



**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

R.25-08-013
(Filed August 28, 2025)

**RESPONSE OF WAYMO LLC
ON THE JANUARY 12, 2026 ADMINISTRATIVE LAW JUDGE'S E-MAIL RULING
REGARDING QUESTIONS FROM JANUARY 6, 2026 E-MAIL RULING**

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In accordance with the assigned Administrative Law Judge’s (“ALJ”) January 12, 2026 e-mail ruling (the “Ruling”) regarding the party responses to questions from the assigned ALJ’s January 6, 2026 e-mail ruling, Waymo LLC (“Waymo”) hereby submits the following responses to the Assigned Commissioner’s and ALJ’s questions in the above-captioned rulemaking.

I. RESPONSES TO QUESTIONS FROM ALJ RULING

1. Safety and Reliability Concerns

- **During the recent December 20, 2025, power failures in San Francisco, reports surfaced of Waymo Autonomous Vehicles (AV) stopping either in traffic lanes or in the middle of intersections.**
 - **What was the total number of vehicle stoppages?**
 - **How long did the stoppages occur before corrective action was taken?**
 - **What was/were the cause/causes of such stoppages?**
 - **What impact did the stoppages have on police, fire, and other first responder services?**
 - **What corrective action has been undertaken to prevent such stoppages in the future?**
 - **Were there any passengers in these stopped vehicles? If so, how were the passengers able to safely exit the vehicles?**
 - **Did any other AV companies experience similar vehicle stoppages?**
 - **If an AV or a drivered vehicle offering an AV/driverless feature (such as Tesla) is involved in a vehicular incident, are there clear written, visual, and/or audible instructions for exiting the vehicle?**

- **What remote customer support is available for customers needing to exit the vehicle?**
- **How is the remote customer support accessed?**
- **Are there any other safety and reliability issues that the Commission should consider as part of its regulatory oversight of AV transportation service?**

Response: On December 20, 2025, there was a widespread Pacific Gas and Electric Company (“PG&E”) power outage that impacted nearly one-third of San Francisco. Without power, many traffic lights in the affected area went dark. The situation was severe and persistent enough that the San Francisco Department of Emergency Management advised residents to stay home, underscoring the significance of the disruption. The combination of circumstances described below presented a novel challenge for Waymo’s fleet, which serves on the order of tens of thousands of fully autonomous fared trips per day in California. Between 12 PM and 11 PM on December 20, 2025 (the “Peak Outage Period”), 829 Waymo vehicles operated for some amount of time within the geographic area affected by the PG&E outage in San Francisco.

The Waymo autonomous vehicle (“AV”) is designed to safely navigate darkened traffic signals by treating them as four-way stops. In some cases, such as during blackout conditions, the Waymo Driver may request confirmation from Remote Assistance (“RA”) to verify that it is safe and appropriate to proceed through the intersection. Because Waymo AVs are designed to handle this uncertainty cautiously to avoid inappropriately proceeding through an intersection, they wait until their requests are addressed by RA agents – which usually happens promptly.

Though some traffic signal outages were detected as early as 12:00 PM on December 20th, Waymo AVs were not encountering notable issues navigating darkened signals while operating and serving trips during the initial hours of the outage. At approximately 5 PM on December 20th, the volume of confirmation requests began to markedly exceed typical request volume, resulting in RA response times that were longer than typical. In a subset of cases, Waymo AVs waiting on confirmation from RA remained stationary at intersections with darkened traffic signals. This contributed to congestion on already-disorderly streets. In light of these conditions, at approximately 5:55 PM, Waymo

suspended its ride-hail service and accelerated efforts to park or call vehicles back to the depot.¹ Waymo resumed service the next day, except in limited areas where the PG&E power outage continued to persist.

Regarding the number of “stoppage events”² – a metric defined by the Commission in Decision (“D.”) 24-11-002 to mean a stop of 120 seconds or more where an AV “cannot proceed”³ without outside assistance (e.g. from RA) – during the Peak Outage Period Waymo’s fleet logged 1,593 such stops in the affected area, over 96% of which were resolved by the vehicles continuing on their way, driving fully autonomously. The remaining stoppages were resolved by manual retrieval. This includes retrievals of vehicles parked out of the flow of traffic.

While these stoppages occurred during the Peak Outage Period, they were not all related to traversals of intersections with darkened traffic lights, and therefore not indicative of Waymo’s impact on traffic conditions. The total number may also include stoppages attributable to other reasons, including erratic behavior by other drivers and increased traffic congestion from the PG&E power outage, as well as vehicle stops occurring due to traffic and other routine roadway conditions (e.g. a congested merge or yielding behind another stationary vehicle).

