How Safe Is Safe Enough for Autonomous Vehicles?

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Overview

- Risk management frameworks
  - Which human is a baseline driver?
  - Risk mitigation is not safety

- Uncertainty as a limiting factor
  - Predicting safety before deployment
  - Field feedback to manage uncertainty

- A broader view of Safe Enough
  - Ethical considerations
  - Hierarchical model of safety needs

- Deployment criteria

ADS = Automated Driving System
(Car drives; people can sleep)
ADS Technology: Sold Based on Safety

Waymo VSSA  https://bit.ly/2QuYhai

We’re Building a Safer Driver for Everyone

Self-driving vehicles hold the promise to improve road safety and offer new mobility options to millions of people. Whether they’re saving lives or helping people run errands, commute to work, or drop kids off at school, fully self-driving vehicles hold enormous potential to transform people’s lives for the better.

Safety is at the core of Waymo’s mission—it’s why we were founded over a decade ago as the Google Self-Driving Car Project.

Newsworthy crashes might not predict safety
- Crewed testing is not autonomous
- Crash reports need a denominator

Need a framework for evaluating safety beyond the news cycle
Companies blame human drivers for bad news
  ● Humans are terrible at supervising automation
  ● Maybe driver monitoring helps(?)

The Moral Crumple Zone:
  ● Blame the most convenient human for failing to mitigate technical malfunctions

Regulatory strategy: computer is driver
  ● Not a legal person, so … crashes are nobody’s fault (???)
How About A Robot Driver Test

- **Written test**
  - Does ADS know traffic laws & behaviors?

- **Road test**
  - Can ADS obey traffic laws?
  - Can ADS negotiate effectively with human drivers?
  - Can ADS resolve potentially ambiguous situations?

- **Being a 16 year old human**
  - How do we measure ADS judgment maturity?
  - Autonomous systems struggle with novelty, unknowns

→ Need safety engineering, not just a driver test
Setting The Risk Goal

- **MEM – Minimum Endogenous Mortality**
  - System risk has minimal effect on overall risk

- **ALARP – As Low As Reasonably Practicable**
  - Reduce identified risks unless cost is extreme

- **NMAU – “Nicht Mehr Als Unvermeidbar”**
  - Reduce identified risks within reasonable cost

- **SIL – Safety Integrity Level approaches**
  - Engineering rigor applied to mitigate risks

- **GAMAB – “Globalement Au Moins Aussi Bon”**
  - At least as good as an existing system (e.g., a human driver)
Positive Risk Balance (PRB)

- Utilitarian GAMAB approach
  - 36,096 fatalities (1.10/100M miles)
  - 2,740,000 injuries
  - 6,756,000 police-reported crashes
  - Data includes drunk drivers, speeders, no seat belts

➡️ Expect zero deaths in a 10M mile testing campaign

- The averages do not necessarily apply
  - Which driver?
  - Under what conditions?
  - Driving which vehicle?
Which Driver Are We Better Than?

- ~100M miles/fatal mishap for human drivers
  - 28% Alcohol impaired/Driving Under Influence
  - 26% Speed-related
  - 9% distracted driving
  - 2% drowsy ... 

(total > 100% due to multiple factors in some mishaps)

- Fully functional drivers are much safer
- New AV has better safety than 10+ year old “average” car

Better than an unimpaired, undistracted driver in new car
Driver Age Affects Crash Rates

Are older drivers worse? (caution – not the whole story!)

Police-Reported Crashes per 100M VMT

- ALL CRASHES
- INJURY/FATALITY

DRIVER AGE

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Better than a middle-aged driver

Driver Age Affects Crash Rates

Police-Reported Crashes per 100M VMT

- ALL CRASHES
- INJURY/FATALITY

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Region Affects “Safe Enough” Value

Fatality averages for 2019 (IIHS)

- **Location** | Deaths/100K people | Deaths/100M miles
- **DC**   | 3.3 | MA | 0.51
- **US**   | 11.0 | **US** | 1.11
- **WY**   | 25.4 | **SC** | 1.73

![Fatality averages for 2019 (IIHS)](https://bit.ly/3CJm7nP)

Fatal crash type

- DC: highest pedestrian rate (39%)
- NY, FL, DE: highest bicycle rate (5%)
- Fatalities per 100M miles: Urban 0.86 vs. Rural 1.65
- What about day/night, weather, etc.?

Better in same conditions as AV operations

[IIHS Fatality Fact Sheets State by State; DOT HS 813 060]
Assume we determined a human driver baseline for comparison
- Competent, unimpaired middle-age driver
- Same operational conditions as AV (location, time of day, weather, ...)

RAND report says only 10% better than human driver is a safety win
- But, this assumes accurate estimate of safety is available before deployment
- What if estimate is 5x too optimistic?

