FILED
03/27/26
04:59 PM
C2603035

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Service Employees International Union, California State Council; Service Employees International Union, Local 521; Service Employees International Union, Local 721; Service Employees International Union, Local 1021, Complainants, v. Waymo LLC, Defendant.	Docket No. _____

APPENDIX TO COMPLAINT – EXHIBITS

Scott A. Kronland
Marisa C. Lowe
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: skronland@altber.com
mlowe@altber.com

Attorneys for Complainants

Table of Contents

Exhibit 1

RASIER-CA, LLC:
PLAN REGARDING UNACCOMPANIED MINORS

June 6, 2016

(Pursuant to the Assigned Commissioner's Ruling issued on May 11, 2016 and clarified on May 23, 2016, Rasier-CA, LLC is submitting this report to SED)

Rasier-CA, LLC: Plan Regarding Unaccompanied Minors

How each TNC will prominently notify its app subscribers that the transportation of unaccompanied minors is prohibited.

How each TNC will prominently notify its TNC drivers that the transportation of unaccompanied minors is prohibited, and what actions a TNC driver should take if a ride is requested for an unaccompanied minor.

Users who request trips on the Uber platform must agree to the service's terms and conditions. These terms and conditions expressly require a user to be at least 18 years of age to use the services and to obtain an account:

> [i]n order to use most aspects of the Services, you must register for and maintain an active personal user Services account ("Account"). **You must be at least 18 years of age, or the age of legal majority in your jurisdiction (if different than 18), to obtain an Account**.

(emphasis added). Further, the terms and conditions clearly state that the service is not available for persons under the age of 18 and that a user may not authorize a third-party to use their account or transport unaccompanied minors:

> The Service is not available for use by persons under the age of 18. You may not authorize third parties to use your Account, **and you may not allow persons under the age of 18 to receive transportation or logistics services from Third Party Providers unless they are accompanied by you**.

(emphasis added). These terms and conditions are available at any time at the following webpage: https://www.uber.com/legal/terms/us/.

Rasier-CA, LLC ("Rasier") also provides public notification of its policy regarding the transportation of unaccompanied minors on its webpages for California. First, riders are generally directed to Uber city webpages. These city webpages are

intended as a resource for riders and provide information about policies, services, and available products. The California city webpages include the following language:

> In California, unaccompanied minors are prohibited from traveling with most carriers, including TNCs. In California, a rider must be 18 to sign up for an Uber account, but if a driver believes a rider might be underage, the driver may ask the rider to confirm their age. The driver may also let a rider know that the driver will have to cancel the trip if the rider is indeed under 18. In addition, drivers can report requests to transport unaccompanied minors by submitting in-app feedback.

Second, drivers are directed to the UberMovement webpages. These webpages serve as a resource for driver-partners and outline city- and airport-specific policies and regulations. The California UberMovement webpages include the following language:

> In California, unaccompanied minors are prohibited from traveling with most carriers, including TNCs. In California, a rider must be 18 to sign up for an Uber account, but if you believe a rider might be underage, you can ask them to confirm their age and let them know that you will have to cancel the trip if they are indeed under 18. In addition, you can report requests to transport unaccompanied minors by submitting in-app feedback.

In addition, Rasier-CA will provide drivers with information on its policy regarding unaccompanied minors to its drivers. Rasier-CA is currently working to implement the new requirements adopted in D.16-04-041, including updated driver training and additional notice to drivers. *See* D.16-04-041, at 25-26, 56 (Ordering Paragraph 5). As part of these efforts, both the updated driver training video and the updated driver notice will include a discussion of the prohibition on transporting unaccompanied minors in California.

How each TNC will track and verify that unaccompanied minors are not being transported by a TNC driver.

Rasier-CA relies on its robust feedback system to identify and act on requests to transport unaccompanied minors. Rasier-CA's feedback system seeks input from drivers and riders in order to monitor incidents occurring on the platform as well as driver and rider behavior. Rasier-CA is able to review feedback in order to identify requests to transport unaccompanied minors. Rasier-CA can then issue warnings to riders and driver-partners who use its digital platform to transport unaccompanied minors. In some instances, riders' and driver-partners' accounts may also be deactivated.

Additional tracking or verification requirements would be unnecessarily intrusive and burdensome. For instance, requiring drivers to check personal identification of riders would require riders to expose substantial amounts of personally identifying information to their drivers. This information could include a rider's full name, home address, and date of birth. More problematically, such a requirement could potentially deny mobility to historically underserved portions of the population. These individuals may not have the most common documentation used to verify age. For example, according to a 2006 study conducted by the Brennan Center for Justice, "[a]s many as 11 percent of United States citizens--more than 21 million individuals--do not have government-issued photo identification."[1] The individuals who lack photo identification also tend to be from historically underserved communities, including the elderly, minorities, and those with lower income.[2] To require a rider age verification system would risk systematically

[1] Brennan Center for Justice, *Citizens without Proof*, November 2006, at 3, *available at*: http://www.brennancenter.org/sites/default/files/legacy/d/download_file_39242.pdf.
[2] *Id.*

preventing these individuals from accessing the affordable transportation option that TNCs offer.

TNCs should not be singled out and required to further track and verify that unaccompanied minors are not being transported on a trip-by-trip basis. Rasier-CA is not aware of requirements for other transportation providers regulated by the Commission to track and verify this information. Since at least 1990, the Commission has been aware that limousine operators and other charter-party carriers sometimes transport unaccompanied minors,[3] but the Commission has not required these carriers to track and verify that unaccompanied minors are not being transported. Imposing such a requirement on TNCs would unfairly single out TNCs from other regulated transportation companies.

How each TNC will enforce the prohibition against transporting unaccompanied minors.

What actions each TNC will impose on the TNC app subscriber that requests that a TNC driver transport an unaccompanied minor.

What actions each TNC will impose on the TNC driver that transports an unaccompanied minor.

Riders

Rasier-CA deactivates a rider's account when Rasier-CA receives information leading it to believe that the account holder is a minor. The rider's account will remain deactivated until the account holder is able to provide photo identification that

[3] 37 CPUC 2d 124, 1990 Cal. PUC LEXIS 691 *3-4 ("In this regard, we are mindful that limousine operators and other charter-party carriers sometimes transport unaccompanied minors, particularly during prom season.").

demonstrates he or she is age 18 or older. Rasier-CA will continue to apply and enforce this policy.

In addition, Rasier-CA is in the process of implementing an updated enforcement policy that will address account holders who use their accounts to transport unaccompanied minors who are not the account holders. Under this policy, when Rasier-CA is informed that a rider has requested a trip on its digital platform for an unaccompanied minor, the account holder will be notified that he or she has violated Rasier-CA's policy. If Rasier-CA continues to receive reports of such activity, the rider's account will be permanently deactivated.

Drivers

Rasier-CA continues to consider ways to improve its policy by also addressing driver-partners who are reported as transporting unaccompanied minors. Rasier-CA's policy will seek to ensure compliance with the Commission's rules while ensuring that driver-partners are not unfairly penalized. Under this policy, if Rasier-CA receives multiple reports that a driver-partner transported an unaccompanied minor, the driver-partner will be permanently deactivated. Because riders are in the best position to know whether an unaccompanied rider is a minor, Rasier-CA will consider mitigating factors, such as whether a driver-partner self-reported a violation. Rasier-CA believes that encouraging self-reporting is important in order to avoid unintended safety consequences. For example, a driver-partner might accept a trip, only to see that the passenger may be an unaccompanied minor. The driver-partner might have concerns about the rider's safety given the surrounding neighborhood, the time of day, or other factors. If so, the driver-partner may reasonably believe that the best course of action is to transport the

minor, and then report the trip to allow Rasier-CA to take action against the rider account holder. Similarly, Rasier-CA's policy will be focused on driver-partners who have knowingly transported an unaccompanied minor. Rasier-CA believes that this updated policy balances important safety considerations and fairness to its driver-partners while holding driver-partners accountable for complying with the Commission's rules and regulations.

If a TNC is planning to expand its services to include the transport of unaccompanied minors, including where such service is one of a range of services offered by the TNC, its plan for meeting the requirements of D.16-04-041 and D.97-07-063 and requesting Commission approval of its license to perform such operations before initiating the service.

Currently, Rasier-CA does not have plans to expand its product offerings in California to include services that target the transportation of unaccompanied minors. Should Rasier-CA determine that it will expand its services in that area, Rasier-CA will follow up with the Commission.

Exhibit 2

June 6, 2016

Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE. REPORT OF LYFT, INC. REGARDING UNACCOMPANIED MINORS

In response to *Assigned Commissioner's Ruling Ordering the Submittal of Plans from Transportation Network Companies that Do Not Primarily Transport Unaccompanied Minors* of May 23rd, 2016 (the "Order"), Lyft, Inc. ("Lyft") submits the following report regarding its plans and current practices to prevent the use of its platform by unaccompanied minors.

As Lyft explained in its comments during Phase II, it is Lyft's policy that unaccompanied minors are not permitted to access or use the platform. Lyft users are required to be at least 18 years of age, and it is Lyft's stated policy that unaccompanied minors are not permitted to take Lyft rides on their own. This report sets forth the measures that Lyft currently takes to ensure that unaccompanied minors do not use the platform, as well as Lyft's plans to enhance these measures.

1. HOW EACH TNC WILL PROMINENTLY NOTIFY ITS APP SUBSCRIBERS THAT THE TRANSPORTATION OF UNACCOMPANIED MINORS IS PROHIBITED

Prior to being able to access or utilize the Lyft application (the "app"), Lyft requires that every user (passengers and drivers) certify that he or she is over the age of 18, through the following process:

Each user that creates an account with Lyft is required to consent to our Terms of Service ("Terms"). The second section of Lyft's Terms establish the eligibility criteria for use of the app, including age:

> **2. Eligibility**
>
> The Lyft Platform is available only to, and may only be used by individuals who can form legally binding contracts under applicable law. Without limiting the foregoing, the Lyft Platform is not available to children (persons under the age of 18) or Users who have had their User account temporarily or permanently deactivated. By becoming a User, you represent and warrant that you are at least 18 years old and that you have the right, authority and capacity to enter into and abide by the terms and conditions of this Agreement.

As part of the sign-up process, all users must consent to these Terms, and represent and warrant that they are over 18 years old. Accordingly, as a threshold measure, no person can access the Lyft app without certifying that they meet this age requirement.

In addition to this conspicuous requirement in the Terms, Lyft also notifies users of the age requirement on its "Safety Policies" webpage of the online help center. This language can be seen here: https://help.lyft.com/hc/en-us/articles/213584258-Safety-Policies]

Finally, every landing page for our California cities (e.g. https://www.lyft.com/cities/los-angeles) will remind passengers and drivers that unaccompanied minors are not permitted to use the Lyft platform with the followig language:

In California, unaccompanied minors are prohibited from traveling with most carriers, including TNCs. In California, a passenger must be 18 to sign up for Lyft account, but if a driver believes a passenger might be underage, the driver may ask the passenger to confirm their age. The driver may also let a passenger know that the driver will have to cancel the trip if the passenger is indeed under 18. In addition, drivers can report requests to transport unaccompanied minors by contacting Lyft support.

This is the primary landing page where users look for local information about rates, coverage areas, and airports, and therefore we believe is an effective way to reinforce this message.

The minimum age requirement is clearly presented in the app itself, the signup process, and on the website. We believe these notifications are more than sufficient to

notify app subscribers that unaccompanied minors are not permitted to access the Lyft platform.

2. HOW EACH TNC WILL PROMINENTLY NOTIFY ITS TNC DRIVERS THAT THE TRANSPORTATION OF UNACCOMPANIED MINORS IS PROHIBITED, AND WHAT ACTIONS A TNC DRIVER SHOULD TAKE IF A RIDE IS REQUESTED FOR AN UNACCOMPANIED MINOR.

By communicating the age requirement up-front and on a recurring basis, as well as on multiple online driver resources, we are confident that drivers will be well aware of their obligation not to transport unaccompanied minors.

Lyft communicates its safety standards – including the prohibition on transporting unaccompanied minors – on Lyft's website as well as on various driver training materials.[1] For example, the Lyft online help center provides this guidance for drivers:

Don't pick up minors unaccompanied by an adult

Passengers are more than welcome to request rides for their friends, though we do ask that they give you a heads up. Children 17 or under, however, are not permitted to ride without being accompanied by an adult.

[1] https://help.lyft.com/hc/en-us/articles/214218427-Ensuring-Passenger-Safety-as-a-Driver , and https://help.lyft.com/hc/en-us/articles/213584258-Safety-Policies

...

Age Requirement

In California, unaccompanied minors are prohibited from traveling with most carriers, including TNCs. In California, a passenger must be 18 to sign up for Lyft account, but if a driver believes a passenger might be underage, the driver may ask the passenger to confirm their age. The driver may also let a passenger know that the driver will have to cancel the trip if the passenger is indeed under 18. In addition, drivers can report requests to transport unaccompanied minors by contacting Lyft support.

In addition to the website and the Terms, Lyft plans to reinforce this age requirement by ensuring that it is communicated both at the onboarding stage and at regular intervals once drivers are on the road. To this end, we plan to include within our new driver onboarding information to applicants that they are not permitted to transport unaccompanied minors. This message will then be reinforced with reminders to the drivers, sent at least on a quarterly basis. One such driver-focused communication is the "driver digest" email newsletter, which provides drivers with tips and updates, as well as key information about local rules and requirements. Another channel for reinforcing this message is the driver help center.

If a driver suspects that a ride is being requested for an unaccompanied minor, the driver should alert Lyft's support team immediately, and Lyft will reach out to the user to

alert them this activity is prohibited. As shown above, these instructions are included on Lyft's website.

3. HOW EACH TNC WILL TRACK AND VERIFY THAT UNACCOMPANIED MINORS ARE NOT BEING TRANSPORTED BY A TNC DRIVER

Lyft has a number of measures in place to track and verify that unaccompanied minors are not being transported by a TNC driver:

- Passengers signing up to use the Lyft app must follow the same process outlined above in response to Question 1. Therefore, each user that requests a ride through the application has already verified that he or she is over 18, and will have been informed through the Terms that the transportation of unaccompanied minors is strictly prohibited.
- Lyft also has measures in place to prevent unaccompanied minors from being transported by a TNC driver. The app provides drivers with the first name and image provided by the person associated with the account. Lyft instructs drivers to

ask riders "what's your name?" when they arrive at the pickup location, and to ensure it matches the name provided in the app.[2] This serves the dual purpose of ensuring that the right passenger gets in the right vehicle, and also helps to verify that the passenger has consented to the Terms.

- Lyft also has a robust complaint management and tracking system, which enables it to track complaints by driver, and type of complaint. These complaints can easily be submitted directly through the app, by phone, or by email.

We believe these measures are more than sufficient to track and verify that unaccompanied minors are not accessing the platform.

4. HOW EACH TNC WILL ENFORCE THE PROHIBITION AGAINST TRANSPORTING UNACCOMPANIED MINORS

Currently, Lyft treats reported violations of the age requirement in the same manner as other violations of the Terms – in which drivers and passengers can be deactivated depending on severity and other aspects of the reported offense. As explained in more detail below, if Lyft receives multiple complaints that this type of prohibited activity is occurring, the driver or passenger account will be deactivated.

[2] https://help.lyft.com/hc/en-us/articles/214219587-Picking-up-the-Wrong-Passenger .

5. WHAT ACTIONS EACH TNC WILL IMPOSE ON THE TNC APP SUBSCRIBER THAT REQUESTS THAT A TNC DRIVER TRANSPORT AN UNACCOMPANIED MINOR

If Lyft receives complaints that the user is a minor, a Lyft employee will contact the user to verify their age. In the event that the user is under the age of 18, the account will be immediately deactivated, as it is a violation of our Terms for an account holder to be under 18 years of age.

If, instead, Lyft receives a complaint that a user is requesting rides on behalf of unaccompanied minors, Lyft will reach out to the user to alert the user that requesting a Lyft on behalf of unaccompanied minors is prohibited, and a violation of Lyft's Terms. If Lyft receives multiple complaints that this type of prohibited activity is occurring, the passenger's account will be deactivated.

6. WHAT ACTIONS EACH TNC WILL IMPOSE ON THE TNC DRIVER THAT TRANSPORTS AN UNACCOMPANIED MINOR

If Lyft receives a complaint of a driver transporting unaccompanied minors, Lyft will reach out to the driver to provide additional training and reminders that this type of activity

is prohibited. If Lyft receives multiple complaints that this type of prohibited activity is occurring, the driver's account will be deactivated.

7. IF A TNC IS PLANNING TO EXPAND ITS SERVICES TO INCLUDE THE TRANSPORT OF UNACCOMPANIED MINORS, INCLUDING WHERE SUCH SERVICES IS ONE OF A RANGE OF SERVICES OFFERED BY THE TNC, ITS PLAN FOR MEETING THE REQUIREMENTS OF D.16-04-041 AND D.97-07-063 AND REQUESTING COMMISSION APPROVAL OF ITS LICENSE TO PERFORM SUCH OPERATIONS BEFORE INITIATING THE SERVICE.

Lyft currently has no plans to expand its services to include the transport of unaccompanied minors in California.

Dated: June 6, 2016

LYFT, INC.

By: _____

Andrea Ambrose Lobato
Director, Regulatory Compliance

Exhibit 3

August 11, 2023

Rides
The Waymo Team

Fully autonomous vehicles were once the unimaginable future. For many San Franciscans they're now a daily reality and an essential mode of transportation. Since late 2022, thousands of SF residents across all neighborhoods have relied on our fully autonomous Waymo One service to get around the city 24/7.

Now, we're making the experience available to more people.

Today, Waymo received its driverless deployment permit from the California Public Utilities Commission (CPUC), the final step in a robust process with regulators before we could offer a paid fully autonomous ride-hailing service in San Francisco. In the coming weeks, we'll begin charging fares for rider-only trips in the city and gradually welcoming more riders into the service.

"Today's permit marks the true beginning of our commercial operations in San Francisco," said Tekedra Mawakana, co-CEO of Waymo. "We're incredibly grateful for this vote of confidence from the CPUC, and to the communities and riders who have supported our service. We can't wait for more San Franciscans to experience the mobility, safety, sustainability and accessibility benefits of full autonomy for themselves — all at the touch of a button."

With over 100,000 signups (and counting) on our waitlist, we expect demand will be incredibly high. So to ensure riders receive a reliable service and our expansion is gradual, we'll be welcoming new riders to Waymo One incrementally.

"I started riding with Waymo through an ongoing partnership between Waymo and the Women's Building where I work," said Olivia Glowacki, Development Associate at The Women's Building.

“While at first I was hesitant to try it out, I can now say that I trust Waymo's autonomous vehicles to get me around the city in a safe manner that not only protects me, but protects hundreds of pedestrians, bicyclists, and other San Franciscans.”

More riders will also be able to ride across all of the city, from Bernal Heights to Fisherman’s Wharf, and from Bayview to Lands End. Over a thousand riders have already been enjoying fully autonomous trips across all of San Francisco, and we’ll make it available to everyone over time.

Waymo One is already serving over 10,000 rides every week to members of the public — with no human behind the wheel — across both San Francisco and Phoenix. Parents use Waymo when picking their kids up from soccer practice, hospital staff to get to work, individuals with disabilities to get around independently and seniors to stay connected to their community.

“Being almost eighty years old, I have given up driving,” said Zak Kong, a long-time San Francisco resident. “Being in a Waymo vehicle is not only exciting, but a safe and easy way for me to get around San Francisco. I love the way Waymo navigates through city traffic and it is priceless to be able to relax while I safely get where I need to go.”

There’s a critical need to improve the safety of our roads. Nearly 43,000 people died on U.S. roads in 2022—an average of 117 per day. Early data indicates the Waymo Driver is already reducing traffic injuries and fatalities in the places where we operate. In our first million miles of fully autonomous driving, we had no reported injuries, no collisions involving pedestrians or cyclists, and every vehicle-to-vehicle event involved rule violations or dangerous behavior on the part of the human drivers.

The technology behind the Waymo Driver is also

constantly improving, learning from every mile it drives. From handling heavier levels of rain and fog to smoothly navigating construction zones and improved rerouting around emergency scenes — we're seeing strong performance and rapid ongoing advancements across the board.

We take a careful, gradual approach to expanding our technology, guided by our safety framework. We'll continue to work closely with policymakers, regulators, first responders, advocates for road safety and the cities in which we operate to ensure our service has a positive impact on mobility and the community overall.

We would like to thank our riders, community advocates, and the residents of this city, whose support has enabled this exciting new chapter of fully autonomous technology in San Francisco. We're thrilled to bring you on board, and can't wait for you to experience fully autonomous rides firsthand. If you'd like to sign up to ride, download the Waymo One app on the App Store and Google Play.

Exhibit 4

March 13, 2024

Rides

The Waymo Team

Later this year, Waymo One will be offering rides to the public in four major cities.

Starting tomorrow, March 14, our fully autonomous ride-hailing service will be available to select members of the public in Los Angeles. And after starting initial rider-only testing in Austin last week, we plan to offer Waymo One to Austinites later this year.

This exciting news was shared by Waymo co-CEO, Tekedra Mawakana, during a featured session at SXSW today in Austin, Texas.

“Once an unimaginable future, autonomous driving is now a real-world way of getting around for tens of thousands of people each week,” said Mawakana. “After achieving key milestones in each city, we're so excited to bring the safety, comfort and delight of our Waymo One service to more people in Los Angeles and Austin this year.”

In LA, we’ll begin by offering rides in a 63 square mile area from Santa Monica to Downtown LA, scaling our operations over time. These initial rides will be free, and with the California Public Utilities Commission’s recent approval, we will transition to paid service in the coming weeks. We’ll permanently welcome riders into our service, gradually onboarding the more than 50,000 people on our LA waitlist and continuing to hand out temporary codes at local events throughout the city.

Exhibit 5

November 12, 2024

Rides

The Waymo Team

Roll out the red carpet. Starting today, anyone in Los Angeles can take fully autonomous rides 24/7 with Waymo One – rolling through Santa Monica, Hollywood Boulevard, USC, and everything in between.

Waymo has enjoyed a warm welcome from Angelenos since we began commercial operations in LA earlier this year, with nearly 300,000 people joining our waitlist. We've opened our doors to those eager riders over time, who have taken hundreds of thousands of paid trips across the city and highly rated them at 4.7 / 5 stars on average. In fact, riders recently surveyed in LA said that 98% are satisfied with our service and 96% find it useful.

"Now is an exciting time to welcome everyone in Los Angeles along for the ride," said Tekedra Mawakana, co-CEO, Waymo. "Our service has matured quickly and our riders are embracing the many benefits of fully autonomous driving. We're so grateful to all of our first riders in LA, and we can't wait to serve more riders soon."

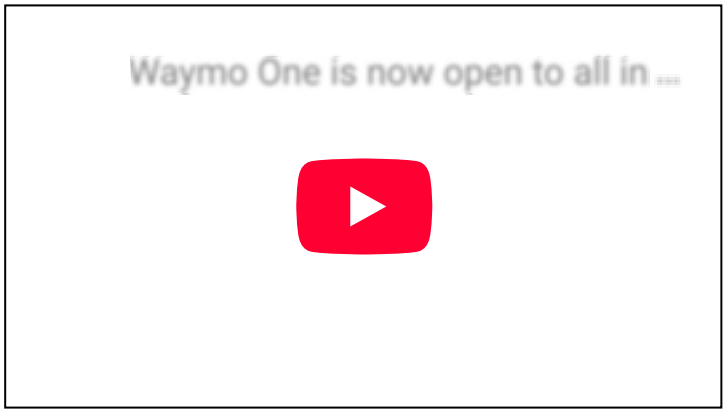
Riders can now traverse nearly 80 sq miles of LA County, and we intend to grow our service area to cover more of the city in the future. We look forward to welcoming many first-time riders and welcoming back those we've served over the last year, as we steadily scale our service over time just as we've done in San Francisco and Phoenix.

Our LA riders have fully embraced the convenience and freedom of riding with Waymo One. With the Waymo Driver at the wheel, people are reclaiming their time in LA traffic to be more productive – or not – as they wish. Whether it's taking extra time to run lines before an audition, filming social media videos, or simply taking a beat to relax, Angelenos

are increasingly incorporating Waymo into their daily lives.

As we open our doors to more people, we're working closely with local community partners aligned with our mission to make roads safer and mobility more accessible. For example, we're proud to work with She is Hope, a nonprofit dedicated to empowering single mothers in Los Angeles.

"Riding with Waymo was an incredible experience—smooth, safe, and truly impressive," said Tisha Janigan, founder of She is Hope. "When I rode alone and with some of our single mother families, we were amazed by the driverless technology and the sense of comfort it provided. Access to Waymo could be a game-changer for women we serve, offering a nonjudgmental, reliable transportation option that prioritizes safety."



Waymo's also proud to serve as the Official Ride-Hail Partner of the Los Angeles Auto Show. If you'll be in town and attending the show running November 22 - December 1, join us to learn more.

We're eager for more people to experience the many benefits of fully autonomous driving. To ride in LA, SF, or Phoenix, simply download the Waymo One app and ride today.

Exhibit 6

Exhibit 7

Sean O'Kane 1:50 PM PST · January 23, 2026

IMAGE CREDITS: WAYMO

The National Transportation Safety Board (NTSB) has opened an investigation into Waymo after its robotaxis have been spotted illegally passing stopped school buses numerous times in at least two states.

The NTSB is specifically focusing on the more than 20 incidents that have occurred in Austin, Texas, it said in a post on X on Friday.

“Investigators will travel to Austin to gather information on a series of incidents in which the automated vehicles failed to stop for loading or unloading students,” the NTSB said in a statement to TechCrunch. A preliminary report is expected within 30 days, and the safety board will publish a more detailed final report in 12 to 24 months.

It’s the first time Waymo has been investigated by the NTSB, but it’s the second investigation launched into Waymo over its school bus problem. The National Highway Traffic Safety Administration’s (NHTSA) Office of Defects Investigation opened a similar probe in October.

Waymo also issued a software recall last year to address the problem. But previous software updates have not been enough to stamp it out, and in Austin, Texas — where the bulk of incidents have been captured on camera — the school district has asked the company to suspend operations during pickup and drop-off times.

The new investigation comes as Waymo is in the middle of a rapid expansion around the United States. Just this week, the company started offering a robotaxi service in Miami, adding to its operations in Atlanta, Austin, Los Angeles, Phoenix, and the San Francisco Bay Area.

