

## Torc Input on Potential EU Teleoperations Policy

Any potential law/regulation concerning the automotive use of teleoperations should:

- Allow SAE Level 4 ADS-equipped vehicles to operate on public roads with Remote Assistance. Remote Assistance is defined by SAE J3016 as “*Event-driven provision, by a remotely located human, of information or advice to an ADS-equipped vehicle in driverless operation to facilitate trip continuation when the ADS encounters a situation it cannot manage.*”
- Align with industry best practices and standards, including the AVSC Best Practice for ADS Remote Assistance Use Case (see attached).
- Consider that continuous connectivity is not practical without the appropriate infrastructure in place. Therefore, potential regulations should allow for infrastructure variances in connectivity availability.

### Background on Torc’s Technical Approach

Torc is developing an autonomous SAE Level 4<sup>1</sup> Commercial Motor Vehicle (CMV) for hub-to-hub operation. Safety considerations are foundational to Torc’s technical approach. Simulation and closed course testing occur before testing or operation on public roads, and cybersecurity protections are incorporated by design.

Remote assistance capability is part of Torc’s Level 4 automated driving systems (ADS) design. Torc anticipates that remote assistance will be used in rare situations, such as when encountering novel road or environmental conditions, for exceptionally complex maneuvers, or in other ambiguous situations. Torc’s approach to remote assistance is to minimize the need for assistance but utilize the capability when there is a safety benefit in doing so. The ADS-equipped vehicle will maintain final decision-making authority and perform path execution. In this manner, Torc’s remote assistance capability will not be conducting “remote driving,” i.e., providing real-time acceleration/braking/steering inputs.

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<sup>1</sup> The SAE J3016 standard defines six levels of driving automation, from SAE Level Zero (no automation) to SAE Level 5 (full automation).