



Project 1616

Draft Standard Comment Compendium June 26-July 25, 2002

DOCUMENT # 61

This compendium is a continuation of a call for comment on IEEE P1616 Draft Standard for Motor Vehicle Event Data Recorders (MVEDRs).

It includes all written comment received from June 26 to July 25, 2002, and focuses on issues of scope and purpose.

**The following e-mail excerpts have been
"cut-and-pasted" verbatim in the order that
they were received.**

Greetings,

On 7/11 I posted a message received from Alan German. Today, 7/12 I am posting a message received from Barb Wendling.

The topic is central to what was proposed and still under consideration.

You are welcome to respond via e-mail in support or opposition by July 25th to mvedr@ieee.org

All comment received will be "cut-and-pasted" into the P1616 July Task Compendium (Document #61) and discussed at the upcoming meeting.

The June 24-25 minutes will be available on the website as soon as I received them from the secretaries appointed for the meeting.

Co-Chair, IEEE P1616
Tom Kowalick
910-695-3881 Campus Office 8-1 M-F
910-692-5209 Residence 2-10 Daily

-----Original Message-----

From: bew7@daimlerchrysler.com [<mailto:bew7@daimlerchrysler.com>]
Sent: Friday, July 12, 2002 11:34 AM
To: GERMANA@tc.gc.ca
Cc: tkowalick@nc.rr.com
Subject: FW: Important Topic

...resending...

----- Forwarded by Barbara E Wendling/CTC/DCC/DCX on 07/12/2002 11:33 AM

	Barbara E Wendling	To:
GERMAN@tc.gc.gov		cc: ieee@mvedr.org
	07/12/2002 10:16	Subject: FW: Important
Topic	AM	

Hi Alan,

I received your message below from Tom Kowalick via the IEEE Reflector. As one of the proponents of the revised scope, I'd like to explain the

decision reached by the P1616 committee to exclude reference to prescribing a minimum set of "required" data elements. This decision was approved by majority vote at both of the last two meetings.

P1616 committee members discussed at length the issue of whether to specify some minimum set of data elements that would have to be recorded in order to "comply" with this standard when finalized. We chose not to, because there is currently no consensus among the general public--or even this committee--as to whether universal EDRs are necessarily desirable, much less which specific data elements ought to be collected, if EDRs are implemented. As I am sure you are aware, EDRs are something of a hot-button issue for privacy advocates, who are concerned that mandatory EDR data collection will lead to legal abuses and violation of individual rights in practice. Unless or until those concerns are addressed, and a national consensus develops which provides a basis for prioritizing the selection of specific data elements for standardized collection, it would be highly inappropriate for IEEE to make such a policy call on its own. This is particularly evident because IEEE is an organization of technical experts who are not necessarily well-versed in the legal, moral, and policy considerations that need to be weighed in reaching a reasonable decision in matters of social importance, such as this, and who in any case are not charged with the authority to do so.

Given our shared commitment to free-market economic principles, it follows that until or unless a national consensus develops that will support a public policy on EDRs, the decision whether to install an EDR on vehicles destined for private use, and if so which data elements to collect, ultimately resides with the individual vehicle and device manufacturers who produce the technology. The particular decisions ultimately made by individual vehicle and device manufacturers with regard to EDRs may or may not be guided by the same reasoning that you or others on the P1616 committee would use, and therefore you may or may not agree with any particular outcome, but you can at least take comfort in the fact that their decisions are tempered by the tremendous responsibility that attends their implementation, and that any abuses on their part will be judged harshly in the court of public and consumer opinion enforced by the threat of product liability and government regulation.

Having said all that, it is hopefully clear to you and the rest of the P1616 committee that not specifying a minimum set of data elements that "must" be collected is not the same as saying we will not define any EDR data elements. On the contrary, at the last meeting we discussed and generally agreed to the need for writing a data dictionary and establishing post-collection compatibility requirements for those elements that will meet the needs of people interested in pursuing permission to use the data recorded in the field. That is, instead of saying in the standard, for example, 'you must collect vehicle speed data in this prescribed format ,' we would instead say 'if you collect vehicle speed data, the data output should be transmittable in standardized format .' This serves the legitimate need for data that is comparable among dissimilar makes and models and can be used to improve motor vehicle safety, without dragging the committee into an impossible-to-mediate discussion of whether vehicle speed is more important than brake status, and whether GM's method of recording speed data is better than DaimlerChrysler's.