“We safely navigate thousands of school bus encounters weekly across the United States, and the Waymo Driver is continuously improving. There have been no collisions in the events in question, and we are confident

that our safety performance around school buses is superior to human drivers," Mauricio Peña, Waymo's chief safety officer, said in a statement to TechCrunch. "We see this as an opportunity to provide the NTSB with transparent insights into our safety-first approach."

The NTSB is different from the NHTSA in that it is not a federal regulatory agency. It cannot issue fines or penalties. Rather, the safety board usually performs deep investigations to identify root causes of problems in the transportation world. When an investigation is complete, the board often holds hearings and issues non-binding recommendations.

The first notable incident where a Waymo vehicle passed a stopped school bus happened last September in Atlanta. The Waymo pulled out of a driveway and crossed perpendicularly in front of the school bus from the bus' right side. The robotaxi then turned left and proceeded down the street while kids were getting off the bus.

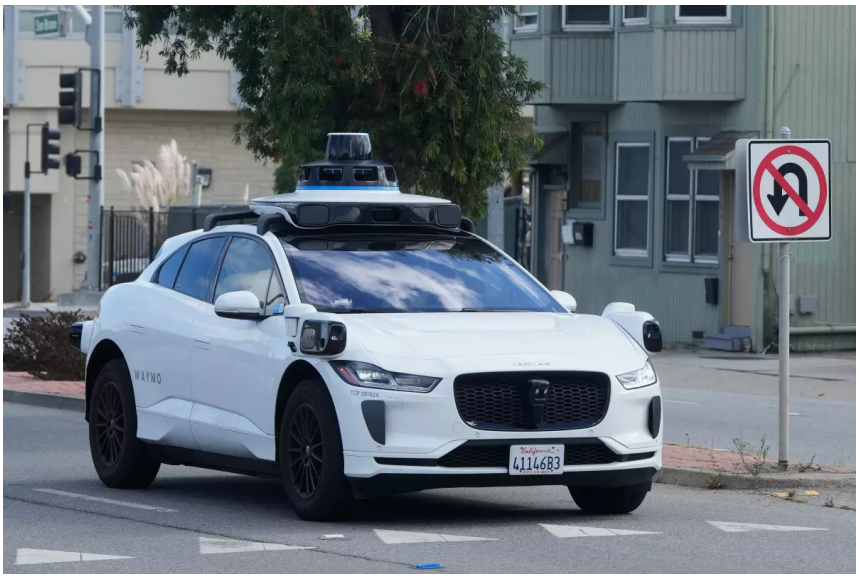
Waymo said at the time that the vehicle was unable to see the stop sign or flashing lights, and has since said that it addressed this particular scenario with a software update.

But as Waymo patched the specific scenario it encountered in Atlanta, some of the company's vehicles were caught passing stopped school

Exhibit 8

BUSINESS

Waymounder scrutinyafterhitting childnearSanta Monicaelementary school



Waymoisunderscrutinyafteroneofitsautonomoustaxisstrucka childnearaSantaMonicaelementaryschoolduringdrop-o ff,leaving thechildwithminorinjuries. (Je ffChiu/AssociatedPress)

ByCarolinePetrow-CohenandSalvadorHernandez

Jan.29,202611:37AMPT

- AWaymoautonomoustaxistrucka

childnearaSantaMonica elementaryschoolduringdrop-o ff, leavingthechildwithminorinjuries.

- Thechildranfrombehindaparked SUVintotra ffic;thevehiclebraked hard,reducingspeedfrom17mphto 6mphbeforeimpact.
- Theincidenttriggeredafederal safetyinvestigation,withWaymo claimingitsautonomoussystem preventedgreaterinjury.

AWaymoself-drivingtaxirecentlystruckachild nearaSantaMonicaelementaryschoolduring drop-offhours,triggeringaninvestigationinto theincidentbytheNationalHighwayTraffic SafetyAdministration.

Thechildsustainedminorinjuries, Waymosaid . Afterbeingstruck,thechildstoodupandwalked tothesidewalk,wherewitnessescalled911.

SantaMonicaPolicesaidofficersrespondedto theJan.23incidentnear24thandPearlstreets, closetoGrantElementarySchool.Afterbeing evaluatedbyrespondersfromthefire department,thechildwasreleased.

Theinvestigation saidthechildwasrunning acrossthestreettowardtheschoolwhenthey werehit.Waymosaidthechildappearedfrom

behindalargeSUV.

CALIFORNIA

SantaMonicaordersWaymotostop noisyovernightoperationsatcharging stations.Neighborsrejoice

Nov.24,2025

“Theeventoccurredwhenthepedestrian suddenlyenteredtheroadwayfrombehindatall SUV,movingdirectlyintoourvehicle’spath,” Waymosaidinastatement.“TheWaymoDriver brakedhard,reducingspeedfromapproximately 17mphtounder6mphbeforecontactwasmade.”

Therewereotherchildren,acrossingguardand severaldouble-parkedvehicles inthevicinity whentheaccidentoccurred,accordingtoNHTSA.

WaymoreportedtheincidenttotheNHTSA OfficeofDefectsInvestigationandsaiditwould fullycooperate.TheWaymoinvolvedwas

operatingonthecompany'sfifth-generation automateddrivingsystemwithoutasafetydriver.

Thecompanysaidtheincidentdemonstratedthe safetybenefitsofWaymo.

"Our peer-reviewedmodel showsthatafully attentivehumandriverinthissamesituation wouldhavemadecontactwiththepedestrianat approximately14mph,"thestatementsaid."This significantreductioninimpactspeedandseverity isademonstrationofthematerialsafetybenefit oftheWaymoDriver."

CALIFORNIA

WaymokilledKitKat.California neighborhoodmournsacorner-store cat

Nov.3,2025

AspokespersonforthecityofSantaMonica referredquestionstopolice.

SantaMonicasuedWaymoinDecemberafterit orderedthecompanytoceaseovernight operationsoftwochargingstationsforthe autonomousvehicles.Waymoinsuedthe city,allegingthatcityofficialswereawarethe chargingfacilitieswouldbeoperating24hoursa dayandmaintainacommercialelectricvehicle fleet.

TheAlphabet-ownedcompanyalsocameunder firelatelastyearforrunningoverandkilling KitKat,abelovedneighborhoodcatinSan Francisco.WeekslateranotherWaymohitan unleasheddoginthecity.

CALIFORNIA

‘Waymoproblems’:Manjumpsinto trunkofdriverlesstaxiinL.A.,gets stuckandisremovedbypolice

Dec.11,2025

Video evidenceshowsthatKitKatlingeredunder thevehicleforseveralsecondsbeforeitpulled away,crushinghim.Awomanwascrouched besidethecar,tryingtolureKitKattosafety.A humandrivereasilywouldhavenoticed somethingwasn’tright,criticssaid.

WaymohasbeenthesubjectofseveralNHTSA investigationsandrecalls ,includingarecallof morethan1,200vehicleslastyearbecauseofa softwaredefectthatledtoaseriesofminor crashes.

WaymolaunchedtsservicesinLosAngelesin 2024andcoversmorethan120squaremilesof thecounty,notincludingLosAngeles InternationalAirport.Thecompanygotitsstart astheGoogleSelf-DrivingCarProject,which beganin2009andputitsfirstautonomouscaron theroadin2015.Theprojectrebrandedas

Waymoin2016underGoogle’sparentcompany andlaunchedits driverless ride-hailing service knownasWaymoOnein2020.

MoretoRead

WhyareWaymovehicles failingtostopforschool buses?

Jan.26,2026

California’sTeamsterscall forWaymoban,saying driverlesscarsthreaten safetyandjobs

Feb.2,2026

WaymosuesSantaMonica, andthecitysuesright back:Courtfightahead

Dec.23,2025

Insidethebusinessofentertainment

TheWideShotbringsyounews,analysisandinsightson everythingfromstreamingwarstoproduction—andwhatit allmeansforthefuture.

Bycontinuing,youagreetoour TermsofServiceandour Privacy Policy.

Enteremailaddress

Agree&Continue

CarolinePetrow-Cohen

CarolinePetrow-Cohenisa BusinessreporterattheLos AngelesTimescoveringelectricvehiclesand aviation.SheisagraduateofDukeUniversity, whereshestudiedjournalism,Englishand environmentalscienceandpolicy.

SalvadorHernandez

SalvadorHernandezisareporter ontheFastBreakDesk,theLos AngelesTimes'breakingnewsteam.Before joiningthenewsroomin2022,hewasasenior reporterforBuzzFeedNews,wherehecovered criminaljusticeissues,thegrowingmilitia movementandbreakingnews.Healsocovered crimeasareporterattheOrangeCountyRegister.

HeisaLosAngelesnative.

Exhibit 9

Because families have complicated schedules.

Listen to this article · 7:44 min Learn more


By Corina Knoll Photographs by Mark Abramson

Jan. 5, 2026

A light drizzle had begun in South Los Angeles when the sound of a school bell unleashed a stream of students onto the sidewalk. Clad in gray skirts and purple polo shirts, the uniform at the all-girls public school, students climbed into school buses or scanned the scrum of cars hopefully for a parent arriving on time in the November rain.

Alexis Munoz — a 13-year-old with wavy hair and a smile threaded with braces — ambled away from the scene and up to a busy street. A white Jaguar sport utility vehicle came into view and pulled over, its spinning cameras and sensors hinting at an empty driver's seat.

The robot car had come to take her home.

"There's no one in there, so I don't have to worry about being awkward," said Alexis, a shy seventh-grader, before climbing in with her backpack.

When Waymo's robotaxis arrived in Los Angeles in 2024, they seemed a futuristic gimmick that many believed would flounder in a city whose identity was built on cars — the human-behind-the-wheel kind — where drivers have little patience for one another, let alone those who do not exist.

Still, the autonomous cars drew fans. And a subset of users recognized that taxis devoid of strangers could offer an even more revolutionary service: chauffeuring teens and tweens in place of their harried parents.

It is a life hack taking root in the five markets where Waymo's service is available to the public, but there is something profound about the possibilities in Los Angeles, where urban sprawl, soul-crushing traffic and a cumbersome public transit system are the great afflictions of working parents.

Here, it is not unusual for families to have multiple children attending different schools far from home. School buses, if you are deemed eligible, are limited to dropping off and picking up children at locations and times that are often unhelpful. The city bus, if there is

The affluent turn to the nanny, while others seek the unicorn: a reliable, affordable caregiver available solely to perform drop-offs and pickups. But most tackle these family logistics on their own. Add soccer practice and music lessons and doctors' appointments, and so begins a tormented dance of the privileged, to-ing and fro-ing through rush hour as any zest for life disintegrates.

Which brings us to robots handling our precious cargo, a notion rooted in science fiction that is, astonishingly, now happening for kids like Alexis.

"You have these very limited resources, and you just have to do what you have to do," said her mother, Veronica Rivera.

Ms. Rivera, a psychiatric social worker, is stuck at work until 6 p.m. most days, while her husband, who installs and repairs glass, comes home even later.

The couple struggles to coordinate their jobs and their three children. They tried Uber, and Lyft, but found that those drivers tended to cancel after discovering their riders were minors. They turned to HopSkipDrive, a service geared toward students, but the drivers had to be scheduled in advance, and would leave if children were late.

Then, a few months ago, Ms. Rivera and Alexis did a test run with Waymo.

"It was the only option where I was like, 'Oh my God, she can order a car, nobody's in there, she can unlock it with her phone,'" Ms. Rivera, 42, said. "I know she's going to be safe and she's going to get home."

Those already alarmed by the idea of self-driving cars will likely be appalled by parents who would willingly use them to cart their children around. Skeptics tally a growing list of mishaps. In November, as police conducted an arrest in downtown Los Angeles, a Waymo car was spotted almost jauntily driving through the intersection, seemingly oblivious to the row of police cars and a man lying on the street.

There is, however, a snag in the whole operation — one unknown to most Waymo users. California law prohibits the transportation of those under 18 years of age without an adult in an autonomous vehicle.

Waymo has endorsed the robotaxi and adolescent pairing, launching a program over the summer in the Phoenix metro area for those aged 14-17. According to a Waymo spokeswoman, the company may seek to add accounts for teenagers in California as the state's rules evolve.

For now, in Los Angeles, Waymo as child chauffeur is primarily a middle- and upper-class practice, although robotaxis have been spotted ferrying young passengers from all corners of its domain. Parents say the cost is comparable to that for other rideshare apps, cheaper than hiring a caregiver and worth it for the extra set of wheels. Their children say the highlights are access to independence and social outings.

There are, of course, concerns about what exactly the kids are doing while alone in the cars.

"We listen to music and just, like, chill," explained Joshua Levy, 14, on a recent Tuesday outside Beverly Hills High School. He was preparing to order his own Waymo car, a reprieve from his usual 40-minute walk home.

"If you try to do anything, it's like, they'll just catch you," added his friend Luca Mchedlishvili, also 14, referring to the car's internal cameras, which can spot any high jinks, say, if more than four people try to wedge themselves inside.

As the two freshmen lingered on the sidewalk along with a straggle of other teens, several Waymo cars pulled up to the curb to pick up students. They were barely noticed.

Exhibit 10

Laura Mancuso was in a bind.

Her 15-year-old daughter needed a ride from their home in North Beach to a friend's house in the Balboa Park neighborhood. It was after dusk on a Saturday in November. Driving across town would have taken a couple of hours round-trip, Mancuso estimated. In any case, neither she nor her husband could swing it; she was attending an event while he looked after their younger son.

So they hailed a Waymo.

- **Read more:** Inside Daniel Lurie's handling of Waymo crisis during S.F. power outages
- **Also:** Waymo wants to be Big Tech's nice guy. Will San Francisco buy it?
- **Related:** Waymos are now coming for your coveted San Francisco parking spots

"We just realized it would make our lives easier," Mancuso said, recalling how they installed the app on their daughter's phone, and connected it to her husband's account. The ride cost $39.75 after a 20% promotional discount from Waymo. Other than sticker shock, Mancuso had no complaints.

hail drivers, more dependable than public transit, highly preferable to a 16-year-old friend who just got a license, and definitely essential in situations that might involve alcohol. Not to mention that robotaxis make the ideal of free-range parenting newly attainable.

“It’s really become part of our culture,” said Megan Schmidt, a mother in the Inner Richmond who considers Waymo a vital form of mobility for her 14-year-old daughter and 11-year-old son. Like other moms, Schmidt said that AVs have helped her reclaim a lot of time, some of which she can spend socializing with other parents.

“Now we’ll be hanging out at someone’s house, the kids will need a ride, we’ll say, ‘get them a Waymo,’” Schmidt said, noting that all the kids have the Waymo app on their phones.

The trend has many societal implications. Some parents joke that driving might become an obsolete skill or cease to be a rite of passage. Others revel in their children’s newfound independence, and in the sense of security that an autonomous vehicle provides.

“If my daughter calls because she is out on Ocean Beach, which is where kids gather on the weekends, and it’s 10 p.m., and I’ve had a martini, then I’m not going to say, ‘Oh, take the 38 (Muni bus),’” Mancuso said. “Apart from the expense, which is annoying, I have no issues” with an AV driving her home.

drudgery of driving. “But what if one day you have a kid in a Waymo,” he said, “and something really bad happens?”

Enforcement isn’t that easy. While Waymo cars have interior cameras that help identify terms of service violations, including those related to age eligibility, it’s not an exact science. Representatives of the company say they try to respect customers’ privacy. To some degree, the honor system prevails.

“There are instances we are aware of, as some of them are publicly reported, where parents have used Waymos for transportation of minors,” the company’s attorney, Jack Stoddard, told an administrative judge during a recent California Public Utilities Commission proceeding. Stoddard noted that the parents who book rides for unchaperoned minors are breaching the terms of service, and subject to suspension if discovered.

Such warnings might give some parents anxiety, but not enough to deter them from using Waymo. If anything, demand seems to be growing.

“My daughter has to go to a lot of volleyball practices, games, slumber parties and other engagements, and I want to give her the option to get home when I’m not available,” said a Presidio Heights mother who did want to be named, for fear

From her perspective, robotaxis have given both of them more freedom.

Waymo responded to similar interest in another market, Phoenix, by introducing teen accounts for riders ages 14 to 17 — with the stipulation that each be linked to a parent or guardian. The feature, launched last July, was pitched as a tool for parents who want to give their children more autonomy while still being able to track their trips. It drew instant buzz.

make new rules and policies for autonomous vehicles. Children's use of robotaxis was among the items up for discussion, though at this point it's unclear where regulators would land.

Labor leaders, taxi operators and other government agencies have weighed in. In written comments submitted in October, officials at the San Francisco County Transportation Authority recommended that the commission keep its prohibition on unaccompanied minors. It would be premature to allow children into autonomous vehicles by themselves, members of the Transportation Authority argued, "given the nascent state" of the industry.

They have reason to be skeptical. During the Dec. 20 blackouts in San Francisco, Waymo vehicles became immobilized in intersections where stoplights went dark. The strange scenes raised questions about the cars' behavior in a disaster scenario, and incited worry among parents who had planned for Waymo to carry their kids home that day.

"It was apocalyptic," said the Presidio Heights mom, whose daughter found she was unable to book a Waymo home from Stonestown Mall during the outage. Her mom was at an event and had no access to a car to pick the girl up. Ultimately, she spent an hour and a half on Muni, which also faced disruptions.

That experience "was a nightmare," the mom said. But it hasn't shaken the family's trust in robotaxis.

Last week, the daughter called her mom from the Golden Gate Bridge. She and her friends had rented scooters to get there. They were snapping selfies and posting TikTok videos. The mother was charmed by their free-spiritedness.

"Isn't San Francisco a cool place to raise a kid?" she asked, chuckling.

When it started to rain, the girls caught a Waymo back home.

Kid Rock backlash erupts as ‘underage’ lyrics resurface

TRAVEL

What Rick Steves wants you to know about traveling as you age

WEATHER FORECASTS

California weather to see ‘major pattern change’ as storm door opens

Let's Play

 Cross|word

 Flipart

 Really Bad Chess

 SpellTower

Top

About

Contact

Services

Account

Exhibit 11

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
01/30/26
04:59 PM
R2508013

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

Mari Davidson
Waymo LLC
1600 Amphitheater Parkway
Mountain View, CA 94043
Email: maridavidson@waymo.com

F. Jackson Stoddard
Chan Q. Vu
BRB Law LLP
492 Ninth Street, Suite 220
Oakland, CA 94607
Phone: (510) 999-8430
Email: jack@brblawgroup.com

Attorneys for Waymo LLC

January 30, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

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.

Respectfully submitted on this 30th day of January, 2026.

F. Jackson Stoddard
Chan Q. Vu
BRB Law LLP
492 Ninth Street, Suite 220
Oakland, CA 94607
Phone: (510) 999-8430
Email: jack@brblawgroup.com

/s/ F. Jackson Stoddard
F. Jackson Stoddard

Attorneys for WAYMO LLC

Exhibit 12

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
02/13/26
04:59 PM
R2508013

Order Instituting Rulemaking to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Service	R.25-08-013 (Filed August 28, 2025)

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

Mari Davidson
Waymo LLC
1600 Amphitheater Parkway
Mountain View, CA 94043
Email: maridavidson@waymo.com

F. Jackson Stoddard
Chan Q. Vu
BRB Law LLP
492 Ninth Street, Suite 220
Oakland, CA 94607
Phone: (510) 999-8430
Email: jack@brblawgroup.com

Pejman Moshfegh
Morgan Lewis & Bockius LLP
600 Montgomery Street, Suite 2300
San Francisco, CA 94111
Phone: (415) 442-1000
Email: pejman.moshfegh@morganlewis.com

Attorneys for Waymo LLC

February 13, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Service	R.25-08-013 (Filed August 28, 2025)

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

In accordance with the assigned Administrative Law Judge's ("ALJ") January 12, 2026 e-mail ruling (the "Ruling") regarding party responses to questions from the assigned ALJ's January 6, 2026 e-mail ruling, Waymo LLC ("Waymo") hereby submits the following reply comments to the parties' opening comments.

Waymo appreciates the diversity of perspectives and thoughtful proposals reflected in the opening comments. As detailed below and in its opening comments, Waymo urges the Commission to prioritize providing clarification related to partnerships, as Uber proposes, and authorizing AV service for unaccompanied minors, subject to the same restrictions and requirements that apply to Transportation Network Companies (TNCs). The Commission should decline to adopt a number of proposals that would impose significant new regulatory burdens and costs, are unnecessary, or that would impede AV operator flexibility. These include requirements related to additional data reporting regarding airport operations, and performance metrics for customer support response time and operational safety, as well as Commission regulation of AV operator incident response preparedness and planning.

Waymo supports and looks forward to participating in and contributing to workshops, and requests that the Commission schedule them following issuance of one or more staff proposals, with sufficient advance notice to ensure adequate time for parties to prepare.

I. The Commission Should Authorize Transportation of Unaccompanied Minors.

As Waymo described in its opening comments, the Commission should lift the prohibition on the transportation of unaccompanied minors in AVs. Waymo agrees with comments from Zoox and Lyft that the Commission should authorize AV carriers to transport unaccompanied minors consistent with the framework adopted for TNCs in Decision (D.) D.24-12-004, but excluding any driver-specific requirements.[1] Allowing established AV carriers to transport unaccompanied minors will not only grant parity with TNCs that are already permitted to transport unaccompanied minors, but will unlock a safe mode of transportation for teens and families.[2]

Waymo disagrees with LADOT's suggestion that additional research and data is needed to evaluate whether these services are safe for unaccompanied minors. LADOT recommends, for example, that the CPUC should analyze TNC data regarding the usage rates by unaccompanied minors and the average age of all vehicle occupants.[3] Waymo notes, however, that based on D.24-12-004, it does not appear the Commission undertook such research and data collection in authorizing TNC service for minors. Moreover, while D.24-12-004 requires TNCs to report rides provided to unaccompanied minors through their Commission-authorized teen service offerings TNCs are *not* required to report any data on a rider's age, nor any other data specific to minors. This is for good reason. Requiring carriers to collect specific age data would unreasonably intrude on rider privacy and may not be feasible. Waymo requires that accountholders attest that they are over 18, but does not collect rider age data due to verification complexity and in order to protect rider privacy. Moreover, in adopting the framework for transportation of unaccompanied minors by TNCs, the Commission considered—but did not adopt—such requirements, after Uber correctly commented that collecting such data would invade passenger privacy.[4] The

[1] *See* Opening Comments of Zoox, Inc. on the Email Ruling Providing Prehearing Conference Questions (Jan. 30, 2026) ("Zoox Comments") at 9; Opening Comments of Lyft, Inc. on the ALJ's E-mail Ruling Providing Questions for Prehearing Conference ("Lyft Opening Comments") at 4.
[2] As Waymo noted in its opening comments, Waymo already transports unaccompanied teen riders (aged 14–17), with parental permission, in Phoenix, Arizona. Information about Waymo's service for teen riders in Phoenix, Arizona is available here: https://waymo.com/teens/.
[3] LADOT Opening Comments at 6–7.
[4] *See* Assigned Commissioner's Ruling Requesting Comments on Uber Technologies, Inc.'s Request to Establish the Threshold for Primarily Transporting Unaccompanied Minors, R.12-12-011 (June 7, 2025) at 5 (asking, "While the CPUC does not collect information that identifies passengers, should

Commission should take the same approach here and decline to adopt LADOT's recommendation to require unnecessary and invasive data collection.

Even if AV carriers could feasibly collect comprehensive and reliable data regarding the "number of unaccompanied minors" and the "average age of occupants," as LADOT recommends, these metrics would not provide insight as to risks or the safety of transporting unaccompanied minors in AVs. As Waymo recommended in its opening comments, potential risks to unaccompanied minors should be addressed through each AV carrier's unique Passenger Safety Plan ("PSP"). AV operators can identify risks that may be unique to their specific platform and services, and describe the safety measures implemented to mitigate any such risks. There is no need for the Commission to impose burdensome data reporting requirements that serve no clear regulatory purpose.

Waymo further opposes SEIU's request for the Commission to continue to prohibit AV carriers from transporting unaccompanied minors,[5] and LADOT's suggestion that the Commission should set an "age limit" for transportation of unaccompanied minors.[6] These recommendations are not justified and are at odds with the framework that the Commission has already established for transportation of unaccompanied minors by TNCs. As Waymo noted in its opening comments, the Commission should leave to the discretion of each AV operator the age range for minors that can utilize their services when not accompanied by an adult.[7]

Lastly, the Commission should reject SEIU's call for the Commission to hold an evidentiary hearing regarding alleged violations of the Commission's prohibition against serving unaccompanied minors. Waymo has procedures in place to prevent unaccompanied minors from using its ride-hail service. These include requiring that accountholders attest that they are over 18 years old when setting up their account.

TNCs be required to report data that identifies or summarizes rides provided to minors?"). *See also*, Opening Comments of Uber on Assigned Commissioner's Ruling Requesting Comments (June 28, 2025) at 16–17.

[5] Opening Comments of SEIU Locals 521, 721, and 1021, on the Order Instituting Ruling to Establish Policies, Processes and Rules Regarding Autonomous Vehicle Passenger Transportation Service (Jan. 30, 2026) at 10.

[6] LADOT Opening Comments at 7.

[7] As noted, if authorized by the Commission, Waymo anticipates offering service for teen riders ages 14–17, inclusive, with parental permission, consistent with its service offering for teen riders in Phoenix, Arizona.

Additionally, Waymo's terms of service express prohibit accountholders from hailing rides for unaccompanied minors. Violations of these requirements are reviewed and may result in account suspension. It is not feasible, however, for Waymo to categorically check and reliably determine the age of every rider. As it did for TNCs, authorizing AV service for minors would provide AV operators—as well as parents and guardians—with better visibility regarding minors utilizing AV service. Moreover, a rulemaking is not the proper forum for pursuing enforcement or to hold an evidentiary hearing to adjudicate alleged violations by a single operator. To the extent the Commission seeks to investigate and enforce potential violations of its requirements, the Commission can do so through its well-established mechanisms and procedures.

