OICA secretariat comments to document WP29-150-22
Guidelines on establishing requirements for high priority warning signals

A. Proposal

At the March 2010 session of WP29, it was agreed to transmit WP29-150-22 to the various working parties, with the request to collect comments and to review the matter at the March 2011 WP29 session.

WP29-150-22 was submitted to WP29 by the WP29 Informal Group on ITS (Intelligent Transport Systems) and contains "guidelines" on the development and design of so-called high priority warning signals.

The working party on lighting GRE has already submitted comments on this paper, as published in informal document GRSP-48-07 which serve as the basis of the discussions at GRSP.

OICA generally supports the GRE comments as per GRSP-48-07. In particular, the GRE comments clarify that the issue at stake relates to Advanced Driver Assistance Systems, and not to ITS, which is a much broader and complex issue.

OICA also suggests that GRSP endorses the GRE comments, with however the following proposal for paragraph 3.1. OICA would like to suggest adding, in paragraph 3.1 ("high priority warnings should be noticeable in the driving environment"), last by one section, the following additional sentence:

Paragraph 3.1, amend to read:

"3.1. High-priority warnings should be noticeable in the driving environment

...increasing the likelihood of an appropriate response. Other studies (SAE J2808 / Tijerina / Stanley) however indicate that a combination of signals may in some particular cases create confusing situations for the driver and result in slower reactions by the drivers. Therefore, a case by case evaluation is essential depending on the technology.

As a consequence, ...
"

B. Justification

OICA understands that the quoted study SAE J2808 related specifically to lane departure warning systems and that therefore its conclusions cannot be extrapolated to other systems without a careful evaluation. OICA also understands that in most cases, a combination of signals may be needed as indicated in several studies. OICA however wishes to stress that, regardless of the quoted study (or studies), the whole issue of high-priority warning signals is still very new and that therefore some caution is needed and each technology should be evaluated separately.