Regarding impacts on first responder operations, while Waymo cannot speculate as to San Francisco first responders’ experience with Waymo AVs operating in the city during the outage, Waymo is aware of two instances where Waymo AVs were disengaged and manually moved by first responder personnel during the Peak Outage Period.

¹ Waymo had already begun to return cars to the depot earlier in the afternoon, at approximately 3 PM, due to power outages experienced at Waymo facilities.

² While Waymo asserted confidentiality over stoppage data at the January 9, 2026 prehearing conference (“PHC”), after further review Waymo is electing to voluntarily disclose this information. Waymo’s disclosure of this information in this specific instance does not constitute and should not be construed as a waiver of Waymo’s confidentiality claims related to stoppage-fleet data in its quarterly reports or any other context.

³ As Waymo noted in comments at the time the “stoppage event” definition was adopted, without expert manual review of each individual stoppage event, it cannot be determined with certainty in all cases that assistance provided by Remote Assistance during a stop was, in fact, necessary for the vehicle to proceed. See *Waymo Opening Comments on the Proposed Decision Adopting New Data Reporting Requirements for Autonomous Vehicles Deployment and Pilot Programs* (filed Sept. 26, 2024), R.12-12-011, at 7.

With regard to the Commission's questions about Waymo's practices related to passengers exiting vehicles during stoppages, as a general matter, Waymo provides instructions to passengers about safely exiting the Waymo AV in the event a trip cannot continue through multiple sources, including: (1) Waymo's in-app communications and Help Center; (2) a rider safety video; and (3) in real-time via Rider Support and the in-vehicle Screen. In the event a car cannot proceed, riders are instructed to remain seated with seatbelts fastened in the car for their safety, but they can exercise their judgment to leave the vehicle should they so choose. In the event that the Waymo AV's onboard software detects a trip interruption, Waymo's Rider Support team affirmatively reaches out to riders to check on them and provide assistance. Additionally, riders can contact Waymo's Rider Support team for guidance or assistance related to exiting the vehicle, and any other issues they need help with. This can be done through the in-vehicle screen or through the Waymo app.

Finally, Waymo does not believe that there are safety or reliability issues related to this event that should be addressed in this rulemaking proceeding. The Waymo AV is capable of confidently recognizing inactive traffic signals in most contexts, and successfully did so in the vast majority of situations in San Francisco on December 20th. Waymo has already identified improvements to avoid future similar large-scale power outages from negatively impacting our fleet and, by extension, our riders and roadways. These include internal alerts triggered by sudden increases in non-functioning traffic signal requests to RA that will enable Waymo to begin implementing mitigations more quickly – a capability that has already been implemented. In addition, Waymo now has a system in place to mark a region experiencing a blackout, providing more context to the AVs and reducing the volume of RA requests in connection with non-functioning traffic signals during power outages.

More programmatically, Waymo's reactive response capabilities include an Incident Response function which is staffed by a dedicated, 24/7 team of Incident Managers now representing a combined 100+ years of experience in public safety who coordinate our enterprise response. This team ensures a consistent, high-quality response to crisis situations through structured subject matter expert involvement and clear escalation

pathways. This core function is supplemented by a network of over 100 Waymo subject matter experts available 24/7 to provide specialized support during our most impactful incidents. Each of these teams individually, and in collaboration with the others, work to plan and prepare to deliver consistent, high-quality response to incidents and crisis situations, in service to our riders and communities.

2. GO 157-E Exemptions

- **Should the Commission streamline the process for General Order (GO) 157-E exemptions (per Part 8.01 and 8.02 of GO 157-E) such that:**
 - **Exemptions are requested, reviewed, and approved or denied by CPUC staff for both Pilot and Deployment;**
 - **Exemptions last for the duration of the TCP permit without requiring renewal until the expiration of the TCP permit or the carrier's vehicles or operations change as described below;**
 - **No annual re-attestation of functional equivalence is required in either Pilot or Deployment;**
 - **And carriers must apply for a new exemption if changes to the carrier's vehicle(s) or operations render the original exemption and/or information submitted justifying the exemption untrue or inapplicable?**

Response: Yes, the Commission should expand and streamline the exemption process as proposed. The Commission previously amended General Order (“G.O.”) 157-D to allow Commission staff to grant exemptions to AV carriers seeking to participate in the Commission’s AV Pilot Program, which the Commission had only recently approved in D.18-05-043, which authorized pilot AV operations.⁴ The Commission has not revisited the exemption process since authorizing driverless deployment and there is no reason that it should be limited to the Pilot program.