II. The Commission Should Allow Flexibility in Partnerships that Will Allow AV Services to Scale.

Waymo supports Uber's proposal that the Commission should issue an interim decision affirming the deployment of AV passenger services through TNC platforms and affirming that TNCs and other non-manufacturer entities can obtain permits to operate AV passenger fleets.[8] As Uber notes, the industry stakeholders strongly support the deployment of AVs through TNC platforms.[9] Allowing AV carriers to operate their AV fleets on TNC platforms will further expand safe and accessible AV ride-hail options for Californians. As Waymo noted in its Reply Comments on the OIR, where existing regulatory requirements present an obstacle to potential partnership structures, including involving alternative fleet ownership structures, the Commission should make clear that regulated carriers may seek exemptions under GO 157-E.[10]

III. The Commission Should Not Adopt Requirements that Impose Significant New Burdens and Costs or Otherwise Prohibit AV Adoption.

A minority of the commenters (SFCTA, LADOT, and SEIU) urge the Commission to impose additional operational, permitting, and reporting requirements governing AV passenger carriage, or to otherwise prohibit certain AV services. These proposals will impose a substantial additional regulatory burden on AV carriers, but without serving any

[8] Uber Opening Comments at 1–2.
[9] Uber Opening Comments at 2–3.
[10] Waymo Reply Comments to OIR at 3, 10.

clear regulatory purpose. Consistent with Waymo's earlier comments on these topics, the Commission should not adopt these proposals.

A. Industry-wide Customer Support Response Time Metrics are Unnecessary.

SEIU and LADOT state that they are in favor of response times for customer support agents to connect with passengers.[11] While SEIU does not propose a specific response time, LADOT states that a "reasonable initial response time for a customer support agent to connect with a passenger should not exceed 180 seconds" though LADOT adds, "further evaluation is needed to determine the most effective time frame for initial contact."[12] As Waymo noted in its comments, staffing levels and response times may vary as operators advance and scale their fleets and service. Adoption of customer support response time requirements will impede operator flexibility that is necessary for continued innovation. While Waymo typically answers calls and chats from riders within 60 seconds, Waymo does not support prescriptive mandates for response times and reiterates that the Commission should simply require AV carriers to describe anticipated customer support response times in their respective PSPs.

B. The Commission Should Adopt Reasonable Requirements but Should Not Prohibit Use of Level 2 ADAS-Equipped Vehicles in Passenger Transportation Service.

SFCTA and LADOT both argue that Level 2 ADAS vehicles should be operated only in the "traditional manner, with the driver maintaining full control of the vehicle at all times."[13] As Waymo noted in its earlier comments, the Commission can allow passenger services using vehicles equipped with Level 2 ADAS pursuant to reasonable regulations that ensure that passengers are fully aware of, and consent to, the limitations of the vehicles. Operators of Level 2 ADAS-equipped vehicles should provide passengers a notice and consent form that expressly identifies the vehicle's particular ADAS capabilities and informs 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. Operators utilizing vehicles with Level 2

[11] SEIU Opening Comments at 12; LADOT Opening Comments at 8.
[12] LADOT Opening Comments at 8.
[13] LADOT Opening Comments at 6; SFCTA Opening Comments at 4.

ADAS should also be consistent regarding the marketing of their vehicles' capabilities to avoid rider confusion over the vehicle's capabilities.[14]

C. The Commission Should Not Adopt Airport-Specific ODDs or Data Reporting.

SEIU states that to the "extent of the Commission's jurisdiction, an airport-specific ODD should be established, authorized by a publicly accountable process."[15] However, the Department of Motor Vehicles (DMV)—not the Commission—is vested with the authority to evaluate and approve an AV operator's ODD,[16] which encompasses all road-way types including airports. The Commission should not second-guess the DMV's review and approval process by adopting an airport-specific ODD.

The Commission should also reject the proposal by SEIU and LADOT for AV carriers to submit data specific to airports.[17] As Waymo noted in its opening comments to the OIR, airport-specific data reporting is unnecessary and unjustifyably burdensome.[18] The Commission's existing AV data reporting framework already requires AV carriers to report substantial information across all public roads operations. The required data captures information that applies equally to all airports within California, which includes the data points that LADOT identifies in its comments.[19]

Lastly, the Commission should not adopt SEIU's suggestion that contracts or agreements between TNCs or TCPs and airport authorities should be publicly posted to the Commission's website, or that AV operators should be required to submit "template documentation signed off formally by the airport."[20] There is no need for the Commission to collect such information, nor create a template that airports, per SEIU's suggestion, would be required to sign. Instead, the Commission should allow AV carriers to voluntarily

[14] *See* Waymo Opening Comments to OIR (Oct. 31, 2025) at 8–10; Waymo Opening Comments at 9.
[15] SEIU Opening Comments at 9.
[16] See e.g., Cal. Code Regs., tit. 13, § 228.06.
[17] SEIU Opening Comments at 9; LADOT Opening Comments at 5.
[18] Waymo Opening Comments to OIR at 19–20.
[19] LADOT Opening Comments at 5 (suggesting that the Commission should collect additional data, such as "number of trips, number of pick up and drop offs, from AV carriers operating at airports.")
[20] SEIU Opening Comments at 9–10.

notify the Commission upon an airport authority's approval of an AV carrier's services, consistent with Waymo's existing practice.[21]

D. The Commission Should Not Duplicate the DMV's Established Practice of Publicly Disclosing AV Carrier ODDs on its Website.

SFCTA, LADOT, and SEIU state that the Commission should require public disclosure of AV carriers' ODDs.[22] Consistent with Waymo's and other stakeholders' comments,[23] Waymo agrees with Zoox that the Commission should not adopt a requirement that would needlessly duplicate the DMV's existing public disclosure of AV carriers' ODDs.[24] As Waymo previously noted, the DMV already maintains on its website a description of the ODDs for each AV company permitted to operate in California, under several permit categories.[25] Thus, AV carriers should provide Commission staff with notice of an expanded geographic ODD only on a voluntary basis.

E. Additional 30-Day Attestations are Unnecessary.

Waymo opposes SFCTA's and SEIU's request for AV carriers to submit new 30-day attestations whenever they modify their ODDs in a manner that materially affects their PSPs.[26] Waymo agrees with Zoox that such a requirement would be unnecessary and overly burdensome.[27] As both Waymo and Zoox have noted,[28] 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.[29] While the attestation requirement

---

[21] SEIU notes that in response to its Public Records Act Request to Santa Monica, the city stated that "'there is no agreement with Waymo to operate at the Airport.'" SEIU Opening Comments at 9. Waymo cannot speak to the accuracy of SEIU's characterization of Santa Monica's response to its PRA request, but confirms that Waymo has in fact received authorization from the Santa Monica airport to operate fared driverless AV services.
[22] SFCTA Opening Comments at 3; LADOT Opening Comments at 4; SEIU Opening Comments at 7.
[23] *See* Waymo's Opening Comments to OIR at 25–26.
[24] Zoox Opening Comments at 5.
[25] *See* Autonomous Vehicle Permit Holders: https://www.dmv.ca.gov/portal/vehicle-industry-services/autonomous-vehicles/autonomous-vehicle-testing-permit-holders/.
[26] SFCTA Opening Comments at 4; LADOT Opening Comments at 5–6.
[27] Zoox Opening Comments at 8.
[28] See Waymo Opening Comments at 8; Zoox Opening Comments at 8.
[29] D.18-05-043 at 35.

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.

F. The Commission Should Not Require Additional Collision Data Reporting.

LADOT suggests that data on collision incidents should be made public. As a preliminary matter, Waymo notes that the Commission's existing data reporting requirements—detailed in the Deployment Decision and D.24-11-002—already require AV carriers to report robust data on collisions. Thus, there is no need for the Commission to add any additional data reporting requirements that would require more than AV carriers are already required to report. To the extent that Commission Staff or local government stakeholders seek information concerning specific incidents that are not already made public, Waymo has cooperated in providing additional information, subject to any necessary privacy or confidentiality protections.

G. The Commission Should Authorize Staff to Reinstate AV Permits Following Reinstatement of Parallel Authority by the DMV.

A minority of commenters oppose the Commission's delegation to staff the authority to reinstate Pilot and Drivered Deployment programs, but provide no substantive rationale for their opposition.[30] As Waymo noted in its comments, there is good reason to allow staff to reinstate both Pilot and Drivered Deployment authority following the DMV's reinstatement of that carrier's DMV AV testing permit. Commission 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. There is no reason why they should not also have the authority to reinstate the permits or certificates they issued in the first instance.

[30] *See* SFCTA Opening Comments at 4; LADOT Opening Comments at 5, SEIU Opening Comments at 8.

IV. AV Carriers Should Address Emergency Preparedness Through Incident Response Plans Specific to Their Respective Platforms.

A minority of commenters ask the Commission to develop uniform requirements for disaster response and resilience plans and to adopt related safety performance metrics. Waymo strongly supports emergency preparedness and incident response planning as a fundamental element of AV fleet operations. Waymo's safety program ensures application of industry-leading safety practices in AV operations. In addition, Waymo consistently applies and evolves its safety practices by focusing on comprehensive incident response planning and preparation, alongside training and coordination with first responders. Waymo engages in extensive planning and preparation to ensure its incident response capabilities are ready to address a range of events. When Waymo becomes aware, whether through its ADS or other means, of a safety incident that impacts its operations, Waymo initiates its cross-functional incident response procedures, which involves impact assessment, containment, recovery, and remediation.

However, the Commission should reject SFCTA's recommendation for the Commission to develop industry-wide "requirements for AV providers' disaster response and resilience plans."[31] As with other CPUC-regulated passenger carriers, AV carriers should have the flexibility to develop their own incident response plans and procedures tailored to their individual services, technology, and organizational structure. Nor should the Commission accept SFCTA's suggestion that the Commission "consider adopting mandatory adjustments" of AV operations during high-risk events.[32] Waymo already coordinates closely with state and local officials, as needed and appropriate, regarding significant incidents. Managing incident response processes and fleet operations during emergencies requires flexibility so that AV operators can resolve issues quickly and effectively. The particular actions that are required for responding to a specific incident, which may but will not necessarily include adjustments to AV operations on a fleetwide basis, depend on the circumstances. Ultimately, however, decisions regarding AV operations during such events should be made by the AV operator.

[31] SFCTA Opening Comments at 3.
[32] *Id.*

Waymo similarly opposes LADOT's recommendation that the Commission should "complete a third party safety analysis to evaluate the data and develop safety performance metrics."[33] The Commission should also reject SEIU's request that the Commission "assess the safety of AVs," including the effectiveness of an AVs sensors, and to "study AV functionality in adverse weather."[34] These issues primarily relate to the safety of the vehicle platform and the automated driving system more broadly, which should be left to the DMV,[35] appropriate federal authorities, and applicable international standards.[36]

The data to date indicates that Waymo AVs are already making roads safer in the places where we currently operate.[37] Waymo's publicly disclosed safety metrics from approximately 127 million miles of autonomous (driverless) operations demonstrate that the Waymo Driver promotes rider and public safety by reducing airbag deployment, injury, and police-reportable crashes compared to human drivers.[38] While there are opportunities for AV carriers to refine their systems, they do not warrant adoption of industry-wide performance metrics by the Commission.

V. The Commission Should Continue to Evaluate Data Confidentiality Pursuant to Existing Processes.

SFCTA and SEIU argue that information contained in confidential data reports are necessary to inform decisions concerning AV operations and services.[39] While certain confidential elements of AV data reports may add context to the discussions around AV operations in California, the municipalities' interest in such data does not override carriers' obligation to protect, among other things, passenger privacy, nor does it override carriers' right to protect confidential trade secret information. Thus, as Waymo described in its opening comments, the Commission should continue to assess and protect material

[33] LADOT Opening Comments at 3.
[34] SEIU Opening Comments at 7.
[35] As the instant Rulemaking recognizes, the DMV is "charged with adopting regulatory requirements it determines 'are necessary to ensure the safe operation of autonomous vehicles on public roads.' *Order Instituting Rulemaking to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Service* (OIR) (Sept. 5, 2025) at 2-3, n. 2 (citing and quoting (Vehicle Code § 38750, subd. (d)(3).).
[36] Deployment Decision at 98.
[37] See Waymo Safety Impact data, available at: https://waymo.com/safety/impact.
[38] *Id.*
[39] SFCTA Opening Comments at 5; SEIU Opening Comments at 13.

submitted by carriers as confidential pursuant to its existing and established confidentiality process.

VI. 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.

Respectfully submitted on this 13th day of February, 2026.

F. Jackson Stoddard
Chan Q. Vu
BRB Law LLP
492 Ninth Street, Suite 220
Oakland, CA 94607
Phone: (510) 999-8430
Email: jack@brblawgroup.com

/s/ F. Jackson Stoddard
F. Jackson Stoddard

Attorneys for WAYMO LLC

Exhibit 13

CALIFORNIA PUBLIC UTILITIES COMMISSION

Advice Letter Summary Cover Sheet

Date of Submission: March 26, 2025		Date of Service: March 26, 2025
Entity Name: Waymo, LLC		PSG #: TCP0038152A
DBA Name:		
Address: 1600 Amphitheatre Pkwy		
City: Mountain View	State: California	ZIP Code: 94043
Service Contact: Jack Stoddard, BRB Law Group		
Service Contact Email: jack@brblawgroup.com		Service Contact Phone: (415) 531-0785

Advice Letter #: 3	AL Type: ☒ Tier 2 PSP Update, staff disposition
Description: Seeking approval of Waymo's updated Passenger Safety Plan in connection with Waymo's expanded DMV-approved territory for deployment operations, adding additional portions of the San Francisco Bay Area Peninsula.	
Documents Included: ☒Cover letter ☒Advice Letter ☒Passenger Safety Plan	
Relevant Commission Decisions: D.20-11-046 (as modified by D.21-05-017).	
Protests and Responses: Any person (including individuals, groups, or organizations) may submit a response or a protest to an advice letter (General Order 96-B, Section 7.4). When submitting a response or a protest, please include the carrier's name (Waymo LLC) and the advice letter number (0003) in the subject line. A protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the carrier no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11). A response or protest must be submitted within twenty (20) days of the date the advice letter was served and must be served on the carrier (Waymo LLC) via email on the same day.	

Responses and protests must be submitted to:

Terra Curtis, Director
California Public Utilities Commission
Consumer Protection and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3214
terra.curtis@cpuc.ca.gov

and to

AVPrograms@cpuc.ca.gov

On the same day the response or protest is submitted to the Commission, the respondent or protestant shall email a copy to Waymo to the attention of Mari Davidson at the following address: waymo-regulatory-permits@google.com

BACKGROUND

Waymo is an autonomous driving technology company with the mission to be the world's most trusted driver, and make it safer, more accessible, and more sustainable to get around - without the need for anyone in the driver's seat. Safety is at the core of Waymo's mission and a hallmark of our Waymo One ride hail service.

Advancing roadway safety is the reason we began our pioneering AV research and development as the Google Self-Driving Car Project more than 15 years ago. Since our start in 2009, Waymo has published dozens of studies and white papers detailing our safety methodologies and analyzing our driving performance.[4] More about Waymo's safety record and research can also be found at Waymo's Safety Hub,[5] which presents a comparison of Waymo's driverless crash rates to human crash benchmarks for surface streets. Waymo's Safety Hub leverages best practices in safety impact analysis and builds upon dozens of Waymo's safety publications. The data to date indicates that the Waymo Driver is already making roads safer in the places where we currently operate.[6]

Waymo's unmatched experience in developing and deploying autonomous vehicle technology includes:

- Tens of millions of fully autonomous (driverless) miles on public roads;
- Billions of miles of simulated driving; and
- Millions of fared and fully autonomous trips served in California.[7]

Headquartered in California, Waymo is authorized by the CPUC to operate as an AV charter party carrier of passengers (TCP) in the Commission's AV Programs (Drivered and Driverless Pilot; Phase I Drivered and Driverless Deployment).[8] The Waymo One fleet used in our fully autonomous, fared service is currently comprised of the all-electric Jaguar I-PACE vehicle platform. Our ride-hailing experience is supported by our Waymo One mobile app, available on both iOS and Android platforms.

As we expand to include more California communities and riders, we remain committed to learning and to making continuous improvements to our service. Listening to our riders is essential to our efforts - as is meaningful engagement with community groups, local governments, and first responders - so that we continue to provide passengers with a safe,

[4] Available at waymo.com/safety/research.
[5] Available at waymo.com/safety/impact.
[6] Specifically, the Safety Hub data demonstrates that the Waymo Driver is better than humans at avoiding crashes that result in injuries, airbag deployments, and police-reported crashes.
[7] Trips provided since the grant of our CPUC Driverless Deployment Permit in August 2023. Waymo provided driverless rides to members of the public for free for nearly a year prior, since having first received our CPUC Driverless Pilot Permit in November 2022.
[8] The CPUC approved Waymo to participate in each of these programs in July 2019, February 2022, November 2022, and August 2023, respectively.

sustainable,[9] and comfortable Waymo One experience.

Each day, thousands of Californians are riding in Waymo AVs, at all times of day, with no human behind the wheel. We're excited to grow our Waymo One service to bring our transformative technology and service to more Californians.

WAYMO ADVICE LETTER 0003

Waymo seeks CPED's approval of the March 2025 Update of Waymo's Passenger Safety Plan in connection with Waymo's expanded ODD for deployment operations covering additional portions of the San Francisco Peninsula and South Bay. Waymo's territory expansion for passenger carrier service, together with other updates and revisions to reflect Waymo's robust approach to passenger safety, are reflected in our updated Passenger Safety Plan (Attachment C).

Per the Deployment Decision, Waymo's Passenger Safety Plan describes our driverless autonomous vehicle technology and service, and provides an overview of the policies and procedures we use to promote the safety, comfort, and convenience of our riders. Waymo's Passenger Safety Plan demonstrates our continued commitment to enhancing passenger safety and addresses the elements highlighted by the Deployment Decision. Waymo's March 2025 Update includes the following key updates:[10]

- *Throughout:* Describes new features that Waymo has implemented to further enhance passenger safety and convenience, including but not limited to, the icon that the Waymo AV displays on the rear of the main ADS sensor module when yielding to pedestrians, the door unlock and handle release feature triggered by rider proximity detection, as well as Waymo's new lost item detection feature.
- *Throughout*: Provides updated images of the Waymo One mobile app display and in-car screens, illustrating updated functionalities and features, including the app display riders may use to edit their drop off destination.
- *Section I. Our Mission & Section III. Moving People with Waymo One:* Describes Waymo's recent service milestones operating Waymo One. Waymo is now providing hundreds of thousands of paid passenger trips each week across multiple major U.S. cities. In California,

[9] Waymo's commitment to sustainability is rooted in our mission to be the most trusted driver, ensuring safer roads for everyone. We achieve this by deploying a fully electric, shared fleet and actively supporting more walkable, bikeable, and transit-oriented communities. To power our fleet, Waymo purchases renewable electricity from a variety of sources, including local utilities and community choice energy programs. Electric vehicle chargers are enrolled in California's Low Carbon Fuel Standard (LCFS) program, contributing to state emissions reduction targets.

[10] Please note that this list is not exhaustive of all revisions but highlights key updates, including advancements and refinements that Waymo has made since the last-updated Passenger Safety Plan (January 2024), which CPED approved on March 1, 2024. Revisions have been made throughout to update, clarify, improve readability, and conform the Passenger Safety Plan to Waymo's current relevant passenger safety policies and practices.

Waymo is now providing over one million driverless rides each quarter across the San Francisco Peninsula and in the greater Los Angeles area.

- *Section III. Moving People with Waymo One:* Describes the expanded geographic territory approved by the DMV for Waymo deployment, effective as of March 17, 2025.
- *Section VI. Responding to Adverse Events:* Updates the description of Waymo's operational teams that are available 24/7 to respond to potentially disruptive events during passenger carrier service, and further details aspects of their respective roles. Provides updated information about Waymo's first responder training and engagement efforts.
- *Section VIII. Health & Safety Protocols:* Makes changes in conformance with applicable health and safety guidance.

EFFECTIVE DATE

Pursuant to Ordering Paragraph 20 of the Deployment Decision, Waymo respectfully requests CPED approval of this Tier 2 advice letter. Per GO 96-B Section 7.3.5, the advice letter will be effective immediately upon CPED's written approval.

PROTESTS AND RESPONSES

Any person (including individuals, groups, or organizations) may submit a response or a protest to an advice letter (General Order 96-B, Section 7.4). When submitting a response or a protest, please include the carrier's name (Waymo LLC) and the advice letter number (0003) in the subject line. A protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the carrier no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11). A response or protest must be submitted within twenty (20) days of the date the advice letter was served and must be served on the carrier (Waymo LLC) via email on the same day.

Responses and protests must be submitted to:

Terra Curtis, Director
California Public Utilities Commission
Consumer Protection and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3214
terra.curtis@cpuc.ca.gov

and to

AVPrograms@cpuc.ca.gov

On the same day the response or protest is submitted to the Commission, the respondent or protestant shall email a copy to Waymo to the attention of Mari Davidson at the following address:

waymo-regulatory-permits@google.com

NOTICE OF SERVICE

In accordance with Section 4 of General Order 96-B, and D.20-11-046 (as modified by D.21-05-017), a copy of this advice letter is being sent electronically to the service lists for R.12-12-011, R.19-02-012, and R.21-11-014. Address changes to these service lists should be directed to the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov.

Respectfully,

DocuSigned by:
Mari Davidson
B1021588BA0747D...

Mari Davidson
Managing Counsel
Waymo LLC
1600 Amphitheater Parkway
Mountain View, CA 94043

INDEX OF ATTACHMENTS

A	Statement and Map of DMV-Approved Operational Design Domain - Driverless Deployment (March 17, 2025)
B	Waymo DMV Deployment Permit (March 2025 Amendment Approval Letter)
C	Passenger Safety Plan - CPUC Driverless Autonomous Vehicle Deployment Program (March 2025)

ATTACHMENT A

Statement and Map of Operational Design Domain - Deployment

Waymo's deployment ODD[11] as most recently approved by the California Department of Motor Vehicles on March 17, 2025, is as follows:

Roadway Type	The intended operational design domain of Waymo's AVs includes all roadway types and areas accessible for ride-hailing and goods delivery services, such as: • Freeways, highways, city streets, rural roads, and other roadways. • Parking lots and driveways.
Speed Range	The intended operational design domain of Waymo AVs includes all speed limits.
Weather	The intended operational design domain for Waymo AVs includes all rain, fog, and other conditions, but will not at this time allow for driverless operation when there is widespread snow or ice accumulation on the roadway. The Waymo ADS is designed to adjust its driving behavior as appropriate for the conditions. For example, the ADS tends to drive more slowly as fog becomes denser or as rainfall increases, which helps the ADS to respond to surrounding traffic that typically moves more slowly in these conditions.
Time of Day	The intended operational design domain of Waymo's AVs includes all times of day and night.
Dynamic Operating Parameters	Controlling the operating parameters of its AVs is a part of Waymo's dynamic operations. Waymo may choose to change the operating parameters for some or all of its AVs at various times. For example, operations may be dynamically adjusted or restricted during certain times of day, around certain road features, or in certain weather conditions. In both the drivered and driverless configurations, if an AV encounters any of conditions outside of the applicable operating parameters, the ADS is

[11] Pursuant to 13 CCR Section 227.02(j), the operational design domain ("ODD") is "the specific operating domain(s) in which an automated function or system is designed to properly operate, including but not limited to geographic area, roadway type, speed range, environmental conditions (weather, daytime/nighttime, etc.), and other domain constraints."

	designed to be capable of achieving a minimal risk condition. In addition, in a drivered configuration, the ADS also alerts the trained driver. To continue a trip, drivers may take over in such conditions. Trained drivers have discretion to take over at any time and are trained to do so as appropriate to support safety, traffic law compliance, or community values. Trained drivers are more likely to take over in atypical traffic conditions.
Geographic Area for Both Drivered & Driverless Configurations	Waymo seeks authorization for deployment operations in both drivered and driverless configurations in the area depicted in the map below. No changes are proposed to the Los Angeles area geographic ODD at this time. As noted in prior materials submitted in connection with Waymo's Deployment Permit, controlling the operating parameters of our AVs is part of Waymo's dynamic operational program. For the purpose of deployment operations, Waymo may dynamically adjust operating parameters, including geographic areas, for some or all of its AVs at various times. Although we have found through experience that Waymo's ADS technology is highly transferable to new environments, before we begin operation in a driverless configuration in any new geographical area, we complete a thorough validation process and continuously monitor performance for potential issues. We plan to continue this process of technology validation and incremental expansion.

ATTACHMENT C

Waymo's Passenger Safety Plan (March 2025)

[Remainder of page left blank]

Subject Index

III. Moving People with Waymo One

Waymo has been working on fully autonomous driving technology in our home state of California for over 15 years, learning from each step along the way as we progressed to make our fully autonomous (driverless) Waymo One™ ride-hailing service available to the California public on a commercial basis in August 2023. Waymo is now providing well over one million driverless rides each quarter across the San Francisco Peninsula and in the greater Los Angeles area, and we look forward to welcoming more Californians to experience Waymo One.

A. Waymo One

Waymo One is Waymo's autonomous ride-hailing service, powered by our Waymo Driver and supported by our Waymo One mobile app. To request rides in Waymo's autonomously driven vehicles, riders in California download the Waymo One app to their mobile device (iOS or Android). Riders choose their destination and set a pickup location using an interactive map. Before confirming the trip, riders will see an upfront fare estimate, route overview, and anticipated ETAs. The Waymo One app also displays useful information for the rider during their trip, including the estimated time to dropoff and how to reach out to Waymo for support (see Fig. 2 app display sample below).

Riders also may tailor their Waymo One app and trip experience to their accessibility needs, as described in more detail in Part XI.A. *Accessibility* below.

Waymo riders may request rides immediately after downloading the app and successfully creating an account with Waymo, except in areas where we may have limited service capacity and are growing to meet anticipated rider demand. Waymo is not currently offering riders the option to arrange a driverless ride shared by more than one chartering party. Waymo's service offerings will grow and change over time.

