



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

FILED

09/24/26

04:59 PM

R2508013

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

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

**OPENING COMMENTS OF ZOOX, INC. ON TRACK 1A PROPOSED
DECISION**

**RON THANIEL
PAUL ESCOBAR
AARON SHAPIRO**

Zoox, Inc.
1149 Chess Drive
Foster City, CA 94404
(650) 539-9669
zooxregulatory@zoox.com
legalregulatory@zoox.com

September 24, 2026

TABLE OF CONTENTS AND SUMMARY OF RECOMMENDATIONS

I. INTRODUCTION.....	1
II. COMMENTS.....	2
A. Exemptions to General Order 157-E and Other Rules.....	2
1. Streamlining the GO 157-E exemption process improves efficiency while maintaining stringent safety standards.....	2
B. Permit Reinstatement.....	3
1. For suspensions unrelated to passenger safety, the Commission permit should be automatically reinstated upon submission to staff of documentation of reinstated DMV authority.....	3
2. The Commission should clarify what constitutes “sufficient” information for resolving a suspension.....	4
C. Operational Design Domain Disclosure and 30-Day Attestation for ODD Changes.....	4
1. The Commission should not require public posting of ODDs in order to avoid duplication with the California DMV.....	5
D. Airport Authority.....	5
1. Public posting of airport authorization documentation for AVs creates an uneven standard.....	5
2. The Commission should clarify that a carrier’s attestation continues to satisfy the requirement to document airport permission.....	6
3. The Commission should clarify that Tier 1 Advice Letters for airport service in Driverless Deployment are effective pending disposition.....	6
4. The Commission should allow for an attestation, rather than a fully updated Passenger Safety Plan, for a carrier’s first airport in the Driverless programs.....	7
E. Purpose-Built AVs – Reporting & Safety Protocols.....	7
1. Deferring to a later date more significant policy changes for purpose-built AVs is appropriate.....	7
III. CONCLUSION.....	8
APPENDIX.....	A-1

TABLE OF AUTHORITIES

FEDERAL AUTHORITIES

Statutes and Regulations
49 C.F.R. Part 555.....2

CALIFORNIA AUTHORITIES

Statutes and Regulations
Senate Bill 570 (Wieckowski, 2021).....2

California Public Utilities Commission

Decisions (D.)
D.18-05-043.....3
D.20-11-046.....3

General Orders (GO)
GO 96-B.....7
GO 157-E.....2, 6

Rules of Practice and Procedure
Rule 14.3.....1

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

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

Rulemaking 25-08-013
August 28, 2025

**OPENING COMMENTS OF ZOOX, INC. ON TRACK 1A PROPOSED
DECISION**

Zoox, Inc. (Zoox) submits the following opening comments on the September 4, 2026 Track 1A Proposed Decision (PD) of Commissioner Matthew Baker. These comments are submitted pursuant to California Public Utilities Commission (Commission) Rule 14.3 of the Rules of Practice and Procedure.

I. INTRODUCTION

Based in Foster City, CA, Zoox is reinventing personal transportation through a purpose-built robotaxi that offers a better way to ride. Zoox owns and operates its robotaxi fleet, including fleet management, maintenance, routing, and customer support, and has a long history of active engagement with the Commission through the Commission’s rulemaking process and through participation in the Commission’s autonomous vehicle (AV) permitting programs.

Zoox supports the PD’s overall approach to thoughtfully streamlining the administration of the AV Pilot and Deployment programs, including the delegation of specific exemption determinations to staff and the extension of driverless passenger service to airports in the Driverless Pilot Program. Zoox separately identifies several areas where the PD’s proposed requirements are either unsupported by the record, inconsistent with the Commission’s treatment of other regulated passenger carriers, or would benefit from clarification so that staff and carriers

can administer them as intended. Zoox addresses these issues below in the order in which they appear in the PD.

II. COMMENTS

Zoox appreciates the Commission's efforts in the PD to streamline and clarify several aspects of the AV Pilot and Deployment programs. The comments below identify the specific provisions Zoox supports as proposed and a limited set of modifications that Zoox recommends.

