

#### **Consultation Question 4.**

In our approach the competence level of the human driver also plays a role. Novice drivers get licensed although they are much more involved in accidents, we accept they have to learn to become average skilled. We believe this should be also be the case for software drivers. A stepped driving license related to skills and performance seems acceptable for the public.

#### **Consultation Question 5.**

In the Netherlands we have established rules, the driving procedures / driving tasks. You can see these rules as formulas that produce the performance date. Multi variable analysis showed that we can predict accident involvement based on this data. In the attachment an article about results we achieved with lowering human accidents. Using the human data as a reference we could set a peer group base line. In case the AV's become more skilled and drive safer they will influence the average in a natural way. Using human procedures as a reference we also overcome the problem of using two methodologies of assessment in the traffic system what can lead to accidents because the human driver and software driver will not understand each other.

#### **Consultation Question 8.**

Scenario's are a means to an end. Scenario's are useful for testing but the real testing is about the driving tasks. The problem with scenario's is that they have a limited forecast on accident involvement. Also we know from research that skills handling a specific scenario doesn't have transfer on other scenario's. This is a big problem of scenario's, are you capable of safe driving if you prove to handle a set of scenario's well. We believe you have to measure the capability to mitigate risks that might occur in the future. This is different to handling scenario's. That can be a trick not a skill.

We develop an open architecture for risk assessment called the safety states framework. It will assess the risk value of future positions on possible paths of the vehicle and assess based on the skills of the driver the mitigation actions of the driver. This is different to concepts of space pillow and safety zones. These are located around the vehicle itself, but this is a to reactive approach and not suitable for assessment in our opinion.

The safety states framework is an improved system of our driver safety framework we developed for human driver assessment. This framework is validated and approved for medicine effect studies using simulators. I attached an explanation of our training and assessment methodology, called 'Victor the virtual driving instructor'.

Met vriendelijke groet, kind regards,

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