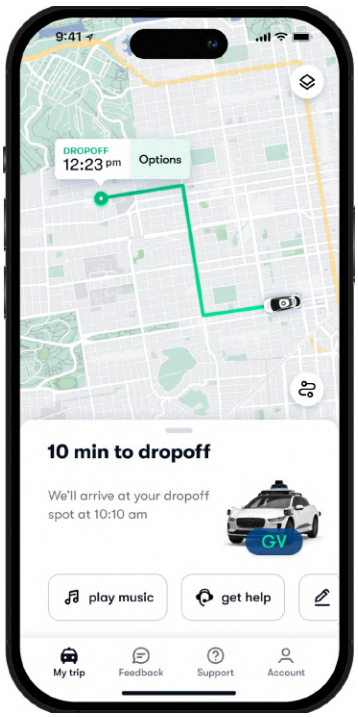


Fig. 2 Waymo One mobile app display with mid-trip information and options

B. Waymo's California Driverless Service ODD

Waymo provides CPUC-authorized driverless passenger carrier service exclusively within the operational design domain ("ODD") authorized by the California Department of Motor Vehicles ("DMV") for driverless testing (CPUC pilot) and deployment. Driverless passenger carrier operations are conducted under a variety of weather conditions (e.g. rain, fog, and hail), on roadway types such as city streets, parking lots, and freeways, at all times of day and night.[7]

Waymo's driverless pilot and deployment geographic ODDs cover parts of:

- The San Francisco Peninsula,[8] including cities and unincorporated territory within the City and County of San Francisco (excluding Treasure Island), the County of San Mateo, and the County of Santa Clara; and
- The Los Angeles area, including cities and unincorporated territory within the County of Los Angeles.

Waymo's ADS is designed so each vehicle does not operate autonomously outside of its approved ODD. For example, our riders cannot select a destination outside of our approved geography, and our software will not create a route that travels outside of our ODD. The Waymo Driver also can detect changes in ODD-relevant conditions and adjust its behavior accordingly (e.g. by slowing down in heavy rain or fog). Furthermore, the Waymo AV is designed to come to a safe stop when conditions outside the ODD are present (e.g. widespread snow or ice accumulation on the roadway).[9]

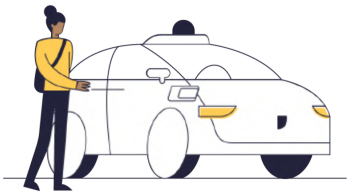
We also design our vehicles to be capable of complying with federal, state, and local laws within our geographic areas of operation. Through our internal programs and processes, we identify applicable legal requirements relevant to safe driving and build those requirements into our system. Before our vehicles drive in a new area, our team works to understand the nuances of driving in that locale, and we update our software so our vehicles are capable of operating safely and appropriately.

---

[7] Maps and descriptions of Waymo's DMV-authorized ODDs are contained in Waymo's Law Enforcement Interaction Protocol for the Jaguar I-PACE, which ODD may be modified from time to time pursuant to 13 CCR 227.30.

[8] Jurisdictions newly included in Waymo's Passenger Safety Plan via this 2025 Update include the cities of Campbell, Cupertino, Los Gatos, Milpitas, Monte Sereno, Pacifica, San Jose, and Saratoga.

[9] See Part IV.C. *Every Waymo Ride* (*Pulling Over and Safely Exiting)* for more on how the Waymo Driver identifies a safe location to pull over, including in the process of achieving a "minimal risk condition."



C. Every Waymo Ride

Each time a rider hails a Waymo AV, we have an opportunity to educate them about how our service can safely serve them. Together, the Waymo One app and the features we integrate into the in-car experience help our riders understand how our fully autonomous vehicles operate. We enhance rider safety and comfort through timely and relevant communications and with an ever-expanding suite of safety features and functionality. These communications and features include the following:

- Seat Belt Reminders. Buckling up saves lives, and Waymo has developed multiple ways of keeping seat belts top of mind for our riders.[11] In our driverless vehicles, riders will be reminded to buckle their seat belt through in-vehicle screen notifications (e.g. our in-vehicle screen alert shown in Figure 8 below), and other media (e.g. rider safety video). Riders also receive automated visual and/or audio alerts if the vehicle's sensors detect unbuckled seat belts.

Fig. 8 In-vehicle screen seat belt alert

[11] Waymo was recently awarded a 3-star rating in the FIA Road Safety Index - the highest possible recognition - in account of these seat belt reminders and Waymo's other safety practices.

- COVID-19 Prevention. We follow current COVID-19 health and safety guidance issued by relevant local, state, and federal authorities, as directed by Commission Resolution TL-19131. Waymo's Health & Safety Protocol is provided in Part VIII below.

- Setting and Changing Pickups and Dropoffs. We want our riders to enjoy a smooth trip experience and sometimes that means they'll want to adjust their pickup or dropoff location. Riders can do so in the Waymo One app, even after having arrived at their original destination, including in response to in-app prompts for the availability of this feature (see Figure 9).

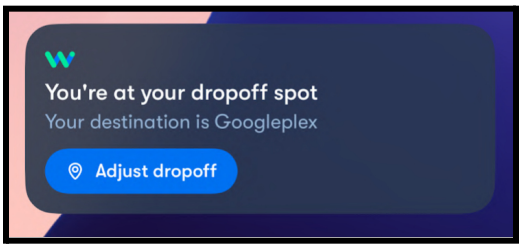


Fig. 9 In-app display of location adjustment prompt

Instructions for creating and editing a trip are available in-app and also in the Waymo One Help Center. Figure 10 below illustrates the dropoff location editing functionality in the Waymo One app.

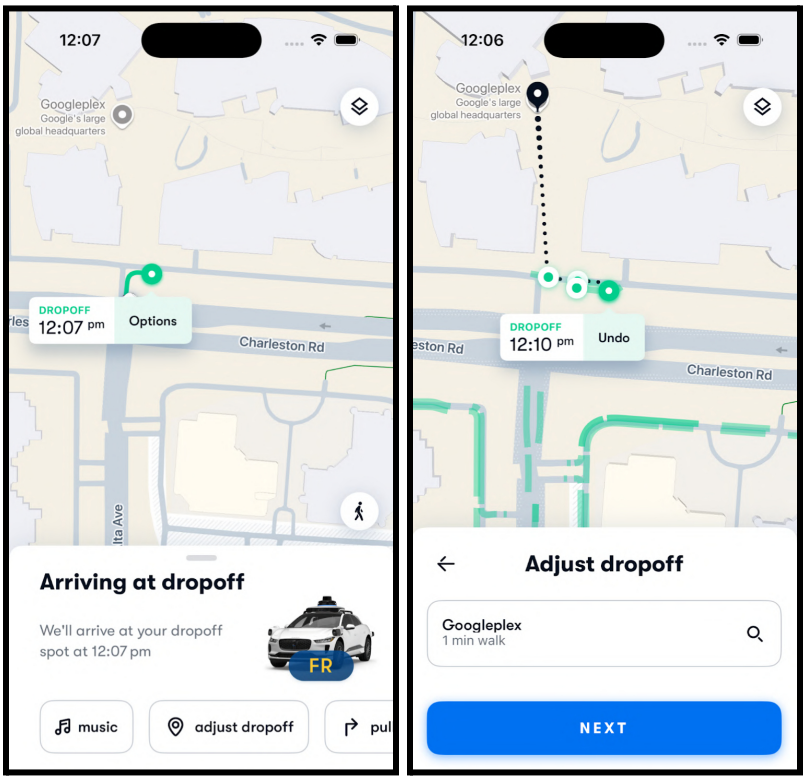


Fig. 10 In-app displays demonstrating dropoff location adjustment

V. Waymo Rider Support

Waymo's Rider Support agents are available 24/7 to assist riders with questions and concerns. Waymo's Rider Support team provides essential and timely customer support for our AV passenger service and will respond to outreach from riders, or initiate contact if the Waymo AV's diagnostics indicate such a need (e.g. if riders do not buckle their seat belts). Once notified, a Rider Support agent is assigned with live information about the state of the trip through our Rider Support tool. Issues may also be escalated to Waymo's Event Response team as described in more detail in Part VI. *Responding to Adverse Events* below.

Whether a trip is in progress, planned, or already completed, riders can reach Rider Support via phone, chat, or email through the Waymo One app. During a trip, riders may also connect with Rider Support by pressing the Rider Support button on the in-vehicle screen to communicate via the vehicle's built-in two-way communication system. All riders, including those accompanying the Waymo One account holder, can use this latter method while riding with Waymo.

To allow for optimal routing of rider requests for assistance, Waymo's in-app help functionality allows riders to select their desired method of reaching out to our Rider Support team or to request urgent assistance by dialing 911 directly from the mobile app, as displayed below.

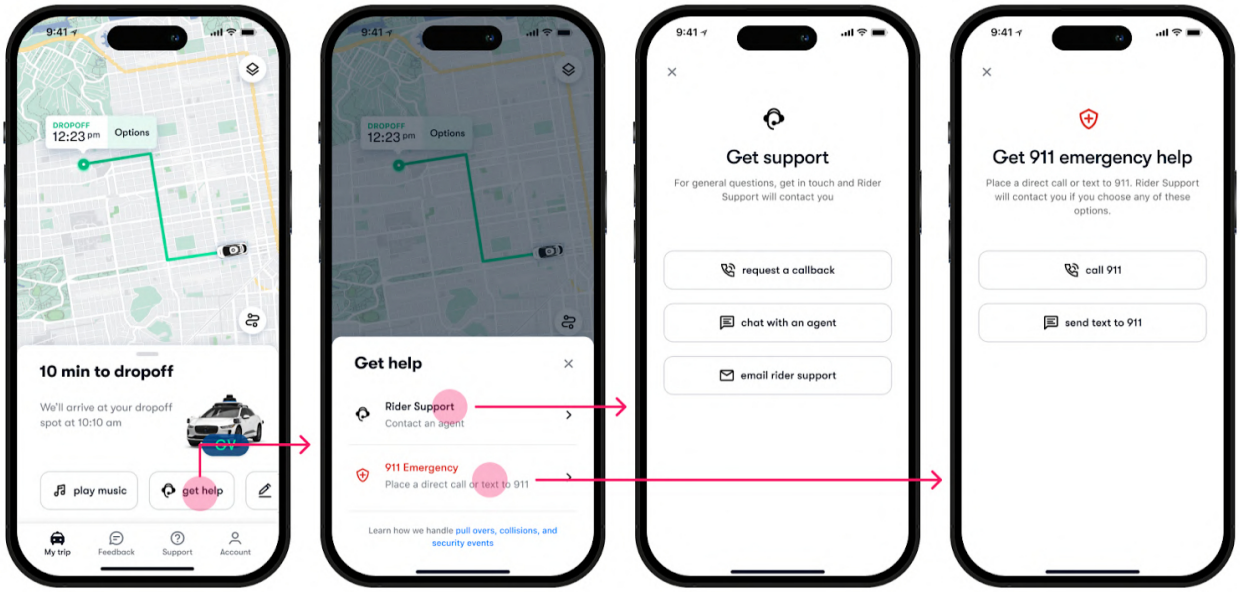


Fig. 18 In-app help functionality

VI. Responding to Adverse Events

Waymo prepares for events that may interrupt a trip or present a safety risk for a rider. We have designed our driverless service to reduce the risk of these events and respond when they occur.

In addition to Rider Support, Waymo maintains operational teams that are available 24/7 to respond to potentially disruptive events. These teams include the Waymo Remote Assistance team, the Waymo Event Response team, and the Waymo Roadside Assistance team.

Waymo Remote Assistance	Waymo Event Response	Waymo Roadside Assistance
Waymo AVs encounter countless dynamic scenarios while operating on public roads. As the Waymo AV interprets the myriad inputs and scenarios it encounters, using its robust sensor suite and onboard computing system, the Waymo AV sometimes reaches out to Waymo Remote Assistance for additional information to contextualize its environment. The Waymo Remote Assistance team supports the Waymo AV with information and suggestions in order to enhance overall vehicle performance.	The Waymo Event Response Team manages the operational response to disruptive in-field events. ERT agents efficiently respond, report, and resolve potentially complex situations, using their training across tasks relevant to remote assistance, authorities (e.g. first responder interactions), and support for riders.	Waymo Roadside Assistance provides in-field assistance to Waymo AVs, including those transporting riders in passenger carrier service. Waymo Roadside Assistance may be dispatched to assist in case of, for example, a collision. WRA may communicate with law enforcement and other parties, assist in the exchange of vehicle information (e.g. insurance), coordinate vehicle retrieval, and assist riders.

Each of these teams has a role in facilitating safe and comfortable rides with Waymo One, as illustrated in the various scenarios below.

A. Trip Interruptions. In the event that the Waymo AV's onboard software detects a potential collision or other trip interruption, Waymo's operational teams (Remote Assistance, Rider Support, and/or the Event Response Team, as circumstances may warrant) will be immediately notified. Waymo will check on the status of the riders and, in the case of a collision or similar event, will inquire as to whether there are injuries or circumstances requiring emergency medical assistance. If so, Waymo will contact 911 emergency services and initiate Waymo's response procedures for such events.

Remote Assistance or Event Response will review the scene using camera feeds from the AV and other signals to determine possible reasons for the interruption, and to

assist the ADS to resolve it, if possible.[13] Various tools may be deployed in such scenarios, depending on the specific circumstances in the field. For example, the Waymo AV may be assisted in routing away from a roadway obstruction or performing a multi-point turn. Additionally, Waymo personnel may select and play audio messages from the Waymo AV's external speakers to help road users around the AV to understand what the Waymo AV intends to do. Messages include, *"I'm planning to move but need more space. Can you back up please?"* and *"I can't move at the moment but help is on the way. Thank you for your patience."*[14] Messages may also caution that "*Unsafe behavior [has been] detected, authorities may be contacted." or* direct law enforcement to "*Please approach the driver-side window to speak with a Waymo representative.*" These tools are designed to minimize the impact of trip interruptions and enhance the safe operation of the Waymo AV.

The Event Response Team is also available to communicate directly with on-scene first responders through the Waymo AV's in-car speakers. Event Response agents are trained to authorize law enforcement to transition the Waymo AV to manual mode so it may be manually driven, if needed.

Where the Waymo AV is not able to continue driving autonomously, Waymo's Roadside Assistance team will be promptly dispatched to the scene. As may be required under the circumstances, Waymo's Roadside Assistance team may communicate with law enforcement and other parties, assist in the exchange of vehicle information (e.g. insurance), coordinate vehicle retrieval, and assist riders.

B. Assaults and Harassment. We work to make every Waymo AV a safe place to be. Engaging in harassing or threatening behavior while using our service (whether aimed at other riders, road users, or a member of the Waymo team) is strictly prohibited. If Rider Support is alerted to or observes potentially criminal behavior by a rider during an active trip in our driverless service, Rider Support will end the trip to allow the vehicle to pull over at a safe location, and will call 911. Waymo will review any

[13] During a trip interruption, the Waymo AV may request additional context about the circumstances from Remote Assistance. Depending on the nature of the request, assistance is designed to be provided quickly - in a matter of seconds - to help get the Waymo AV on its way with minimal delay. For a majority of requests that the Waymo AV makes during everyday driving, the Waymo AV is able to proceed driving autonomously on its own. In very limited circumstances such as to facilitate movement of the AV out of a freeway lane onto an adjacent shoulder, if possible, our Event Response agents are able to remotely move the Waymo AV under strict parameters, including at a very low speed over a very short distance.
[14] The Waymo AV is also capable of playing certain external audio messages without assistance from the Waymo Remote Assistance team.

such event for potential deactivation of the offending rider's Waymo account and will cooperate with any related law enforcement request.

C. Rider Medical Events. Waymo anticipates that a rider may experience a medical event, including, for example, a condition that renders a rider unresponsive. If Rider Support is alerted to the event either through the in-car screen or the rider's mobile app, or observes an apparent medical event occurring with a rider, agents are trained to quickly assist. Rider Support will, for example, contact 911 if emergency services need to be dispatched to the location of the Waymo vehicle.

D. Unsafe Scenarios Outside of the Vehicle. Potentially unsafe scenarios include, but are not limited to, physical security events by hostile individuals (e.g. vehicle vandalism), spontaneous road closures (e.g. for construction), as well as natural disasters. In addition to supporting our riders with the 24/7 availability of Rider Support and 911 emergency services (described in Part V. *Waymo Rider Support* above), the Waymo ADS and operational processes described herein were developed with such scenarios in mind, in order to safeguard those in and around the Waymo AV.

The first means of protecting against risks associated with potentially unsafe conditions is to avoid them wherever possible. Waymo minimizes the likelihood of being involved in such situations by redirecting vehicles away from such areas. For example, if one vehicle encounters an unplanned road closure, the rest of the fleet can be quickly routed away from the affected area. Waymo also employs other avoidance approaches, which include temporarily reducing our presence in close proximity to known areas of potential concern (e.g. parade) and partnerships with select public safety agencies to receive rapid notice of first responder avoidance areas.

In the event the Waymo AV encounters an unsafe scenario, the vehicle's driving functionality can help protect against the risk of physical harm. For example, the Waymo AV is designed to detect emergency scenes at a distance, giving the vehicle adequate time and space to safely maneuver away from a scene, including by performing a multi-point turn. Waymo vehicles also can detect approaching emergency vehicles,[15] and crowds of pedestrians gathered in or traversing the roadway, to protect against a collision, for example. External audio messages may also be utilized to indicate that law enforcement has been called to the scene, as may be

[15] The Waymo vehicle is designed to yield as appropriate to moving emergency vehicles, no matter which direction they are headed.

appropriate. In addition, the Waymo AV can signal for support from Waymo teams trained in incident response procedures to quickly address a triggering event, including requesting law enforcement and medical assistance, as may be needed. These and other key capabilities have been designed, tested, and implemented to prioritize the safety of our Waymo One riders and the broader public.

Waymo works with law enforcement and other first responders in the areas in which we operate. Our dedicated team of experienced public safety executives have over 120 years of combined experience as first responders.[16] Waymo prioritizes proactively conducting regular in-person training sessions detailing best practices for safe interactions with the Waymo AV, including how to quickly reach Waymo in the case of an emergency event. To date, Waymo has trained over 9,500 of California's first responders, providing information to those in the areas we operate who may interact with our vehicles. Waymo also seeks first responder input regarding AV operations in individual jurisdictions and has incorporated suggestions from first responders into our operations.[17]

E. Vehicle Tampering. Waymo instructs riders not to touch the Waymo AV's sensors (e.g. lidar), vehicle controls (e.g. gear shift), or driving mechanisms (e.g. steering wheel). Upon detection that the AV's external sensors have been manipulated, Waymo's security controls will prompt the vehicle to come to a safe stop (or remain stopped) until safe to proceed, and Rider Support will be alerted. Depending on the nature of the event, Rider Support may end the trip, and the rider may have their Waymo account status impacted or be reported to law enforcement authorities.

F. Items Left Behind. Riders who inadvertently leave items behind in a Waymo AV may reach out to Rider Support (see Part V *Waymo Rider Support* above) to have the vehicle returned to a Waymo facility for item retrieval. Waymo has also developed certain features meant to help keep riders from forgetting their things to begin with. At the end of a trip, if the Waymo AV detects that an item (such as a phone or wallet) may have been left behind after the rider has exited, the rider will be alerted by a message played via the Waymo AV's external speakers. A notification will also appear on the rider's phone, allowing them to retrieve their item before the Waymo AV proceeds.

[16] See https://waymo.com/firstresponders/
[17] See Waymo's Law Enforcement Interaction Protocol for the Jaguar I-PACE vehicle.

- **Features and Service Improvements.** Our work is ongoing but already has generated features and service improvements to assist and accommodate riders of all abilities. These include the following:

Honk Horn or Chime When the car is stopped at pickup, riders can press a button in the app to honk the car's horn or ring a distinctive chime sound. Riders can use the sound of the horn or chime to locate the car. Limits on the honk horn button prevent the horn from being honked too frequently and bothering bystanders.	**Wheelchair Accessible Vehicles** Using the Waymo app, riders may hail a ride in a WAV provided by a Waymo partner in a conventional (not autonomous) ADA wheelchair accessible van. Partner drivers are trained to industry-leading standards to work with disabled riders. Riders with mobility needs other than WAV can also hail these vehicles. Waymo is working to expand this offering to other service areas.	**Minimize Walking Setting** Riders can select a setting to minimize walking, even if a shorter walk means the car may need to take a longer route and add to their overall trip time. This setting also makes it much less likely for the car to pull over on the opposite side of the street from where the rider requested.
Screen Reader Support Our Android and iOS apps are regularly tested with Talkback and VoiceOver screen readers to ensure blind and low-vision riders can navigate them.	**Assistive Audio** Riders can enable a setting that provides more audio cues and information throughout the ride (e.g. why the car is yielding) which is particularly helpful for those with vision disabilities.	**Vehicle ID** Waymo riders can set a unique two-letter car ID and color that is displayed atop the vehicle, making it easier to distinguish their Waymo vehicle from others and confirm it's their ride.
Long Walk Warnings Before requesting a ride, riders are informed if a long walk will be required at pickup or dropoff. This allows the rider to plan accordingly. If a rider is having trouble finding or getting to the car, a rider can request that Rider Support delay the vehicle's departure.	**Adaptive App Navigation** Navigation wayfinding experiences with haptic cues assist riders with turn-by-turn walking directions and a compass that points in the direction of the vehicle providing distance and direction.	**Rider Support** Riders can connect with our Rider Support team by phone, chat, or email making assistance accessible to those with speech or hearing disabilities. Agents are trained to assist riders who have accessibility needs with wayfinding, including by looking through the car's cameras to understand the rider's environment.

Riders may adjust and tailor the accessibility settings in the Waymo One app in order to meet their needs. This includes a setting for riders in eligible service areas to request a wheelchair accessible vehicle through the Waymo One app (see Figure 20 below).

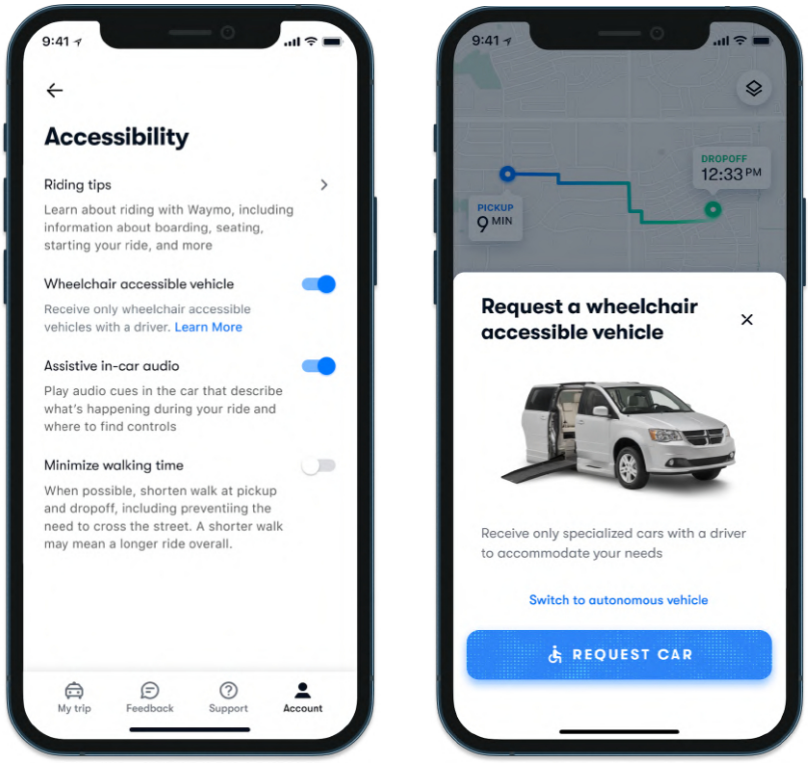


Fig. 20 In-app accessibility settings, illustrating WAV ride hailability

- **Service Animals.** Service animals are always welcome to ride with Waymo. There is no need to notify us or bring any paperwork for a service animal to ride with us. Riders may take extra time at boarding to secure their service animal before starting their ride.

B. Minor Riders

We require Waymo account holders in California to be at least 18 years of age, but minors who are accompanied by an adult account holder are welcome to ride. If a minor requires a car seat or booster, it must be provided by the accompanying adult, as indicated in the Waymo seat-back safety card (see Part IV.C. *Every Waymo Ride* above). Riders may take extra time at boarding to install a car seat before starting their ride.

Exhibit 14

CALIFORNIA PUBLIC UTILITIES COMMISSION

Advice Letter Summary Form

CARRIER & AL FILER INFORMATION

Date of Submission: January 28, 2026		Date of Service: January 28, 2026
Carrier Name: Waymo, LLC		PSG #: 0038152
DBA Name:		
Address: 1600 Amphitheatre Pkwy		
City: Mountain View	State: California	ZIP Code: 94043
Filer's Name: Jack Stoddard, BRB Law LLP		
Filer's Email: jack@brblawgroup.com		Filer's Phone: (415) 531-0785

AL INFORMATION

Advice Letter #: 4	AL Type: ☒ Tier 2 PSP Update, staff disposition
Description: Seeking approval of Waymo's updated Passenger Safety Plan in connection with Waymo's expanded DMV-approved territory for deployment operations, in connection with DMV's approval of Waymo's Ojai vehicle platform and expanded territory for deployment operations, adding additional portions of Northern and Southern California.	
Relevant Commission Decisions: D.20-11-046 (as modified by D.21-05-017).	
Protests and Responses: Any person (including individuals, groups, or organizations) may submit a response or a protest to an advice letter (General Order 96-B, Section 7.4). When submitting a response or a protest, please include the carrier's name (Waymo LLC) and the advice letter number (0004) in the subject line. A protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the carrier no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11). A response or protest must be submitted within twenty (20) days of the date the advice letter was served and must be served on the carrier (Waymo LLC) via email on the same day.	

WAYMO

Waymo LLC
1600 Amphitheatre Pkwy
Mountain View, CA

January 28, 2026

ADVICE LETTER 0004 (Tier 2)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In accordance with Decision (D.) 20-11-046 (as modified by D.21-05-017) (the "Deployment Decision") and the *CPUC Autonomous Vehicle (AV) Drivered and Driverless Pilot and Phase I Deployment Programs Application Instructions and Requirements (Version 1.0)* ("Application Instructions"), Waymo LLC ("Waymo") (TCP0038152A) hereby submits this Advice Letter 0004 to the Commission's Consumer Protection and Enforcement Division ("CPED").

PURPOSE

By this advice letter, Waymo seeks Commission approval of Waymo's updated Passenger Safety Plan (January 2026), in connection with Waymo's expanded operational design domain ("ODD") for deployment,[1] which the Department of Motor Vehicles (DMV) approved on November 21, 2025.[2] As amended, Waymo's DMV Deployment ODD authorizes Waymo to expand deployment operations in additional portions of Northern and Southern California, including, but not limited to, San Diego and Sacramento, and to deploy the Ojai vehicle[3] in existing and expanded deployment territories.