A. Exemptions to General Order 157-E and Other Rules

1. Streamlining the GO 157-E exemption process improves efficiency while maintaining stringent safety standards.

Zoox supports the PD's approach to streamlining the General Order (GO) 157-E exemption process, which would authorize Commission staff to approve or deny specified exemptions without further Commission action and eliminate the need for annual renewal or re-attestation so long as the underlying authorization and supporting facts remain unchanged.¹ This approach reflects the recommendations Zoox and other carriers made throughout this proceeding and appropriately aligns the treatment of exemptions across the Pilot and Deployment programs.²

Zoox particularly supports the PD's clarification that exemptions under Parts 4.02, 4.05, and 4.06 of GO 157-E are unnecessary for equipment that a vehicle is not equipped with and that state or federal law do not otherwise require.³ This clarification appropriately aligns Commission regulations with state and federal regulations, including Senate Bill 570 (Wieckowski, 2021) and Zoox's federal authorizations through the National Highway Traffic Safety Administration (NHTSA) Automated Vehicle Exemption Program and its Part 555 commercial exemption. This alignment will reduce unnecessary exemption requests and support continued innovation in AV platforms to enhance passenger safety and the rider experience. Zoox has no changes to propose to this portion of the PD.

¹ Track 1A Proposed Decision of Commissioner Baker (PD) at 11-13.

² Comments of Zoox, Inc. on the Order Instituting Rulemaking to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Services, October 31, 2025 ("Zoox OIR Opening Comments"), at 13, 20-21; Opening Comments of Zoox, Inc. on the Email Ruling Providing Prehearing Conference Questions for Parties, January 30, 2026 ("Zoox PHC Opening Comments"), at 4.

³ PD at 12-13.

B. Permit Reinstatement

The PD proposes a process for reinstating a suspended Commission AV authorization following the California Department of Motor Vehicles' (DMV) reinstatement of the carrier's underlying DMV permit.⁴ Zoox recommends two modifications to this process, discussed below, to ensure it functions clearly and effectively within both the Commission's and California's broader regulatory framework.

1. For suspensions unrelated to passenger safety, the Commission permit should be automatically reinstated upon submission to staff of documentation of reinstated DMV authority.

Zoox recommends that the Commission modify the PD to provide that, for suspensions unrelated to passenger safety, the Commission's AV authorization is automatically reinstated upon a carrier's submission to staff of documentation confirming DMV has reinstated the underlying authority with no further documentation or review required.

As Zoox has observed throughout this proceeding, the Commission's jurisdiction over AV carriers is centered on passenger safety and consumer protection, while the DMV retains authority over the safe operation of AVs on public roads.⁵ Commission decisions similarly acknowledge each agency's specific role.⁶ Where a DMV suspension was unrelated to passenger safety, the condition giving rise to that suspension is, by definition, one DMV has already resolved through its own reinstatement process. In this case, it is unclear what purpose Commission staff would have in reviewing and approving additional information or what standard of review staff would use to determine if the information is sufficient. Therefore, carriers seeking reinstatement in this situation should not be required to submit additional information beyond documentation confirming DMV reinstatement.

⁴ PD at 17.

⁵ Zoox OIR Opening Comments at 22–23; Reply Comments of Zoox, Inc. on the Order Instituting Rulemaking to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Services, November 17, 2025 ("Zoox OIR Reply Comments"), at 5 (citing D.18-05-043).

⁶ *See, e.g.*, D.18-05-043, Finding of Fact 2: "The California DMV regulates the safe operation of AVs and the Commission regulates certain for-hire transportation to provide for safety and consumer protection." Also see D.20-11-046 at 30: "[...] vehicle safety is currently addressed by another State agency," referring to the DMV, "Thus, the DMV is the appropriate authority to evaluate and affirm through the permit process the AVs' capability to perform the dynamic driving task."

2. The Commission should clarify what constitutes “sufficient” information for resolving a suspension.

To the extent the Commission declines to adopt the modification proposed above and proceeds with the proposal in the PD, Zoox supports staff-level reinstatement in all but the more complex circumstances the PD identifies for elevation to the Commission – namely, novel policy, regulatory, or legal issues, material unresolved factual disputes, or other issues requiring Commission discretion.⁷ In order to administer the reinstatement process efficiently and predictably, Zoox asks that the Commission clarify what constitutes “sufficient” information for purposes of a reinstatement request, so that staff and carriers share a common upfront understanding of what is expected. Setting a clearer standard will ensure that many reinstatement requests can be handled ministerially by staff as the PD intends, rather than potentially necessitating the Commission weigh in on the reasonableness of the submitted documentation.

