

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

ASSISTANT CHIEF ADMINISTRATIVE LAW JUDGE
W. ANTHONY COLBERT, in attendance

ADMINISTRATIVE LAW JUDGE LEAH GOLDBERG, presiding

Service Employees International Union,	)	PREHEARING
California State Council; Service	)	CONFERENCE
Employees International Union, Local	)	
521; Service Employees International	)	
Union, Local 721; Service Employees	)	
International Union, Local 1021,	)	
	)	
Complainants,	)	
	)	
Vs.	)	Case
	)	26-03-035
Waymo LLC,	)	
	)	
Defendant.	)	

REPORTERS' TRANSCRIPT
San Francisco, California
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JUNE 30, 2026 - 10:00 A.M.

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ADMINISTRATIVE LAW JUDGE GOLDBERG: The
Commission will come to order. We're on the record.

The time is 10:00 o'clock on June 30th, 2026.

This is the prehearing conference for Complaint
26-03-035, Service Employees International Union,
California State Council, et al. versus Waymo LLC.

I'm Administrative Law Judge Leah Goldberg, the
assigned ALJ to this proceeding. I'm joined by
Assistant Chief Administrative Law Judge Anthony
Colbert. The assigned commissioner is Christine Harada.
Commissioner Harada cannot join us today, but her staff
is here. I'll be working very closely with both the
commissioner and her staff throughout this proceeding.

This prehearing conference is conducted in
person at the California Public Utilities Commission
headquarters and is being transcribed by a court
reporter. In order to get a complete transcript of the
proceeding, please comply with the following directions:

Speak only when I address you;

Please identify yourself each time you speak;

Speak slowly and clearly;

If someone else is speaking, please wait for

1 him or her to finish before saying anything. The court
2 reporter cannot transcribe multiple people at once.

3 As we go through the issues and the discussion,
4 I'll ask the representative for each party separately to
5 respond to my questions. After I've heard from each
6 party, if warranted, I'll allow each party -- the other
7 party one additional opportunity to respond to
8 statements made by the other parties. While I know it's
9 unnecessary to remind you, please be courteous to the
10 other parties.

11 The main purpose of today's prehearing
12 conference -- purposes are to discuss the scope,
13 category, schedule, need for evidentiary hearing and any
14 other procedural issues. No determinations will be made
15 today. Commissioner Harada will make those
16 determinations when she issues the scoping memo and
17 ruling.

18 We'll start with party appearances, and we'll
19 talk about the service list. As I call upon the parties
20 to the proceeding who have filed an appearance so far,
21 please state and spell your name. Also, please let me
22 know your preferred pronouns.

23 Who is representing Service Employees Union --
24 Service Employees International Union, California State
25 Council; Service Employees Union -- International Union,

1 Local 521; Service Employees International Union, Local
2 721; and Service Employees International Union, Local
3 1021.

4 MR. KRONLAND: Scott Kronland, S-c-o-t-t
5 K-r-o-n-l-a-n-d, from Altshuler Berzon, pronouns, "he,"
6 "him," representing SEIU, et al.

7 MS. LOWE: And Marisa Lowe, M-a-r-i-s-a
8 L-o-w-e -- my preferred pronouns are "she," "her" --
9 also from Altshuler Berzon representing SEIU, et al.

10 ALJ GOLDBERG: So you're representing all of
11 the unions, correct?

12 MR. KRONLAND: Correct.

13 ALJ GOLDBERG: Thank you.

14 Who's representing Waymo LLC?

15 MR. STODDARD: Thank you, your Honor. Jack
16 Stoddard with BRB Law Group representing Waymo LLC. My
17 name is spelled J-a-c-k S-t-o-d-d-a-r-d, and my
18 preferred pronouns are "he," "him."

19 Thank you, your Honor.

20 ALJ GOLDBERG: Thank you. I'll refer to
21 Service Employees International Unions collectively as
22 SEIU and as Waymo LLC as well.

23 Is there anyone else who wishes to become a
24 party to this proceeding?

25 (No response.)

1 MS. DAVIDSON: Oh. If I might also make an
2 appearance.

3 ALJ GOLDBERG: I'm sorry.

4 MS. DAVIDSON: No. No problem. Mari Davidson,
5 M-a-r-i D-a-v-i-d-s-o-n, for Waymo.

6 ALJ GOLDBERG: Thank you.

7 MR. MOSHFEGH: And also, Pejman Moshfegh for
8 Waymo, P-e-j-m-a-n, last name, M-o-s-h-f-e-g-h,
9 pronouns, "he," "him." Thank you.

10 ALJ GOLDBERG: Thank you. I'm sorry. I didn't
11 mean to not get all of the representatives, but I would
12 ask that there be a primary representative from each
13 party to speak on your behalf. So thank you.

14 Okay. Is -- if there's no one else that wishes
15 to be a party, we'll talk about the service list. The
16 service list includes an information-only section for
17 those who want to follow the proceeding but not become a
18 party. If you wish to be on the information-only list,
19 please contact the process office at
20 process_office@cpuc.ca.gov.

21 Parties are reminded that you if you plan to
22 file a Notice of Intent for intervenor compensation and
23 not have already done so, you must do so within 30 days
24 of the prehearing conference.

25 Now let's go over serving documents to the

1 parties in the service list. The Commission encourages
2 electronic service and requires all documents be served
3 electronically to everyone on the list, which includes
4 those listed under information only.

5 Please remember that I'm on the service list.
6 If you're sending discovery requests or arranging
7 meetings between the parties, please remember to remove
8 me from the service list for those items.

9 After this hearing, each of the parties should
10 go to the CPUC website and confirm that the name of the
11 one person designated as the party representative and
12 the names of other persons on the service list as
13 information only to receive documents are correct. If
14 they're not correct, there's a form on the website that
15 you can submit to update names and contact information.

16 Transcripts. There's been an expedited
17 transcript ordered in this case, I understand. I don't
18 know which party ordered it, but --

19 MR. STODDARD: Yes, your Honor. Waymo ordered
20 it.

21 ALJ GOLDBERG: Great. Thank you.

22 Now let's talk about the categorization of this
23 proceeding. In the Instructions to Answer, which was
24 filed on April 28th, 2026, this proceeding was
25 categorized as adjudicatory. In an adjudicatory

1 proceeding, under Rule 8.2 of the Commission Rules of
2 Practice and Procedure, ex parte communications with
3 decision makers are not allowed. Decision makers
4 include commissioners, their advisors and me as the ALJ.
5 Discussing purely procedural matters with me is
6 permitted, but be sure to copy the entire service list
7 on all procedural communications. Please be sure not to
8 stray into areas that may not be considered procedural.

9 Does any party wish to comment on the category
10 of the proceeding or the ex parte rules?

11 SEIU?

12 MR. KRONLAND: No, your Honor.

13 ALJ GOLDBERG: Waymo?

14 MR. STODDARD: No, your Honor.

15 ALJ GOLDBERG: Thank you.

16 So before we -- as we scope this proceeding, I
17 have a number of questions, and -- for both parties, but
18 I'd like to start with some questions I have for SEIU.
19 I was a little confused by your complaint. And I need
20 to understand -- so SEIU represents the drivers of both
21 Lyft and Uber; is that correct?