⇒ Need to address uncertainty
If 200M miles/critical mishap…
- Test 3x–10x longer than mishap rate
  ➔ Need 2 Billion miles of testing

That’s ~50 round trips on every road in the world
- With fewer than 10 critical mishaps
- Even more testing if you find a defect and redo some testing

Road testing leaves uncertainty
Do Lots of Simulation

- Highly scalable; fidelity vs. cost tradeoff
  - Need to build highly detailed models (modeling errors?)
  - Challenge of matching real world data into simulation models
  - Only tests things you have thought of => residual uncertainty
Would you put a child in front of an AV validated with:

- 10,000M mile sims
  ... perhaps with a simulator error?
- Based on 100M miles road data collected
  ... perhaps with scenario analysis errors?
- Validated by 10M miles of road testing
  ... that missed the above errors?
- And 10K repetitions of closed course testing
  ... with standard dummies instead of people?
- Built with biased perception training data?
- Using software binaries & tools
  ... with no safety qualification?
Testing alone is insufficient for life-critical systems
  • So we use also use engineering rigor

Can you trust the system itself?
  • Is it engineered for safety?
  • Were standards and best practices used?
  • Is there a safety case documenting all this?

Can you trust your validation process?
  • Did you engineer the simulations properly?
  • Did you design the validation campaign properly?
Identifying & Mitigating Hazards

- ISO 26262: Hazard and Risk Analysis (HARA)
  - Identify and mitigate risks per ASIL requirements

- ISO 21448:
  Identify and mitigate unsafe scenarios
  - Safety of the Intended Function (SOTIF)
  - Reduce “unknown unsafe” area
  - Deploy at acceptable residual risk
Field Engineering Feedback

- Expected risk has a mean + uncertainty
  - Deploy only when mean is acceptable
  - But there will be uncertainty
    - Missed edge cases during road testing
    - Unknown gaps in validation plan
    - Unknown unknowns in general

- Solution: manage uncertainty
  - Safety Performance Indicators (SPIs)
    - SPI violation means safety argument has a defect (surprise!)
  - “Surprise” arrival rates could help estimate safety case uncertainty
    - Start during validation; continue after deployment
## ANSI/UL 4600 SPIs and Lifecycle Feedback

- SPI: direct measurement of safety case claim failure
  - Independent of reasoning ("claim is X ... yet here is ~X")

- A falsified safety case claim:
  - Safety case has some defect
  - Not (necessarily) imminent loss event

- Root cause analysis might reveal:
  - Product or process defect
  - Invalid safety argument
  - Issue with supporting evidence
  - Assumption error
Field Engineering Feedback

- Architectural support for lifecycle field feedback
  - Safety Performance Indicators (SPI) data linked to safety case
    - Transition from recall model to continuous improvement
Ethics: Risk vs. Safety

- Cost of excessive risk drives improvement
  - Reducing risk tends to improve safety, but...

- Affordable risk might exceed acceptable safety
  - Life insurance for combat military personnel
  - Commercial space launch insurance
  - Cost of fatality settlement compared to $2M-$5M/day burn rate

- Risk management is not enough for acceptable safety
  - Risk transfer (occupants vs. pedestrians)
  - Existential pressure for company to deploy with unproven safety
# Ethics: Deployment Governance

- **#1 ethical issue in AVs is deployment governance**
  - Who decides when to deploy based on what?

- **Pressure for aggressive deployments**
  - Missing independent technical oversight

- **Ethical deployment should address:**
  - Publicly disclosed safety prediction
  - Inclusion of stakeholder concerns
  - Transparency of data & processes
  - Accountability for any losses
  - Non-discrimination in operational concept
What People Mean By “Safe”

- Human drivers are bad, so computers will be safe
  - Industry rhetorical talking points are ubiquitous
- “Safety is our #1 priority”
- Safe driving behavior
  - Follows traffic laws; good roadmanship
- Tested/simulated for millions of miles
- Risk is managed via insurance
- Conforms to safety standards
- Positive Risk Balance
- Safety cases supported by evidence
Hierarchy of Concurrent Safety Needs

- **AV Safety Hierarchy of Needs**
  - **Just Culture**
    - Lifecycle-oriented safety culture
  - **Socio-Technical**
    - Stakeholder expectations
  - **System Safety**
    - ANSI/UL 4600 – safety case
    - ISO 21448 – insufficiencies
  - **SOTIF**
    - ISO 26262 – internal faults
  - **Functional Safety**
    - Engineering risk mitigation
  - **Hazard Analysis**
    - AV avoids driving risk
  - **Defensive Driving**
  - **Basic Driving Functionality**
    - Can the AV drive?
Summary: Safe Enough AV Deployment

- Don’t forget safety while public road testing – SAE J3018
- Acceptable safety is more than just a risk number
  - Good human PRB + safety factor for unknowns
  - Safety & security industry engineering standards
  - Ethical & stakeholder concerns addressed
- Safety case
  - Transparent argument based on evidence
  - Lifecycle uncertainty management via feedback
- Deployment Governance – #1 ethical issue
  - Stakeholders involved in safety criteria & decision
  - Safety culture assures fair dealing on decision