The Commission should articulate the specific information or documents that it deems sufficient to support reinstatement and should rely on existing documents and protocols as much as practical. The PD already proposes leveraging the Passenger Safety Plan (PSP) in the reinstatement process. Zoox recommends that, in addition to documentation of the reinstated DMV permit, carriers seeking reinstatement submit either: (1) an updated PSP as a Tier 2 advice letter; or (2) an attestation that no material changes to the PSP were required as part of remediation, with a brief explanation of why no changes were required. Staff should reinstate the permit promptly upon receipt of a complete reinstatement request. If the Commission opts to require further documentation, the Commission should consider its requirements in the context of other state and federal regulators whose evaluations of a carrier’s capabilities may have preceded that of the Commission. The Commission should avoid requiring submission of documents specific to other regulators’ jurisdictions when there is no direct relationship to passenger safety or, if it determines information submitted to other regulators is relevant to passenger safety, avoid requiring the creation of bespoke documents where information already submitted to other regulators would be sufficient.

⁷ PD at 17.

C. Operational Design Domain Disclosure and 30-Day Attestation for ODD Changes

Zoox supports the PD's clarification that no new 30-day attestation is required solely because of an Operational Design Domain ("ODD") modification for carriers that have already established on-road experience in California.⁸ This is how the Commission has implemented this requirement to date and is consistent with the position Zoox has advocated throughout this proceeding.⁹ However, the Commission should not adopt the PD's proposed extension of public ODD disclosure requirements to the Driverless Pilot and Drivered Deployment programs.

1. The Commission should not require public posting of ODDs in order to avoid duplication with the California DMV.

The PD extends public ODD disclosure requirements to the Driverless Pilot and Drivered Deployment programs.¹⁰ This information, however, is already made public by the DMV, which maintains a detailed list and maps of approved ODDs.¹¹ A separate Commission disclosure obligation is duplicative of this existing, reliable public resource and introduces a risk that the two agencies' postings fall out of sync if one agency updates its records before the other. Zoox asks that, to the extent the Commission adopts this requirement, staff be permitted to rely on and cross-reference the DMV's public ODD records where practicable to minimize the potential for inconsistency between the two sources. If the Commission intends to post ODDs publicly on its own website, where possible it should do so through a direct link to the DMV's posted ODD rather than creating a static posting on the Commission website.

D. Airport Authority

Zoox strongly supports the PD's authorization of passenger service in the Driverless AV Pilot Program at airports,¹² a change Zoox and other parties have requested throughout this proceeding.¹³ Zoox proposes four modifications to the specific airport service requirements the PD adopts across the AV programs.

⁸ PD at 22-23.

⁹ Zoox PHC Opening Comments at 8; Reply Comments of Zoox, Inc. on the Email Ruling Providing Prehearing Conference Questions for Parties, February 13, 2026, at 2-3.

¹⁰ PD at 21-22; Ordering Paragraph 6.

¹¹ See [Autonomous Vehicle Permit Holders - California DMV](#).

¹² PD at 25.

¹³ Zoox OIR Opening Comments at 16-17.

1. Public posting of airport authorization documentation for AVs creates an uneven standard.

The PD requires that “Commission staff will make the airport authority’s written authorization publicly available on the Commission’s website” for all AV carriers offering airport service.¹⁴ No other TCP carriers, including transportation network companies, are subject to a comparable requirement to submit airport authorization to the Commission for public posting, even though GO 157-E requires all TCP carriers to obtain airport consent before commencing service.¹⁵ Applying this obligation to AV carriers alone would create an asymmetric standard among competing passenger services without a clear regulatory purpose.

If the Commission nonetheless adopts a public posting requirement, Zoox recommends that any such posting be limited to a list maintained by Commission staff of the airports at which each carrier is authorized to operate, rather than the underlying authorization documents themselves. Should staff require additional detail about the scope of a particular airport’s authorization, staff can obtain that information through a data request to the carrier.

2. The Commission should clarify that a carrier’s attestation continues to satisfy the requirement to document airport permission.

