

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to  
Establish Policies, Processes, and  
Rules Regarding Autonomous  
Vehicle Passenger Transportation  
Service

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Rulemaking 25-08-013  
(Filed August 28, 2025)

**REPLY COMMENTS OF THE SAN FRANCISCO TAXI WORKERS ALLIANCE ON  
ORDER INSTITUTING RULEMAKING TO ESTABLISH POLICES, PROCESSES, AND  
RULES REGARDING AUTONOMOUS VEHICLE PASSENGER TRANSPORTATION  
SERVICE**

November 17, 2025

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The San Francisco Taxi Workers Alliance (SFTWA) submits these Reply Comments on Order Instituting Rulemaking to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Service.

## **I. Introduction**

As a general principle, SFTWA agrees with the Opening Comments of SEIU Locals 521, 721, and 1021 (“SEIU”) that the Commission should “(p)rioritize understanding AVs impacts on drivers and communities before fast-tracking deployments.”<sup>1</sup> SEIU calls for an independent study to identify economic impacts of driverless vehicles on TNC drivers and local communities<sup>2</sup> (to which we would add taxi and other for-hire drivers, as well as drivers of mass transportation vehicles, who will also suffer the impacts of AV operations). In our Opening Comments, SFTWA further proposed the creation of an Economic Impact Mitigation Fund to provide compensation to career for-hire drivers who lose their livelihoods to AVs.<sup>3</sup> We urge the Commission to expand the scope of this rulemaking and adopt these proposals. These Reply Comments will focus on one critical area of commercial AV operations, those that take place at airports.

## **II. AV operations at airports are especially risky.**

### **A. AVs should not be allowed access to airport terminals.**

Airports present a unique set of problems and risks for commercial AV operations. As SFTWA noted in our Opening Comments, “(h)uman drivers find it hard enough to navigate a chaotic environment of narrow, frequently congested roadways and drivers jockeying to gain access to terminals and limited curb space.”<sup>4</sup> AVs are notorious for their poor handling of

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<sup>1</sup> Joint Comments at 3.

<sup>2</sup> *Id.*

<sup>3</sup> SFTWA Opening Comments at 4.

<sup>4</sup> *Id.* at 6.

unconventional situations.<sup>5</sup> Below is a list of some of the conditions CAC and SFO say ADS Level 2 and Level 3 vehicles (which are not AVs) have to deal with.

- single lanes
- choke points
- congested curbs
- heavy pedestrian flow
- unusual weather
- roadway construction
- passengers loading and unloading luggage
- unexpected individuals in the roadway<sup>6</sup>

AVs have to navigate the same terrain. CAC and SFO cite the following potential hazards relating to ADS Level 4 and Level 5 (AV) operations:

- disengagements
- traffic collisions
- disabled vehicles
- construction zones
- first responders
- abnormal events
- single points of failure
- cybersecurity
- terrorist threats<sup>7</sup>

Rules and regulations governing AVs will only go so far in dealing with these hazards. The less serious ones are bound to result in entanglements and delays with some frequency; the most serious, which hopefully will never the occur, could have devastating effects. Imagine what a commandeered vehicle with no human presence could do. The best way to guarantee that AVs will not cause or contribute to disruptions or worse at the terminals is to prohibit their access to them. SFTWA has proposed that commercial AV operations be stationed away from the terminals.<sup>8</sup> The Commission has the authority to prohibit commercial AV operations

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<sup>5</sup> *Id.* See f/n 6 for a small sampling of the myriad documented instances of AVs tying up San Francisco traffic.

<sup>6</sup> See CAC Opening Comments at 6; SFO Opening Comments at 5.

<sup>7</sup> See CAC Opening Comments at 7; SFO Opening Comments at 6.

<sup>8</sup> SFTWA Opening Comments at 9.

at airports,<sup>9</sup> and has asserted that authority.<sup>10</sup> It surely has the power to place conditions on those operations, including restricting them to off-terminal areas. This falls directly within the scope of the Commission's primary responsibility, which is the protection of passengers and the public from foreseeable harms.<sup>11</sup> If the Commission declines to assert its authority in this area, airports should take it upon themselves to place order and safety above convenience – especially as there is limited curb space at terminals, and multiple modes of transportation that do not present similar risks are available to passengers.