22 MR. KRONLAND: Yes. Among other workers.

23 ALJ GOLDBERG: Other workers being?

24 MR. KRONLAND: We represent workers around the
25 state in a variety of occupations. The SEIU State

1 Council represents about 800,000 workers throughout
2 California in a variety of occupations.

3 AC ALJ COLBERT: For the purpose of this
4 complaint, who are you representing?

5 MR. KRONLAND: For purposes of this complaint,
6 we represent the organizations that filed the complaint.

7 AC ALJ COLBERT: Who are?

8 MR. KRONLAND: Who are the Service Employees
9 International Union, California State Council, Service
10 Employees International --

11 AC ALJ COLBERT: No. What companies that
12 the -- that the Commission regulates do your clients
13 work for?

14 MR. KRONLAND: Our clients drive for Uber and
15 Lyft. So those would be regulated companies, but we
16 assert that we are able to file a complaint not just as
17 representatives and drivers of Uber and Lyft but of
18 representatives of people who are affected in other ways
19 by the conduct complained of.

20 AC ALJ COLBERT: I think Judge Goldberg is
21 going to get to that point.

22 ALJ GOLDBERG: So -- so understanding that you
23 represent workers, and that includes the drivers of Uber
24 and Lyft, I'm a little unclear as to the injury that --
25 that you're alleging. Is it to the drivers, or is it to

1 parents? And if it's to parents, do you represent
2 parent organizations?

3 MR. KRONLAND: We don't represent parent
4 organizations. We assert three types of injuries in our
5 complaint. One is a competitive injury by the drivers
6 for Uber and Lyft from the alleged conduct in the
7 complaint of Waymo carrying unaccompanied minors. We
8 allege that we have drivers that are not allowed to do
9 that, and we suffer competitive injury.

10 Second, we allege an injury to the safety of
11 our union members including not just the drivers who are
12 on the roads and could be affected by unsafe conditions
13 but workers in other occupations like crossing guards at
14 schools or other workers who could be affected by risks
15 to safety.

16 And finally, we allege injury to our members in
17 their capacity as parents.

18 ALJ GOLDBERG: But you don't represent parent
19 organizations, correct?

20 MR. KRONLAND: The unions have broad purposes
21 of working to make life better for their members, and we
22 assert that the union's purpose in making life better
23 for their members includes all aspects of their members'
24 lives.

25 AC ALJ COLBERT: Can you address the last

1 point. What is the injury to parents?

2 MR. KRONLAND: We allege in the complaint that
3 unaccompanied minors are at risk when they are in
4 autonomous vehicles without any supervision, and as
5 parents, the parents are concerned about the potential
6 risks if their children are riding unaccompanied in
7 autonomous vehicles.

8 AC ALJ COLBERT: Are children at risk if
9 there -- are unaccompanied minors at risk in a drivered
10 vehicle?

11 MR. KRONLAND: They could be at risk in a
12 drivered vehicle too, but there are protocols where
13 drivered vehicles are permitted to carry unaccompanied
14 minors. It often comes with safety protocols. At this
15 time, the Commission hasn't approved any safety
16 protocols for allowing unaccompanied minors in
17 driverless vehicles.

18 I know that that's an issue for the future, but
19 the complaint concerns the current law where there
20 aren't any safety protocols to protect unaccompanied
21 minors in autonomous vehicles, and the Commission has
22 not permitted Waymo to carry unaccompanied minors.

23 AC ALJ COLBERT: So is it your contention that
24 drivered vehicles, which are driven by your clients, all
25 of those drivered vehicles have -- all of those drivers

1 have authority when they are transporting unaccompanied
2 minors to transport them?

3 MR. KRONLAND: No. Our understanding is that
4 they don't. There are certain -- certain drivers may
5 have authority to do that, but in general, some car
6 drivers don't.

7 AC ALJ COLBERT: So would that make an injury
8 to a parent? For -- for drivered TNCs that do not have
9 the authority to transport unaccompanied minors, is that
10 a risk?

11 MR. KRONLAND: Well, to the extent that the
12 CPUC has required that drivered TNCs taking
13 unaccompanied minors must follow certain safety
14 protocols and their drivers are not approved to
15 transport accompanied unaccompanied minors, then yes, it
16 is a risk if unaccompanied minors are being transported
17 against the Commission's rules in those vehicles.

18 AC ALJ COLBERT: And -- so should the complaint
19 be expanded to include that group?

20 MR. KRONLAND: Well, the complaint alleges that
21 Waymo is routinely carrying unaccompanied minors in its
22 Waymo vehicles. It doesn't allege anything about anyone
23 else.

24 AC ALJ COLBERT: I understand it doesn't
25 allege. We're actually talking about what actually

1 happens. Is it your contention that the number of
2 unaccompanied minors transported by Waymo is higher than
3 the number of unaccompanied minors transported by
4 drivered TNCs?

5 MR. KRONLAND: Well, we allege that Waymo has
6 been routinely transporting unaccompanied minors as has
7 been reported in several newspaper articles, that it
8 isn't a onetime thing. It's a routine thing that Waymo
9 is transporting unaccompanied minors. I'm not aware of
10 similar facts suggesting that the drivered vehicles are
11 routinely doing it in violation of the Commission's
12 rules.

13 AC ALJ COLBERT: As far as safety, you say that
14 crossing guards and other school personnel are at risk
15 by Waymos transporting unaccompanied minors. How is
16 that?

17 MR. KRONLAND: Because the unaccompanied minors
18 may exit the vehicles unexpectedly. They may not be
19 able to respond to emergencies, and as such, they may be
20 a risk to the public.

21 AC ALJ COLBERT: Are the crossing guards and
22 school personnel your clients in this matter?

23 MR. KRONLAND: We do represent some workers who
24 work as school crossing guards. The SEIU locals
25 represent public employees throughout California, some

1 of whom are, in fact, school crossing guards.

2 AC ALJ COLBERT: Do you have specific
3 individuals named in the complaint?

4 MR. KRONLAND: The complaint names the
5 organizations, not any specific individuals.

6 AC ALJ COLBERT: Thank you.

7 Thank you, your Honor.

8 ALJ GOLDBERG: Thank you.

9 So I'm still a little confused, and I'm
10 confused -- you recognized earlier that there is another
11 proceeding that's looking at autonomous vehicles. Can
12 you tell me what relief you're seeking explicitly in
13 this complaint proceeding?

14 MR. KRONLAND: Yes. We're seeking two forms of
15 relief, and we lay it out in our complaint, the various
16 kinds of relief that we're seeking in this proceeding
17 but I can give you shorthand. One is that we're seeking
18 punishment for what happened in the past. We contend
19 that Waymo violated the Commission's rules and its terms
20 of service and that the Commission should find that
21 Waymo did that and punish Waymo.

22 And we're also seeking relief going forward
23 that the Commission should require Waymo to abide by
24 its -- the decision authorizing them to operate which
25 doesn't allow transporting unaccompanied minors and its

1 passenger safety plan which does not allow transporting
2 unaccompanied minors.

3 ALJ GOLDBERG: By "punishment," you mean
4 penalties?

5 MR. KRONLAND: Correct.

6 ALJ GOLDBERG: And have you filed a complaint
7 with the Commission's Consumer Protection and
8 Enforcement Division, who is the entity that typically
9 assigns penalties?

10 MR. KRONLAND: No.

11 ALJ GOLDBERG: Okay.

12 AC ALJ COLBERT: Do you have examples that in a
13 complaint proceeding at a Commission we have levied
14 penalties or sanctions against a party in a complaint
15 proceeding?

