



## ADAS Level-2 Report

*Requesting UNECE Reg. 79 Temporary Removal*

Attn: [REDACTED]

We're looking to get approval to perform an independent review and report into the dangers and limitations of the UNECE Regulation 79 regarding ADAS systems homologated by the EU to pass to the Department for Transport, Centre for Connected and Autonomous Vehicles and public (if permitted).

The subject vehicle in question will be a Model 3 [REDACTED]. The subject of the report will be to discuss, monitor and prove that the ECE Regulations relating to Level-2 ADAS systems (not; Level-3 ALKS system which are under ECE Regulation 157) are unsafe in their current form for the United Kingdom and should be changed/adapted for owners of vehicles with ADAS driver assistance features as we believe the regulations were initially designed for wider European roads. We were made aware of a collision in the UK due to the limitations and feel that it is in the public's interest that these systems and flaws are highlighted so action can be made in creating a safer environment for the general public.

Now that the United Kingdom has left the EU and the Government has stated they're open to the idea of easing or changing the EU inherited regulations, [REDACTED] these systems.

The United Kingdom is already at a huge disadvantage due to our vehicles being RHD - but as **there were an estimated 1,390 reported road deaths in the year ending June 2021\*** which is an average of 26 deaths per week, we want to make a difference and push towards easing/adapting regulations to better suit our uniquely designed UK roads. According to Tesla, their Level-2 ADAS system that is currently in use in the United States and Canada, in the 4th quarter recorded one crash for every **4.31 million miles driven** in which drivers were using Autopilot technology (Autosteer and active safety features). For drivers who were not using Autopilot technology (no Autosteer and active safety features), Tesla recorded one crash for every 1.59 million miles driven. By comparison, NHTSA's most recent data shows that in the United States there is an automobile crash every **484,000 miles.\*\***

From our initial report, provisional testing shows [REDACTED]. Human drivers take this turn on average at 35mph.

We are seeking approval to run a brief report on Autopilot to see how restricted the driver assistance feature is under ECE regulations and conduct a review and report into the limitations of the laws and system itself.

Whilst the government is open to companies trialling ALKS Level-3 self-driving/driving-assistance features, Tesla's Autopilot and their FSD Beta software is currently homologated as Level-2 ADAS in the United States.

When Tesla was asked to confirm what systems are under regulation limitations, an employee responded:

[REDACTED]

We've also spoken with [REDACTED]

[REDACTED] this request:

[REDACTED]

[REDACTED]

[REDACTED]

Best regards,

[REDACTED]

ekao

\* [Reported road casualties in Great Britain, provisional estimates: year ending June 2021 - GOV.UK](#)

\*\* [Tesla Vehicle Safety Report](#)