**B. The Commission should declare a moratorium on AV operations at airports.**

CAC has asked the Commission to

require permittees to develop additional plans and approaches for how AV permittees intend to address: (1) an increase in and scaling of passenger volumes and traffic congestion at airports; (2) specific emergency measures for operations at airports including vehicle malfunctions, medical events, terrorist threats, and cybersecurity risks; (3) use of third-party dispatch services; and (4) accountability associated with subcontracting services to unpermitted carriers.<sup>12</sup>

SFO has made a virtually identical request.<sup>13</sup> Although CAC and SFO are not opposed to AV commercial operations on airport property, and some airports already allow it,<sup>14</sup> their recitations of the various hazards associated with this service should serve as a warning and

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9 **“Operations At Airports.** No carrier shall conduct any operations on the property of or into any airport unless such operations are authorized by both this Commission and the airport authority involved. Consistent failure to comply with safety or traffic rules and regulations of an airport authority may result in suspension or revocation of Commission operating authority.” CPUC GO-157-E, § 3.02

10 The Commission prohibited commercial AV operations at airports in the Pilot Program. See D.18-05-043 at 36.

11 Along with the DMV, which is the lead agency on issues pertaining to the safety of the vehicle itself.

12 CAC Opening Comments at 4.

13 SFO Opening Comments at 3.

14 “Waymo is currently authorized to provide AV passenger services at Palo Alto Airport, San Carlos Airport, San Jose Airport, and Santa Monica Airport. Waymo has also obtained provisional authorization to provide AV passenger services at San Francisco International Airport pending completion of testing phases.” Opening Comments of Waymo LLC, f/n 23 at 18.

signal of the need for a pause before allowing unrestricted expansion of commercial AVs into airports.

Among the issues raised by CAC and SFO are questions surrounding the various conceivable partnership arrangements between and among manufacturers, vehicle owners, service platforms and others.<sup>15</sup> Liability issues are a primary concern. Questions of responsibility must be answered before access is allowed. Witness the regulation of TNCs, which established themselves in vast numbers long before major aspects of their operations were dealt with, causing the Commission to play catch-up on major issues (e.g., service to the disability community and clean-air regulations), and never to deal with others (e.g., impacts on traffic and congestion). This should be an object lesson.

The impacts of AV access to airports will also be felt on the roadways leading to them. The potential for serious injury or death greatly increases at freeway speeds. How well will AVs handle these roads? This question will remain unanswered for some time to come, until there is sufficient data for valid comparisons. And what about the prospect of greater congestion on roads that are already above their intended capacity, once AV fleets proliferate and vehicle numbers vastly increase? These unknowns counsel caution at this early stage of AV regulation.

At the very least, the hazards described by CAC and SFO point to the need for greater regulation before allowing commercial operations at airports to become widespread. The sheer number of questions in the OIR related to commercial AV operations overall and at airports indicates that the regulatory scheme is far too short of completion to allow this to happen. The Commission must get a firm handle on AV operations **before** the door opens wide. **SFTWA proposes a moratorium on all AV operations at airports until there is**

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<sup>15</sup> CAC Opening Comments at 5, 8; SFO Opening Comments at 4, 6.

**greater regulatory clarity around the multiple subjects discussed in the OIR.** If the Commission is unwilling to do so, it could allow restricted operations, under a watchful eye, at airports where commercial operations have begun, until a true picture of their impacts emerges. At that point, far more will be known to provide guidance for additional regulation.

### **III. Conclusion**

The Commission should not allow AVs at airport terminals and should pause or restrict commercial AV operations at airports until a clearer picture of their potential consequences emerges and a broader regulatory scheme is in place. Beyond that, as discussed in SFTWA's Opening Comments, the Commission should address AVs' impact on the livelihood of drivers who provide transportation to the public by creating a fund to compensate workers who have lost their jobs owing to commercial AV operations.

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Respectfully submitted,

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