16 MR. KRONLAND: I don't have examples to offer
17 you now. I'd be happy to, you know, brief it. I know
18 that Waymo had planned to file a motion to dismiss. As
19 we read the statutes, they entitle anyone to file a
20 complaint with the Commission, that the Commission's
21 rules --

22 AC ALJ COLBERT: That wasn't my question. My
23 question is, do you have examples of a complaint being
24 filed with the Commission and the result being that the
25 Commission has issued fines or sanctions against the

1 regulated entity by way of the complaint proceeding?

2 MR. KRONLAND: I don't have examples off the
3 top of my head, but given the opportunity, I'd be happy
4 to brief the issue.

5 ALJ GOLDBERG: That would be very helpful.
6 Thank you. And we can talk about any of the questions
7 that Assistant Chief Judge Colbert and I are asking that
8 we will want additional briefing on possibly even before
9 scoping.

10 AC ALJ COLBERT: And -- sorry, your Honor.

11 You said that you want Waymo to be compelled to
12 abide by its current operating agreements concerning
13 unaccompanied minors?

14 MR. KRONLAND: Correct.

15 AC ALJ COLBERT: And does the same go for
16 drivered TNCs?

17 MR. KRONLAND: We certainly think everyone
18 should follow the law including their CPUC operating
19 authority, but this complaint is about the defendant
20 Waymo, not about anyone else.

21 AC ALJ COLBERT: Well, the Commission is
22 concerned with the behavior of regulated entities and
23 safety of the public. So if your accusation is that
24 Waymo's behavior is putting individuals and the public
25 in danger by a certain type of behavior and other

1 entities are engaged in that behavior, the Commission
2 should be concerned about that.

3 MR. KRONLAND: I agree. It's just that our
4 complaint is against Waymo. I wasn't aware that we
5 couldn't file a complaint against Waymo because some
6 other regulated party --

7 AC ALJ COLBERT: Oh. You can file it.

8 MR. KRONLAND: -- might be doing something.

9 AC ALJ COLBERT: You can file it. The
10 questions we're asking is what relief should be granted,
11 if any.

12 Your Honor.

13 ALJ GOLDBERG: Thank you. Thank you.

14 So you mentioned earlier that you know there's
15 another proceeding. It's Rulemaking 25-08-013. Is SEIU
16 a party to that proceeding?

17 MR. KRONLAND: I believe some locals are
18 participating. I would have to check on whether they
19 are parties formally.

20 ALJ GOLDBERG: In terms of prospective relief,
21 that appears, to me, that it would be probably a more
22 proper venue for resolving prospective relief.]

23 MR. KRONLAND: Well, that proceeding,
24 your Honor, is about, among other things, whether in the
25 future Waymo should be permitted to transport

1 unaccompanied minors and under what conditions. So it's
2 possible the law may or may not change in the future.
3 But this complaint is about the fact that right now,
4 Waymo is not approved to transport unaccompanied minors,
5 and the complaint alleges that Waymo violated that.

6 ALJ GOLDBERG: But the relief you're seeking
7 includes prospective relief.

8 MR. KRONLAND: It does. But --

9 ALJ GOLDBERG: So I'm not sure how we could
10 grant prospective relief if there's another proceeding
11 that's looking at prospective activities.

12 MR. KRONLAND: Well, until the rules change,
13 the rules are what the rules are. The legislature could
14 always change a statute, but it doesn't mean the
15 existing statutes don't get enforced. Right now, Waymo
16 is not permitted to transport unaccompanied minors, so
17 it shouldn't be transporting them. If, in the future,
18 the Commission changes the law, then the law will be
19 different. But --

20 ALJ GOLDBERG: So then perhaps I don't
21 understand what prospective relief you're asking for.

22 MR. KRONLAND: We're asking that Waymo be
23 ordered not to transport unaccompanied minors and to
24 take whatever steps are necessary to prevent that from
25 occurring.

1 AC ALJ COLBERT: So you're asking that Waymo
2 not be allowed to transport unaccompanied minors and
3 whatever -- and the Commission to take whatever actions
4 are needed to prevent that from happening?

5 MR. KRONLAND: Correct. To require Waymo to
6 take whatever actions are necessary to prevent that from
7 happening.

8 AC ALJ COLBERT: Isn't that our current rule
9 now?

10 MR. KRONLAND: Well, your current rule is that
11 Waymo is not allowed to transport unaccompanied minors,
12 but our complaint is that they are.

13 AC ALJ COLBERT: Right. But the relief you've
14 stated to Judge Goldberg is we want the Commission to
15 require Waymo not to transport unaccompanied minors and
16 for the Commission to take the appropriate action to
17 make sure that doesn't happen. Isn't that the current
18 state now?

19 MR. KRONLAND: Well, the Commission has said
20 that you can't transport unaccompanied minors. The
21 Commission hadn't imposed specific requirements as to
22 what Waymo must do in order to stop doing that, nor has
23 the Commission decided that Waymo shouldn't operate
24 until it's able to stop that from happening.

25 AC ALJ COLBERT: When you say what Waymo must

1 do, isn't it to not transport unaccompanied minors?

2 MR. KRONLAND: Well, that carries with it more
3 specifics as to how Waymo prevents that from occurring.
4 Waymo says that it has a protocol to prevent that from
5 happening, but it is happening. So our contention is
6 the protocol is not --

7 AC ALJ COLBERT: We'll hear from Waymo. But it
8 seems -- kind of going to the questions that
9 Judge Goldberg was asking -- well, maybe it's different.
10 The relief you're asking for is the current state of the
11 Commission's rules. You cannot transport unaccompanied
12 minors for Waymo. And if you do, there are -- there are
13 consequences for that. So do you acknowledge that Waymo
14 is not allowed to transport unaccompanied minors and
15 that if they do, the Commission can issue consequences?

16 MR. KRONLAND: Yes. I certainly --

17 AC ALJ COLBERT: So nothing needs to change?

18 MR. KRONLAND: Well, something needs to change,
19 which is we need the consequences to be imposed. And we
20 need going forward --

21 AC ALJ COLBERT: The earlier question that
22 Judge Goldberg asked you is have you all made inquiries
23 with the Commission's Consumer Enforcement and
24 Protection Division (sic), which regulates your clients
25 and Waymo to take enforcement action? Have you made any

1 effort to inquire with CPED about doing that?

2 MR. KRONLAND: We have not.

3 AC ALJ COLBERT: Thank you, your Honor.

4 ALJ GOLDBERG: Thank you.

5 So I have, I think, one last question. I'm
6 still, honestly, a bit confused about the relief that
7 you're seeking that we can offer in a complaint
8 proceeding. But Waymo has made an argument of unclean
9 hands. And as we've -- so I guess my question is is
10 SEIU aware of whether your members have transported
11 minors in violation of the -- of their -- your members'
12 companies' licenses, which also at this point prohibit,
13 without some additional background checks, transporting
14 minors?

15 MR. KRONLAND: I'm not aware of that.

16 ALJ GOLDBERG: You're not aware that Uber or
17 Lyft ever transport minors?

18 MR. KRONLAND: I'm not aware of it. And your
19 specific question was about our members.

20 ALJ GOLDBERG: Your members' companies, yes.

21 MR. KRONLAND: Our members' companies. I'm not
22 aware of what Uber and Lyft are doing.

23 AC ALJ COLBERT: But earlier I thought I had
24 asked you are you aware that driver TNCs have
25 transported unaccompanied minors without the requisite

1 background checks, and you said yes. So now you're
2 saying no, you're not?

3 MR. KRONLAND: I didn't think I said yes to
4 that.

5 AC ALJ COLBERT: So your answer is that you're
6 unaware whether Uber or Lyft and, by extension, the
7 drivers that drive for those companies, by extension,
8 some of which are your clients, have engaged in
9 transportation of unaccompanied minors without the
10 requisite background checks? You just don't know?