Per the Deployment Decision, "if an entity authorized to participate in the driverless deployment program intends to change its operations in a way that would materially affect the approaches outlined in its Passenger Safety Plan, that entity should provide the Commission's Director of Consumer Protection and Enforcement Division with an updated Passenger Safety Plan by way of a Tier 2 Advice Letter."[4] Waymo plans to expand passenger carrier service provided to the public under our CPUC Phase I Driverless Autonomous Vehicle (AV) Deployment Permit and has revised our CPUC Passenger Safety Plan to reflect these changes and to make other timely updates, as described more fully below. We respectfully request the timely disposition of this advice letter by CPED, pursuant to General Order (GO) 96-B and the authorities referenced above.

[1] A Statement and Map of Waymo's November 21, 2025 DMV-approved ODD for deployment operations is appended hereto as Attachment A.
[2] DMV Letter of Deployment Amendment Approval, dated November 21, 2025, is appended hereto as Attachment B.
[3] The Zeekr vehicle platform, which was approved by the DMV for use in Waymo's driverless testing and deployment ODDs, has been renamed the Ojai (pronounced "oh-hi").
[4] The Deployment Decision, Ordering Paragraph 20.

BACKGROUND

Waymo is an autonomous driving technology company with a mission to be the world's most trusted driver. We aim to make it safer, more accessible, and more sustainable[5] to get around - without the need for anyone in the driver's seat. We believe that the widespread adoption of autonomous driving technology will improve access to mobility, accelerate the adoption of electric vehicle technology, and reduce the number of traffic injuries and fatalities.

Since our founding in 2009 as the Google Self-Driving Car Project, we have been headquartered in our home state of California and have launched the world's first and largest ride-hailing service powered by fully autonomous vehicles ("AVs"). Today, Waymo is the leading provider of fared driverless passenger services in the United States, and our ride-hailing service currently provides more than 450,000 weekly "rider only" trips to paying members of the public in California, Arizona, Georgia, and Texas. Waymo AVs have provided more than 10 million trips in California alone. Each mile driven in California and elsewhere has been guided by Waymo's robust and ongoing safety readiness evaluations.[6] Safety is at the core of Waymo's mission and a hallmark of our ride-hail service.[7]

Waymo is authorized by the CPUC to operate as an AV charter party carrier of passengers (TCP) in the Commission's AV Programs (Drivered and Driverless Pilot; Phase I Drivered and Driverless Deployment).[8] Once authorized by the approval of this advice letter, the Waymo fleet used in our fully autonomous, fared service will include the all-electric Jaguar I-PACE vehicle platform as well as the new all-electric Ojai vehicle. Our ride-hailing experience is supported by our Waymo mobile app, available on both iOS and Android platforms.

---

[5] Waymo's commitment to sustainability is rooted in our mission to be the most trusted driver, ensuring safer roads for everyone. We achieve this by deploying a fully electric, shared fleet and actively supporting more walkable, bikeable, and transit-oriented communities. To power our fleet, Waymo purchases renewable electricity from a variety of sources, including local utilities and community choice energy programs. Electric vehicle chargers are enrolled in California's Low Carbon Fuel Standard (LCFS) program, contributing to state emissions reduction targets.

[6] *See* Waymo Safety Impact - Methodology, *available at* https://waymo.com/safety/impact/#methodology.

[7] More about Waymo's safety record and research can also be found at Waymo's Safety Hub (available at waymo.com/safety/impact), which presents a comparison of Waymo's driverless crash rates to human crash benchmarks for surface streets. Waymo's Safety Hub leverages best practices in safety impact analysis and builds upon dozens of Waymo's safety publications. The data to date indicates that the Waymo Driver is already making roads safer in the places where we currently operate. Specifically, the Safety Hub data demonstrates that the Waymo Driver when compared to human benchmarks is involved in fewer crashes that result in injuries (both serious injury or worse and any-injury-reported) and airbag deployments.

[8] The CPUC approved Waymo to participate in each of these programs in July 2019, February 2022, November 2022, and August 2023, respectively.

As we expand to include more California communities and riders, we remain committed to improving and evolving our technology and service. Listening to and learning from our riders, community leaders, and other AV transportation stakeholders is essential to our efforts.

Each day, thousands of Californians are riding in Waymo AVs, at all times of day, with no human behind the wheel. It is a privilege to serve each and every one of these trips and we look forward to providing safe and reliable service across more of our home state in the months and years to come.

WAYMO ADVICE LETTER 0004

Waymo seeks CPED's approval of the January 2026 Update of Waymo's Passenger Safety Plan in connection with Waymo's expanded ODD for deployment operations covering additional portions of Northern and Southern California, including but not limited to, Sacramento and San Diego. Waymo's service area expansion, together with the introduction of the Ojai vehicle platform and other updates and revisions consistent with Waymo's robust approach to passenger safety, are reflected in our updated Passenger Safety Plan (Attachment C) for fared passenger carrier service.

Per the Deployment Decision, Waymo's Passenger Safety Plan describes our driverless autonomous vehicle technology and service, and provides an overview of the practices and procedures we use to promote rider safety . Waymo's Passenger Safety Plan demonstrates our continued commitment to enhancing passenger safety and addresses the elements highlighted by the Deployment Decision. Waymo's January 2026 Update includes the following key updates:[9]

- *Throughout:* Describes new features that Waymo has implemented to further enhance passenger safety, comfort, and convenience, including, but not limited to, functionality for real-time, rider-initiated pickup and dropoff location adjustment, and rider-initiated honking of the horn.
- *Throughout:* Describes Waymo's new all-electric Ojai vehicle platform, showing how Waymo has incorporated our passenger safety approach into our latest ride-hail vehicle platform (e.g. showing the easily identifiable vehicle exterior).[10]
- *Throughout*: Provides updated images of the Waymo mobile app display and in-car screens, illustrating updated functionalities and features, including the in-car screen prompt that allows a rider to indicate an urgent need for support.

[9] Please note that this list is not exhaustive of all revisions but highlights key updates, including advancements and refinements that Waymo has made since the last-updated Passenger Safety Plan (March 2025), which CPED approved on May 1, 2025. Revisions have been made throughout to update, clarify, improve readability, and conform the Passenger Safety Plan to Waymo's current relevant passenger safety policies and practices.

[10] Waymo's passenger safety policies and procedures generally apply uniformly across our I-PACE and Ojai platforms; differences relevant to Waymo's Passenger Safety Plan elements are described therein.

- *Section I. Our Mission & Section III. Moving People with Waymo:* Describes Waymo's recent service milestones operating Waymo's autonomous ride hail service. Waymo is now providing over 1 million fully autonomous rides each month across multiple major U.S. cities. In California, Waymo is now providing millions of rides each quarter across the San Francisco Peninsula and the greater Los Angeles areas.
- *Section III. Moving People with Waymo:* Describes the expanded geographic territory approved by the DMV for Waymo deployment, effective as of November 21, 2025.
- *Section VI. Responding to Adverse Events:* Describes new Rider Support tooling that allows agents to arrange for a replacement Waymo ride in the event a trip is interrupted. Provides updated information about Waymo's first responder training and engagement efforts. Describes Waymo's Resilience and Incident Management team, which assesses readiness for potential events impacting Waymo's riders and fleet through exercises and real events, building effective policies and procedures to manage and learn from events to improve resiliency. Waymo is continuing to iterate on these policies and procedures, including exploring ways to more closely coordinate with local emergency management stakeholders where we operate.
- *Section VIII. Health & Safety Protocols:* This section has been removed, consistent with applicable health and safety guidance.

EFFECTIVE DATE

Pursuant to Ordering Paragraph 20 of the Deployment Decision, Waymo respectfully requests CPED approval of this Tier 2 advice letter. Per GO 96-B Section 7.3.5, the advice letter will be effective immediately upon CPED's written approval.

PROTESTS AND RESPONSES

Any person (including individuals, groups, or organizations) may submit a response or a protest to an advice letter (General Order 96-B, Section 7.4). When submitting a response or a protest, please include the carrier's name (Waymo LLC) and the advice letter number (0004) in the subject line. A protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the carrier no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11). A response or protest must be submitted within twenty (20) days of the date the advice letter was served and must be served on the carrier (Waymo LLC) via email on the same day.

Responses and protests must be submitted to:

Terra Curtis, Director
California Public Utilities Commission
Consumer Protection and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3214
terra.curtis@cpuc.ca.gov

and to

AVPrograms@cpuc.ca.gov

On the same day the response or protest is submitted to the Commission, the respondent or protestant shall email a copy to Waymo to the attention of Mari Davidson at the following address:

waymo-regulatory-permits@google.com

NOTICE OF SERVICE

In accordance with Section 4 of General Order 96-B, and D.20-11-046 (as modified by D.21-05-017), a copy of this advice letter is being sent electronically to the service lists for R. 25-08-013, R.12-12-011, R.19-02-012, and R.21-11-014. Address changes to these service lists should be directed to the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov.

Respectfully,

DocuSigned by:
Mari Davidson
B1021588BA0747D...

Mari Davidson
Assistant General Counsel
Waymo LLC
1600 Amphitheater Parkway
Mountain View, CA 94043

INDEX OF ATTACHMENTS

A	Statement and Map of DMV-Approved Operational Design Domain - Driverless Deployment (November 21, 2025)
B	Waymo DMV Deployment Permit (November 2025 Amendment Approval Letter)
C	Passenger Safety Plan - CPUC Driverless Autonomous Vehicle Deployment Program (January 2026)

ATTACHMENT A

Statement and Map of Operational Design Domain - Deployment

Waymo's deployment ODD,[11] as most recently approved by the California Department of Motor Vehicles on November 21, 2025, is set forth below. Please note that, other than the geographic areas described below and shown in Figures 1 and 2, these descriptions remain unchanged from Waymo's Amended Deployment Application approved by the DMV on March 17, 2025 (and by the CPUC on May 1, 2025 via Waymo Advice Letter 0003), and apply to both the Jaguar I-PACE and Ojai vehicle platforms.:

Roadway Type	The intended operational design domain of Waymo's AVs includes all roadway types and areas accessible for ride-hailing and goods delivery services, such as: • Freeways, highways, city streets, rural roads, and other roadways. • Parking lots and driveways.
Speed Range	The intended operational design domain of Waymo AVs includes all speed limits.
Weather	The intended operational design domain for Waymo AVs includes all rain, fog, and other conditions, but will not at this time allow for driverless operation when there is widespread snow or ice accumulation on the roadway. The Waymo ADS is designed to adjust its driving behavior as appropriate for the conditions. For example, the ADS tends to drive more slowly as fog becomes denser or as rainfall increases, which helps the ADS to respond to surrounding traffic that typically moves more slowly in these conditions.
Time of Day	The intended operational design domain of Waymo's AVs includes all times of day and night.
Dynamic Operating Parameters	Controlling the operating parameters of its AVs is a part of Waymo's dynamic operations. Waymo may choose to change the operating parameters for some or all of its AVs at various times. For example, operations may be dynamically adjusted or restricted during certain times

[11] Pursuant to 13 CCR Section 227.02(j), the operational design domain ("ODD") is "the specific operating domain(s) in which an automated function or system is designed to properly operate, including but not limited to geographic area, roadway type, speed range, environmental conditions (weather, daytime/nighttime, etc.), and other domain constraints."

	of day, around certain road features, or in certain weather conditions. In both the drivered and driverless configurations, if an AV encounters any conditions outside of the applicable operating parameters, the ADS is designed to be capable of achieving a minimal risk condition. In addition, in a drivered configuration, the ADS also alerts the trained driver. To continue a trip, drivers may take over in such conditions. Trained drivers have discretion to take over at any time and are trained to do so as appropriate to support safety, traffic law compliance, or community values. Trained drivers are more likely to take over in atypical traffic conditions.
Geographic Area for Both Drivered & Driverless Configurations	Waymo seeks authorization for deployment operations in both drivered and driverless configurations in the area depicted in the map below. As noted in prior materials submitted in connection with Waymo's Deployment Permit, controlling the operating parameters of our AVs is part of Waymo's dynamic operational program. For the purpose of deployment operations, Waymo may dynamically adjust operating parameters, including geographic areas, for some or all of its AVs at various times. Although we have found through experience that Waymo's ADS technology is highly transferable to new environments, before we begin operation in a driverless configuration in any new geographical area, we complete a thorough validation process and continuously monitor performance for potential issues. We plan to continue this process of technology validation and incremental expansion.

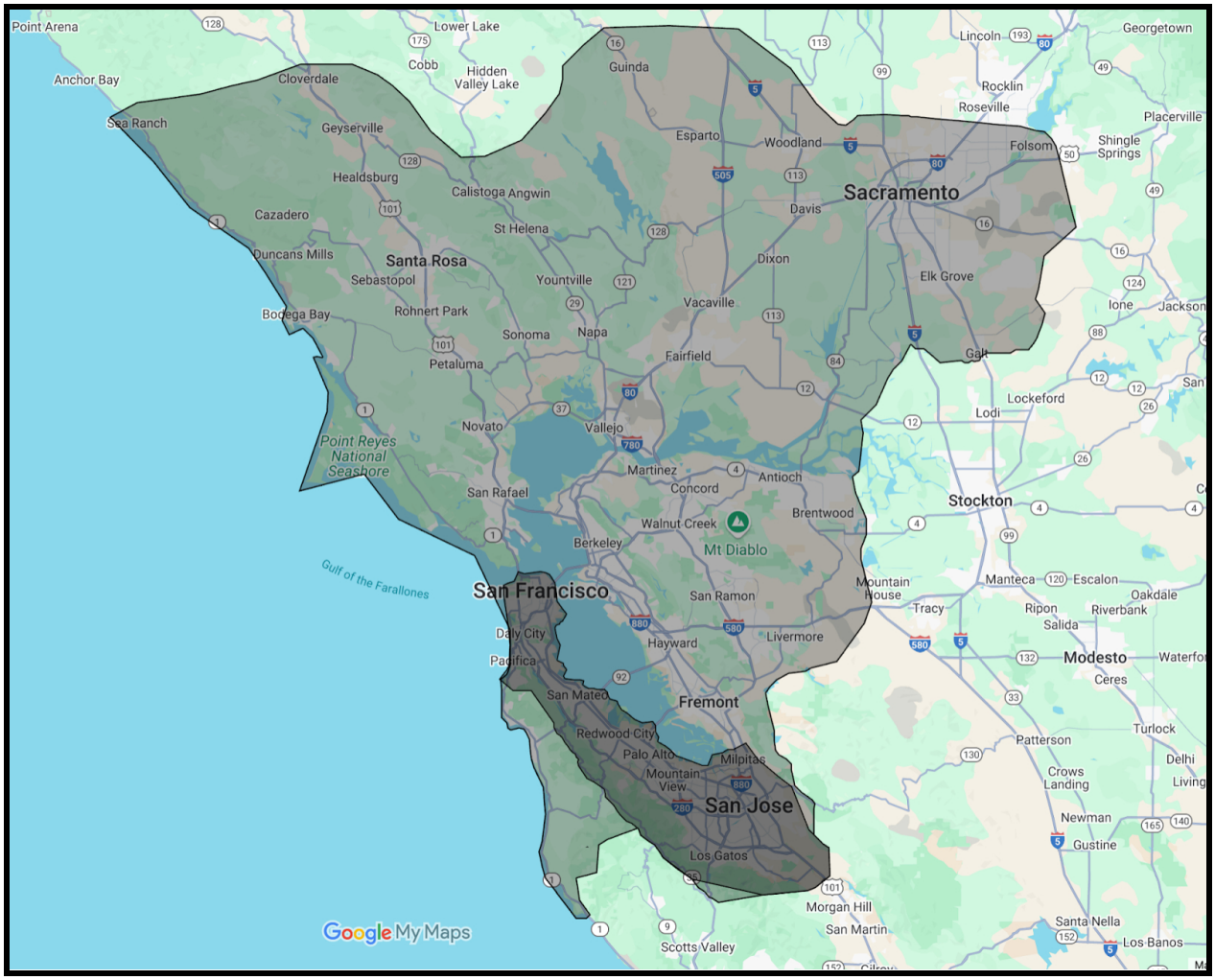


Figure 1. Waymo Operational Design Domain Map - Northern California deployment area. The more lightly shaded area is Waymo's expanded ODD for deployment operations approved by the DMV on November 21, 2025.

ATTACHMENT C

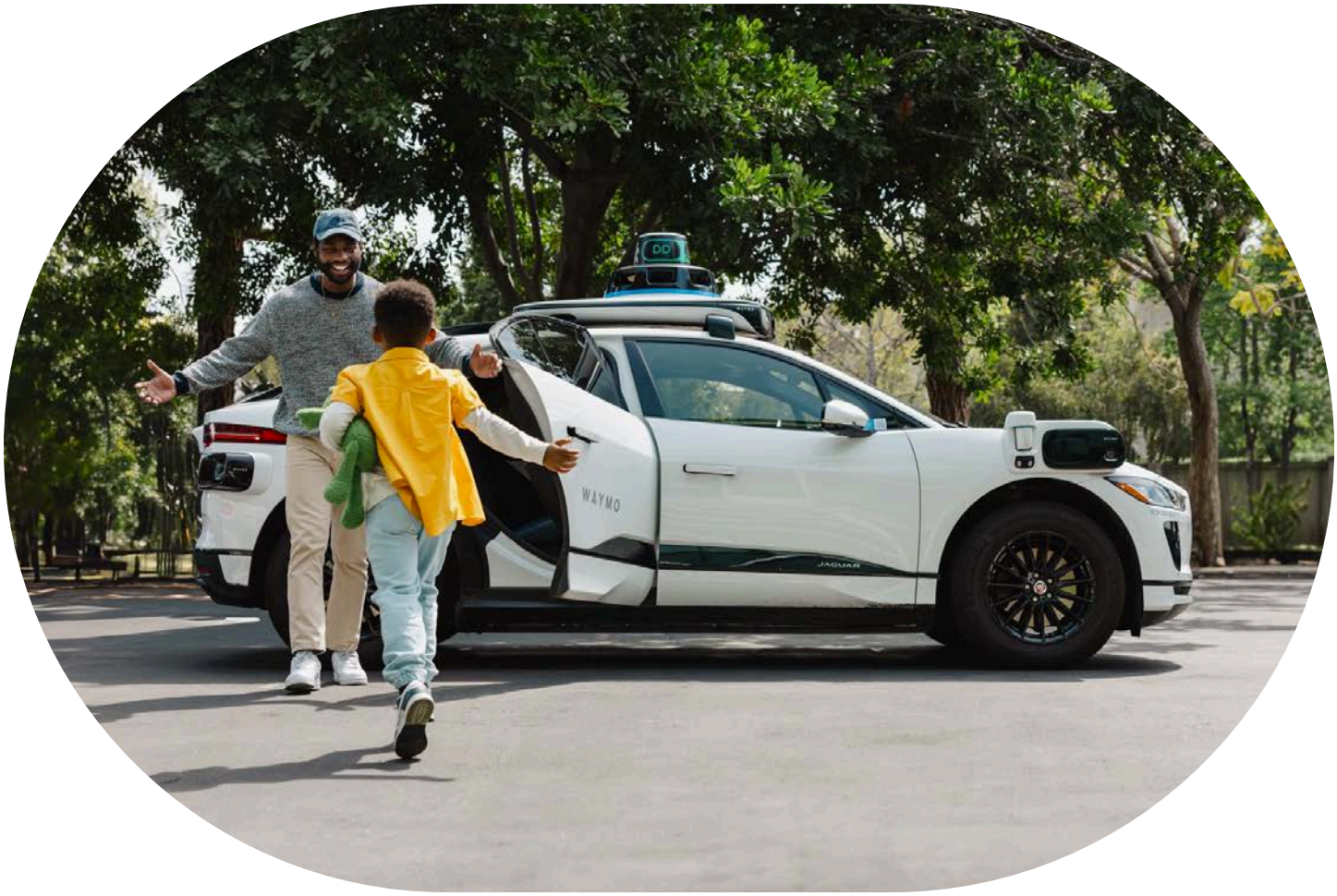
Waymo's Passenger Safety Plan (January 2026)

[Remainder of page left blank]

WAYMO

Passenger Safety Plan

CPUC Driverless Autonomous Vehicle Deployment Program
January 2026



Subject Index

BECAUSE SAFETY IS URGENT™

I. Our Mission

Waymo is an autonomous driving technology company with a mission to be the world's most trusted driver, making it safer, more accessible, and more sustainable to get around — without the need for anyone in the driver's seat. We're building *The World's Most Experienced Driver™* and believe our technology will improve access to mobility and make roads safer for all.

Safety is at the core of Waymo's mission — it's why we were founded in 2009 as the Google Self-Driving Car project. Our commitment to safety is reflected in everything we do, from our company culture, to how we design, test, and deploy our automated driving system ("ADS"), which we call the Waymo Driver™. Safety is also the hallmark of our rider experience.

Waymo's Passenger Safety Plan describes how we deliver our California[1] riders a safe, comfortable, and delightful rider experience each and every day. The features and service enhancements highlighted in this Plan are drawn from our experience providing hundreds of thousands of paid passenger trips each week across multiple major U.S. cities[2] and from driving over 100 million autonomous miles on public roads and tens of billions of miles in simulation.[3] Waymo has also spent years meaningfully engaging with, and learning from stakeholders that include public agencies, local governments,

[1] Waymo is authorized to operate drivered and driverless AV passenger carrier service pursuant to the jurisdiction of the California Public Utilities Commission ("CPUC") under TCP Permit No. 38152-A in portions of Northern and Southern California. Waymo's Passenger Safety Plan is specific to Waymo's California service areas and is submitted pursuant to Decision 20-11-046, as modified by Decision 21-05-017.

[2] Waymo also operates commercial autonomous ride-hail services in Arizona, where our service area currently extends across Metro Phoenix and includes trips to and from Phoenix Sky Harbor International Airport. Waymo AVs are also available to the riding public through the Uber app in Austin, Texas and in Atlanta, Georgia.

[3] See Waymo's public road safety performance data publications, including an analysis of Waymo performance relative to human benchmarks over millions of miles of fully autonomous driving. The latest Safety Impact assessment is available at our Safety Hub at waymo.com/safety/impact. More in-depth performance assessments in our scientific publications are available at waymo.com/safety/research.

utilities, and research institutes; accessibility, road safety, and sustainability organizations; as well as neighborhood associations, schools, and other community groups.

As we grow, Waymo is committed to advancing the capabilities of the Waymo Driver, discovering and developing features to enhance our rider experience, and refining our operational programs. Waymo's Passenger Safety Plan highlights certain aspects of the capabilities, features, and procedures that we've integrated into our passenger carrier service, demonstrating how Waymo prioritizes rider safety.

II. The Waymo Driver

Waymo's automated driving system is designed to perform the entire dynamic driving task, operating within a defined geography and set of conditions, without the need for a human driver. Our ADS includes the software, hardware, and compute that, when integrated into the vehicle, performs the entire dynamic driving task.

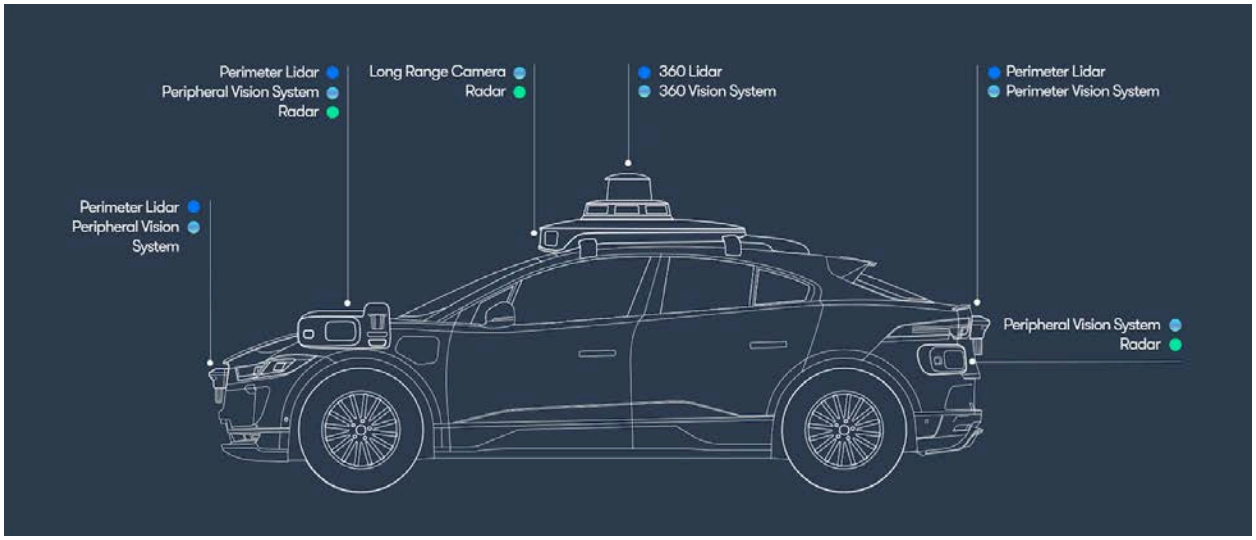


Fig. 1 Illustration of a Waymo Driver sensor suite on the Jaguar I-PACE vehicle

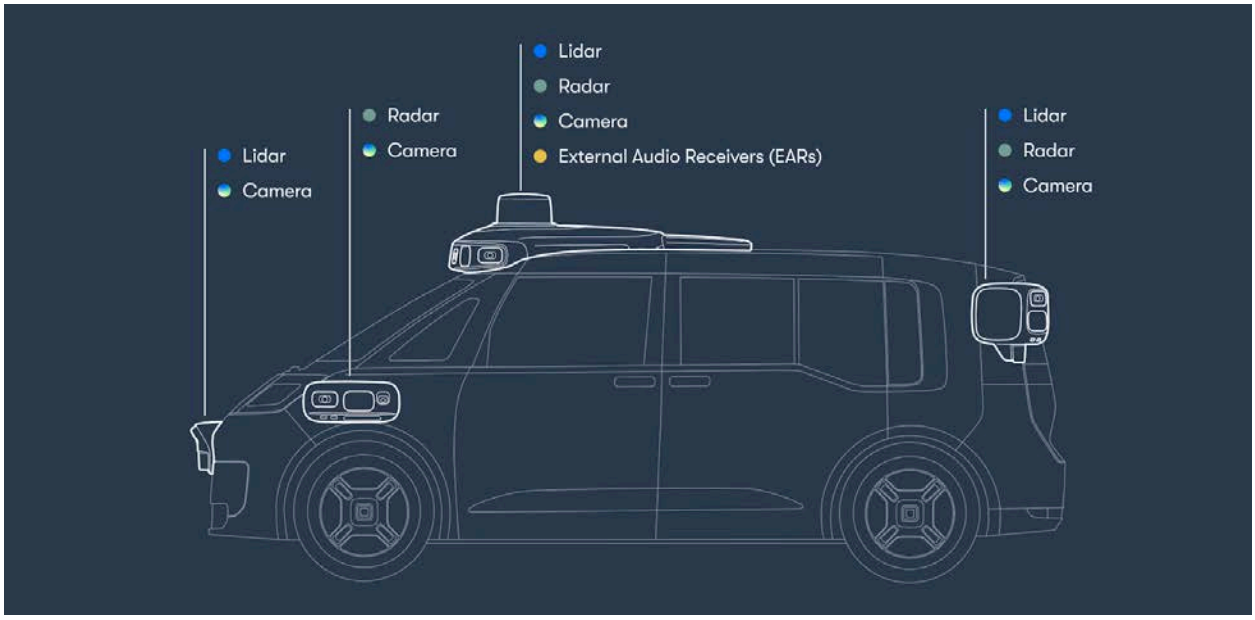


Fig. 2 Illustration of a Waymo Driver sensor suite[4] on the Ojai vehicle

To meet the complex demands of fully autonomous driving, Waymo has developed an array of sensors that enable the Waymo Driver to see a detailed 3D picture of the world, both during the day and at night, as far as three football fields away. This

[4] Please note that Waymo's website, mobile app, and other materials referenced in this Plan may be modified from time to time in consideration of new information and operational updates, and are provided here for illustrative purposes. Any Plan updates will be submitted in accordance with D.20-11-046 (as modified by D.21-05-017) and the CPUC AV Programs Application Guidance (last updated August 16, 2024).

multi-layered sensor suite (composed of lidar, radar, cameras, and other sensors[5]) works in concert, making the Waymo Driver capable of identifying dynamic and static objects including pedestrians, cyclists, other vehicles, traffic lights, construction cones, and other road features.