Similarly, there is no reason for such exemptions to expire or terminate, or to require annual re-attestation of functional equivalence, unless there have been material changes to the permit holder’s service or operations such that the factual basis for the original exemption is rendered untrue or inapplicable. Waymo urges the Commission to expand the scope of the existing exemption found under Part 8.02 (currently limited to the Pilot program), to allow Commission staff flexibility to approve exemptions for both pilot and

⁴ Resolution TL-19129 (rel. Oct. 29, 2018).

deployment operations if the applicant can meet the existing functional equivalence standard.

3. ODD Disclosure

- **The Commission currently requires public disclosure of operational design domains (ODDs) for entities applying for and operating in the Deployment program. Should the Commission extend that requirement to entities applying for and operating in the Pilot program, and if so, should public disclosure also be required for subsequent ODD modifications?**

Response: No, there is no need for the Commission to extend the requirements of public disclosure to the Pilot program, nor to any subsequent operational design domain (“ODD”) modifications. The California Department of Motor Vehicles (“DMV”) already maintains on its website a description of the ODDs for each AV company permitted to operate in California. As explained in Waymo’s comments on the OIR, AV carriers should be permitted to provide Commission staff with notice of an expanded geographic ODD on a voluntary basis.⁵

4. Purpose-Built AVs

- **Should the Commission clarify that carriers must submit an updated passenger notice and consent plan (as described in D.18-05-043 Ordering Paragraphs 5 and 7, D.20-11-046 as modified by D.21-05-017 Ordering Paragraphs 5(i) and 7(h)) to CPUC staff prior to operating a purpose-built vehicle in passenger service?**
- **What risks are unique to passenger service in purpose-built AVs vs. AVs using a more traditional form factor? How should the Commission evaluate if a carrier’s protocols and procedures adequately mitigate those risks?**

Response: Clarification is welcome, but the Commission does not need to adopt new rules specific to purpose-built vehicles. Purpose-built vehicles introduce unique and difficult-to-identify risks, which should be addressed separately on a case-by-case basis rather than on a universal or industry-wide basis. Any unique risks that might exist would likely be platform-specific. Both the DMV and federal regulators oversee general vehicle safety of any new vehicle platforms. Carriers operating purpose-built vehicles should

⁵ See *Waymo Opening Comments on OIR* (filed October 31, 2025) at 25-26.

address any passenger-safety risks presented by their unique purpose-built vehicles in their Passenger Safety Plan (“PSP”).

5. Permit Reinstatement

- **Should the Commission delegate to staff the authority to reinstate suspended authorizations for the Pilot and Drivered Deployment programs, following reinstatement of the carrier’s DMV AV permit and a demonstration by the carrier of how the issue leading to the suspension was resolved?**
- **Should the Commission require carriers request reinstatement of a suspended Driverless Deployment authority by submitting a Tier 2 advice letter demonstrating how the issue leading to the suspension was resolved?**

Response: The Commission should authorize the Consumer Protection and Enforcement Division (“CPED”) to reinstate AV Charter Party Carrier (“TCP”) permits. Commission staff should be authorized to reinstate both Pilot and Drivered Deployment authority following the DMV’s reinstatement of that carrier’s DMV AV testing permit. Staff is already authorized to evaluate applications for AV passenger carriage and issue permits or certificates for both Pilot programs, and the Drivered AV deployment program. Commission staff should also be permitted to reinstate a carrier’s suspended AV deployment permit unless unique circumstances warrant Commission approval. Reinstatement by advice letter should only be required only if suspension or revocation of an AV carrier’s Driverless AV Deployment authority is unrelated to suspension or revocation by the DMV, and staff determine that unique circumstances warrant the Commission’s consideration.

6. Airports

- **What passenger service risks are unique to operations at airports? How should the Commission evaluate if a carrier’s protocols and procedures adequately mitigate those risks?**

Response: Issues related to AV service on airport property should be left to the responsible airport authority. Waymo is not aware of any “passenger service risks” that are unique to AV operations at airports. As with Transportation Network Companies (“TNCs”) and non-AV TCPs, airport authorities are best situated to determine how AV operators access and serve airports and to address any logistical issues that arise. Airports are well

equipped and experienced with regulating pick-up and drop-off (“PUDO”) locations for all types of transportation providers. Within California, Waymo is currently authorized to provide AV passenger services at Palo Alto Airport, San Carlos Airport, San Francisco International Airport, San Jose International Airport, and Santa Monica Airport. Waymo’s access to and service at airports is typically governed by permits issued by the relevant airport authority and related contractual agreements.