11 MR. KRONLAND: I don't know one way or another.
12 And you're equating the organizations with their
13 individual members.

14 AC ALJ COLBERT: I'm saying what I'm saying.
15 Don't characterize what I'm saying. I'm asking the
16 questions.

17 MR. KRONLAND: My clients are the
18 organizations. I do not know one way or another whether
19 any members of my clients' organizations who work as
20 Uber or Lyft drivers have transported unaccompanied
21 minors in violation of the Commission's rules.

22 AC ALJ COLBERT: If they had, would your
23 arguments for the Commission enforcing its rules and
24 engaging in or applying some kind of consequence for
25 that -- would you agree that is appropriate?

1 MR. KRONLAND: Yes. I would agree that it's
2 appropriate for the Commission to enforce its rules.

3 AC ALJ COLBERT: Thank you.
4 Thank you, your Honor.

5 ALJ GOLDBERG: Thank you. That was going to be
6 my next question. Thank you.

7 So I want to switch -- I'll give Waymo an
8 opportunity to respond. But first I have a couple
9 questions for Waymo.

10 In your version of the scoped issues, Waymo
11 proposes a question as to whether Waymo implemented
12 reasonable practices to prevent unaccompanied minors
13 from using its services. Where does a reasonableness
14 standard come from? If the license says one cannot do
15 something and they do it, why would we default to a
16 reasonableness standard? And I didn't see anything.

17 MR. STODDARD: Thank you, your Honor. I
18 appreciate the opportunity to clarify our statement from
19 the PHC statement.

20 The first issue that we identified, which is
21 whether or not Waymo has complied with the Commission's
22 requirement, Waymo views as a threshold issue. And if I
23 may explain a little bit further, the language -- and I
24 just want to make this clear for the record.

25 AC ALJ COLBERT: Counsel, hold on a second. Is

1 your microphone on?

2 MR. STODDARD: Yes. Can you hear -- is that
3 better?

4 AC ALJ COLBERT: Yeah.

5 MR. STODDARD: The actual language of the
6 Commission's requirement as stated in the ordering
7 paragraph to the Commission's deployment decision --
8 that's ordering paragraph 7(k) -- is that permit holders
9 participating in the Driverless AV Deployment Program
10 shall ensure that the services available only to be
11 chartered by adults 18 years and older and provide proof
12 of such assurance to the Commission with their
13 Transportation Charter-Party Carrier permit application
14 and upon request any time thereafter.

15 Waymo's position is that it has complied with
16 its requirement by including in its terms of service a
17 restriction that prohibits unaccompanied -- that
18 prohibits account holders from arranging rides for
19 unaccompanied minors and requires all account holders to
20 confirm that they are 18 years or older. Waymo thinks
21 that this, by its plain language, is clear in terms of
22 what its requirement is.

23 However, to the degree that SEIU's position is
24 that the Commission adopts or agrees with SEIU 's
25 position, which is that that requirement isn't specific

1 to chartering, but it's just generally about any form of
2 transportation of unaccompanied minors, then our
3 position is that after reaching that threshold question,
4 the next issue would be reasonableness. And the reason
5 that reasonableness comes into it is because the
6 Commission can't have a strict liability requirement
7 where the ordering paragraph says something different
8 from what's said elsewhere or where the words mean
9 something other than what they say.

10 Chartering as a concept has clearly been
11 defined by the Commission to mean prearrangement. It
12 includes the contractual engagement through contract,
13 meeting of the minds. When unaccompanied minors utilize
14 Waymo's service, it's in violation of Waymo's terms of
15 service and without Waymo's advanced knowledge.

16 ALJ GOLDBERG: I'm still confused as to how
17 you've -- how that distills out, I mean, into a
18 reasonableness standard.

19 MR. STODDARD: Thank you, your Honor. Yeah.
20 If I can try to explain again, the -- SEIU's position, I
21 think, has been made clear in the PHC statement. We
22 have divergent views on what the legal standard should
23 be here. SEIU's position is it's a strict liability
24 requirement that is -- that prohibits any unaccompanied
25 minors from riding in Waymo AVs, period. Waymo's

1 position is that the ordering paragraph needs to be the
2 controlling standard where it is specific to chartering
3 the vehicle.

4 To the degree there is something in between or
5 the Commission doesn't think it's about the chartering
6 arrangement or it's not the plain language of the
7 ordering paragraph, it can't be a strict liability
8 standard. It needs to be something else because that
9 would be -- there would be a due process violation to
10 impose strict liability for a requirement that means
11 something other than what it says based on the vagueness
12 of the rule.

13 AC ALJ COLBERT: So if a Waymo vehicle is
14 pulled over by -- as you may know, the -- CPED, the
15 Commission's Consumer Protection and Enforcement
16 Division, does have field officers and staff which do
17 audits and can do investigations. If a Waymo vehicle
18 was pulled over with a 12-year-old inside, can the
19 Commission sanction Waymo based on that alone? Or is
20 there some other kind of standard that we need to apply?

21 MR. STODDARD: No, your Honor. Our position is
22 that that -- it's a violation -- it's not a violation of
23 the Commission's rules if Waymo is not aware and has
24 attempted to prohibit the use of its service by
25 unaccompanied minors. And let's say it's a parent, a

1 Waymo user, who puts their child in a Waymo AV, hails
2 the ride for them through the app where they've
3 represented that they're complying with the terms of
4 service. They hail a Waymo AV. The child gets in the
5 car, is transported. Again, Waymo is unaware. If
6 that's pulled over by CPED, Waymo's position is that is
7 not a violation of the Commission's requirement as
8 stated in the ordering paragraph.

9 AC ALJ COLBERT: You said Waymo is unaware.
10 Does Waymo have a way to see inside of cars?

11 MR. STODDARD: Yes, your Honor. There are
12 instances -- and we describe this in our answer. Waymo
13 has -- conducts a camera check at the beginning of each
14 ride based on the rider's appearance. And if they are
15 flagged potentially as an unaccompanied minor, then
16 there are steps of review that are undertaken.

17 And rider support may call into the vehicle and
18 ask the rider to confirm their age. If the rider
19 represents they are over 18 years old, that's the end of
20 the conversation. That's the end of the inquiry. They
21 do have discretion to flag them as an unaccompanied
22 minor, but that's the process. It's essentially a
23 camera check with subsequent review. And if a rider is
24 contested and confirmed as an unaccompanied minor
25 because if they say no, I'm 8 years old, right, in that

1 instance, then they are -- a warning is either --

2 ALJ GOLDBERG: Well -- but are they
3 confirmed -- using my example, let's say they're 12
4 years old. And they ask, "Are you 18?" And they say
5 yes, but they're actually 12. And the car is going to
6 Acme Middle School. The Commission can't take any of
7 that in consideration in fining Waymo for it?

8 MR. STODDARD: Well, your Honor, respectfully,
9 that's a slightly different question because in that
10 instance, it's not based solely on the presence of the
11 minor in the vehicle. There's other contextual facts.

12 AC ALJ COLBERT: Let's take a step back. Waymo
13 can see inside the vehicles; correct?

14 MR. STODDARD: Yes.

15 AC ALJ COLBERT: Waymo knows where the vehicle
16 is going; correct?

17 MR. STODDARD: Yes.

18 AC ALJ COLBERT: So if a parent hails -- if an
19 account holder hails a Waymo, a small person gets into
20 that Waymo, and the destination of that Waymo is Acme
21 Middle School, Waymo has all that information -- is that
22 correct -- before the ride starts?