Zoox is concerned that the PD’s reference to “written permission from the relevant airport authority” is, intentionally or not, a departure from current practice.¹⁶ To date, carriers have satisfied airport authorization requirements by submitting a letter from the carrier to the Commission memorializing the airport’s approval. On the other hand, the PD’s language could be read to require a document issued directly by the airport authority itself. Such documents may contain sensitive commercial or technical terms unrelated to passenger safety that are not appropriate for public disclosure and that provide no particular utility to the general public. Given that, this requirement may effectively require airports to generate a new document solely to satisfy a Commission filing requirement, which would impose an unnecessary burden on both airport and carrier staff with no clear safety or consumer protection benefits. Zoox therefore asks the Commission to clarify that a carrier’s own attestation memorializing the airport’s authorization continues to satisfy this requirement. If Commission staff require further

¹⁴ PD at 27, Ordering Paragraph 8 at 36.

¹⁵ General Order 157-E, Part 3.02. *See also* Zoox OIR Reply Comments at 6-7 (citing Waymo Opening Comments at 19).

¹⁶ PD at 26, Ordering Paragraph 8 at 36.

information about a carrier's airport authorizations as they relate to passenger safety, they may request it directly from the carrier under the Commission's existing data request authority.

3. The Commission should clarify that Tier 1 Advice Letters for airport service in Driverless Deployment are effective pending disposition.

The PD requires that authorization packages including PSP updates for airport-specific risks in Driverless Deployment be submitted as Tier 1 Advice Letters, but further provides that "[t]he carrier shall not commence Driverless Deployment airport passenger service until Commission staff issues a written disposition of the advice letter."¹⁷ This treatment is inconsistent with the Commission's general practice for Tier 1 Advice Letters, which typically become effective upon filing pending disposition.¹⁸ Zoox requests the Commission to clarify that a carrier may commence airport passenger service upon filing the Tier 1 Advice Letter consistent with the standard Tier 1 process, rather than waiting for staff's written disposition.

4. The Commission should allow for an attestation, rather than a fully updated Passenger Safety Plan, for a carrier's first airport in the Driverless programs.

For additional airports beyond the first, the PD permits a carrier to submit either an updated PSP or an attestation that its approved PSP already addresses the risks presented by the new airport.¹⁹ The PD does not extend this option to a carrier's first airport, instead requiring a fully updated PSP describing how the carrier will address airport-specific risks. A carrier may, however, have already developed and incorporated airport-specific risk mitigations into its PSP prior to securing authorization from its first airport. Assuming the ODD approved in the existing PSP includes the airport, the Commission should extend the attestation option to the first airport. This would allow such a carrier to consolidate its PSP updates where circumstances warrant, reducing the burden of a duplicative review and approval process on both carriers and Commission staff without any reduction in passenger safety.

E. Purpose-Built AVs – Reporting & Safety Protocols

1. Deferring to a later date more significant policy changes for purpose-built AVs is appropriate.

Zoox supports the PD's decision to defer more significant policy changes specific to purpose-built AVs and to instead apply the same passenger notice, consent, and PSP update

¹⁷ PD at 27.

¹⁸ General Order 96-B, General Rule 7.3.3. *See also* Energy Industry Rule 5.1.

¹⁹ PD at 26-27.

requirements to any new vehicle platform, purpose-built or otherwise.²⁰ Zoox has no changes to propose to this portion of the PD. Should the Commission revisit the issue of purpose-built AVs in the future, Zoox urges the Commission to focus on maintaining consistency across its regulated passenger carriers and avoid imposing specific requirements based on vehicle form factor or technology alone.

III. CONCLUSION

Zoox greatly appreciates the opportunity to submit these opening comments for consideration, respectfully urges the Commission to adopt the recommendations discussed above, and looks forward to working collaboratively with all parties on these important issues.

Respectfully submitted on this 24th day of September, 2026.

/s/ Aaron Shapiro

Zoox, Inc.
1149 Chess Dr.
Foster City, CA 94404
(650) 539-9669
legalregulatory@zoox.com

Attorney for Zoox, Inc.

²⁰ PD at 29-30.

APPENDIX

PROPOSED MODIFICATIONS TO FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDERING PARAGRAPHS

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, Zoox proposes the following modifications to the PD's Findings of Fact, Conclusions of Law, and Ordering Paragraphs. Proposed deletions are marked as ~~strikeouts~~, and proposed new text is **underlined and bolded**.

