



October 7, 2022

Feedback on Technical Guidelines for Automated Driving System Implementing Regulation

The Autonomous Vehicle Industry Association (“AVIA”) appreciates the opportunity to provide feedback on the European Commission Joint Research Centre’s (“EC-JRC”) proposed technical guidelines to support the EU Automated Driving System (“ADS”) Implementing Regulation, as discussed in EC-JRC’s September 9, 2022 workshop.

Echoing the comments made by the Government of France, ACEA and CLEPA during the September 9th workshop, as well as our previous written submission (enclosed), AVIA recommends prioritizing the development of voluntary *guidance* based on existing standards, as opposed to mandatory *guidelines* that member states are required to implement. We appreciate the Commission’s confirmation during the September 9, 2022 workshop that the guidance is intended to be voluntary, and we strongly encourage the Commission to formally designate all guidance documents produced throughout this process as voluntary guidance (e.g., in an introduction or similar section).

We further wish to reiterate that any final guidance should not reference standards that are still in development. While a developing standard may reflect the latest in industry discourse on a given technology, such standards are, by nature, unfinished. Until finalized, these standards remain in flux and cannot provide the certainty needed by regulators and industry members. We look forward to continued discussions on the exact use of standards in the interpretation document.

AVIA appreciates the opportunity to provide feedback on the technical guidance now and as it develops further. We look forward to continuing our engagement with the EC-JRC, the Commission, and EU Member States on this issue.

Sincerely,

/s/



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