In our California service areas, we've integrated our ADS into the Jaguar I-PACE and Ojai vehicle platforms, both of which are battery-electric and powered by renewable energy.[6] Equipped with our ADS, the Jaguar I-PACE and Ojai vehicles provide our riders with an exceptional autonomous vehicle ("AV") passenger carrier experience in a variety of urban and suburban environments.

[5] Other sensors include an array of external audio receivers (EARs) used to detect and pinpoint the location of emergency vehicle sirens.
[6] Waymo plans to integrate additional vehicle platforms into the fleet over time, including the all-electric Hyundai IONIQ 5.

III. Moving People in Waymo Autonomous Vehicles

Waymo has been working on fully autonomous driving technology in our home state of California since 2009, learning from each step along the way as we progressed to make our fully autonomous (driverless) Waymo ride-hailing service available to the California public on a commercial basis in August 2023. Waymo is now providing millions of fully autonomous rides across the San Francisco Peninsula and in the greater Los Angeles area, and we look forward to welcoming more Californians to experience Waymo.

A. The Waymo Mobile App

To request rides in Waymo's autonomously driven vehicles, riders in California download the Waymo app to their mobile device (iOS or Android). Riders choose their destination and select a pickup location from those available using an interactive map. Before confirming the trip, riders will see an upfront fare estimate, route overview, and anticipated ETAs. The Waymo app also displays useful information for the rider during their trip, including the estimated time to dropoff (see Figure 3 app display sample below).

Riders also may tailor their Waymo app and trip experience to their accessibility needs, as described in more detail in Part XI.A. *Accessibility* below.

Waymo riders may request rides immediately after downloading the app and successfully creating an account with Waymo, except in areas where we may have limited service capacity and are growing to meet anticipated rider demand. Waymo is not currently offering riders the option to arrange a driverless ride shared by more than one chartering party. Waymo's service offerings will grow and change over time.

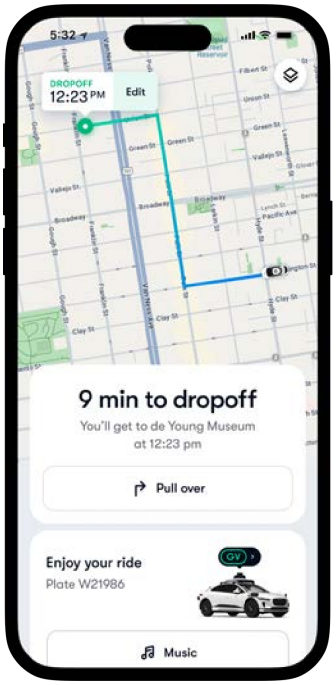


Fig. 3 Waymo mobile app display with mid-trip information and options

B. Waymo's California Driverless Service ODD

Waymo provides CPUC-authorized driverless passenger carrier service exclusively within the operational design domain ("ODD") authorized by the California Department of Motor Vehicles ("DMV") for driverless testing (CPUC pilot) and deployment. Driverless passenger carrier operations are conducted under a variety of weather conditions (e.g. rain, fog, and hail), on roadway types such as city streets, parking lots, and freeways, at all times of day and night.[7]

Waymo's driverless pilot and deployment geographic ODDs cover parts of:[8]

- Northern California, including cities and unincorporated territory within the Alameda County, Contra Costa County, Marin County, Napa County, Sacramento County, City and County of San Francisco, the County of San Mateo, and the County of Santa Clara, Santa Cruz County, Solano County, Sonoma County, Yolo County; and
- Southern California, including cities and unincorporated territory within the County of Los Angeles, Orange County, Riverside County, San Bernardino County, San Diego County, and Ventura County.

Waymo's ADS is designed so each vehicle does not operate autonomously outside of its approved ODD. For example, our riders cannot select a destination outside of our approved geography, and our software will not create a route that travels outside of our ODD. The Waymo Driver also can detect changes in ODD-relevant conditions and adjust its behavior accordingly (e.g. by slowing down in heavy rain or fog). Furthermore, the Waymo AV is designed to come to a safe stop when conditions

[7] Maps and descriptions of Waymo's DMV-authorized ODDs are contained in Waymo's Law Enforcement Interaction Protocols for the Jaguar I-PACE and Zeekr, which may be modified from time to time pursuant to 13 CCR 227.30.

[8] Municipalities newly added to Waymo's deployment service area via this 2026 Update include those in the SF Bay Area (including but not limited to Alameda, Antioch, Berkeley, Corte Madera, Half Moon Bay, Oakland, Napa, Santa Rosa, Walnut Creek), Sacramento area (including but not limited to Sacramento, Vacaville, Vallejo), Los Angeles area (including but not limited to Long Beach, Santa Clarita, Thousand Oaks), Orange County (including but not limited to Anaheim, Irvine), and the San Diego area (including but not limited to San Diego, Chula Vista). Waymo's DMV-approved operational design domain (which is coterminous with Waymo's CPUC service area) can be found at https://www.dmv.ca.gov/portal/vehicle-industry-services/autonomous-vehicles/autonomous-vehicle-testing-permit-holders/.

outside the ODD are present (e.g. widespread snow or ice accumulation on the roadway).[9]

We also design our vehicles to be capable of complying with federal, state, and local laws within our geographic areas of operation. Through our internal programs and processes, we identify applicable legal requirements relevant to safe driving and build those requirements into our system. Before our vehicles drive in a new area, our team works to understand the nuances of driving in that locale, and we update our software so our vehicles are capable of operating safely and appropriately.

[9] See Part IV.C. *Every Waymo Ride* (*Pulling Over and Safely Exiting)* for more on how the Waymo Driver identifies a safe location to pull over, including in the process of achieving a "minimal risk condition."

IV. Rider Education

Our automated driving technology is cutting edge, but how we talk about it isn't complicated. Our rider-oriented communications educate our riders about how our technology and services work, what they can expect in riding with us, and what precautions and processes we have in place to transport them safely and comfortably.

A. Public Engagement

Before signing up to ride with Waymo, potential riders may be introduced to our service through various media and methods. Waymo also seeks to reach beyond our potential customers to the broader public, to familiarize people with the Waymo AV's capabilities.

- Waymo's Website. Waymo maintains a website with useful information about Waymo's service, experience, and safety information. For example, Waymo's website hosts our blog (waymo.com/blog), which provides updates on Waymo's service and technology. Our website also links to our published safety papers (waymo.com/safety/research), our law enforcement interaction plans (waymo.com/firstresponders), details of our commitment to sustainability

(waymo.com/sustainability), and other informative resources. Key resources are provided in Spanish, Filipino, and Chinese (traditional and simplified) as illustrated in the two sample images below (see Figures 4 and 5).

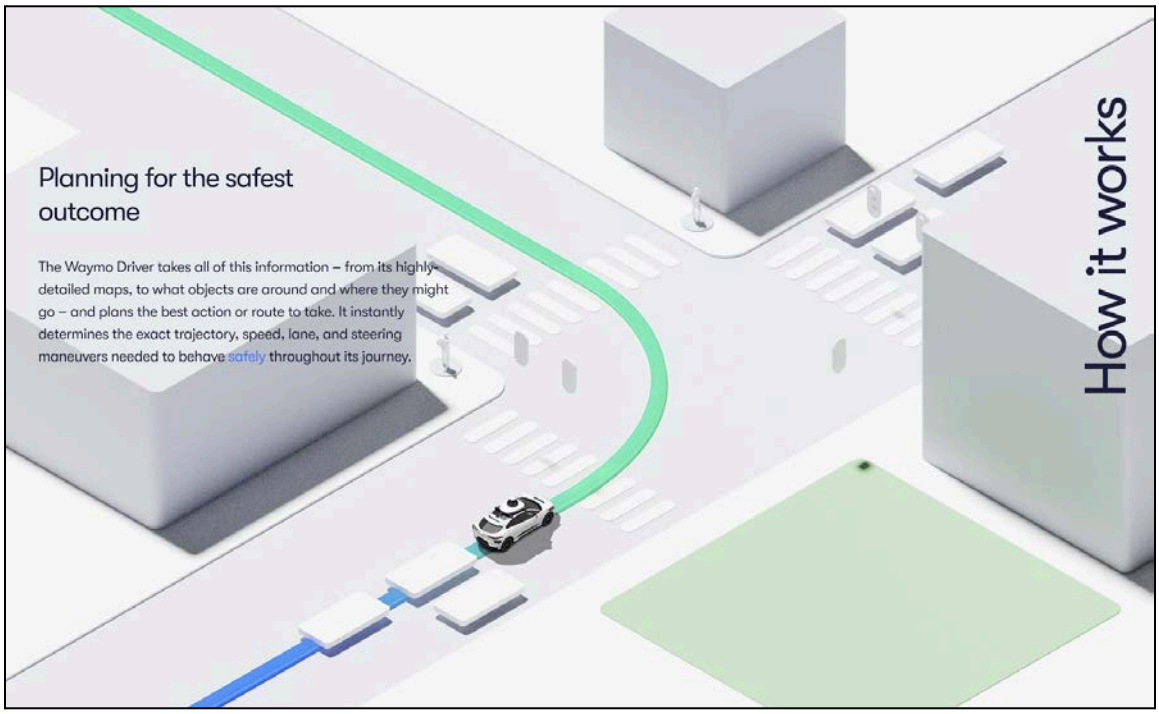


Fig. 4 "How it works" slide story at *https://waymo.com/waymo-driver/ (English)*

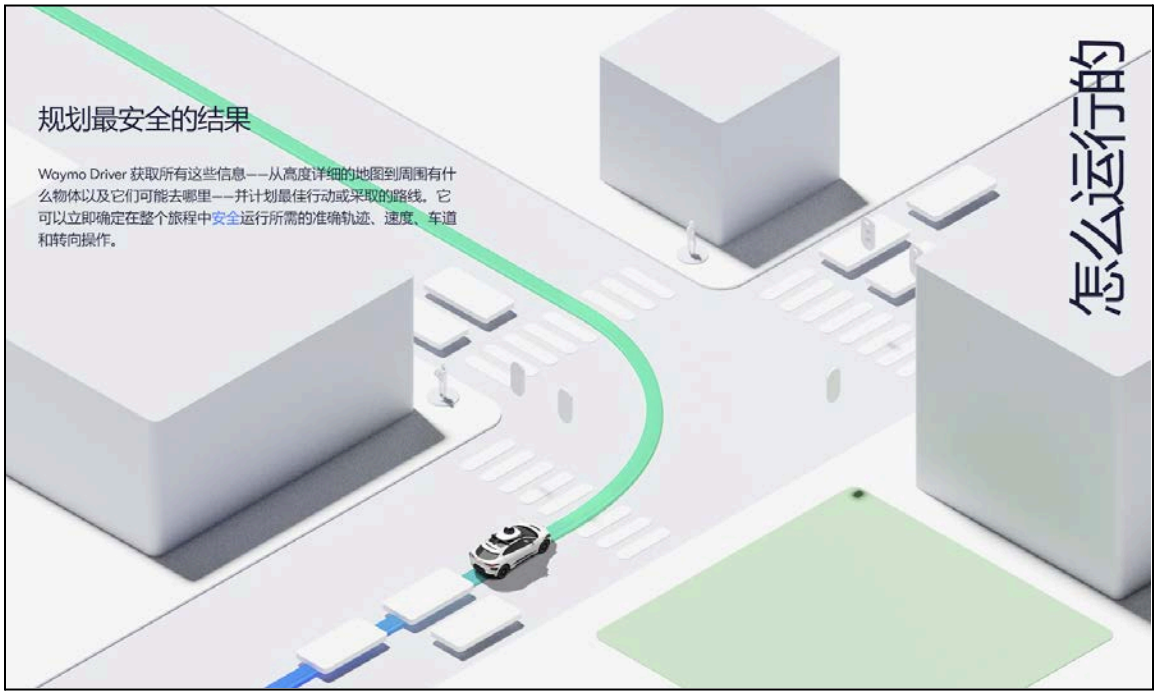


Fig. 5 "How it works" slide story at *https://waymo.com/waymo-driver/ (Chinese - simplified)*

- Waymo's Community Engagement. Waymo supports local and national nonprofits through event sponsorships, charitable delivery, free and reduced ride programs, educational vehicle showcases, providing rides to and from partner events, volunteerism, and more. Waymo works in partnership with local and national safety, disability, equity, mobility, and senior organizations to engage and educate the public about how Waymo's AV technology works and the public benefits it may unlock. We invite nonprofit partners to participate in user experience research studies as well as Waymo's Accessibility Network to ensure Waymo is listening to and learning from a diverse set of communities to better equip us to serve the unique needs of all riders. Please see waymo.com/community for more information.

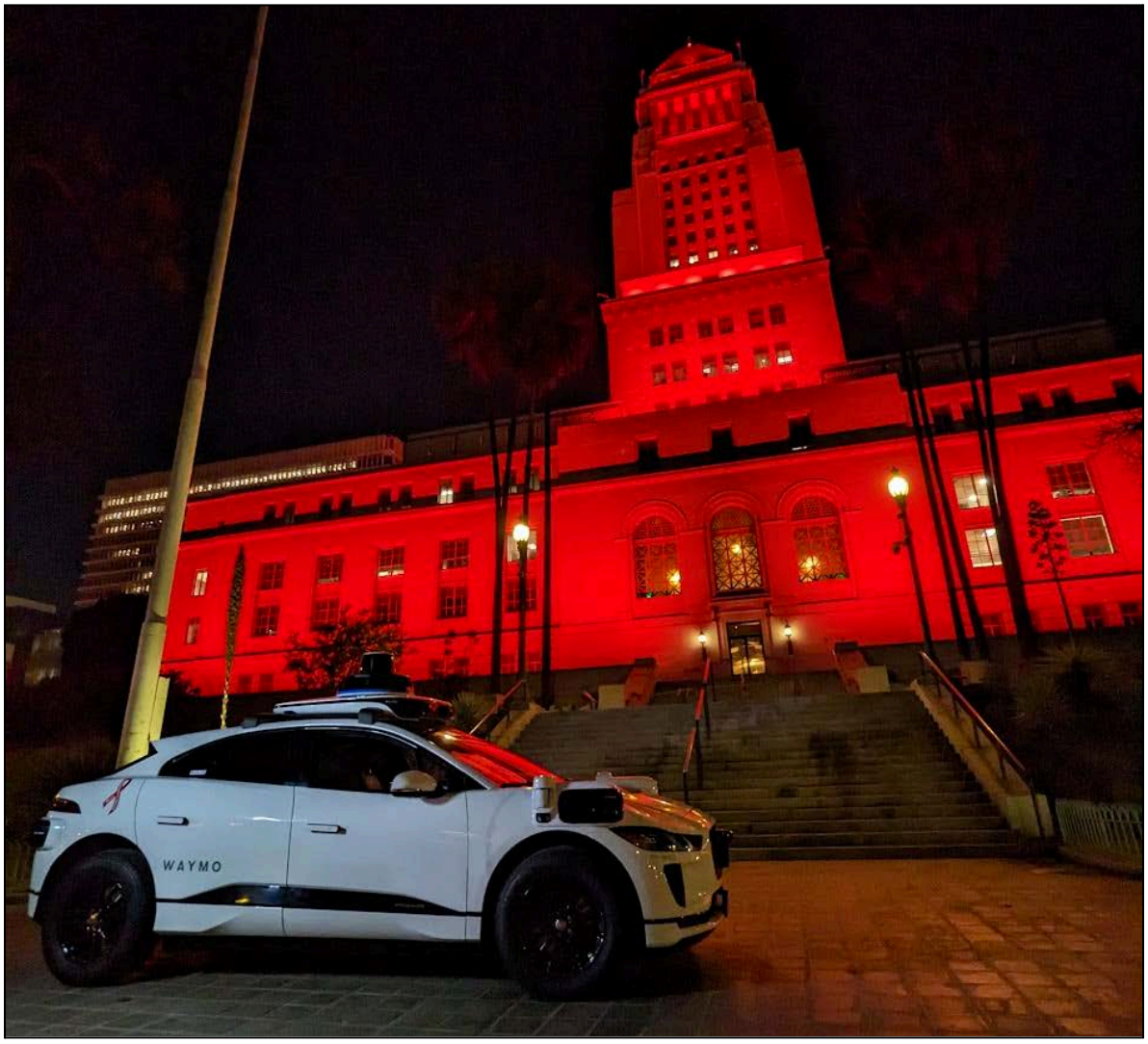


Fig. 6 Waymo with red ribbon decal encouraging people to "designate a driver" at the annual Illuminate MADD California Press Conference and Vigil, Los Angeles City Hall

Waymo also hosts informational events in the communities in which we operate. These events help us to inform, and be informed by, our neighbors and local organizations. We typically include a static showcase of our vehicle, with Waymo representatives available to answer questions and share their experiences. We may also set up interactive displays at events that describe Waymo's technology, mission, and vision for the future. For certain events, we've also employed digital content, video tutorials, and other media to educate about our technology. These informational events are a user-friendly way to introduce Waymo's state-of-the-art automated driving system and ride-hailing service to the public.

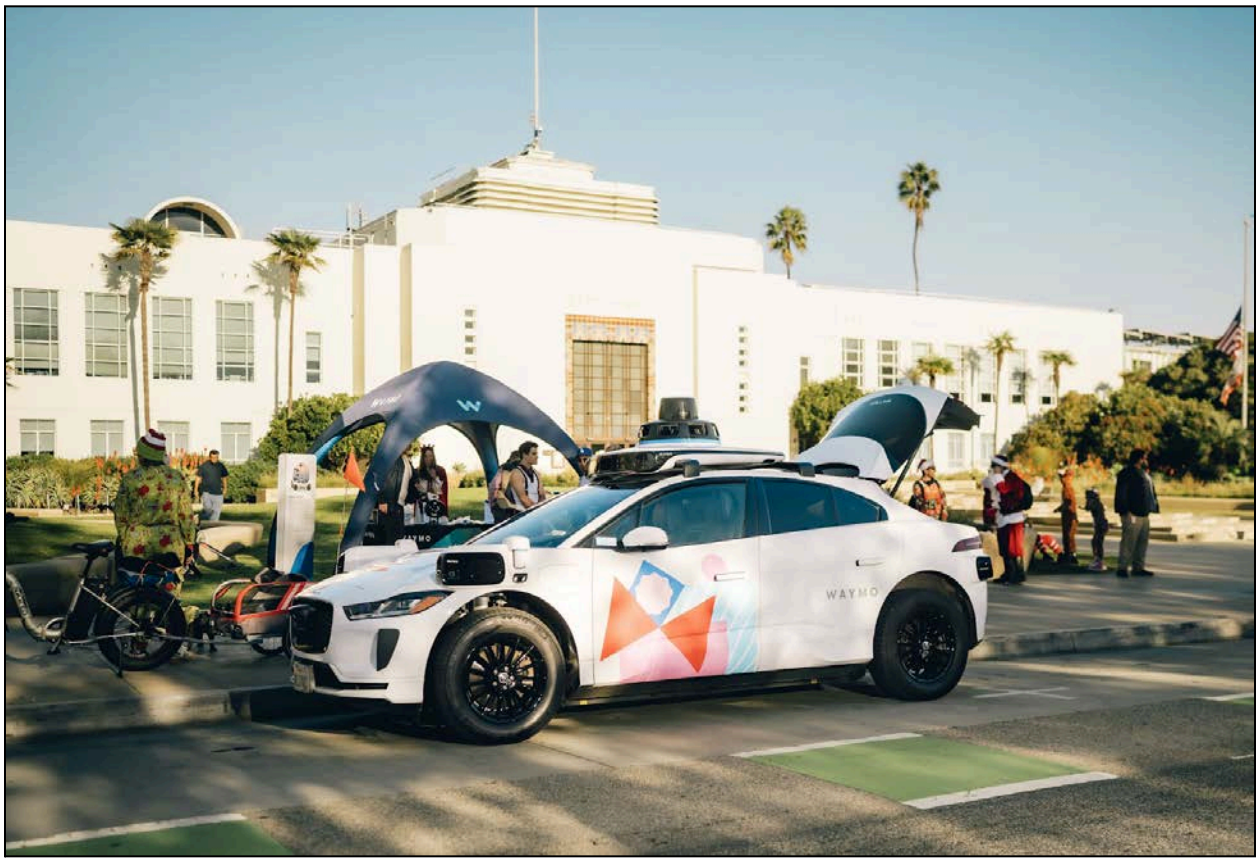


Fig. 7 Waymo at the Santa Monica Boys and Girls Club Toy Drive with Beyond the Board at Santa Monica City Hall in December 2025

B. Getting Started with Waymo

Waymo's onboarding process provides our prospective riders with a variety of resources about the Waymo ride experience and what to expect from our vehicles. Those seeking to take driverless trips in our California service areas have the opportunity to review our terms of service and privacy policy in the process of setting

up a Waymo account. Onboarding[10] also includes notice to account holders that they will be receiving driverless AV service provided by Waymo under the Commission's jurisdiction, and account holders acknowledge and agree to receiving such service as part of creating a Waymo account. Account holders are also required to confirm that they are at least 18 years of age to ride with Waymo (riders under 18 must be accompanied by an adult account holder) in California.

Key actions taken in the onboarding flow are memorialized in communications sent to the account holder by email. A new Waymo account holder will receive confirmation that they can now ride with Waymo, together with useful information about taking their first autonomous ride using the Waymo mobile app.

Riders have 24/7 access to FAQs and articles hosted in the Waymo mobile app and through the Waymo (online) Help Center. Waymo's Help Center provides text and video resources describing the rider experience and familiarizing riders with the vehicle and mobile app (see Figure 8 example below showing riders how to start their ride with a reminder to use seat belts).

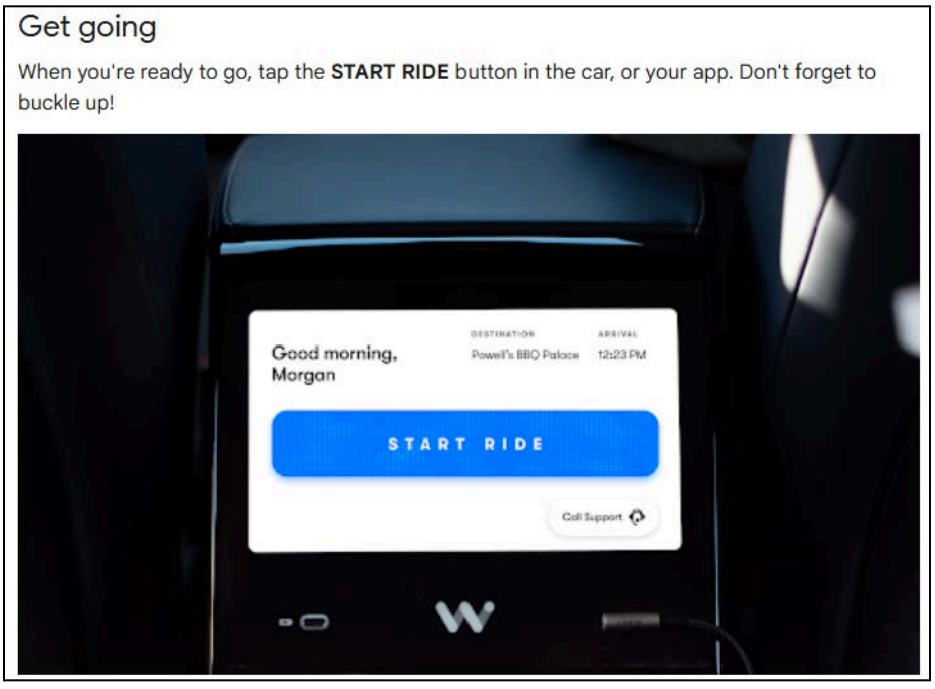


Fig. 8 Help Center sample from "Your first trip" article

[10] Waymo account onboarding may change and streamline over time as our Waymo service expands to serve more riders, but essential notices and acknowledgments will remain.

