A Methodology for Normalizing Safety Statistics of Partially Automated Vehicles

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Abstract

The safety of increasingly automated vehicles is of great concern to regulators, yet crash rates are generally reported by manufacturers with proprietary metrics. Without consistent definitions of crashes and exposure, comparing automated vehicle crash rates with baseline datasets becomes challenging. This study investigates the reported on-road crash rates of one manufacturer's partially automated driving system. Their reported crash rates are adjusted based on roadway classification and driver demographics to allow for direct comparison with the manufacturer's own advanced driver assistance systems. Recommendations for uniform crash reporting standards are provided.

Disclaimer: The views and opinions expressed in the article are those of the author and do not necessarily reflect the official policies or positions of any agency of the Commonwealth of Virginia.

1 Introduction

The driving task is becoming increasingly automated, with computerized control not only of the throttle but also of brake and steering. Vehicles that can combine these functions are referred to as automated vehicles.

Establishing the safety of automated driving systems, both those conducted using on-road tests with trained operators as well as those being sold to the public, is of critical importance. California has established licensing programs for automated vehicle testing and requires companies to submit reports of all crashes as well as mileage both in automated and manual control (California Department of Motor Vehicles, 2018). Other states have various laws relating to automated vehicle operation, but few mandate companies report crashes or crash rates (National Conference of State Legislatures, 2019). The National Highway Traffic and Safety Administration (NHTSA) recently issued a standing general order requiring AV developers to report crashes within one day of occurrence (National Highway Traffic Safety Administration, 2021a). Before this order, companies testing outside California generally reported crashes and autonomous miles-traveled on a voluntary basis using metrics and thresholds of their own choosing (National Highway Traffic Safety Administration, 2021b).

When data is available, it can be difficult to compare self-reported statistics to national crash rates. Many automated vehicle crashes reported in California, for example, fall below the threshold for police-reportability and cannot be compared to national-level crash data which relies largely on police reports. An estimated 15% of injury crashes and 24% of property damage-only crashes are never reported to police (M. Davis and Company, Inc., 2015), while 9% of injury crashes and 24% of property damage-only crashes are reported but not logged (Blincoe et al., 2015). Even with robust data, establishing the statistical significance of automated vehicle safety can be expensive. Kalra and Paddock (2016) demonstrated that establishing that an AV has a fatal crash rate equivalent to the national average with 95% confidence would require driving a fleet of 100 vehicles continuously for 12.5 years.

Tesla is a manufacturer of battery-powered electric vehicles. Beginning in 2014, new vehicles came installed with hardware allowing combined steering and throttle control. The automated driving system, named Autopilot, was officially introduced in 2015 and has undergone several updates via over-the-air software patches. Autopilot is considered an example of SAE Level 2 automation (SAE International, 2018) as it combines steering, brake, and throttle control, yet requires a human to monitor the system at all times and take control with little to no notice.

Beginning in 2018, Tesla began publishing short safety reports on a quarterly basis (Tesla, Inc., 2021). The reports list the average miles between observed crashes for vehicles using Autopilot, vehicles using active safety features only, and vehicles without Autopilot and active safety features. Although the reports provide a critical insight into the crash rates of partially automated vehicles in use by the general public, they are difficult to interpret due to the lack of separate crash counts and baseline mileage, as well as unclear definitions of the criteria for an incident to be considered a crash. Given that Autopilot until recently was recommended

for freeway use only, and given the demographics of their vehicle owners, crash rates of their vehicles may not allow a direct comparison to national rates without controlling for driver age and road usage.

The objective of this study is to establish a methodology for evaluating automated vehicle developers' safety reports in comparison to different samples, using the manufacturer's safety reports as a case study. This evaluation is based on reports from July 2018 through March 2021, and results may change as the automated driving system continues to be refined.¹ This is intended as a planning level analysis that will assist manufacturers, regulators, and researchers who may have access to more detailed, timely, and accurate data regarding vehicle safety and performance.

2 Literature Review

Several studies have investigated automated vehicle crash rates. Schoettel and Sivak (2015) analyzed crash records of three companies approved to test automated vehicles in California and required to submit crash records to the California Department of Motor Vehicles. They found that although automated vehicles crashed at higher rates than the national average, the crash rates were within the 95% confidence interval in part due to small sample sizes.

