## China's General Comments and Suggestions on Working Party on Automated/Autonomous and Connected Vehicles (GRVA)

The People's Republic of China, as a Contracting Party (CP) to the 1998 Global Agreement, appreciates the opportunity to put forward relevant comments and suggestions on the organization and operation of the newly established GRVA on the basis of China's position papers submitted at the WP29 meeting in June 2018, so as to facilitate discussion by experts from Contracting Party (CP) and other stakeholders.

1. It is the best time window for international community to harmonize regulations for Automated/Autonomous Connected Vehicle.

Automated/Autonomous Connected Vehicle is an emerging and integrated industry which differs greatly from the conventional auto industry in technical development, application and management mode. The Automated/Autonomous Connected Vehicles are developing rapidly around the world.

Almost all WP.29 CPs and international organizations have started the development of standards and regulations relevant to Automated/Autonomous Connected Vehicles. Fortunately, these regulatory activities are still at their early stages and has not form the situations like traditional vehicles where national or regional regulations are very different and difficult to be coordinated. It is the best opportunity for the international communities to develop internationally harmonized regulations.

2. GRVA shall mobilize forces of all interest parties to promote the harmonization of regulations within the framework of both 1958 Agreement and 1998 Agreement.

As the newly established expert group specialized in automated driving under WP.29, GRVA is faced with new challenges and shoulders heavy responsibilities. Therefore, the businesses of GRVA shall not only be based on the present, but also face the future.

GRVA shall actively adapt itself to the rapid development of Automated/Autonomous Connected Vehicles as well as relevant technologies. It shall ensure that the development of regulations can keep the pace of the technologies and industries, meet the demand of future type approval and management, and guarantee the safety and security of Automated/Autonomous Connected Vehicles.

The biggest challenge in front of GRVA is to strike a balance between 1958 Agreement and 1998 Agreement in practical operations. The harmonization work and development of regulations under GRVA shall not be limited within a specific Agreement, so as to enable all CPs to equally, effectively and substantially join the discussion of regulations and topics related to Automated/Autonomous Connected Vehicles.

Wherever possible, the development and harmonization of regulations for Automated/Autonomous Connected Vehicles shall be conducted firstly within the framework of 1998 Agreement, or be conducted synchronously within the framework of both 1998 Agreement and 1958 Agreement. This approach also complies with the principle of 1998 Agreement which encourages GTRs to focus on new technologies.

In addition, as one of the solutions at the specific operational level, GRVA can ignore or shelve the differences in the implementation provisions of the 1958 and 1998 agreements, and allow all CPs jointly conduct research, discussion and coordination of relevant technical contents. Once the technical contents are totally harmonized, GRVA then finally decide, based on the real situation, to issue the corresponding UN regulations and GTR separately or simultaneously.

3. GRVA shall make innovations to its organizational and operational modes to adapt itself to the rapid development of Automated/Autonomous Connected Vehicles.

Traditionally, a GR does not necessarily need such document as TOR. However, GRVA, as a brand new GR, covers several industries, such as automobile, information and communication technologies. The top priority work of GRVA at present is to determine the work scope, clarify the boundary with other GRs and set out the work target. Under such circumstances, a guideline document, like TOR, will effectively promote the development of these work.

In order to strike a balance between 1958 Agreement and 1998 Agreement and take full consideration of the positions of all CPs, GRVA shall consider establishing a new organizational structure and working mechanism, as so to adapt itself to the new technologies, new functions and new situations of Automated/Autonomous Connected Vehicles. Meanwhile, the interests of CPs to the agreements can be secured and the process of regulation development can be accelerated under such organizational structure and working mechanism.

4. China is intended to take the responsibilities of the vice chair of GRVA and work together with all interest parties to promote the harmonization of regulations for Automated/Autonomous Connected Vehicles.

As the largest auto producer and the largest auto market in the world, China not only can provide sufficient support to the testing, verification and improvement of Automated/Autonomous Connected Vehicles, but will be one of the potential markets for Automated/Autonomous Connected Vehicles. China is committed to contribute its expertise to the work of WP.29 and play an active and positive role in the development of regulation for Automated/Autonomous Connected Vehicles.

According to the latest WP.29 Working Document ECE/TRANS/WP.29/2018/166, which is proposed recently by the secretariat of WP29, a chairperson and, if desired, vice-chairpersons shall be elected for each subsidiary body of WP.29. China welcomes this practical amendment to the Rules of WP.29, expects GRVA to be the first GR to form its leadership following this amendment and intends to take the responsibilities of the vice chair of GRVA.

In a word, China intends to take the responsibility of vice chair of GRVA and strengthen the cooperation with all interest parties to accelerate the harmonization of regulations within the framework of WP.29 and promote the wide application of Automated/Autonomous Connected Vehicles.