Riders can also learn more about how the Waymo app keeps them informed of their vehicle's arrival status, how to enable or change accessibility settings, the vehicle's seating capacity (see Figure 9 example below), how to access the trunk, and many other practical tips intended to optimize their experience.

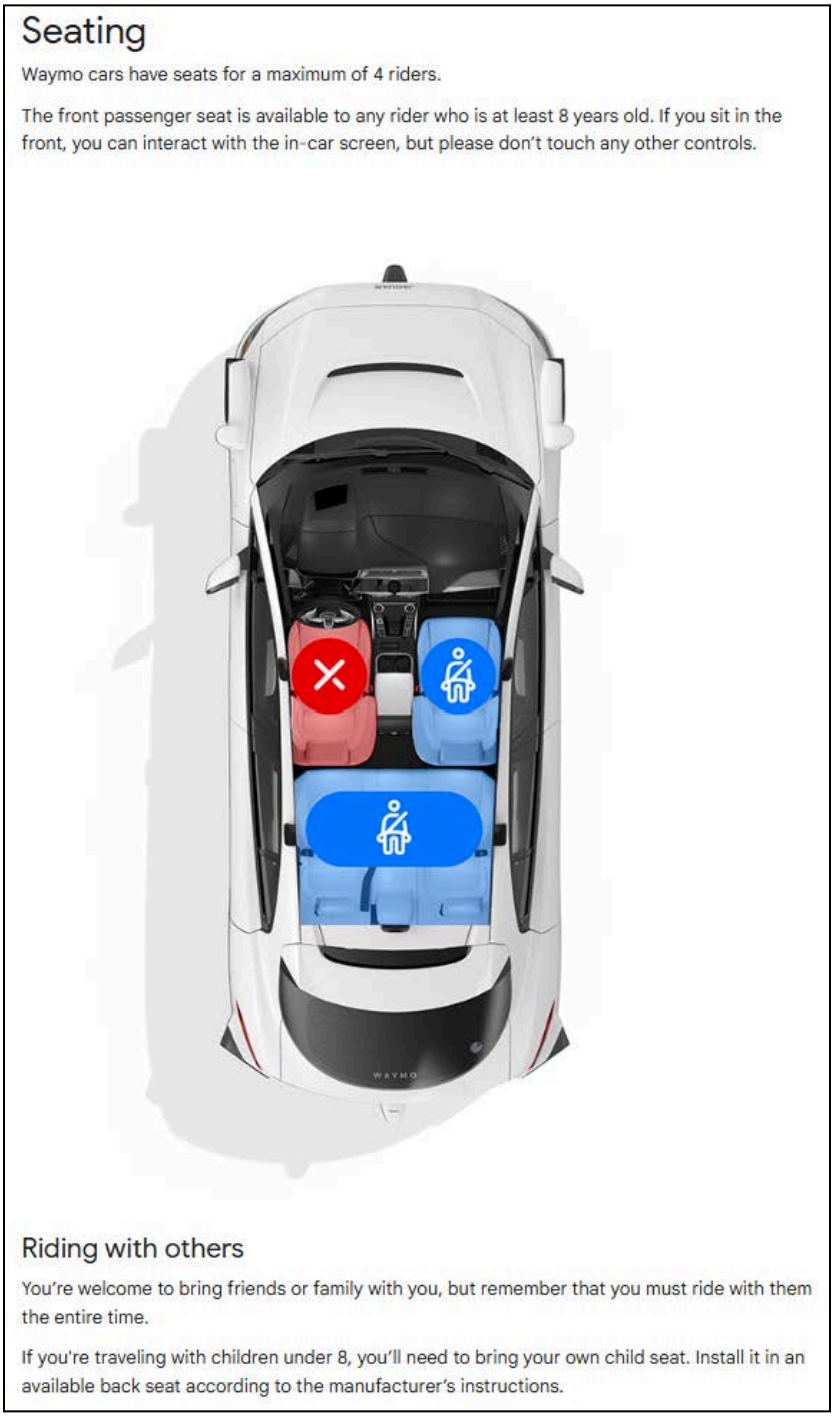


Fig. 9 Help Center sample from "Seating" article (Jaguar I-PACE)

The Waymo Help Center also includes reminders to riders - those who are new to our service and those who ride with us often - such as the “10 things to know about your trip” article (see Figure 10 for an excerpt reminding riders of the car and rider rules).

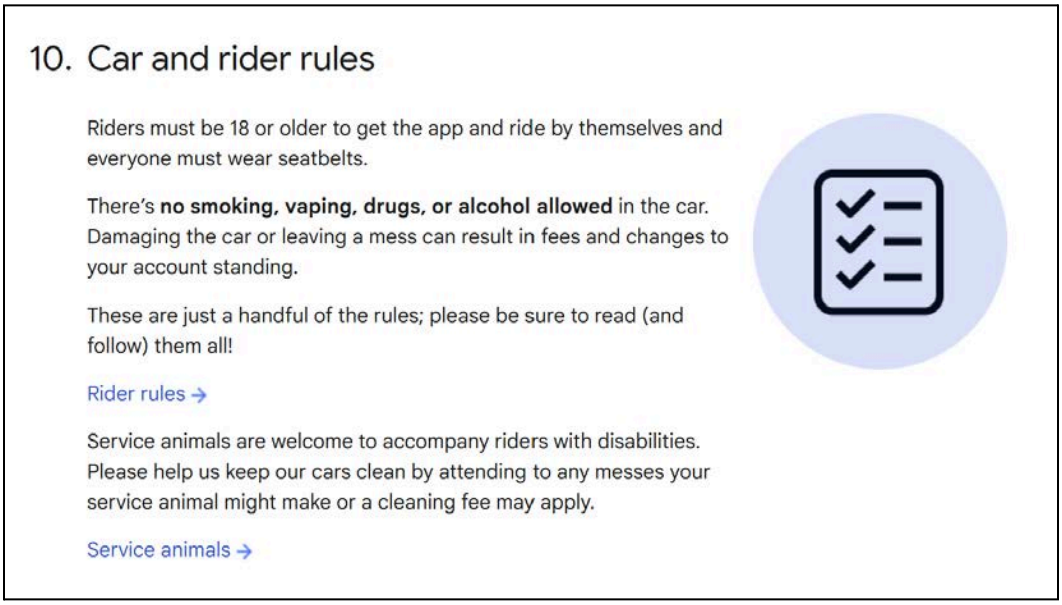
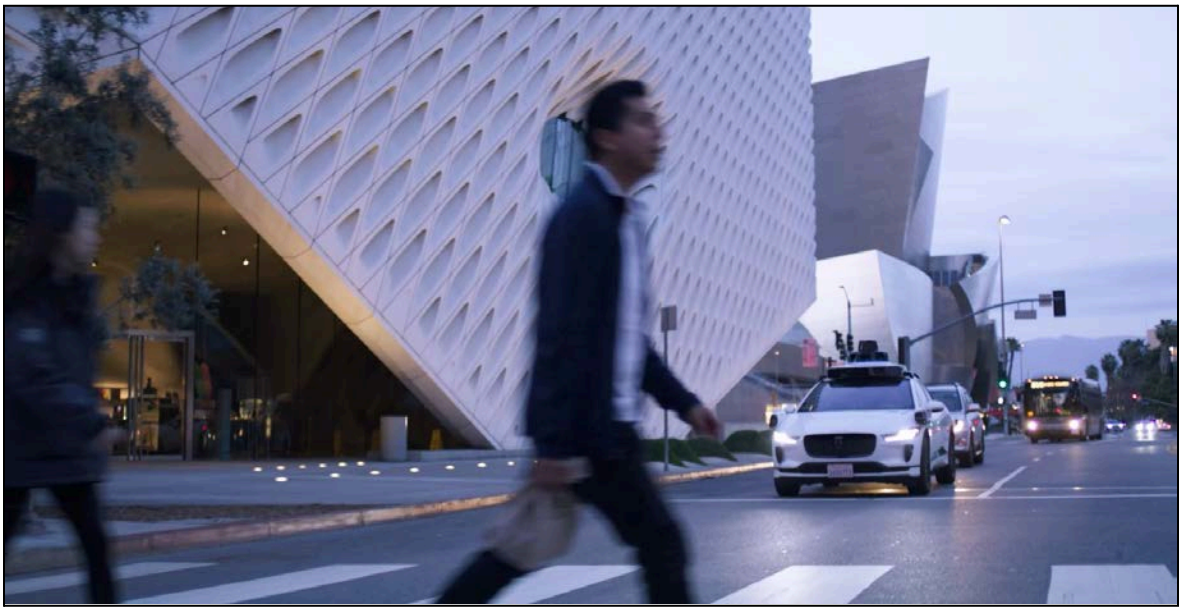
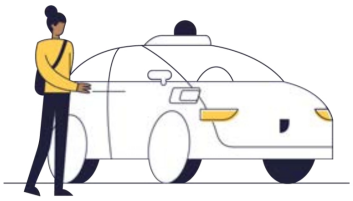


Fig. 10 Help Center sample from “10 things to know about your ride” article highlighting car and rider rules

The Waymo Help Center is updated with new information as the service grows and evolves.

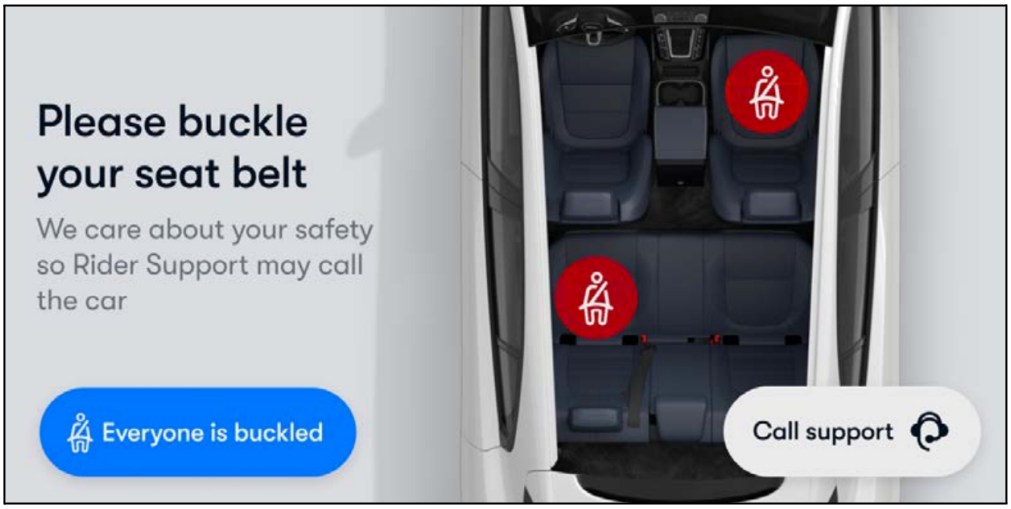




C. Every Waymo Ride

The Waymo app and the features we integrate into the in-car experience help our riders understand how our fully autonomous vehicles operate. We enhance rider safety and comfort through timely and relevant communications and with an ever-expanding suite of safety features and functionality. These communications and features include the following:

- Seat Belt Reminders. Buckling up saves lives,[11] and Waymo has developed multiple ways of keeping seat belts top of mind for our riders.[12] In our driverless vehicles, riders will be reminded to buckle their seat belt through in-vehicle screen notifications (e.g. our in-vehicle screen alert shown in Figure 11 below), and other media (e.g. rider safety video). Riders also receive automated visual and/or audio alerts if the vehicle's sensors detect unbuckled seat belts. Waymo's Rider Support agents may also connect with riders through the in-car speakers to instruct on seat belt usage.



[11] See Waymo's publication *Ride-hailing in the Safe System: Increased Seat Belt Compliance and Late Model Year Vehicles* available at https://waymo.com/research/ride-hailing-in-the-safe-system-increased-seat-belt-compliance-and-late/

[12] Waymo was awarded a 3-star rating in the FIA Road Safety Index - the highest possible recognition - in account of these seat belt reminders and Waymo's other safety practices aimed at reducing serious injuries and fatalities.

Fig. 11 In-vehicle screen seat belt alert

- Setting and Changing Pickups and Dropoffs. We want our riders to enjoy a smooth trip experience and sometimes that means they'll want to adjust their pickup or dropoff location. Riders can do so from the in-car screen or in the Waymo app. Riders can change their dropoff location even after having arrived at their original destination and can choose to simply pull the car ahead a short distance or change their destination entirely. (see Figure 12).

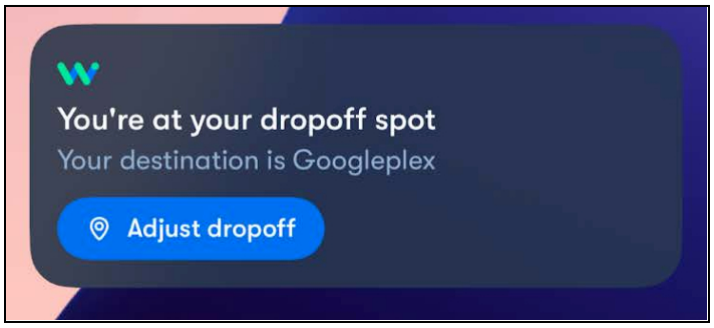


Fig. 12 In-app display of location adjustment prompt

Instructions for creating and editing a trip are available in-app and also in the Waymo Help Center. Figure 13 below illustrates the dropoff location editing functionality in the Waymo app.

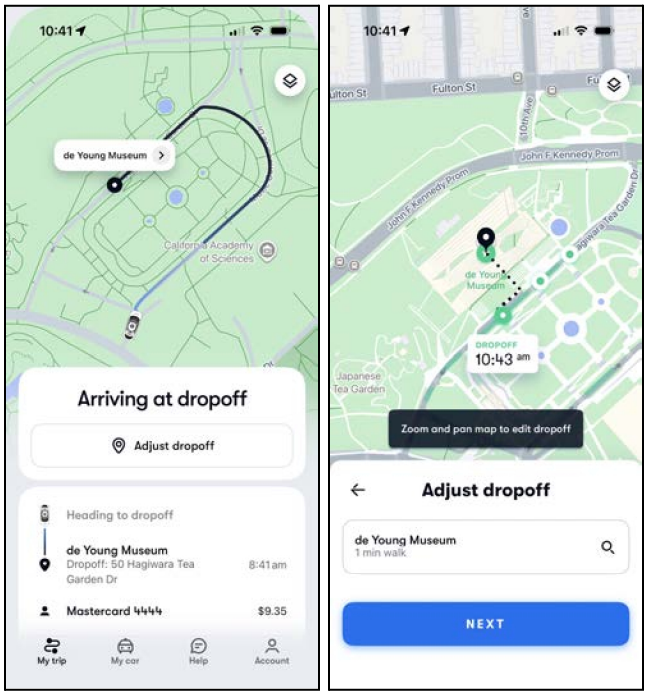


Fig. 13 In-app displays demonstrating dropoff location adjustment

- Identifying the Vehicle. For each trip, the rider is shown an image of the vehicle model in the app. Each Waymo AV is easily identifiable by the automated driving system's roof assembly and front fender additions, which bear Waymo's distinctive blue ring, the Waymo name on the vehicle, and Waymo's CPUC-assigned TCP number. Waymo vehicles are also recognizable by the light display on the rooftop sensor, which may also show a "W" logo, two-letter rider initials, or other icons (e.g. boarding, pedestrian crossing).[13]

Fig. 14 Vehicle Identification (Hardware, Name, TCP) on the Jaguar I-PACE

Fig. 15 Vehicle Identification (Hardware, Name, TCP) on the Ojai

[13] Elements of the platform aesthetic not listed here (e.g. exterior color; interior materials) may change over time.

- Personalized Vehicle ID. To make it even easier for riders to find their unique vehicle in driverless operation, Waymo AVs have a vehicle identification feature that displays two (2) letters and a color unique to the hailing rider on the AV's main ADS sensor module. Riders can select the letter and color combination for each trip in the app, or the display will default to the rider's first and last initials. This feature is displayed on the vehicle when the AV arrives at the pickup location and is ready for the rider to board.

Fig. 16 Vehicle Identification (Initials Display Jaguar I-PACE)

The Waymo app also allows riders to prompt their Waymo AV to emit a distinctive chime sound or to honk the vehicle's horn (see Part VI.A *Accessibility* for more about this feature). This functionality helps riders identify and find their way to their vehicle using sound.

Having arrived at the vehicle, the rider will receive additional cues that they have located the correct car. These cues include door unlock and handle release (I-PACE) or door button activation (Ojai) triggered by the rider unlocking the vehicle in-app or via rider proximity detection. A distinctive welcome chime will also play a greeting using the rider's first name once the door is opened, and their name will appear on the in-vehicle screen display (see Figure 18 below).

- Safely Boarding a Waymo AV. Waymo enhances the safety of the boarding process for the benefit of our riders and other road users by displaying a boarding icon on the rear-facing side of the main ADS sensor module. This boarding icon turns on

once the vehicle comes to a stop at the pickup location and is waiting for the rider to arrive, indicating to other road users that the vehicle is stopped for a rider to board.

Fig. 17 Rider Boarding Notification Icon

- In-Vehicle Screen Display. Each Waymo AV has in-vehicle screen displays that are for the dedicated use of the riders during their trip. The screen enables the rider to take certain actions throughout their ride, which include the following: Start Trip, Call Rider Support, Pull over, and Lock Door. The screen displays notifications about the rider's trip that are important to know along the way, such as: ETA, destination details, and instructions in the event of a trip interruption. Our rider safety video also automatically plays on the in-vehicle screen to start a rider's first trip. The video covers important safety points and is available for replay via an on-screen button at any time.

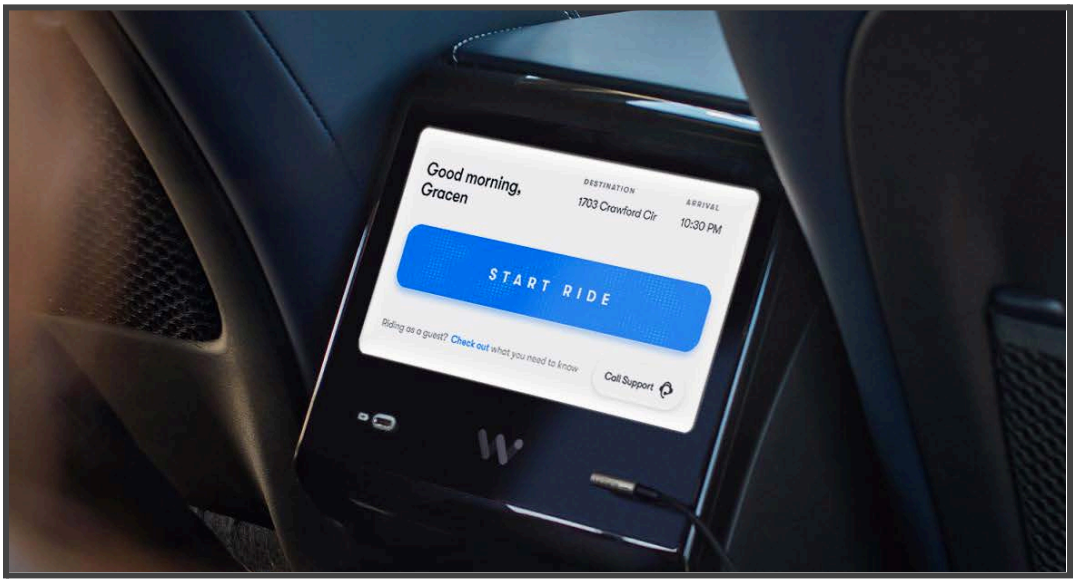


Fig. 18 In-Vehicle Screen in Jaguar I-PACE

- In-Vehicle Languages. In addition to English, riders may tailor their Waymo experience to meet certain language needs; the Waymo app can be displayed in Spanish, Chinese, French, German, Italian, or Polish. The in-vehicle experience can be enjoyed in Spanish or Chinese;[14] no extra settings are needed — if the hailer's phone is set to one of these languages, the in-car content will automatically be provided in the same language.

- In-Vehicle Cameras. Cameras inside our AVs help to ensure trips go smoothly and improve the service. Among other things, we may use cameras to check that our vehicles are clean, find lost items, provide help in case of emergency, check that in-car rules are being followed, and improve products and services.

- Pulling Over the Vehicle and Safely Exiting. Riders may request to end their trip early and exit the Waymo AV before reaching their destination by using the Pull over button. This feature is available during a ride through the in-vehicle screen and in the Waymo app. If activated, the rider will receive confirmation that a pullover has been initiated by audio and visual alerts inside the vehicle (in-vehicle screen and speakers), including a notification that the car is looking for a safe spot to pull over. Riders can also cancel a pullover, if desired.

Fig. 19 Showing a pullover in progress display on in-vehicle screen

[14] Additional in-vehicle language display options are presently in development.

When selecting and safely navigating pull over locations, Waymo prioritizes rider and road user safety. The Waymo AV factors in compliance with applicable stopping, standing, and parking laws, the quality of the rider experience, and potential community impacts (e.g. congestion). We analyze various data points to select a pull over location that balances these considerations, based on real time conditions (e.g. open curb, presence of other road users) and information from our detailed 3D maps (e.g. roadway type). We use this same holistic approach to pull over under circumstances that are routine (e.g. rider-requested pickups and dropoffs), as well as those that are more infrequent (e.g. events where the Waymo AV seeks to achieve a minimal risk condition).[15]

Once the vehicle is pulled over, it's always prudent for a rider to check for other approaching road users before opening the door. Waymo's dooring alert feature provides both visual and audible notifications to alert the rider when opening the door if a cyclist, scooter, or other approaching road user is detected near the door.

In the event that a rider arrives at a dropoff location and wants to adjust it without changing their ultimate destination - whether for safety or convenience - the Waymo AV's "Pull ahead" functionality empowers riders with a quick and low-effort way to prompt the vehicle to move to the next eligible pull over location. Upon making the "Pull ahead" request, riders may review the proposed updated dropoff location and may choose whether to proceed or to cancel.

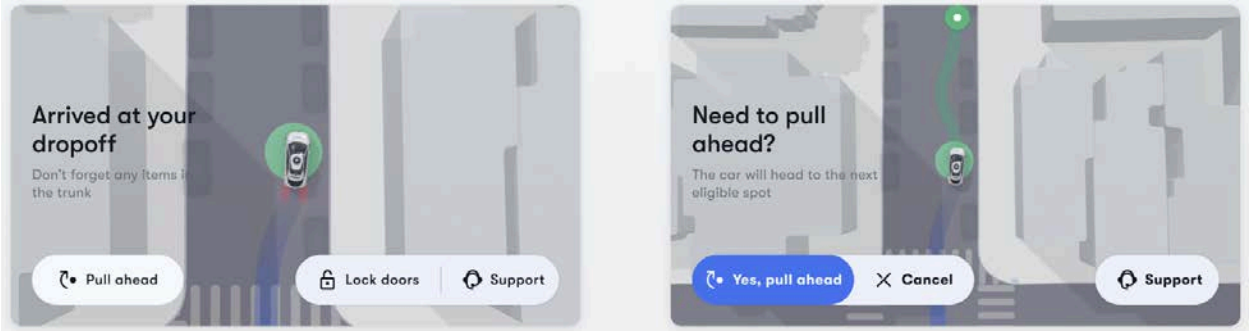


Fig. 20 Showing the Pull ahead functionality on the in-vehicle screen

[15] 13 CCR Section 227.02(i) defines "minimal risk condition" as "a low-risk operating condition that an autonomous vehicle resorts to when either the automated driving system fails or when the human driver fails to respond appropriately to a request to take over the dynamic driving task."

The Waymo AV also enhances the safe interaction of our riders with other road users, including pedestrians and cyclists, by displaying a de-boarding icon on all four sides of the main ADS sensor module. This display indicates to other road users that a rider is in the process of exiting the vehicle.

Fig. 21 Rider De-boarding Notification Icon

- Lighting. Waymo uses lighting to enhance the rider experience, including by facilitating safe entry and exit from the vehicle with puddle lamps that illuminate the ground and by automatically turning on cabin lights during pickup and dropoff. Riders can also choose to turn on cabin lights during a ride using the in-vehicle screen.

- Pedestrian Yielding Signal. The Waymo AV promotes safe interactions with other road users for the benefit of our riders and pedestrians by displaying a pedestrian yielding icon on the main ADS sensor module.

Fig. 22 Pedestrian Yielding Notification Icon (Jaguar I-PACE)

- Contacting Rider Support. Riders are encouraged to contact Waymo's Rider Support team for 24/7 assistance, as described more fully in Part 5 *Waymo Rider Support* below.

V. Waymo Rider Support

Waymo's Rider Support agents are available 24/7 to assist riders with questions and concerns. Waymo's Rider Support team provides essential and timely customer support for our AV passenger service and will respond to outreach from riders, or initiate contact if the Waymo AV's diagnostics indicate such a need (e.g. if riders do not buckle their seat belts). Once notified, a Rider Support agent is assigned with live information about the state of the trip through our Rider Support tool. Issues may also be escalated to Waymo's Event Response team as described in more detail in Part VI. *Responding to Adverse Events* below.

Whether a trip is in progress, planned, or already completed, riders can reach Rider Support via phone, chat, or email through the Waymo app. During a trip, riders may also connect with Rider Support by pressing the Rider Support button on the in-vehicle screen to communicate via the vehicle's built-in two-way communication system. All riders, including those accompanying the Waymo account holder, can use this latter method while riding with Waymo.

To allow for optimal routing of rider requests for assistance, Waymo's in-app help functionality allows riders to select their desired method of reaching out to our Rider Support team or to request urgent assistance by dialing 911 directly from the mobile app, as displayed below.