Blanco et al. (2016) performed a more in depth study of Waymo (Google, at the time) automated vehicle crashes using Waymo's own internal records. To obtain national rates of minor crashes that did not meet police reporting thresholds, data from the Second Strategic Highway Research Program Naturalistic Driving Study (SHRP 2 NDS) (Antin et al., 2019) was used for comparison. When comparing crash rates of similar severities, the researchers found that Waymo automated vehicles crashed at lower rates than national estimates.

Dixit et al. (2016) compared Waymo's automated vehicle crash rate as reported to the California Department of Motor Vehicles from September 2014 to November 2015 with California Highway Patrol's (CHP) estimated statewide crash rates. The study was limited due to CHP's coverage of State, U.S., and Interstate roads when Waymo testing at the time occurred primarily on local roads outside CHP's jurisdiction.

Teoh and Kidd (2017) analyzed Waymo automated vehicle crashes in both the California Department of Motor Vehicle reports as well as testing performed outside California and discussed in Waymo's monthly activity reports. Waymo crashes were limited to those that met the criteria for police reporting, but were compared to general public crashes that were actually reported to the police. This created some challenges as a significant number of general public crashes that meet the criteria for a police report are either never reported, or are reported but not

¹ Tesla's most recent report as of this writing, for April through June of 2021, uses different safety metrics that previous reports (Kane, 2021). Previous reports provided crash rates driving with "Autopilot engaged," "without Autopilot but with our active safety features," and "without Autopilot and without our active safety features" (Tesla, Inc., 2021) The latest report uses different terminology, distinguishing between driving "in which drivers were using Autopilot technology (Autosteer and active safety features)" and "drivers who were not using Autopilot technology (no Autosteer and active safety features)" (Tesla, Inc., 2021) It is not clear from their wording if how the prior category of active safety features only maps to the new categories. Without further guidance, these new crash rates cannot be compared to previously reported crash rates.

logged into police databases (Blincoe et al., 2015; M. Davis and Company, Inc., 2015). This was evident in several Waymo crashes where police were called but did not respond. Waymo crash rates were also compared to the SHRP 2 NDS dataset, but the naturalistic data was biased towards higher risk drivers at both ends of the age spectrum and did not appear to be age-weighted in the analysis. The authors found that SHRP 2 NDS crash rates were higher than Waymo's at a 95% confidence interval.

Goodall (2021) investigated struck-from-behind crashes of automated vehicles using ageweighted crash rates from SHRP 2 NDS database as a baseline. Automated vehicles were struck from behind at five times the rate of human-driven vehicles, although much of the difference could be attributed to higher rates of urban driving experienced in automated vehicle testing.

Other studies have used automated vehicle crash records to model crash severity (Wang and Li, 2019), analyze crash narratives using text mining (Alambeigi et al., 2020; Boggs et al., 2020), and perform exploratory analysis (Das et al., 2020; Leilabadi and Schmidt, 2019; McCarthy, 2021).

In independent research, Templeton (2020) compared Tesla's stated crash rates with Autopilot enabled and not enabled by attempting to control for increased use of Autopilot on relatively safer freeways. To compare human-driven crash rates of freeways and non-freeways, Templeton used fatality rates, which may overestimate crash rates on freeways as higher speeds increase crash severity according to a fourth power law (Evans, 1994). When controlling for road type, the crash rate benefits of Autopilot narrowed significantly. Templeton was unable to fully assess their comparison of Autopilot crash rates with national estimates due to their different definitions of crashes.

A review of the literature establishes a clear need for methods to isolate environmental and demographic factors when evaluating automated vehicle safety using raw crash statistics.

3 Materials and Methods

3.1 Manufacturer Data

Tesla's stated crash rates for vehicles with Autopilot (AP) and active safety features engaged, and active safety features-only (ASO) engaged, were compared with national crash rates. Manufacturer's safety rates were obtained from their self-published quarterly safety reports (Tesla, Inc., 2021) which listed miles per crash but not specific mileages nor crash counts. Tesla defines a crash as an incident where "the crash alert indicated an airbag or other active restraint" was deployed (Tesla, Inc., 2021). According to the report, this "correlates to nearly any crash at about 12 mph (20 kph) or above, depending on the crash forces generated" (Tesla, Inc., 2021). Crash rates when no active safety features were in use were also reported, but these are excluded from this analysis as active safety features are engaged as the default. The use of active safety only is considered as operating under manual control when comparing with other datasets.