23 MR. STODDARD: Yes. I believe so, your Honor.

24 AC ALJ COLBERT: Thank you.

25 ALJ GOLDBERG: And I guess I'm a little

1 confused about something you just said too. You said
2 the violation -- that if there's a 12-year-old alone in
3 a vehicle, that's not the violation. Is that what I
4 heard you say?

5 MR. STODDARD: Sorry. Just to be clear, that's
6 a violation of Waymo's terms of service. In -- the
7 violation based on the language of the ordering
8 paragraph adopted by the Commission relates to
9 chartering of Waymo service, which is the prearrangement
10 via contract through the app by anyone under the age of
11 18.

12 AC ALJ COLBERT: Do Waymo's terms of service go
13 before the Commission in any way?

14 MR. STODDARD: The -- this specific restriction
15 is described in Waymo's passenger safety plan, which is
16 included and submitted to the Commission in connection
17 with its permit applications. So --

18 ALJ GOLDBERG: Does the Commission look at it?
19 Does it approve it? Does it say change this, change
20 that?

21 MR. STODDARD: The Commission approves Waymo's
22 passenger safety plan in the context of approving
23 Waymo's -- issuing Waymo's driverless deployment permit.

24 AC ALJ COLBERT: So the terms of service that
25 describe who can, using your words, I believe, charter

1 the vehicle and the terms of service describe that
2 unaccompanied minors riding in the vehicle would be a
3 violation of the terms of service?

4 MR. STODDARD: That's correct.

5 AC ALJ COLBERT: And the terms of service are
6 contained in the passenger safety plan, which is
7 reviewed and approved by the Commission?

8 MR. STODDARD: Not exactly, your Honor. The
9 terms of service in their entirety are not included in
10 the --

11 AC ALJ COLBERT: Well, we're talking about this
12 issue with the unaccompanied minors. And I thought you
13 said it was included.

14 MR. STODDARD: Sorry. I was just trying to
15 clarify for the record that what the passenger safety --

16 AC ALJ COLBERT: Does what the Commission
17 approves include the language concerning unaccompanied
18 minors?

19 MR. STODDARD: Yes. It includes --

20 AC ALJ COLBERT: So the Commission has approved
21 that, and it's part of what the Commission approved.
22 And are you saying that now the Commission can't enforce
23 what we've approved?

24 MR. STODDARD: I'm not sure I follow. The
25 Commission's -- the passenger safety plan describes the

1 measures that are undertaken by Waymo on topics
2 identified by the Commission in its deployment decision
3 related to passenger safety or other issues.

4 AC ALJ COLBERT: Are there any consequences if
5 the passenger safety plan is violated?

6 MR. STODDARD: That -- frankly, that has not
7 yet presented -- been addressed by the Commission, given
8 the novelty of and the emergent nature of autonomous
9 vehicles. But yes, if an entity acts in a way that
10 deviates from its passenger safety plan, there is a
11 possibility of enforcement action. However, passenger
12 safety plans are subject to change over time, and so
13 there are instances where a passenger safety plan may
14 describe a measure that has been since updated or
15 changed. And in those instances, it's not clear that
16 there would be any -- that enforcement or sanction or
17 penalty would be appropriate.

18 ALJ GOLDBERG: Does the Commission then -- but
19 the Commission would approve any changes to the
20 passenger safety plan; right?

21 MR. STODDARD: That issue is currently before
22 the Commission in a rulemaking proceeding. It's one of
23 the issues that's being addressed in a rulemaking
24 proceeding.

25 AC ALJ COLBERT: But that issue is updating the

1 passenger safety plan, isn't it?

2 MR. STODDARD: That issue is whether -- when
3 and whether to update -- when it should be required --

4 AC ALJ COLBERT: Off the record.

5 (Off the record.)

6 AC ALJ COLBERT: Back on the record.

7 You know, I'm not trying to engage in semantics
8 here. But -- and Judge Goldberg has referenced and is
9 discussing this with the complainants that there is an
10 open rulemaking specifically focused on autonomous
11 driverless vehicles. Do you agree with that?

12 MR. STODDARD: Yes, your Honor.

13 AC ALJ COLBERT: And it has several aspects to
14 it. And the passenger safety plans are -- and the rules
15 accompanying them are most likely going to be part of
16 that, if not already. Would you agree with that?

17 MR. STODDARD: They are already.

18 AC ALJ COLBERT: Okay. Thank you.

19 Thank you, your Honor.

20 ALJ GOLDBERG: So -- thank you. So I wanted to
21 go back to this issue of chartering. So -- for it --
22 whether you intended to say this or not that the
23 12-year-old being alone in the vehicle is not, according
24 to your view of how the ordering paragraph was written,
25 the violation. It's the chartering. And you said that

1 you -- I mean, I think I find this a little bit of
2 wordplay because obviously no credit card company is
3 going to issue a credit card to a 12-year-old. So a
4 12-year-old is clearly using an adult's log-in somehow
5 to get to charter this -- to charter their ride.

6 And then you said that you take a number of
7 steps, that you -- you know, you look at it. You try
8 and figure out was there really a violation. And then
9 you turn it over to your passenger safety group. I
10 think you mentioned it in the response as well.]

11 MR. STODDARD: Rider support, your Honor.

12 ALJ GOLDBERG: Rider support. But what I
13 didn't see was whether rider support ever takes any
14 action, and if so, what actions do they take and how
15 often do they do it. And you said the first time is a
16 warning. What happens on the second time?

17 MR. STODDARD: Yes, your Honor. And I should
18 be clear. It depends on the circumstances. If Waymo
19 confirms, in the course of interacting with the rider or
20 in reviewing the event, that the account holder that
21 hailed the ride was, in fact, the same as the child or
22 was under 18 years old, then that account is suspended.

23 If it was a parent hailing a ride for -- so a
24 parent who's over 18 hailing a ride for a minor, then,
25 in that issue, a warning is issued, and typically, after

1 that, it would be -- the account would be suspended for
2 repeated violations.

3 AC ALJ COLBERT: Counsel, could you describe
4 that last example again. I didn't -- I couldn't pick up
5 the difference between your first example and that last
6 example.

7 MR. STODDARD: Yes, your Honor. Thank you for
8 asking. In the first example, the account holder who
9 has the app that hailed the ride was the unaccompanied
10 minor -- or is a minor, right? In that example, if
11 Waymo makes that determination, the account is
12 immediately suspended.

13 In the second example, it's where a parent or
14 another adult hails a ride. The account holder is an
15 adult, they hail a ride for a child, and the
16 unaccompanied minor travels separately from the adult,
17 also a violation of Waymo's terms of service. In that
18 scenario, a warning email is issued. First of all,
19 rider support gets on the phone. You know, we may talk
20 with the rider, confirm their age, confirm their safety,
21 contact the account holder to let them know that an
22 unaccompanied minor is traveling unaccompanied, that
23 it's a violation of Waymo's terms of service, issue a
24 warning, and then if there's repeated violations, that
25 account will be subject to suspension.

1 AC ALJ COLBERT: Thank you for the
2 clarification.

3 ALJ GOLDBERG: Wait a second, because I have
4 another question. So would be subject to suspension.
5 So if it's a minor, you said, and they -- and you
6 figured out and -- that it's a minor, immediately the
7 account is suspended. If it's an adult that's
8 chartering for a minor, first time is a warning, and the
9 second time it might be suspended?