7. 30-day Attestation for Operational Design Domain (ODD) Changes

- **In the AV Driverless Deployment framework (Decision (D.)20-11-046 as modified by D.21-05-017), a carrier’s initial application must include a statement and map of the Department of Motor Vehicles (DMV)-approved ODD, but currently there is no explicit requirement to re-submit a new 30-day attestation to the Commission for any subsequent ODD modifications.**
- **Should the Commission require carriers to submit a new 30-day attestation whenever they modify their ODD in a way that materially affects their Passenger Safety Plan (PSP) strategies, or should the existing requirement to file an updated PSP be considered sufficient on its own?**
- **If the Commission were to require a new 30-day attestation for certain ODD modifications, what specific changes should trigger that requirement? (e.g., operation on new roadway types such as freeways) Should any attestation requirement apply only in Deployment, or also in Pilot?**

Response: The Commission should not impose a new 30-day attestation each time an operator modifies their ODD in a manner that materially affects their PSP. The Commission initially adopted the attestation requirement in the Pilot’s decision “in order to ensure that the fleet that will carry passengers obtains on-road experience in California before beginning such service” following the DMV’s grant of a testing permit.⁶ That same rationale does not apply to already operating carriers. While the attestation requirement makes sense for new entrants to the pilot or deployment programs rolling out new ADS platforms, it should not be required for expansions and other incremental modifications to ODDs operational AV carriers that have already established the “on-road experience” of their vehicles.

⁶ D.18-05-043 at 35.

8. Use of Advanced Driver Assistance Systems or “Level 2” by Regulated Carriers

- What information should carriers be required to present to passengers when providing notice of the use of Level 2 Advanced Driver Assistance Systems (ADAS) features in passenger service and when soliciting passenger consent on the use of those features? When and how should the information be conveyed to passengers to ensure their awareness?
- What requirements should the Commission put in place to ensure consumers appropriately understand the distinction between a service using Level 2 ADAS and autonomous vehicle service?
- What requirements, if any, should the Commission set regarding service names and marketing terms, such as “robotaxi,” “self-driving,” or other similar terms to avoid misleading passengers?
- Should the Commission require carriers offering rides using Level 2 ADAS to submit a passenger notice and consent plan as a Tier 1 advice letter?
- When and how should carriers provide updates to the Commission on changes to their notice and consent plan?
- Should small transportation charter-party (TCP) or transportation network company (TNC) carriers be exempted from the requirement to file a notice and consent plan with the Commission? What threshold should the Commission set for such an exemption?

Response: As explained in Waymo’s Opening Comments on the OIR, reasonable regulation of Level 2 Advanced Driver Assistance Systems (“ADAS”) would promote public safety, transparency, and rider education.⁷ Both TCPs and TNCs operating vehicles with Level 2 ADAS should be required to provide notice and obtain rider consent prior to any trip in a vehicle with Level 2 ADAS. At a minimum, the notice and consent form should expressly list the vehicle’s particular ADAS capabilities and inform the rider that the driver must continuously monitor the vehicle’s operations and must be ready to take control of the vehicle at any time, and include any other requirements specified by the manufacturer in connection with Level 2 ADAS operations. Operators utilizing vehicles with Level 2 ADAS should be consistent regarding the characterizations of their vehicles’ capabilities in all marketing, advertising and other external statements, and should not be permitted to market or refer to their Level 2 service as “driverless,” “self-driving” or “robotaxi.” As stated in Waymo’s comments to the Order Instituting Rulemaking (“OIR”), Level 2 carriers should

⁷ See *Waymo Opening Comments to OIR* (filed October 31, 2025) at 8-10.

submit their notice and consent plan to Commission staff for review and approval.⁸ This could be processed via Tier 1 advice letter or simply an informal submission to staff.