The ratio of Tesla miles traveled with Autopilot and active safety only on freeways was obtained from an unpublished 2018 study (Fridman et al., 2018). The report discussed a

naturalistic driving study of 28 vehicles with automated driving features, of which 25 were Tesla models equipped with Autopilot. Vehicles had traveled a total of 323,384 miles at the time the report was written. The study focused primarily on driver attentiveness, but a breakdown of distances traveled on roads with various speed limits were shown in Figures 3 and 4 in that report (Fridman et al., 2018). Distance by speed limit from that report is reproduced here in Figure 1.



Figure 1 Distance traveled on different roads by speed limit (Fridman et al., 2018).

Although widely reported in the press when first posted online (della Cava, 2018; Niedermeyer, 2019), the study was later pulled for reasons that appear related to the driver attentiveness portion of the study. An author has confirmed in personal correspondence that all mileages in the study are accurate (Reimer, 2021). The naturalistic driving study is ongoing, and has produced several papers (Ding et al., 2020; Morando et al., 2020; Reagan et al., 2019).

3.2 National Data

National crash rates and adjustment factors were obtained from the SHRP 2 NDS. Between 2012 and 2014, video, audio, and kinematic data were collected from 3,500 drivers using their personal vehicles (Antin et al., 2019). Although data was continuously recorded and later deleted, it was only saved permanently when either triggered by a change of acceleration threshold or other crash indicator, or at random intervals to collect baseline driving data. Events were analyzed and categorized by a team of trained analysts.

SHRP 2 NDS used several tiers of crash severity. Three appear to correlate to the manufacturer's crash definition. The first is any crash that results in the activation of an airbag. The second is referred to as Crash Severity I – Most Severe ("Severe" for short), which includes any airbag crashes as well as any crashes that result in physical injury, roll over, or a change in speed of the instrumented vehicle of greater than 20 mph (Virginia Tech Transportation Institute,

2015). Vehicle safety research refers to this change of speed as delta-v. The third is referred to as Crash Severity II – Police Reportable, and includes any crash that does not meet the definition of Severe but either causes an estimated minimum of \$1500 in damages or reaches acceleration on any axis of 1.3g (Virginia Tech Transportation Institute, 2015). The combined severe/police reportable metric was selected for use in the analysis as part of this effort, as it appears closest the manufacturer's crash definition. Airbag crashes are included in severe crashes.

The SHRP 2 NDS also records baseline mileage data and crash events by age of the driver and roadway type. Roads are classified based on observation from video rather than speed. Events classified as "Interstate/bypass/divided highway with no traffic signals" (Virginia Tech Transportation Institute, 2015) are considered freeways, while all other events are considered non-freeway.

Each entry in the database includes two separate events, as many crashes have an initial event (e.g., a rear-end collision) followed by a second event (e.g., a curb strike). SHRP 2 NDS data was queried for Crash Severity 1 = I or II OR Crash Severity 2 = I or II. Records were then filtered by locality and airbag deployment.

3.2.1 Age-Weighting

The sample of drivers in the SHRP 2 NDS dataset was biased towards younger and older drivers as they represent higher risk groups. Mileages and crash counts for all age groups were reweighted based on ages of United States licensed drivers in Blanco et al. (2016). Their calculations are reproduced in Table 1. Age-weighted SHRP 2 NDS data are used throughout the study.

Age	Weight	Percentage in SHRP 2 NDS	Percentage of US Licensed Drivers	Million miles driven	Weighted million miles driven
16-24	0.32	37	12	12.9	4.1
25-39	1.53	17	26	6.4	9.8
40-54	2.33	12	28	4.6	10.7
55-74	1.35	20	27	6.3	8.5
75+	0.5	14	7	3.4	1.7
Totals	-	100	100	33.6	34.8

 Table 1 Age Group Sample Weights for SHRP 2 Naturalistic Driving Study Data (Blanco et al., 2016)

The analysis in this paper relies on the assumption that the freeway-to-non-freeway and age group crash ratios found in the SHRP 2 NDS are consistent with the manufacturer's data, as there are no roadway specific nor age-related factors in the manufacturer safety report. Crash rates by severity are shown in Table 2.

