



26 July 2018

National Transport Commission  
Public submission - Safety Assurance  
System for Automated Driving Systems  
Level 3/600 Bourke Street  
MELBOURNE VIC 3000

**Audi Australia Response to NTC Consultation RIS:  
Safety Assurance System for Automated Driving Systems**

To whom it may concern,

In response to the NTC's 'Safety Assurance for Automated Driving Systems: Consultation Regulation Impact Statement', we would like to provide the Audi Australia company response.

Audi Australia has been involved in discussions on this topic through involvement in the FCAI Technical Committee and our company representative attended the NTC Information Session on Safety Assurance System for Automated Driving Systems.

Audi Australia supports the FCAI position which has been submitted in document 'FCAI Response to NTC Consultation RIS: Safety Assurance System for Automated Driving Systems'

The company supports the FCAI's proposed revision to Option 2:

- *Introduce an administrative safety assurance system as part of the current regulatory regime with the introduction of ADR 90/01. As part of the approval to ADR 90/01, a self-certification statement of compliance will need to be submitted for Levels 3, 4 or 5 automated driving systems that are not covered by ADR 90/01 (the '02' series of UN R79).*
- *The statement of compliance would be submitted to the Federal Government (DIRDC) as part of the vehicle type approval application and would be included in the vehicle type approval.*
- *The Automated Driving System Entity (ADSE) will be the type approval holder.*
- *The existing state transport/traffic legislation (e.g. vehicle standards rules), recall provisions to be introduced with the new Road Vehicle Standards Act and the Australian Consumer Law (ACL) provisions all ensure automated driving systems to be supported in the market and the owner/operator's responsibility to maintain the vehicle.*

Kind Regards,

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