



December 28, 2017

Rodney Aoki  
Department of Motor Vehicles  
Occupational Licensing Compliance Section  
P.O. Box 932342 (MS S441)  
Sacramento, CA 94232-3420

**Re: Valeo North America, Inc.'s ("Valeo") Autonomous Vehicle Disengagement Report for the period of October 7, 2016 through November 30, 2017.**

Dear Mr. Aoki,

Pursuant to California Code of Regulations Title 13, Article 3.7, § 227.46, below is Valeo's Autonomous Vehicle Disengagement Report for period of October 7, 2016 through November 30, 2017.

#### **Vehicles**

Valeo has one vehicle licensed in the state of California for autonomous technology vehicle testing, license plate number 042M579 (Michigan Manufacturer Plate). The vehicle is used to test automated driving systems and components. The vehicle received software and hardware upgrades beginning in November 2016 that have the capability to allow operation in Autonomous Mode. The majority of the testing is conducted with the vehicle operating in Conventional Mode, solely to collect data from the various vehicle sensors. The mileage shown in the Disengagement Summary chart below represents only the miles driven with the systems that have the capability to allow operation in Autonomous Mode engaged, during which time the driver closely monitored vehicle operation. Valeo files this report in an abundance of caution showing disengagements that occurred with the systems that have the capability to allow operation in Autonomous Mode engaged.

#### **Location for Testing**

Valeo conducted its testing primarily on interstate and state highways in the San Francisco bay area, including I-280, CA-101, CA-92, and I-380. The automated driving system is only tested in automated mode on highways; testing of the automated driving system in automated mode is not conducted on surface streets.

**Disengagement Summary:**

<b>Month</b>	<b>Total Miles on public road in California</b>	<b>Total number of Disengagements</b>
Oct 2016	0.0	0
Nov 2016	21.7	3
Dec 2016	81.4	23
Jan 2017	37.9	2
Feb 2017	0.0	0
Mar 2017	0.0	0
Apr 2017	0.0	0
May 2017	181.2	100
June 2017	251.9	87
Jul 2017	0.0	0
Aug 2017	0.0	0
Sep 2017	0.0	0
Oct 2017	0.0	0
Nov 2017	0.0	0
<b>Total</b>	<b>574.1 miles</b>	<b>215</b>

All the disengagements occurred as part of planned testing--the evaluation and tuning of the lateral control system on curved road sections. All testing occurred during daylight hours. The driver was ready at all times to take over control of the vehicle immediately in the event of a disengagement.

The average time for the driver to intervene and take control after being alerted of a disengagement was one (1.0) second.

Do not hesitate to contact Valeo North America Inc. if you have any questions regarding this report.

Sincerely,



Peter Groth  
Valeo Mobility Tech Center Site Manager  
Valeo North America Inc.