	Crashes per 100 million miles		
Severity	Freeway	Non-Freeway	Combined
Airbag deployment	29	26	27
Severe, incl. airbags	160	293	257
Police-reportable, not severe	226	482	412
Severe and Police-reportable	386	776	668
Minor	569	2455	1934
All	955	3231	2602

Table 2 SHRP 2 NDS Age-Weighted Crash Rates by Severity

Although the ages of drivers in Tesla's crash rate data are unknown, their ages could be estimated from a 2018 demographic survey of 424 Tesla owners (Hardman et al., 2019). Age bins were reorganized to correspond to SHRP 2 NDS bins, assigning proportional counts based on the cutoffs.

3.3 Adjustment Methods

Crash rates can be adjusted to account for differences in environment and demographics in different data sets. A sample dataset with a crash rate *r* is exposed to some variable *i* at a different proportion *p* than the comparison dataset. In the case study, for example, vehicles running Autopilot were driven on freeways (*i*) 93% of the time, resulting in $p_i = 0.93$. In the SHRP 2 NDS, only 28% of vehicle mileage was recorded on freeways, i.e $p_i = 0.28$. In the SHRP 2 NDS data, vehicles on non-freeways crashed 2.01 times more often per mile than vehicles on freeways. The observed Autopilot crash rate can be adjusted to reflect national driving rates to reflect the crash rate that might be observed if 28% of Autopilot mileage was on freeways and 72% were on non-freeways, assuming that the 2.01 ratio holds for Autopilot.

The first step is to find the odds ratios for freeway and non-freeway driving in the SHRP 2 NDS data. The odds ratio is defined as the crash rate under the risk factor divided by the crash rate for all driving:

$$OR = \frac{r_i}{r_t}$$

where r_i is the crash rate for either freeway or non-freeway miles, and r_t is the crash rate per mile of all driving.

The crash rate r_i can be obtained by solving a system of equations. First, the sum of the crash rate r for each risk factor i multiplied by the proportion of exposure spent in that risk factor p_i is equivalent to the total crash rate r_t .

$$\sum_{i=0}^{n} r_i p_i = r_t p_t$$

In the second equation, the odds ratio formula is rewritten as:

$$r_t = \frac{r_i}{OR_i}$$

Given that r_t remains constant for a given sample, this yields the following equation:

$$r_t = \frac{r_o}{OR_o} = \frac{r_1}{OR_1} = \dots = \frac{r_{n-1}}{OR_{n-1}} = \frac{r_n}{OR_n}$$

The value of any crash rate r_i can be expressed in terms of any other crash rate r_j as:

$$r_i = r_j \frac{OR_i}{OR_j}$$

Inserting this equation into the crash rate summation equation yields:

$$r_{o}p_{0} + r_{1}p_{1} + \dots + r_{n-1}p_{1} + r_{n}p_{n} = r_{t}p_{t}$$

$$r_{o}p_{o} + r_{0}\left(\frac{OR_{1}}{OR_{0}}\right) + r_{0}\left(\frac{OR_{2}}{OR_{0}}\right) + \dots + r_{0}\left(\frac{OR_{n-1}}{OR_{0}}\right) + r_{0}\left(\frac{OR_{n}}{OR_{0}}\right) = r_{t}p_{t}$$

$$r_{i}\left(\sum_{i=0}^{n} \frac{OR_{j}}{OR_{i}}p_{j}\right) = r_{t}p_{t}$$

$$r_{i} = \frac{r_{t}p_{t}}{\sum_{i=0}^{n}\left(\frac{OR_{j}}{OR_{i}}p_{j}\right)}$$

When p_i is expressed as a percentage of the total, then $p_t = 1$. In applying the methodology, the odds ratio should be calculated from the more detailed database. For this case study, odds ratios were calculated from the SHRP 2 NDS and the Autopilot NDS.