9. Unaccompanied Minors in AVs

- **What risks are unique to passenger service involving unaccompanied minors in autonomous vehicles? How should the Commission evaluate if a carrier's protocols and procedures adequately mitigate those risks?**
- **Should the Commission require carriers to submit an outline of their training program for staff interacting with minors?**
- **Should the Commission require background checks for carrier personnel who may interact with a minor in person? (e.g., field support/recovery staff)**
- **Should the Commission set an age limit for minors that may travel unaccompanied in an AV?**

Response: The Commission should lift the prohibition on the transportation of unaccompanied minors in AVs. The risks related to passenger service involving unaccompanied minors in AVs are generally similar to the risks related to transportation of unaccompanied minors in other contexts, including TNCs and public transit - services that are available to minors (subject to minimum age limitations in the case of TNCs). Waymo believes that AV operators should identify and describe any passenger safety measures specific to service of unaccompanied minors in their Passenger Safety Plan. These should include the requirements applicable to TNCs (excluding those specific to drivers) that were recently adopted in the Commission's D.24-12-004.⁹ The Commission should evaluate the adequacy of such protocols and procedures in the same manner as other elements of the PSP.

AV operators should not be required to submit training materials to the Commission. Commission staff have ample authority to request submission of such information through data requests, as needed. The Commission does not need to set a minimum age for minors traveling unaccompanied in an AV and should leave it to the discretion of each AV operator. If authorized by the Commission to do so, Waymo anticipates offering service for

⁸ See *Waymo Reply Comments to OIR* (filed Nov. 17, 2025) at 7-8.

⁹ See generally, D.24-12-004.

teen riders ages 14-17, inclusive, with parental permission, consistent with its service offering for teen riders in Phoenix, Arizona.¹⁰

10. Shared Rides

- **What passenger service risks are unique to shared rides in AVs? How should the Commission evaluate if a carrier's protocols and procedures adequately mitigate those risks?**
- **What shared ride elements should be included in a carrier's PSP? (e.g., in-cabin monitoring policy, conflict/harassment protocols, emergency protocols)**
- **What data are necessary to monitor shared ride passenger safety and service quality? (e.g., time to connect with support during active shared rides, co-rider mismatch data, etc.)**
- **Should the Commission impose initial operational limitations on shared rides? If so, what criteria should a carrier meet to lift those limits? (e.g., initial time of day limitations, geographic limitations etc.)**

Response: When compared to shared rides where a driver is present, the absence of a driver in a driverless AV may invite unwanted behavior between unacquainted riders. However, the deterrent effect from a driver's presence is unknown, especially in comparison to the deterrent effect of built-in features that allow carriers to monitor the interior cabin space of each vehicle, and passengers' ability to quickly contact rider support for help. Moreover, as the Commission may be aware from the TNC context, the presence of a driver can sometimes present its own risks to individual riders. The Commission's existing data recording categories adequately capture the data necessary to evaluate issues related to shared rides and specifically requires that AV operators report whether a given trip was a shared ride. The Commission should not adopt specific procedures, protocols or safety measures that AV carriers must describe in their PSPs in connection with shared rides. The Commission should instead provide flexibility for carriers to identify risk(s) and safety measures in their respective PSPs. However, as proposed in Waymo's comments, the Commission should require that AV operators address particular questions related to shared rides in their PSPs, including how shared rides will be requested, how passenger notice and consent will be processed, how shared

¹⁰ Information about Waymo's service for teen riders in Phoenix, Arizona is available here: <https://waymo.com/teens/>.

ride vehicles will be identified by riders, and how the operator will detect and respond to incidents that occur in the course of a shared ride.¹¹

11. Customer Support in Driverless Vehicles

- **What topics related to customer support in driverless AVs should carriers address in their PSPs? (e.g., delineation of roles/responsibilities for various remote support roles, escalation criteria and procedures for emergencies, etc.)**

Response: As discussed in Waymo's comments on the OIR, AV carrier PSPs should address and describe the AV carrier's passenger support function to the extent that it is relevant to passenger safety.¹² The Commission should continue to allow flexibility for AV carriers to provide the elements and detail that the AV carrier deems necessary to address passenger safety issues specific to their unique service model. Commission staff retains discretion to ask for follow up information, if needed and appropriate. Waymo endeavors to maintain its PSP as a public document; this may no longer be possible if the Commission requires significant additional detail regarding internal operations and procedures, which may implicate confidential information.

- **If the Commission were to create a standard for customer support response time, what is a reasonable response time for a customer support agent to connect with a passenger in an active ride? Should there be a different standard for emergency situations?**

Response: The Commission should not adopt any required standard or metric for AV operator customer support response times. As Waymo noted in its comments to the OIR, staffing levels and response times may vary as operators scale their fleets and service, and as AVs learn to successfully navigate more complex issues without any human involvement.¹³ Therefore, the adoption of customer support response time requirements will impede operator flexibility that is necessary for continued innovation. Instead, AV

¹¹ *Waymo Opening Comments to OIR* at 14-16.

