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| ADS IWG Working DocumentChange Proposal FormOne major comment per form(Shaded blocks for use by the IWG Secretariat) |
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| Document Reference | ADS-12-08 | Date | 18 June 2025 |
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| Agenda item |  |  |  |
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| 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Note: this proposal amends the ADS-09-14 which can be considered superseded |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 |
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| 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. | **Move to Chapter 4 (General requirements)** | 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. | **Move to Chapter 4 (General requirements)** | 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. |  **6.4.1.** The manufacturer shall report, as required by the relevant authority, on the in-service safety performance of the ADS vehicle **to confirm the Safety Case’s claims and confirmation that the processes of (SMS Section) have been implemented.** | 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. | **6.4.2.** The reporting by the manufacturer shall **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:****(a) Data access****(b) Data privacy****(c) Data protection.****6.4.3.** **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: | **6.4.4.** **The manufacturer shall provide initial notifications, short-term reports, and periodic reports to the relevant authority.** | 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. |  |
| ~~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.~~ | **Delete.** | This is redundant since the short and periodic sections state that the manufacturer shall provide these reports using the templates.  |
| 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.** |  |
| ~~6.4.9. The manufacturer shall report occurrences listed in Annex [x].~~ | **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 with the template provided in Annex [short-term reporting templates annex]. | **6.4.9.3.** |  |
| 6.4.13. Periodic reporting | **6.4.10.** |  |
| 6.4.13.1. The manufacturer shall undertake periodic reporting of occurrences to the relevant authority. | **6.4.10.1. The manufacturer shall provide periodic reports for the occurrences listed in Annex [occurrences list annex].** | 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: | **6.4.10.2.** |  |
| (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. | **6.4.10.3.** |  |
| 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] | **6.4.10.4. The manufacturer shall provide the periodic report in accordance with the template provided in Annex [periodic reporting templates annex].** | Occurrences list cited in revised 6.4.13.1., so provision can be shortened to align with the form used for short-term reporting. |