Once individual crash rates for each risk factor are calculated, they can be combined into an updated total crash rate using the formula:

$$\sum_{i=0}^{n} r_{i} p_{i,adj.} = r_{t,adj} p_{t}$$

but replacing p_i with the comparison ratios, e.g. 28% freeway miles and 72% non-freeway miles.

4 Results

Crash rates using Autopilot and active safety features only were compared. In the manufacturer's reports, Autopilot is consistently shown to have a higher average distance between crashes, ranging between 1.46 and 2.35 times greater than active safety only (Tesla, Inc., 2021). Autopilot is used predominately on freeways, as surface street functionality was only released recently to select users and remains in beta. A naturalistic driving study has shown that 93% of Autopilot usage is on roads with speed limits of 55 mi/hr or greater. In contrast, of the miles traveled using active safety only, only 30% occurred on roads with speed limits only greater than 55 mi/hr (Fridman et al., 2018). Because the SHRP 2 NDS dataset does not include speed limits but rather road classifications, roads with speed limits greater than 55 mi/hr were classified as freeways to allow for direct comparison with SHRP 2 NDS.

Combined severe and police-reportable crashes were used to calibrate the manufacturer data. The ratio of freeway to non-freeway crashes is 2.01. Assuming that this ratio holds for the manufacturer data, then the crash rates can be adjusted using the methods in the previous section. Variables for Q1 2021 are provided in Table 3.

Table 5 Case Study Crash Aujustment Variables				
Variable	Freeway	Non-Freeway		
OR	0.58	1.17		
p, Autopilot	0.93	0.07		
p, Active Safety Only	0.3	0.7		
p, SHRP 2 NDS	0.28	0.72		

Table 3 Case Study	V Crash Ad	justment `	Variables
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The miles between crashes after adjusting for freeway and non-freeway use is shown in Table 4 and Figures 2 and 3.

	Autopil	ot	Active Safety Only	
	Crashes per 100 n	nillion miles	Crashes per 100 mill	ion miles
Date	Unadjusted	Adjusted	Unadjusted	Adjusted
Q3 2018	29.9	48.4	52.1	52.8
Q4 2018	34.4	55.5	63.3	64.2
Q1 2019	34.8	56.3	56.8	57.6
Q2 2019	30.6	49.4	45.7	46.3
Q3 2019	23.0	37.2	37.0	37.6
Q4 2019	32.6	52.6	47.6	48.3
Q1 2020	21.4	34.5	50.3	51.0
Q2 2020	22.1	35.7	44.1	44.7
Q3 2020	21.8	35.2	41.3	41.9
Q4 2020	29.0	46.8	48.8	49.5
Q1 2021	23.9	38.6	48.8	49.5

 Table 4 Autopilot and Active Safety Only Crash Rates Adjusted for Road Usage



Figure 2 Unadjusted crashes per 100 million miles.



Figure 3 Crashes per 100 million miles, adjusted for road classification.

The same procedure was used to adjust for driver demographics. Tesla owners are concentrated in the 50 to 70-year-old age brackets and underrepresented among drivers ages 16–39 and 75 and older (Hardman et al., 2019). Table 5 lists the percentage of drivers in each bin for both samples.

	Tesla	Percentage of US Licensed	Weighted Most Severe and Police Reportable Crashes	
Age	Owners ¹	Drivers ²	per 100 million miles ³	Odds Ratio
16-24	0.7%	12%	1413	2.11
25-39	12.1%	26%	531	0.79
40-54	29.3%	28%	501	0.75
55-74	47.5%	27%	604	0.90
75+	10.3%	7%	1059	1.58
Totals	100.0%	100.0%	669	1.00

Table 5 Comparison of Driver Demographics

¹ Statistics obtained from Hardman et al. (2019).

² Statistics obtained from Blanco et al. (2016).

³ Statistics obtained from Transportation Research Board of the National Academy

of Sciences (2013).

The results compare the crashes per 100 million miles for Autopilot and Active safety in unadjusted numbers, adjusted for road type, and adjusted for both road type and owner age. National statistics for airbag deployments in the SHRP 2 NDS data are adjusted for driver age. While the Autopilot and active safety only crashes did include airbag deployments, they also included activations of other restraint systems, and so airbag deployments only is probably not an accurate comparison to assess safety. Crash rates rated as severe in SHRP 2 NDS occurred 257 times per 100 million miles, while combined severe and police-reportable crashes occurred 668 times per 100 million miles. Both estimates were significantly higher than manufacturer reported crashes, although without more information regarding manufacturer crash thresholds, a direct comparison is impossible.