In short, those of us who have advocated to restrict the scope in this way are not trying to prevent standardization; on the contrary, we are trying to frame the task in a way that will facilitate reaching consensus on a standard by de-politicizing it and focusing on those technical aspects on which we can all agree. Those in the majority on the committee who voted in favor of such an approach--twice in fact--agree that this is the best way to proceed under the circumstances.

I hope this helps clarify the basis of the committee's decision. Please feel free to call me (248.576.8826) if you'd like to discuss this.

Best regards,
Barbara Wendling

[Tom, please transmit this e-mail message via the IEEE Reflector to the rest of the P1616 communications list, as you have done with Alan's note. Thanks.]

----- Forwarded by Barbara E Wendling/CTC/DCC/DCX on 07/12/2002 07:45 AM

<p><stds-p1616wg@ieee.org></p> <p>Important Topic</p>	<p>"Tom Kowalick" <tkowalick@nc.rr.com></p> <p>Sent by: owner-stds-p1616wg@majordo</p> <p>mo.ieee.org</p>	<p>To:</p> <p>cc:</p> <p>Subject: FW:</p>
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07/12/2002 03:47 AM

Greetings,

I am sending the following message that I received from Alan German to all P1616 WG members via the IEEE reflector. You may remember that during the June meeting Mr. German's e-mail attachment was un-readable.

The topic is central to what was proposed and still under consideration.

You are welcome to respond via e-mail in support or opposition by July 25th to mvedr@ieee.org

All comment received will be "cut-and-pasted" into the P1616 July Task Compendium (Document #61) and discussed at the upcoming meeting.

The June 24-25 minutes will be available on the website as soon as I received them from the secretaries appointed for the meeting.

-----Original Message-----

From: German, Alan [<mailto:GERMANA@tc.gc.ca>]

Sent: Thursday, July 11, 2002 4:32 PM

To: Tom Kowalick

Subject: P1616 Revised draft Scope and Purpose

Tom:

Thanks for your call regarding my proposed change to the scope which apparently was not received correctly.

As noted in the text of my message:

It isn't clear to me how a meaningful standard can avoid identifying and specifying the nature of the data to be captured. Consequently, my suggested revision to the proposed wording is attached.

My intention, therefore, was to propose the deletion of one portion of the suggested text as follows:

IEEE P1616 D0.2.1

Scope: This project will define a standard protocol for uniformity and retrievability of data elements stored in Motor Vehicle Event Data Recorders (MVEDRs), defined as electronic recording systems used to capture data related to motor vehicle pre-defined events. Uniformity encompasses standardization of data output, while retrievability encompasses standardization of download protocols. This standard

[Commence deletion...

does not prescribe the type of data to be stored, nor how the data are to be captured by on-board vehicle systems, andend deletion.]

is applicable to event data recorders for all types of motor vehicles licensed to operate on public roadways, whether offered as original or aftermarket equipment.

Purpose: Many light-duty motor vehicles, and increasing numbers of heavy commercial vehicles, are equipped with some form of event data recorder. These systems, which are designed and produced by individual motor vehicle manufacturers and component suppliers, are diverse in function, and proprietary in nature. The continuing implementation of EDR systems provides an opportunity to voluntarily standardize data output and retrieval protocols to facilitate analysis and comparison of EDR data generated by multiple vehicle manufacturers. Adoption of the standard will therefore make EDR data more accessible and useful to end users.

Hello Tom,

Thank you for sending out the recent emails from German and Wendling. I thought we, as a P1616 working group, had already voted on, and

approved (at the last two meetings) not to stipulate any 'min. required data elements' as part of our activities. In my mind, the issue has been resolved, twice now. However, it appears from your note below, that this issue is somehow still open. Is that correct, or am I misinterpreting something?

On another subject, I wanted to be certain you received my minutes from the morning of the June meeting. Can you confirm that? Thanks.

Regards,

Jim R. Keller
Honda R & D Americas, Inc.

Hi Jim,

Thanks for your e-mail.

I HAVE received your "section" of the draft minutes.