¹² *Id.* at 16.

¹³ *Ibid.*

carriers should be required to describe anticipated customer support response times in their respective PSPs.

- **Should carriers be required to report a “time to customer support agent” metric to the Commission, and if not, what alternative oversight mechanism should apply?**

Response: It is premature to adopt new reporting requirements, such as a “time to customer support agent” requirement. There is presently no indication that customers have generally experienced unreasonably lengthy wait periods before for customer support. Instead, AV carriers should be required to describe anticipated customer support response times in their respective PSPs.

- **What accessibility requirements should apply to customer support channels (e.g., multi-language, voice and text, etc.)?**

Response: As described in Waymo’s PSP, Waymo has made significant investments in accessibility tools and features for our passenger carrier service. Waymo would support further study of this issue, including consideration of need, feasibility, and applicability to all classes of transportation providers.

12. Other Issues

- **Should the Commission develop staff proposals and/or hold workshops for the following issues as described in the OIR: Partnerships between AV operators and other regulated carriers, personally-owned AVs (Level 3, Level 4 and above), Passenger Safety Plan and “materially affect”?**

Response: The Commission should direct staff to develop proposals regarding any issue within the scope of the proceeding where staff believes changes or clarification of existing rules is needed, based on the parties’ comments submitted in response to the OIR. Waymo does not believe that a workshop is needed regarding what sorts of changes should be considered material such that an updated PSP is required as that issue has been adequately addressed in comments.

- **Should the Commission include additional items in the scope of this proceeding, including:**

- **Clarifying the requirement for a new 30-day operational attestation for ODD changes;**

Response: No, as discussed in Waymo’s response to Question 7 above, the Commission should not clarify the requirement for a new 30-day ODD attestation for ODD changes.

- **Confidentiality of the AV quarterly data reports;**

Response: The Commission should continue to utilize its existing and established confidentiality process. The Commission must maintain the confidentiality of data reports and other information previously submitted to the Commission subject to confidentiality claims made in accordance with G.O. 66-D. Generally, information submitters may request confidential treatment of information submitted to the Commission by identifying the confidential portions of information and specifying the basis for confidential treatment.¹⁴ This industry wide rulemaking proceeding is not the appropriate forum for the Commission to make determinations regarding specific confidentiality claims submitted by individual AV TCPs.

G.O. 66-D also provides a process by which the Commission may preemptively and categorically designate certain categories of information as confidential in a Commission decision, which requires the development of a confidentiality matrix.¹⁵ Waymo believes that development of a confidentiality matrix in this proceeding is unnecessary and would be time consuming and inefficient. However, if the Commission chooses to address confidentiality on an industrywide basis, any confidentiality matrix the Commission adopts should only apply prospectively, and should not be used to dispose of confidentiality claims that AV operators have already submitted in accordance with the Commission’s existing confidentiality procedures.

¹⁴ G.O. 66-D, § 3.2.

¹⁵ *Id.* § 3.4.

- **Evaluation of potential modifications to CPUC AV regulations following adoption of updated DMV regulations;**

Response: The Commission should consider streamlining existing AV requirements for established operators, defined as those who have been operating under a driverless deployment permit for at least three years. As proposed in Waymo’s opening comments to the OIR, established AV operators should be permitted to: (1) submit data reports on an annual rather than quarterly basis, mirroring the annual data reporting requirements applicable to TNCs, and (2) address passenger safety measures on discrete topics through a Tier 1 advice letter process.¹⁶

- **Or other issues as proposed by parties?**

Response: Due to the strong interest from the public in such a service, the Commission should prioritize authorization of service for teen riders, ages 14-17, in an initial Phase I decision.

- **How should the Commission prioritize resolution of the issues described in the preliminary scope in the OIR and any new issues proposed for inclusion in the final scope?**

Response: The Commission should prioritize authorization of service for teen riders, ages 14-17, in an initial interim decision, and address all other issues in a subsequent decision. For additional discussion regarding Waymo’s position on a service for teen riders please see Waymo’s Opening and Reply Comments on the OIR.¹⁷

II. CONCLUSION

For the reasons described above, Waymo respectfully urges the Commission to adopt Waymo’s recommendations, and avoid imposing additional unnecessary regulatory burdens on AV TCPs.

¹⁶ *Waymo Opening Comments to OIR* at 27-28.

¹⁷ See *id.* at 11-13, and *Waymo Reply Comments to OIR* at 5-7.