10 MR. STODDARD: Yeah, pursuant to Waymo's
11 procedures, the second time it will be suspended.

12 ALJ GOLDBERG: It will be?

13 MR. STODDARD: Yeah.

14 ALJ GOLDBERG: So second time it's
15 automatically suspended. And then this -- the -- I'm
16 sorry. I keep losing the name of the -- of Waymo's
17 group that does the --

18 MR. STODDARD: Rider support, your Honor.

19 ALJ GOLDBERG: Rider support. Can you tell me,
20 is rider support done by cities? Is it done nationally?
21 Is it done -- I mean, is rider support a group of five
22 people? Is it a group of a hundred people? Tell me --

23 MR. STODDARD: Your Honor, I don't personally
24 have that information. If you will give me a moment, I
25 can consult with my co-counsel from Waymo here.

1 ALJ GOLDBERG: Sure.

2 MR. STODDARD: Thank you, your Honor. Can we
3 go off for the record a moment?

4 ALJ GOLDBERG: (Nodding head.)

5 (Off the record.)

6 AC ALJ COLBERT: Back on the record.

7 MR. STODDARD: Thank you, your Honor.

8 ALJ GOLDBERG: Yes. We're back on the record.

9 MR. STODDARD: Your Honor, Waymo does not have
10 specific answers to those questions at this time. We
11 can say it's not city by city. We don't have the
12 specific current numbers of rider-support agents.
13 Obviously, to some degree, it adjusts depending on need
14 and demand, but in terms of -- to provide those numbers,
15 we would have to follow-up following the PHC.

16 ALJ GOLDBERG: Thank you. And, again, I might
17 ask for written briefing on a number of these questions,
18 but at this point, I'd like to give -- unless, you
19 don't -- no additional questions?

20 AC ALJ COLBERT: (Shaking head.)

21 ALJ GOLDBERG: Great. Thank you. I want to
22 give each party an opportunity to respond, and I want to
23 give -- perhaps we should start with Waymo. You respond
24 to SEIU, and then we'll give you the last opportunity.

25 AC ALJ COLBERT: And -- sorry, Counsel. And

1 just as we allowed SEIU, you can state your position on
2 the complaint, as SEIU said at the beginning, you can
3 respond to them, and they can respond to you after that.

4 ALJ GOLDBERG: Yes.

5 MR. STODDARD: Thank you, your Honor. I would
6 like to briefly address some of the statements SEIU made
7 in relation to its complaint and also the questions
8 raised by your Honors related to the complaint. A lot
9 of the questions touched on defenses that Waymo has
10 raised in its answer.

11 And I think, just generally, I would also like
12 to point out that the lack of clarity between the
13 parties represented, the interest represented, the
14 injuries claimed and the facts in support of, frankly,
15 the claims made in the complaint, also the injuries
16 alleged, and also the parties represented is why Waymo
17 raised as one of its affirmative defenses that the
18 complaint does not conform to Commission Rule 4.2, which
19 governs the contents of the complaints and made it
20 difficult to tease out and figure out kind of argu --
21 the difference between arguments that were raised versus
22 factual allegations that were raised in SEIU's
23 complaint.

24 Also, the issues related to the parties that
25 are represented and the injuries alleged and the

1 interest represented by SEIU also raised concerns that
2 Waymo included in its answer related to standing and
3 associational standing that Waymo thinks in this context
4 probably should bar the complaint from moving forward.

5 In general, Waymo's position in this case is as
6 stated previously, which is Waymo has complied with the
7 Commission's requirement, and although it is aware of
8 unaccompanied minors accessing Waymos vehicles, you
9 know, both when it's arranged by parents but also by
10 unaccompanied minors who have obtained Waymo accounts,
11 those occur in violation of Waymo's terms of service and
12 without Waymo's authorization or advanced knowledge.

13 For that reason, as well as the affirmative
14 defenses that Waymo has raised, Waymo thinks that SEIU's
15 complaint should be dismissed, but in the interim, to
16 the extent that the Commission plans to proceed, Waymo
17 is prepared to address any threshold legal issues that
18 should be addressed through briefing in advance of
19 moving forward on the other scope of issues.

20 AC ALJ COLBERT: Counsel, one of the -- and
21 we'll hear from SEIU. One of the arguments or
22 assertions that I heard SEIU say was that Waymo
23 routinely -- and I think they -- the word "routinely"
24 was used -- transports unaccompanied minors. What's
25 Waymo's response to that specific accusation?

1 MR. STODDARD: Waymo's response would be that
2 "routinely" is a vague and imprecise word. I don't know
3 exactly what SEIU means by "routinely." However,
4 I don't -- again, Waymo does not dispute that, you know,
5 as is reported in the news articles that primarily form
6 the basis of SEIU's complaint, that unaccompanied minors
7 have access and used Waymo's service in San Francisco,
8 Los Angeles -- and Los Angeles, you know, and that it
9 happens. I can't speak at this time to specific
10 numbers. And I don't know what numbers are suggested by
11 the word "routinely." But Waymo does not dispute that
12 it happens but that when it does happen it's in
13 violation of Waymo's terms of service.

14 ALJ GOLDBERG: Thank you.

15 SEIU, I want to give you an opportunity to
16 respond both to the answer and to what you heard today.

17 MR. KRONLAND: Certainly. First I want to
18 raise an issue about the Commission's decision. We
19 don't read the decision D.20-11-046 to be limited to
20 prohibiting unaccompanied minors from chartering Waymos.
21 It says in Section 5 of the decision, quoted in our
22 complaint, "no one under 18 may travel unaccompanied
23 regardless of whoever chartered the vehicle." And there
24 are several other statements in the Commission's
25 decision.

1 So in our view, it's not just an issue of
2 unaccompanied minors not being permitted to charter the
3 Waymos but that Waymo is prohibited from carrying
4 unaccompanied minors regardless of who chartered the
5 vehicle. And we also believe that that is expressed in
6 the Waymo passenger safety plan that's approved by the
7 Commission.

8 So when the 12-year-old is riding in a Waymo,
9 regardless of who chartered the Waymo, that's something
10 that is violating the Commission's decision in Waymo's
11 permit. We have a difference of views about what the
12 law is on that particular issue. So our complaint is
13 not limited to who chartered the vehicle.

14 The second issue is that some of Waymo's
15 arguments go to the affirmative defenses that Waymo has
16 presented to the complaint. I think some of the
17 commissioners -- some of the judges' questions have gone
18 to that issue also. Waymo has said that it plans to
19 file a motion to dismiss. It has not done so, at least
20 not yet.

21 In our view, if these issues are going to be
22 aired out, the best way to air them out would be to let
23 Waymo file whatever motion it's going to file and give
24 us an opportunity to respond to whatever these arguments
25 are.

1 ALJ GOLDBERG: Go ahead.

2 AC ALJ COLBERT: Thank you, Counsel. Do you
3 have a definition of "routinely"? Does routinely mean
4 it happens? It happens 10 percent the time? 15 percent
5 of the time? What is -- when -- and you have corrected
6 me several times saying that I used -- I put words in
7 your mouth. So did you use the term "routinely"?

8 MR. KRONLAND: In our complaint, we used the
9 term "routinely."

10 AC ALJ COLBERT: So how do you define
11 routinely?

12 MR. KRONLAND: We define routinely as something
13 that is happening frequently. It's not a onetime or
14 bizarre occurrence, and that's what's been reported in
15 the media. In our data request to Waymo --

16 AC ALJ COLBERT: I'm sorry, Counsel. When you
17 say, "reported in the media," that routinely is reported
18 in the media or occurrences are reported in the media?