It is my understanding that both you and Bob Kreeb sent a copy of your sections to Dan Selke to finalize. (correct me if I am wrong!)

I requested the draft minutes and other documents from Dan (twice). I plan on calling on Monday. I'm going to ask if I can help get these finalized.

As soon as I get the combined draft minutes covering 24-25 June these will be posted to the website. Thanks again for assisting.

In reply to your specific question under which I am acting. I am acting as per the 25 June minutes.

- Several members also noted that in the future, we should make better use of the Internet, and the Reflector tool in particular, to share draft comments and documents—and to do as much work as possible outside of the actual meetings so that meetings could be reserved for resolving major issues and for making specific working assignments.

I have posted both German and Wendling comments for all to view and offered an opportunity for all to respond (pro or con) via the July Comment Compendium (Doc # 61). As you know, whatever comes in gets recorded in the compendium and shared with all.

As per where we are with the scope & purpose? We are where we stopped at 2:45 on 6/25 as recorded by Hideki Hada. (see attachment)

I hope this information is helpful.

I'm looking forward to seeing you in a few weeks.

The agenda provides travel & lodging info...

Thanks again for your involvement in and support of IEEE P1616.

Co-Chair, IEEE P1616

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7/12/02

I support the changes Mr. German submitted. The proposal allows growth and innovation in the technology to gather and record the data while addressing the ease and economics of data retrieval and use.

Jeff Hegarty

7/12/02

Gentlemen (meaning both genders):

While I initially recommended Alan German's rewrite of the Scope over the original draft, on this particular topic (minimum set of data elements) I presently agree with Barbara Wendling's position.

Moreover, I think that something like her explanation of why the Standard cannot now specify a universally applicable minimum set, should be incorporated as an explanatory Note within the Standard itself.

Such an explanation will make our reasoning more transparent to the future user of the Standard who may logically ask why we did not dictate the minimum required at the outset. (Many standards fail to provide the rationale behind their terse specifications, even though it might have been the subject of intense debate during the formulation process and would be helpful to the users.)

Roger L. Boyell
856-234-5800
www.boyell.com

7/13/02

While I will not be a voting member of the P1616 WG at the July meeting, I would like to express my support for the Wendling version of the Scope and Purpose. This subject is, indeed, very much politicized. The American Trucking Association (ATA) has taken a stance on recorders that the committee should take notice of. I will obtain a copy of that 7 point stance of qualified support for EDR's. Having worked with the Technology and Maintenance Council (TMC) of ATA to develop a recommended practice in this area, I know first hand how differently manufacturers choose to record data and what data. With everyone sensitive to the cost of providing sensors to obtain data, I believe it is better to concentrate on voluntary use of a standard that is flexible and scalable. The approach suggested by Wendling is not mutually exclusive

to German's desire to address the data elements. For each data element that may be of interest in reconstructing and event, the working group can define a standardized way of reading out that data without having to say that that data is required. If that data is available, then this is how it must appear.

The Internet approach to using HTML and, more recently, XML is a good way to approach this. In fact, XML may be a good way to suggest that information is read out. The important technology in XML definitions of data, is that the data stream includes the definition of how to read the data.

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FROM Alan German on 7/22/02

>...it is hopefully clear to you and the rest of the P1616 committee that not specifying a minimum set of data elements that "must" be collected is not the same as saying we will not define any EDR data elements.

Things are fairly clear; however, there may be a little confusion about the notion of a technical standard. Standards merely define parameters for a group of users. They do not require adoption by users. They are merely available for users who chose to take advantage of the benefits that they offer.

As I indicated in my comments to the original proposal on the revised scope (which unfortunately were apparently lost to the E-mail gremlins) my concern was that to achieve a standard on data recorders necessitates defining the data to be recorded, and the form in which they are recorded, or at least the form in which they are retrieved. I perhaps took too broad a view of the term "prescribe" in the revised scope. I note from Barbara's recent E-mail that the committee agreed that the standard should contain a data dictionary with compatibility "requirements" (i.e. provisions). Such a set of data definitions, together with the concepts of uniformity and retrievability as set out in the scope, will provide the appropriate basis for the standard.

Thus, I believe that we are all still on the same page in terms of progression towards a standard.