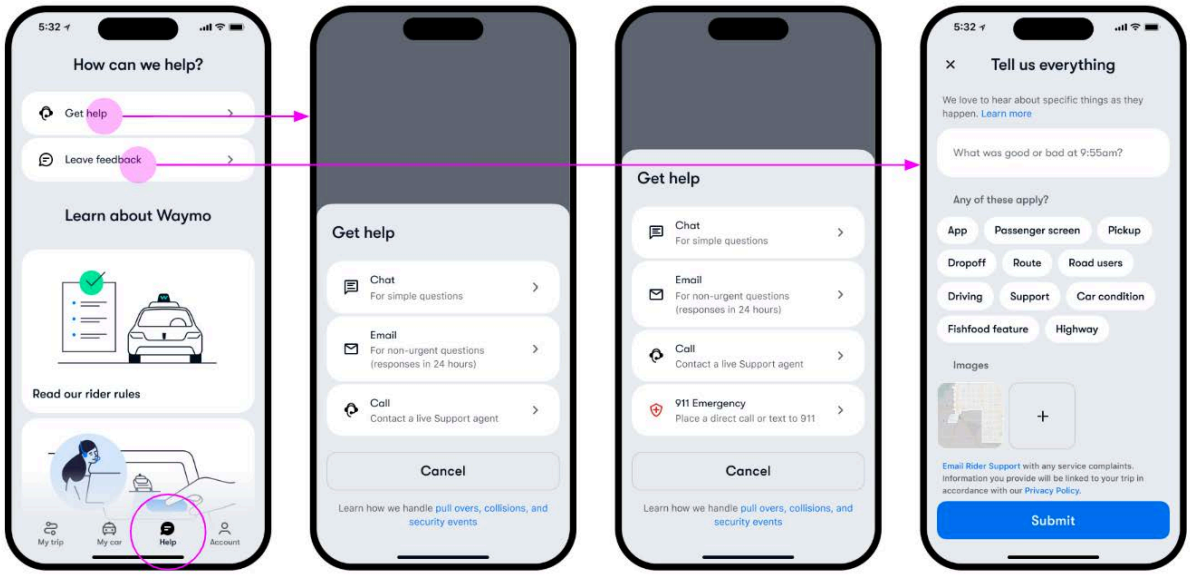


Fig. 23 In-app help functionality

Rider requests for contact communicated by calls and chats are typically answered within 60 seconds. Inquiries sent by email to Rider Support are acknowledged within 24 hours. Agents make every effort to resolve concerns or issues raised by a rider during the initial communication and are supported by an escalation lead. Where further investigation is needed, agents escalate to our cross-functional team for further consultation and resolution. Escalations are meant to help resolve specific concerns, and also to flag learnings from these contacts for future service improvements.

Every Rider Support contact generates a case record, which is categorized according to the nature of the issue raised (e.g. problem with Waymo account setup, request for Waymo service area expansion, additional time needed for pickup, promotions question). This process of categorization enables Waymo to provide uniform and consistent support to our riders, and allows us to monitor trends in rider reach-outs to identify opportunities for future service improvements. Case records are maintained in accordance with Section 6.01 of the Commission's General Order 157-E.

In addition, anyone (riders, as well as non-riders) can reach out to Waymo using our "Contact Us" form available on our website (waymo.com/contact). Communications received through this form are timely reviewed by our cross-functional community support team, and are routed to Rider Support for an initial follow-up with the individual within 24 hours.

Waymo's Rider Support team plays an important role in providing a safe and reliable Waymo experience. We staff our Rider Support team based on service levels, so as Waymo and our ridership grow, we adjust our team capacity accordingly to continue to meet and exceed our riders' expectations.

VI. Responding to Adverse Events

Waymo prepares for events that may interrupt a trip or present a safety risk for a rider. We have designed our driverless service to reduce the risk of these events and respond when they occur. In addition to Rider Support, Waymo maintains operational teams that are available 24/7 to respond to potentially disruptive events. These teams include the Waymo Remote Assistance team, the Waymo Event Response team, and the Waymo Roadside Assistance team.

Waymo Remote Assistance	Waymo Event Response	Waymo Roadside Assistance
Waymo AVs encounter countless dynamic scenarios while operating on public roads. As the Waymo AV interprets the myriad inputs and scenarios it encounters, using its robust sensor suite and onboard computing system, the Waymo AV sometimes reaches out to Waymo Remote Assistance for additional information to contextualize its environment. The Waymo Remote Assistance team supports the Waymo AV with information and suggestions in order to enhance overall vehicle performance.	The Waymo Event Response Team manages the operational response to disruptive in-field events. ERT agents efficiently respond, report, and resolve potentially complex situations, using their training across tasks relevant to remote assistance, authorities (e.g. first responder interactions), and support for riders.	Waymo Roadside Assistance provides in-field assistance (e.g. vehicle retrieval) to Waymo AVs, including those transporting riders in passenger carrier service. Waymo Roadside Assistance may be dispatched to assist in case of, for example, a collision. Waymo may also utilize third-party tow services, as the circumstances may warrant.

Each of these teams has a role in facilitating safe and comfortable rides with Waymo, as illustrated in the various scenarios below.

A. Trip Interruptions. In the event that the Waymo AV's onboard software detects a potential collision or other trip interruption, Waymo's operational teams (Remote Assistance, Rider Support, and/or the Event Response Team, as circumstances may warrant) will be immediately notified. Waymo will check on the status of the riders and, in the case of a collision or similar event, will inquire as to whether there are injuries or circumstances requiring emergency medical assistance. If so, Waymo will contact 911 emergency services and initiate Waymo's response procedures for such events.

Remote Assistance or Event Response will use camera feeds from the AV and/or other signals to review the scene and determine possible reasons for the interruption, and to assist the ADS to resolve it, if possible.[16] Various tools may be deployed in such scenarios, depending on the specific circumstances in the field. For example, the Waymo AV may be assisted in routing away from a roadway obstruction or performing a multi-point turn. Additionally, Waymo personnel may select and play audio messages from the Waymo AV's external speakers to help road users around the AV to understand what the Waymo AV intends to do. Messages include, *"I'm planning to move but need more space. Can you back up please?"* and *"I can't move at the moment but help is on the way. Thank you for your patience."*[17] Messages may also caution against unsafe behaviors with honking or a warning to *"Stop. Authorities are on their way."* Messages may also direct law enforcement to "*Please approach the front window to speak with a Waymo representative.*" These tools are designed to minimize the impact of trip interruptions and enhance the safe operation of the Waymo AV.

The Event Response Team is also available to communicate directly with on-scene first responders through the Waymo AV's in-car speakers. Each Waymo AV also has a QR code affixed to the window that connects first responders to Waymo's first responder hotline, facilitating communication via phone. Event Response agents are trained to authorize law enforcement to transition the Waymo AV to manual mode so it may be manually driven, if needed.

Where the Waymo AV is not able to continue driving autonomously, Waymo's Remote Assistance or Event Response Teams may assist riders by hailing them a new Waymo AV to complete their trip. In addition, Waymo's Roadside Assistance team or a third-party tow service may be dispatched to the scene to assist.

[16] During a trip interruption, the Waymo AV may request additional context about the circumstances from Remote Assistance. Depending on the nature of the request, assistance is designed to be provided quickly - in a matter of seconds - to help get the Waymo AV on its way with minimal delay. For a majority of requests that the Waymo AV makes during everyday driving, the Waymo AV is able to proceed driving autonomously on its own. In very limited circumstances such as to facilitate movement of the AV out of a freeway lane onto an adjacent shoulder, if possible, our Event Response agents are able to remotely reposition the Waymo AV under strict parameters, including at a very low speed over a very short distance.

[17] The Waymo AV is also capable of playing certain external audio messages without assistance from the Waymo Remote Assistance team.

B. Assaults and Harassment. We work to make every Waymo AV a safe place to be. Engaging in harassing or threatening behavior while using our service (whether aimed at other riders, road users, or a member of the Waymo team) is strictly prohibited. If Rider Support is alerted to or observes potentially criminal behavior by a rider during an active trip in our driverless service, Rider Support will end the trip to allow the vehicle to pull over at a safe location, and will call 911. Waymo reviews such events for potential deactivation of the offending rider's Waymo account and will cooperate with any related law enforcement request.

C. Rider Medical Events. If Rider Support is alerted to the event either through the in-car screen or the rider's mobile app, or observes an apparent medical event occurring with a rider, agents are trained to quickly assist. Rider Support will, for example, contact 911 if emergency services need to be dispatched to the location of the Waymo vehicle.

D. Unsafe Scenarios Outside of the Vehicle. Potentially unsafe scenarios include, but are not limited to, physical security events by hostile individuals (e.g. vehicle vandalism), spontaneous road closures (e.g. for construction), as well as natural disasters. In addition to supporting our riders with the 24/7 availability of Rider Support and 911 emergency services (described in Part V. *Waymo Rider Support* above), the Waymo ADS and operational processes described herein were developed with such scenarios in mind, in order to safeguard those in and around the Waymo AV.

The first means of protecting against risks associated with potentially unsafe conditions is to avoid them wherever possible. Waymo minimizes the likelihood of being involved in such situations by redirecting vehicles away from such areas. For example, if one vehicle encounters an unplanned road closure, the rest of the fleet can be quickly routed away from the affected area. Waymo also employs other avoidance approaches, which include temporarily reducing our presence in close proximity to known areas of potential concern (e.g. parade) and partnerships with select public safety agencies to receive rapid notice of first responder avoidance areas.

Secondly, in the event the Waymo AV encounters an unsafe scenario, the vehicle's driving functionality can help protect against the risk of physical harm. For example, the Waymo AV is designed to detect emergency scenes at a distance, giving the vehicle adequate time and space to safely maneuver away from a scene, including by performing a multi-point turn. Waymo vehicles also can detect approaching

emergency vehicles,[18] and crowds of pedestrians gathered in or traversing the roadway, to protect against a collision, for example. External audio messages and honking may also be utilized to communicate vehicle intent, including to indicate that law enforcement has been called to the scene, as may be appropriate. In addition, the Waymo AV can signal for support from Waymo teams trained in incident response procedures to quickly address a triggering event, including requesting law enforcement and medical assistance, as may be needed. Waymo empowers riders in these scenarios; riders may be prompted to alert Waymo to an urgent need for support or honk the Waymo AV's horn through an in-car screen or in-app interface (see Figure 24 in-car screen display sample below). These and other key capabilities have been designed, tested, and implemented to prioritize the safety of our Waymo riders and the broader public.

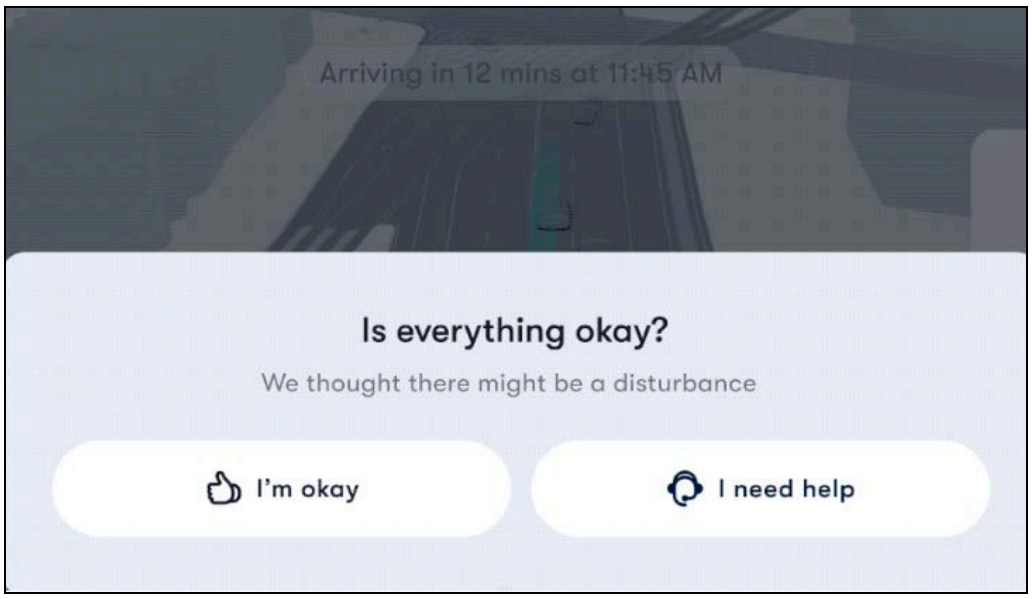


Fig. 24 In-car screen rider help functionality

Lastly, preparedness for unsafe scenarios outside of the vehicle necessitates a proactive, robust, and continually-adapting approach to potential events that might impact a broad subset of Waymo's ridership and/or fleet. Waymo's Enterprise Resilience team assesses readiness through exercises and real events, builds effective policies and procedures to manage events, acts to coordinate event response, and incorporates learnings from events to improve resiliency. A key facet of Waymo's approach is to work closely with law enforcement and other first responders in the

[18] The Waymo vehicle is designed to yield as appropriate to moving emergency vehicles, no matter which direction they are headed.

areas in which we operate. Our dedicated team of experienced public safety executives have over 200 years of combined experience as first responders.[19] Waymo prioritizes proactively conducting regular in-person training sessions with first responders, detailing best practices for safe interactions with the Waymo AV, including how to quickly reach Waymo in the case of an emergency event. To date, Waymo has trained over 11,500 of California's first responders, providing information to those in the areas we operate who may interact with our vehicles. Waymo also seeks first responder input regarding AV operations in individual jurisdictions and has incorporated suggestions from first responders into our operations.[20]

E. Vehicle Tampering. Waymo instructs riders not to touch the Waymo AV's sensors (e.g. lidar), vehicle controls (e.g. gear shift), or driving mechanisms (e.g. steering wheel). Upon detection that the AV's external sensors have been manipulated, Waymo's security controls will prompt the vehicle to come to a safe stop (or remain stopped) until safe to proceed, and Rider Support will be alerted. Depending on the nature of the event, Rider Support may end the trip, and the rider may have their Waymo account status impacted or be reported to law enforcement authorities.

F. Items Left Behind. Riders who inadvertently leave items behind in a Waymo AV may reach out to Rider Support (see Part V. *Waymo Rider Support* above) to have the vehicle returned to a Waymo facility for item retrieval. Waymo has also developed certain features meant to help keep riders from forgetting their things to begin with. At the end of a trip, if the Waymo AV detects that an item (such as a phone or wallet) may have been left behind after the rider has exited, the rider will be alerted by a message played via the Waymo AV's external speakers. A notification will also appear on the rider's phone, allowing them to retrieve their item before the Waymo AV proceeds.

[19] See https://waymo.com/firstresponders/

[20] See Waymo's Law Enforcement Interaction Protocols for the Jaguar I-PACE vehicle and the Ojai vehicle.

VII. Safe & Inclusive Service

A. Accessibility

Improving mobility access is core to Waymo's mission, and we are dedicated to improving personal independence and access to transportation through the broad deployment of our technology. To better understand rider needs, including riders with disabilities, we conduct targeted research studies and collect feedback on an ongoing basis, including from the trips we provide to members of the public. Waymo actively engages individuals and organizations spanning a breadth of access issues to better understand ways to improve accessibility for our riders, including through the Waymo Accessibility Network described further below.

Fig. 25 Waymo hosting educational and experiential opportunities for visitors to the Fairfax Senior Citizens Center, Los Angeles, September 2024

- **Engagement.** Waymo's work to develop mobility solutions that work for riders of all abilities is accomplished in collaboration and learning with the disability community. We partner with organizations that advocate on behalf of different constituencies lacking adequate mobility options, including as part of the *Waymo Community* public education initiative described in Part IV.A. *Public Engagement* above. In fact, local road safety and disability advocacy organizations have been among the

first community members to take rides with Waymo, and we continue to work directly with disability-focused nonprofits to welcome their members into our ridership.

Organizations that we are directly engaged with, certain of which we've partnered with on public education initiatives, include:

- San Francisco-based LightHouse for the Blind and Visually Impaired, one of the largest and most established comprehensive blindness organizations in North America;
- Vista Center for the Blind and Visually Impaired
- Independent Living Resource Center of San Francisco;
- Self-Help for the Elderly;
- Support for Families of Children with Disabilities;
- Northern California Spinal Cord Injury Foundation (NorCal SCI);
- Curry Senior Center;
- National Federation of the Blind;
- Los Angeles-based Integrated Community Collaborative;
- Easterseals Southern California;
- local chapters and affiliates of Best Buddies;
- the Epilepsy Foundation;
- the Arc San Francisco;
- Disability Voices United;
- Southern California Resource Services for Independent Living (SCRS-IL);
- Vista Center for the Blind and Visually Impaired;
- United Spinal Bay Area; and
- the Braille Institute.

In October 2022, Waymo launched the Waymo Accessibility Network to partner directly with organizations that support people of all ages living with physical, visual, cognitive, and sensory disabilities. The network was created to formalize and scale Waymo's longstanding collaboration with disability advocates, and facilitates the sharing of valuable feedback and perspectives with Waymo's product and user experience teams to shape the future of transportation.

- **Features and Service Improvements.** Our work is ongoing but already has generated features and service improvements to assist and accommodate riders of all abilities. These include the following:

Honk Horn or Chime When the car is stopped at pickup, riders can press a button in the app to honk the car's horn or ring a distinctive chime sound. Riders can use the sound of the horn or chime to locate the car. Limits on the honk horn button prevent the horn from being honked too frequently and bothering bystanders.	**Wheelchair Accessible Vehicles** Using the Waymo app, riders may arrange for a ride in a WAV provided by a Waymo partner in a conventional (not autonomous) ADA wheelchair accessible van. Partner drivers are trained to industry-leading standards to work with disabled riders. Riders with mobility needs other than WAV can also hail these vehicles. Waymo is working to expand this offering within our growing service areas.	**Minimize Walking Setting** Riders can select a setting to minimize walking, even if a shorter walk means the car may need to take a longer route and add to their overall trip time. This setting also makes it much less likely for the car to pull over on the opposite side of the street from where the rider requested.
Screen Reader Support Our Android and iOS apps are regularly tested with Talkback and VoiceOver screen readers to ensure blind and low-vision riders can navigate them.	**Assistive Audio** Riders can enable a setting that provides more audio cues and information throughout the ride (e.g. why the car is yielding) which is particularly helpful for those with vision disabilities.	**Vehicle ID** Waymo riders can set a unique two-letter car ID and color that is displayed atop the vehicle, making it easier to distinguish their Waymo vehicle from others and confirm it's their ride.
Long Walk Warnings Before requesting a ride, riders are informed if a long walk will be required at pickup or dropoff. This allows the rider to plan accordingly. If a rider is having trouble finding or getting to the car, a rider can request that Rider Support delay the vehicle's departure.	**Adaptive App Navigation** Navigation wayfinding experiences with haptic cues assist riders with turn-by-turn walking directions and a compass that points in the direction of the vehicle providing distance and direction (see Figure 26 for sample display).	**Rider Support** Riders can connect with our Rider Support team by phone, chat, or email making assistance accessible to those with speech or hearing disabilities. Agents are trained to assist riders who have accessibility needs with wayfinding, including by looking through the car's cameras to understand the rider's environment.

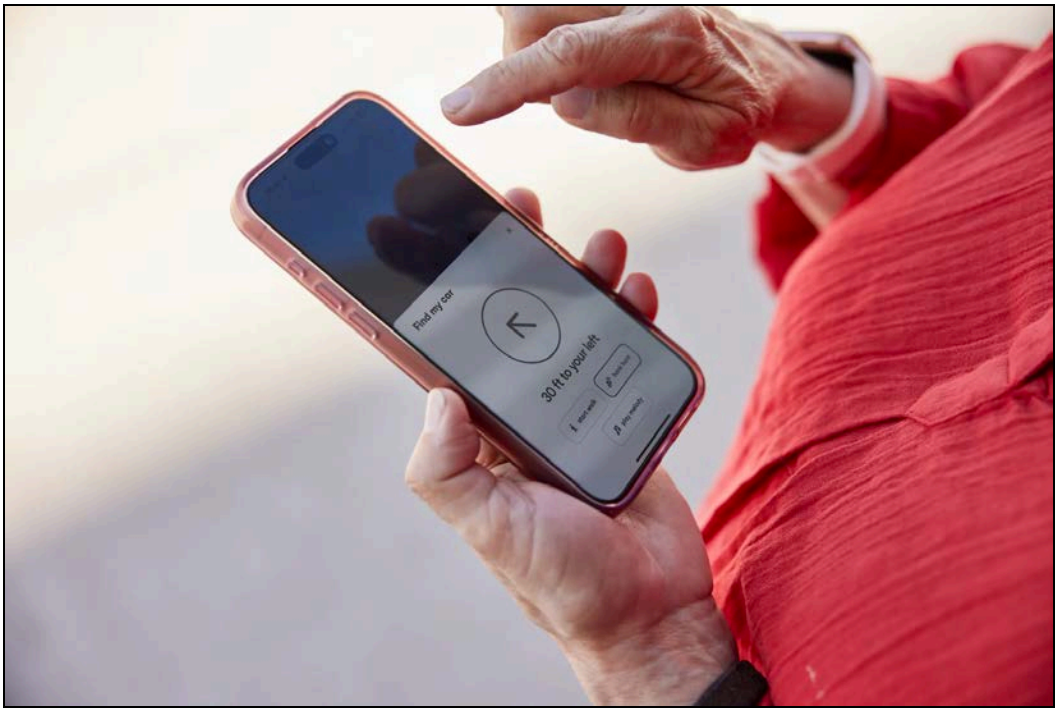


Fig. 26 Adaptive app navigation

Riders may adjust and tailor the accessibility settings in the Waymo app in order to meet their needs. This includes a setting for riders in eligible service areas to request a wheelchair accessible vehicle through the Waymo app (see Figure 27 below).

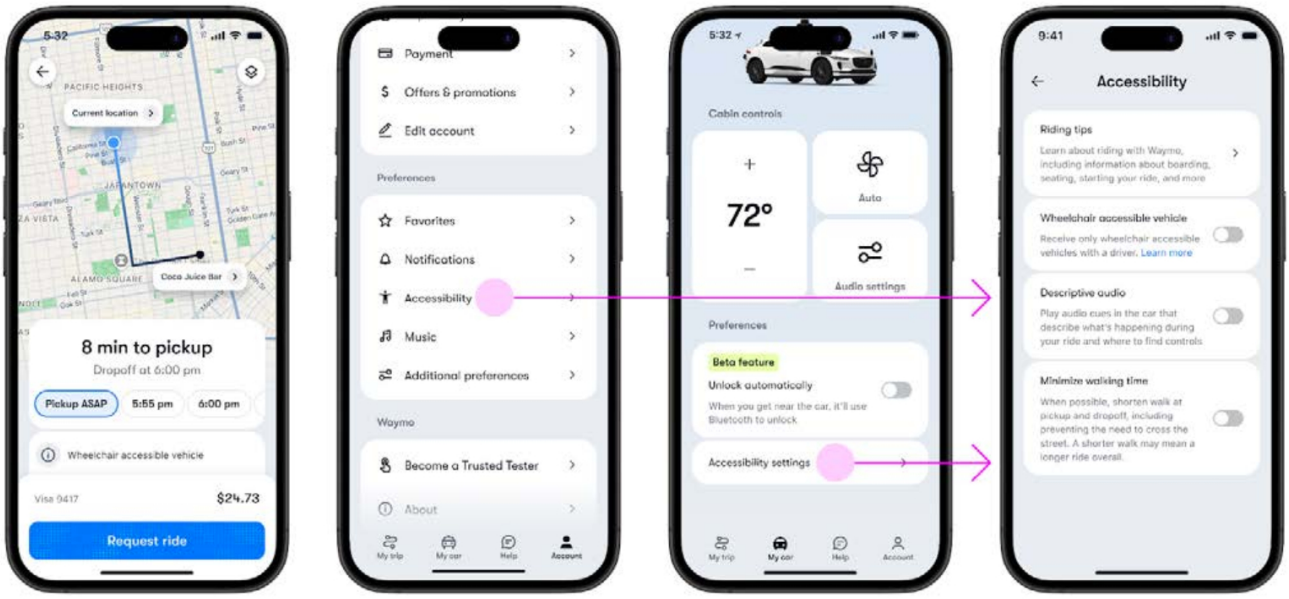


Fig. 27 In-app accessibility settings navigation

- **Service Animals.** Service animals are always welcome to ride with Waymo. There is no need to notify us or bring any paperwork for a service animal to ride with us. Riders may take extra time at boarding to secure their service animal before starting their ride.

B. Minor Riders

We require Waymo account holders in California to be at least 18 years of age, but minors who are accompanied by an adult account holder are welcome to ride. Violations of this requirement, and Waymo's terms of service generally, may result in account deactivation.

For younger children, an accompanying adult is responsible for properly installing and securing any child car seats or booster seats that may be needed in accordance with law. Waymo provides riders with extra time at boarding to install a car seat before starting their ride.

Waymo has fostered - and immensely benefited from - years-long relationships with organizations that champion road safety for youth and families. Engagement is meant to help inform our service development, and also to increase awareness of road safety issues in the communities in which we operate. Our nationally recognized partner organizations include Safe Kids Worldwide, Mothers Against Drunk Driving (MADD), Students Against Destructive Decisions (SADD), Support for Families of Children with Disabilities and Governors Highway Safety Association (GHSA) and more. Locally, in markets such as Los Angeles, we've worked with the organizations Street Racing Kills and Streets Are For Everyone to support in-school presentations about the dangers of reckless driving. An example of a road safety asset we've created includes a road safety and AV curriculum for high school students created in partnership with MADD and SADD and distributed to high school SADD chapters throughout the United States. For more information about Waymo's engagement in the communities in which we operate, please see waymo.com/community.

C. Rail and Transit

Waymo AVs use detailed maps that incorporate dedicated transit lanes (e.g. bus and taxi lanes) as well as railway crossings and alignments, including those used by light and heavy rail vehicles. Our AVs are designed to respect the intended use of these roadway types and features. The AV's behavior also is tailored to specific roadway

features unique to rail and transit. For example, the AV is designed to avoid stopping on rail tracks, including when traversing intersections in heavy, slow-moving traffic.

Waymo conducts robust and methodical testing of our ADS, which includes assessing safety and traffic law compliance. Waymo's testing methods and approach to performance validation are detailed in our published white paper, *Determining Absence of Unreasonable Risk: Approval Guidelines for an Automated Driving System Deployment* (May 2025).[21] Waymo utilizes a variety of safety methodologies, supported by three types of system-level testing (simulation, closed-course driving, and public road driving), which are in turn supplemented by various forms of component and subsystem testing. These types of testing are in constant interaction; each complements and informs the others.

With respect to rail, Waymo AVs are designed to interact with the specific types of railway crossings, railway alignments, and railway vehicles it will encounter in driverless operations in Waymo's driverless ODDs. We conduct thorough testing for specific types of railway crossings, as well as specific individual rail crossings, where appropriate. In the design and testing process, we consider how railway features and trains differ from other types of roadway features and vehicles.

//

[21] Accessible on Waymo's website at https://waymo.com/safety/research.