19 MR. KRONLAND: The media is reporting that
20 parents are routinely using Waymos to send their kids to
21 school unaccompanied --

22 AC ALJ COLBERT: Okay. Thank you.

23 MR. KRONLAND: -- as a routine practice.

24 In our data request to Waymo, which we sent to
25 them on June 9th, we asked them for the data, how often

1 are unaccompanied minors using your Waymos to the extent
2 that you know? So we've asked Waymo for that data. I
3 can't say that we have the statistics right now. That's
4 why we issued the data request.

5 ALJ GOLDBERG: Thank you.

6 I just want to give Assistant Chief Colbert an
7 opportunity. Did you have any follow-up, additional?

8 AC ALJ COLBERT: No. No, your Honor. Thank
9 you.

10 ALJ GOLDBERG: Great. Thank you. Now let's --
11 I think that I've -- can't say everything is crystal
12 clear, which is why I'll be working very closely with
13 the commissioner's office as we scope this. But I want
14 to talk about the need for evidentiary hearings, because
15 SEIU stated it believes hearings are necessary. And
16 Waymo said it believes the issues in dispute are all
17 legal issues that don't warrant evidentiary hearing.

18 This seems, to me, like a very fact-intensive
19 case as SEIU just stated that they have a data request
20 that's specifically requesting factual data. I'd like,
21 Waymo, if you could explain why you think there are only
22 legal issues involved.

23 MR. STODDARD: Yes, your Honor. As Waymo, I
24 think, made clear in the answer, the facts that are
25 specifically alleged by SEIU in their complaint, which

1 are separate from the data request they've sent us but
2 the facts are specifically alleged, which, again, are
3 based on the news reporting and Waymo's own statement, I
4 believe it was my statement of prehearing conference in
5 the rulemaking that we understand and are aware that
6 there -- that unaccompanied minors have accessed Waymo
7 AVs and ridden in them in violation of Waymo's terms of
8 service.

9 Waymo's position is that trips that occur in
10 Waymo -- violation of Waymo's terms of service and also
11 where Waymo has employed reasonable efforts to detect
12 and prevent such violations of terms of service are not
13 a violation of the Commission's requirement. And on
14 that -- you know, so that's the threshold legal issue
15 that we believe could be resolved without evidentiary
16 hearings and without discovery.

17 AC ALJ COLBERT: And I apologize. Judge
18 Goldberg did ask me if I have questions, and now I do.

19 Counsel, do you have a view of the relief that
20 the complainants are seeking?

21 MR. STODDARD: A view in terms of whether or
22 not it's appropriate?

23 AC ALJ COLBERT: For a complaint.

24 MR. STODDARD: Yeah. No. Thank you, your
25 Honor. Waymo -- and we did identify this among our

1 defenses. We believe that the relief requested is not
2 appropriate for a complaint proceeding. It is the exact
3 type of relief that is either addressed through
4 Commission rulemaking proceedings or Commission
5 enforcement proceedings pursued by the Commission's
6 transportation and enforcement branch.

7 We think that that, you know, is both prudent
8 and makes sense as a matter of Commission practice.
9 They are the primary bodies tasked with enforcing
10 Commission procedures. They are also, in some cases,
11 aware of what Waymo's procedures and practices are and
12 have already engaged in inquiries and discussions with
13 Waymos on those topic -- with Waymo on those topics.

14 AC ALJ COLBERT: So are you indicating that --
15 and you can choose -- obviously choose how to answer
16 this -- that there may or you're acknowledging there
17 have been discussions with Waymo and CPED, TED about
18 unaccompanied minors accessing Waymo vehicles?

19 MR. STODDARD: Yes, your Honor.

20 AC ALJ COLBERT: Thank you.

21 MR. STODDARD: And if I may, your Honor. I --
22 cuz I -- just only because of the -- and I apologize
23 because I haven't been able to touch on a few issues. I
24 did want to just make clear for the record that related
25 to their request -- to SEIU's request for relief in

1 their complaint, there are other threshold barriers that
2 Waymo thinks apply to the complaint, which it will raise
3 in its motion to dismiss, that would also be relevant to
4 the request for relief and the fact that, you know, it's
5 not appropriate in this context and primarily because
6 Waymo is not a public utility and the Commission's
7 complaint procedures apply to public utilities. Waymo's
8 a charter-party carrier, which is a different type of
9 regulated entity. So I did want to make sure that we
10 made that point on the record.

11 AC ALJ COLBERT: Yeah. I'm not sure we want to
12 go down that road, but okay. So since you raised it, if
13 something happens with the Waymo and I charter a Waymo
14 and I'm taken the opposite direction of where I want to
15 go or I'm charged twice as much, as happens, I, as a
16 passenger, can't get any relief for that from the
17 Commission?

18 MR. STODDARD: The Commission has a consumer
19 affairs branch process for complaints against
20 charter-party carriers, which is posted on its website,
21 and I think is identified as the forum for complaints
22 against charter-party carriers. And that is a process
23 through which consumers bring concerns about
24 charter-party carrier operations and can seek relief of
25 various kinds and -- you know, including refunds.

1 AC ALJ COLBERT: Well -- and if you contest it,
2 it still ends up here anyway.

3 MR. STODDARD: It could.

4 AC ALJ COLBERT: Okay. Well, your choice.

5 For SEI -- for SEIU, to my questions to Waymo,
6 can you reiterate or give some context to if, in fact --
7 and this goes to a previous question -- that the
8 Commission's Consumer Protection and Enforcement
9 Division transportation enforcement branch have
10 enforcement authority over Waymo, should that process be
11 allowed to play out, Waymo acknowledges that it is --
12 that it is occurring and/or should -- should SEIU engage
13 in that process to try to get the relief sought?

14 MR. KRONLAND: Sure. Thank you, your Honor.
15 This was an issue raised in Waymo's answer, and we'd be
16 happy to address it candidly, your Honor. We have no
17 idea what the Consumer Protection Bureau is doing,
18 whether they are investigating or not. We think there's
19 a transparency issue. It's been widely reported that
20 Waymo is routinely carrying unaccompanied minors even
21 though it's not supposed to. We filed the complaint.

22 We think there's a transparency reason to allow
23 it to go forward in the complaint process rather than --
24 a different process that complaining parties are not
25 involved in that takes place behind closed doors between

1 Waymo and the Consumer Bureau.

2 We don't know what they are investigating, if
3 they are investigating, what they're going to do. So I
4 can't comment on whether what they're going to do is
5 adequate, because I don't know.]

6 AC ALJ COLBERT: Would you acknowledge that the
7 rulemaking -- the existing rulemaking concerning
8 autonomous vehicles is a transparent process?

9 MR. KRONLAND: I agree. But the rulemaking is
10 about what the rules should be going forward. And when
11 the issue was raised in the rulemaking that Waymo hadn't
12 been following the existing rules, Waymo commented this
13 is the wrong forum to deal with Waymo's been violating
14 the rules. So I don't believe the rulemaking can deal
15 with whether in the past Waymo has violated its permit.
16 There should be a process for that. It's not just about
17 going forward. It's also about was there a violation in
18 the past. If there was, it should find that there was.

19 AC ALJ COLBERT: And if, as you're stating,
20 your contention, subject to correction, is that there
21 has been violations in the past, would the Commission
22 opening an OII or an OSC -- would that be a transparent
23 process?

24 MR. KRONLAND: I can't say I know how those
25 processes would work. I'm not aware of that having

1 occurred.

