless of which regulation is applicable.

Moreover, this proposal makes it clear that no ADS should self-modify its behaviour outside of what has been tested and certified to this regulation, regardless of the type of ADS or its software.

Original text

6. The requirements in this Regulation are written with the expectation that ADS software does not include the use of online in-vehicle learning Artificial Intelligence that self modifies system behaviour. Artificial Intelligence can be used to analyse and improve ADS software in an engineering environment. By means of a software update (over the air or connected) this update can be installed in the vehicle, again without in-vehicle learning features during operation of this version.

(n) Artificial Intelligence: vehicle automation is based on a combination of hardware and software. The requirements in this regulation are based on the condition that this software does not include the use of online in-vehicle learning. Artificial Intelligence. Artificial Intelligence can be used to analyse and improve ADS software in an engineering environment. By means of a software update (over the air or connected) this update can be installed in the vehicle, again without in-vehicle learning features during operation of this version.

Revised text

UNR: 6. The requirements in this Regulation are written with the expectation that ADS software does not include the use of online in-vehicle learning that self modifies system behaviour **beyond pre-defined boundaries.**

GTR: (n) The requirements in this regulation are written with the expectation that ADS software does not include the use of online in-vehicle learning that self modifies system behaviour **beyond pre-defined boundaries.**