

OICA comments to Japan documents GRRF-74-41 and GRRF-74-40

Background of OICA position: see OICA document GRRF-74-18-Rev.1

General comments

1. The Japanese proposal GRRF-74-40 obviously aims at regulating LKAS as an “if fitted” system, i.e. with no view of making LKAS a mandatory equipment. This is conforming to the spirit of the 58 Agreement. Yet the main question remains: how justifying the establishment of a new regulation on LKAS?
2. A key parameter to consider when proposing regulating new technologies like LKAS, is whether this technology has been safely introduced into the road traffic. Should the introduction of LKAS in the current fleet cause safety concerns, then regulating this technology may be justified. As such safety concerns did not appear, the rule makers may have difficulties in finding the proper requirements to be regulated. OICA urges Japan, as a prerequisite to any regulatory discussion, to explicitly show the safety concerns caused by the LKAS currently in the fleet.
3. There is no recollection of any safety concern caused by LKAS currently on the market. All these LKAS are approved to the current text of UN R79, including CEL Annex¹.
4. The last session of GRRF (74th session, February 2013) revealed that LKAS is still a technology not mature enough to be regulated. As a consequence, the manufacturers are still developing this technology relative to the markets where the technology will be introduced and to their safety policy. Therefore, in this context, although OICA well understands the Japanese wish to prevent the approval of systems bringing danger on the road, OICA believes this is covered by the R79 CEL annex. Yet OICA is concerned that a new regulation could forbid systems limited to basic features but nevertheless providing safety improvements, e.g. systems limited to highways above a certain speed but having neither eye surveillance camera nor steering wheel hands-off sensors.
5. By regulating LKAS, GRRF would take the risk of blocking innovation and new technical developments and would even jeopardise its diffusion. This would be a brake to safety improvement.
6. For the approval of good, adapted and robust LKAS technology, the current text of UN R79 provides sufficient guarantees to the Contracting Parties with regard to road safety.

GRRF-74-41: accident data in Japan

As mentioned above, the only receivable justifications for establishing a regulation on LKAS would be documented safety concerns provoked by the technology currently in the road.

- As a consequence, the accident data to be tabled by Japan should show specific accidents due to LKAS, and not generic lane departure accidents.
- As a reminder, the European Union and GRRF decided to follow the LDWS way, mainly based on an EC cost/benefits analysis of LDWS vs LKAS. It would hence be logical to firstly get feedback from the LDWS effects, before to assess LKAS benefits

¹ Such safety concerns would question the relevancy of UN R79 for ensuring LKAS reliability. This looks unlikely, since CEL requirements have proven to be a robust approach to ensure high standard of safety of complex control systems, over the past 10 or 15 years

and to discuss LKAS regulation. In this context, showing the need for improving safety regarding lane departure is not relevant to justify LKAS rule making process.

GRRF-74-40: draft skeleton text

- While OICA recognises that it is premature to make an opinion on the basis of a skeleton text as document GRRF-74-40, OICA believes that this draft text is already design restrictive, and as a consequence may block innovation:
 - Paragraph 2: “activating condition”: OICA questions the threshold of 250 m. An LKAS only functioning on straight roads would already improve safety.
 - Paragraph 2: “activating speed”: OICA questions the threshold of 60 km/h. An LKAS only functioning at higher speeds would already improve safety.
 - Paragraph 2: OICA challenges the fact that the LKAS would have to operate up to the maximum speed of the vehicle.
 - The skeleton document is unclear about the links between LDWS and LKAS. OICA questions the necessity to mandate LDWS on all vehicles equipped with LKAS.
 - The skeleton document is unclear about the HMI requirements. Paragraph 6: OICA favours technical flexibility for warning display
 - Paragraph 7: OICA challenges the idea of LKAS threshold activation blindly taken from LDWS specifications.
 - Parts of the proposal are already covered by UN R79, especially the CEL annex:
 - Paragraph 3: “activation of the system shall not result in any critical situation”
 - Paragraph 5: “the system shall have the override function by the driver”.
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