2 AC ALJ COLBERT: Maybe that's going to be a
3 question for you all. So -- so educate yourself about
4 the Commission's OII, which is Order Instituting an
5 Investigation, and an OSC, which is based on -- as you
6 all know, there is a decision, which you both have
7 quoted from. And if that decision has been violated in
8 some way, you can -- I know you know what an OSC is. So
9 we're talking about is this complaint process the
10 correct process, not is there a process at the
11 Commission to address the issues and concerns you have
12 raised.

13 Thank you, your Honor.

14 ALJ GOLDBERG: That was very articulate. I
15 appreciate that. I was trying to get there, you know,
16 but you really -- thank you.

17 So I'm going to -- I've asked -- we've asked a
18 lot of questions. We're likely going to be asking for
19 additional briefing on those issues. And after
20 reviewing the complaint, the answer, answers to our
21 questions, hopefully the written responses to the
22 questions -- to additional issues that we want you to
23 brief, then we'll discuss this with Commissioner Harada
24 in preparation for the scoping memo. So at this point,
25 I'm not going to share proposed scoped issues. That

1 will be a discussion between us and the commissioner's
2 office over the next few weeks.

3 And the proceeding schedule, let's talk about
4 that for just a minute. The timeline for an
5 adjudicatory proceeding is 12 months from the date of
6 filing until Commission vote. I believe that this
7 complaint was filed in March. And in the joint
8 prehearing conference statement, the parties suggested
9 similar proceeding timelines with Waymo noting that it
10 wanted to file a motion for dismissal and -- but that
11 the timelines appear to allow for a proceeding officer's
12 decision within the statutory time frame. Therefore,
13 I'm going to suggest to Commissioner Harada that she
14 consider accepting the timeline proposed in more detail
15 by SEIU in the PHC statement.

16 And, finally, I'd like to talk about our
17 alternative dispute resolution options. The Commission
18 has an alternative dispute program that offers
19 mediation, early neutral evaluation, and facilitation
20 services using ALJs who have been trained in alternative
21 dispute resolution. We encourage parties to start
22 talking early, reaching agreement, if you can, on all or
23 individual issues, and notify me if you wish to make use
24 of the ADR program at the Public Utilities Commission.

25 Are there any questions about the ADR program?

1 SEIU?

2 MR. KRONLAND: No, your Honor.

3 ALJ GOLDBERG: Waymo?

4 MR. STODDARD: No.

5 ALJ GOLDBERG: I'd like to ask if there are any
6 other issues or questions.

7 First, I'd like to start with Assistant Chief
8 Colbert, if you have any other issues or questions.

9 AC ALJ COLBERT: Hopefully, no. And I mean it
10 for real this time. Thank you.

11 ALJ GOLDBERG: SEIU?

12 MR. KRONLAND: The only issue I want to raise
13 is about our data request. We understand there are
14 legal issues that the Commission may want briefing on.
15 We understand that Waymo wants to file a motion to
16 dismiss. Frankly, it's easier, if the issues overlap,
17 to just let Waymo file its motion to dismiss so we can
18 respond to whatever the argument is. But I'm concerned
19 that if the response to our data request gets postponed,
20 we won't be able to be ready on the schedule that the
21 Commission is going to set.

22 ALJ GOLDBERG: Waymo, can you address that?

23 MR. STODDARD: Yes, your Honor. Thank you.

24 Given the threshold issues that your Honor has
25 raised and questions that might require additional

1 briefing and Waymo's forthcoming motion to dismiss,
2 which it plans to file in July, Waymo believes that
3 those should be resolved -- first of all, that that
4 should happen and ideally be addressed prior to any
5 discovery. The discovery requests that SEIU has sent us
6 and that we've discussed, SEIU agreed to hold off on
7 requiring a response until ten days after the prehearing
8 conference. However, that's still going to be well
9 before we likely have completed briefing on any
10 threshold questions that your Honors have, issuance of a
11 scoping ruling, or resolution on Waymo's motion to
12 dismiss. It would be more efficient and less cumbersome
13 for Waymo and avoid kind of a -- frankly, a fishing
14 expedition on issues that may or may not be relevant to
15 the scope of issues that are ultimately established in
16 the scoping ruling to simply stay discovery until after
17 those events have occurred.

18 AC ALJ COLBERT: Do we have a motion to approve
19 the discovery request before us?

20 ALJ GOLDBERG: No.

21 MR. KRONLAND: No.

22 AC ALJ COLBERT: So, Mr. Stoddard, are you
23 suggesting that an appropriate time to take up this
24 discovery issue would be after the issuance of the
25 scoping memo?

1 MR. STODDARD: Yes.

2 AC ALJ COLBERT: Okay. Thank you.

3 ALJ GOLDBERG: Okay. I'm a little -- but I'm a
4 little bit concerned about these discovery issues
5 primarily because on the schedule you proposed,
6 discovery would be completed by September 1st. If the
7 scoping ruling is issued in the next three weeks or so,
8 that doesn't leave a lot of time for discovery to occur.
9 So --

10 MR. KRONLAND: Right. Our concern is we've
11 asked basic questions like how often are you
12 transporting unaccompanied minors? What are your
13 protocols for stopping transporting unaccompanied
14 minors? How many people are you deactivating? It seems
15 like on the schedule that's being discussed, it will be
16 months before we would get any even initial response to
17 our data requests, be unable to follow up on them and
18 the like. And that's what I'm concerned about in terms
19 of the schedule.

20 AC ALJ COLBERT: Well, I think you can make the
21 request, if you wish. Waymo has provided their answer
22 when they would prefer discovery to start, if it does.
23 And the judge can consider it.

24 MR. KRONLAND: So I wasn't aware, your Honor,
25 that we had to file a motion for permission to take

1 discovery.

2 AC ALJ COLBERT: You don't. But Waymo is
3 opposing it.

4 ALJ GOLDBERG: But if there are discovery
5 disputes, then you file a motion.

6 MR. KRONLAND: Okay. So because Waymo orally
7 says we don't want to respond, now I file a motion
8 asking you to allow us to --

9 ALJ GOLDBERG: To compel, right.

10 AC ALJ COLBERT: If you all are at odds and you
11 say we've asked for discovery and Waymo -- and we're
12 talking right now. But if there's an impasse, then the
13 judge has to decide.

14 ALJ GOLDBERG: Then -- and so -- but in terms
15 of discovery in response to this discussion, that --
16 September 1st, that date that you have on the proposed
17 schedule, that might get moved a little bit to allow
18 ample time. If we're looking at discovery after the
19 scoping memo, as Waymo has requested, then we would push
20 out the discovery timeline. So -- but, again, that's a
21 discussion we'll have with Commissioner Harada's office.

22 So if there are no other issues that need to be
23 addressed, I'd like to thank everyone for their
24 participation. And this prehearing conference is
25 adjourned at 11:10. And we're off the record.

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(At the hour of 11:10 a.m., this matter
having been concluded, the Commission then
adjourned.)]

* * * * *

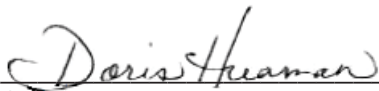
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

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NO. 10538, IN AND FOR THE STATE OF CALIFORNIA, DO
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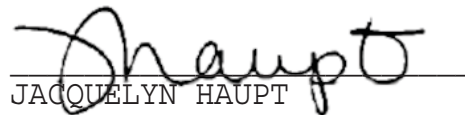
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JACQUELYN HAUPT
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