Crash rates adjusted for road classification and owner age are shown in Figure 4.



Figure 4 Manufacturer crash rates adjusted for road use and owner age.

5 Conclusions

By correcting for roadway usage differences between the Autopilot and active safety only data, much of the crash reduction seen by vehicles using Autopilot appears to be explained by lower crash rates experienced on freeways. Correcting for age demographics likewise produced a 10% increase in the estimated crash rate, although it remains well below the rate of severe crashes in the SHRP 2 NDS.

Several other factors may explain difference in safety rates of new vehicle technologies based on who is using them, where they are being used, and when they are being used. Some safety features cannot be used in rain or snow, for example, which may bias the data towards clear weather and lower crash rates generally.

5.1 Limitations

Comparing limited data across inconsistent samples as done in this study requires several assumptions that may limit the accuracy of the results. There are five main assumptions that may affect the results.

First, it is assumed that ratios between freeway and non-freeway driving found in the SHRP 2 NDS are maintained in the manufacturer data set. If driver crash twice as often on non-freeways as freeways, it is assumed that drivers in the manufacturer's data will also crash twice as often, although the absolute rate may be different.

Second, the MIT data is assumed to be accurate and applicable. The data was collected in early 2018 before manufacturer safety reports were published, so it is possible that driver travel patterns and usage of Autopilot has changed significantly in the interim, affecting the results. Much of the naturalistic data was collect in and around Boston, Massachusetts. This data may not be applicable to the United States generally.

Third, it was assumed that vehicles on the same type of road were exposed to the same crash risk. Not only type of road but also conditions on the road may differ for Tesla drivers resulting in different crash rates. Congested traffic, for example, might result in more crashes per mile traveled. If Tesla's are more likely to be driven along urban corridors during peak periods, then they will be more likely to encounter congestion. These data, while not available, could have a significant impact on observed crash rates.

Fourth, there is some uncertainty over what classifies a road as freeway. In the SHRP 2 NDS, camera images were evaluated to determine road classification. In the MIT data, an assumption was made that roads with speed limits of 55 mi/hr or greater were freeways. There are, of course, roads with 55 mi/hr speed limits that are not freeways, although it is unclear to what extent these roads are prevalent in the Boston area where much of the naturalistic data was collected.

Fifth, it was assumed that the SHRP 2 NDS crash severities of severe and policereportable, when combined, captured the same types of crashes as those recorded by Tesla. While these definitions appear most similar of the choices available, it is unlikely they are a perfect match as SHRP 2 NDS data relied on some human judgement and the manufacturer crash rate definitions were dependent on active safety features with unclear thresholds. It was therefore difficult to directly compare manufacturer crash rates with national estimates.

5.2 Best Practices

When comparing vehicle technologies to national crash rates, some best practices may help facilitate evaluations. Anonymized driver or owner demographics may be used to isolate safety impacts, as highly educated middle-aged drivers are both more likely to purchase luxury cars and simultaneously crash at lower rates than the overall population. Similarly, specific details regarding built-in restrictions on when vehicle technologies can and cannot be used allows researchers to better design baseline metrics that match the technology's operational design domain. Manufacturers should record additional anonymized data on vehicle driving environments, rates of usage of automation modes, and details on when and where the modes are used. Selective sampling of short segments of vehicle trips could be used to develop statistics on baseline behavior to compare against crash records.

Finally, consistent crash definitions and thresholds are becoming increasingly necessary in order to evaluate new safety technologies. The standard metric of police-reportable has different meanings in different jurisdictions—this creates confusion when crashes that meet the threshold for reporting are either not reported or reported but not logged into police databases. More consistent definitions could combine such metrics as maximum jerk, maximum acceleration, changes in subject vehicle relative speed. When metrics such as airbag deployment or vehicle crash sensing are employed, measurements of changes in vehicle velocity over time can help to further refine crash classification and provide insight into a crash's severity.

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Declaration of Competing Interests

The author has no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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