B. Permit Reinstatement

New Finding of Fact (insert after existing Finding of Fact 2):

The Commission's jurisdiction over Autonomous Vehicle carriers is centered on passenger safety and consumer protection, while the California Department of Motor Vehicles retains primary authority over the safe operation of Autonomous Vehicles on public roads, including matters warranting suspension or reinstatement of a Department of Motor Vehicles permit for reasons unrelated to passenger safety.

Revise Conclusion of Law 8:

It is reasonable to conclude that ~~for the Pilot and Drivered AV Deployment, once a carrier has received reinstatement of their permit from DMV, staff may reinstate the Commission AV authorization upon determining that applicable Commission requirements are satisfied.~~ **for reasons unrelated to passenger safety, the carrier's Commission Autonomous Vehicle authorization should be automatically reinstated upon the carrier's submission to staff of documentation confirming DMV's reinstatement of the underlying authority.** ~~Staff may publish and update nonbinding guidance on the documentation required to inform reinstatement as part of an AV Program Guidebook.~~

New Conclusion of Law (insert after existing Conclusion of Law 8):

It is reasonable that where the DMV suspension was related to passenger safety, staff may reinstate the Commission AV authorization upon submission of documentation of reinstatement of the DMV permit and either an updated Passenger Safety Plan via Tier 2 advice letter or an attestation that no changes to the Passenger Safety Plan were required in order to remediate the precipitating issue(s) with a brief explanation as to why no changes were required.

Revise Ordering Paragraph 5:

Following reinstatement of the carrier's applicable Department of Motor Vehicles (DMV) authority, an Autonomous Vehicle carrier shall submit to the Commission staff documentation of the reinstated DMV authority ~~and, **Where the DMV's suspension of the carrier's authority was unrelated to passenger safety, the carrier's Commission Autonomous Vehicle authorization is automatically reinstated upon submission of this documentation. Where the DMV's suspension of the carrier's authority was related to passenger safety, the carrier shall additionally submit** information sufficient to demonstrate that the condition giving rise to the suspension has been resolved, **which will include documentation of reinstatement of the DMV permit and either an updated Passenger Safety Plan via Tier 2 advice letter or an attestation that no changes to the Passenger Safety Plan were required in order to remediate the precipitating issue(s) with a brief explanation as to why no changes were required.**~~ and staff may reinstate the Commission Autonomous Vehicle authorization upon determining that applicable Commission requirements are satisfied. Staff may publish and update nonbinding guidance on the documentation required to inform reinstatement as part of an AV Program Guidebook.

C. Operational Design Domain Disclosure

New Finding of Fact (insert after existing Finding of Fact 3):

The California Department of Motor Vehicles maintains and publicly posts descriptions and maps of Autonomous Vehicle permitholders' approved Operational Design Domains, including geographic area, time of day, roadway types, weather conditions, and speed range.

If the Commission accepts Zoox's recommendation and does not adopt the ODD disclosure requirement:

New Conclusion of Law (replace Conclusion of Law 9 in its entirety):

It is reasonable for the Commission to rely on the Department of Motor Vehicles' existing public disclosure of Operational Design Domains rather than adopt a separate public disclosure requirement for the Driverless Pilot program and the Drivered Deployment Program.

Ordering Paragraphs 6 and 7:

Strike entirely.

If the Commission retains the ODD disclosure requirement, Zoox suggests the following alternative revisions:

Revise Conclusion of Law 9:

It is reasonable to conclude that the Commission should extend the public disclosure of ODDs (including, but not limited to, a geographic map and list of cities/counties, time of day, roadway types, weather conditions, speed range) to the Driverless Pilot program and the Drivered Deployment Program, **provided that this requirement is implemented through a direct link to the Department of Motor Vehicles' public postings.**

Revise Ordering Paragraph 6:

The Commission will extend the public disclosure of Operational Design Domains (ODDs) (including, but not limited to, a geographic map and list of cities/counties, time of day, roadway types, weather conditions, speed range) to the Driverless Pilot program and the Drivered Deployment Program. To satisfy this requirement, Autonomous Vehicle Driverless Pilot and Drivered Deployment carriers shall **provide a link to the Department of Motor Vehicles' public posting of the carrier's Operational Design Domain.** ~~submit the public ODD information to Commission staff through the submission method designated by staff. The submission shall include a geographic map and list of cities/counties, time of day, roadway types, weather conditions, and speed range.~~

D. Airport Authority

New Finding of Fact (insert after existing Finding of Fact 9):

No other transportation charter-party carrier, including transportation network companies, is currently required to submit airport authorization documentation to the Commission for public posting, notwithstanding that General Order 157-E requires all transportation charter-party carriers to obtain airport consent before commencing service.

