



Mercedes-Benz

Mercedes-Benz
Research & Development
North America, Inc.
A Daimler Company

December 12, 2017

DMV – Occupational Licensing
Attn: Rodney Aoki
2415 1st Avenue, MS S441
SACRAMENTO, CA 95818-2606

Mercedes Benz Research & Development North America, Inc. hereby provides the third annual report on disengagements pursuant to California Code of Regulations title 13, article 3.7, section §227.46 for the period of December 1st, 2016 to November 30th, 2017.

Regards,

Heiko Kraft
Director Autonomous Driving



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Disengagements of Autonomous Vehicle System
Report period Dec 1, 2016 – Nov 30, 2017

Vehicle WDF44781313024180

Month	Miles driven in autonomous mode	Number of manual disengagements	Number of automatic disengagements
March	1.43	0	0
April	2.34	0	1
May	20.09	8	17
June	52.71	9	31
July	3.85	0	3

Vehicle WDF447813130121649

Month	Miles driven in autonomous mode	Number of manual disengagements	Number of automatic disengagements
May	0.46	0	0
June	88.41	38	85
July	203.40	20	96
August	25.69	16	6
September	9.91	2	6
October	140.77	36	19
November	36.77	10	11



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Disengagements of Autonomous Vehicle System
Report period Dec 1, 2016 -- Nov 30, 2017

Vehicle WDF44781313024459

Month	Miles driven in autonomous mode	Number of manual disengagements	Number of automatic disengagements
May	0.06	0	0
June	17.18	7	26
July	228.57	32	230
August	93.94	17	33
September	19.21	2	11
October	111.40	30	19
November	31.51	13	8

Driver reaction time on average < 1 second, but measured time can be longer in cases where no immediate action is required. All reported miles driven on urban streets (no highway driving). Only about 5% of miles driven under rainy conditions, rain was never reason for disengagement. All other registered vehicles were only driven on closed tracks or outside of California or in manual mode for data collection. Automatic disengagements happen due to technology evaluation management. Manual disengagements happen due to driver feeling uncomfortable.