New Conclusion of Law (insert after existing Conclusion of Law 11):

It is reasonable to conclude that a carrier's attestation memorializing an airport authority's grant of permission to provide passenger service satisfies the requirement to document airport authorization.

If the Commission accepts Zoxx's recommendation and does not adopt the airport authorization public posting requirement:

Revise Ordering Paragraph 8:

The Commission will permit driverless passenger service in the Autonomous Vehicle (AV) Pilot Program at airports subject to the following requirements: Before beginning airport passenger service, the carrier shall submit an airport authorization package to Commission staff containing: (1) written ~~permission~~ **documentation attesting to authorization** from the relevant airport authority; (2) identification of the Department of Motor Vehicles (DMV)-approved Operational Design Domain (ODD) that geographically encompasses the proposed airport service area; and (3) an updated Passenger Safety Plan (PSP) describing how the carrier will address passenger safety risks associated with airport operations **or, where the carrier's existing approved PSP and DMV-approved ODD already address the airport, an attestation to that effect.** For each additional airport, the carrier shall submit items (1) and (2) above, plus either (a) an attestation that the risks and mitigations in its approved PSP fully address the new airport, or (b) an updated PSP addressing any passenger safety risks not already covered. The airport authorization package shall be submitted directly to Commission staff and does not require an Advice Letter. ~~Commission staff will make the airport authority's written authorization publicly available on the Commission's website.~~ The carrier shall not commence driverless airport passenger service until Commission staff issues a written approval notice confirming receipt of: (1) **the carrier's attestation regarding** airport written consent; (2) the DMV -approved ODD encompassing airport roads; and (3) an updated PSP addressing airport risks **or PSP attestation.** Staff shall issue an approval notice upon receipt of a complete submission.

New Ordering Paragraph (insert after existing Ordering Paragraph 8):

For Autonomous Vehicle Driverless Deployment carriers, an authorization package that includes an update to the carrier's Passenger Safety Plan to address airport-specific passenger safety risks shall be submitted as a Tier 1 Advice Letter, which will be effective upon submission.

If the Commission retains the public posting requirement, Zoox recommends the following alternative revisions:

Revise Ordering Paragraph 8:

The Commission will permit driverless passenger service in the Autonomous Vehicle (AV) Pilot Program at airports subject to the following requirements: Before beginning airport passenger service, the carrier shall submit an airport authorization package to Commission staff containing: (1) written ~~permission~~ **documentation attesting to authorization** from the relevant airport authority; (2) identification of the Department of Motor Vehicles (DMV)-approved Operational Design Domain (ODD) that geographically encompasses the proposed airport service area; and (3) an updated Passenger Safety Plan (PSP) describing how the carrier will address passenger safety risks associated with

airport operations, **or, where the carrier's existing approved PSP and DMV-approved ODD already address the airport, an attestation to that effect.** For each additional airport, the carrier shall submit items (1) and (2) above, plus either (a) an attestation that the risks and mitigations in its approved PSP fully address the new airport, or (b) an updated PSP addressing any passenger safety risks not already covered. The airport authorization package shall be submitted directly to Commission staff and does not require an Advice Letter. ~~Commission staff will make the airport authority's written authorization publicly available on the Commission's website.~~ **Commission staff will maintain and make publicly available on the Commission's website a list of the airports at which each carrier is authorized to provide passenger service.** The carrier shall not commence driverless airport passenger service until Commission staff issues a written approval notice confirming receipt of: (1) **the carrier's attestation regarding** airport written consent; (2) the DMV-approved ODD encompassing airport roads; and (3) an updated PSP addressing airport risks **or PSP attestation.** Staff shall issue an approval notice upon receipt of a complete submission.

New Ordering Paragraph (insert after existing Ordering Paragraph 8):

For Autonomous Vehicle Driverless Deployment carriers, an authorization package that includes an update to the carrier's Passenger Safety Plan to address airport-specific passenger safety risks shall be submitted as a Tier 1 Advice Letter, which will be effective upon submission.