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09/29/26

04:59 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA R2508013

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

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

**REPLY COMMENTS OF SAN FRANCISCO INTERNATIONAL AIRPORT ON THE
TRACK 1A PROPOSED DECISION**

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I. DISCUSSION

The San Francisco International Airport (“Airport” or “SFO”) submits these reply comments on the Track 1A Proposed Decision (“PD”), which addresses Autonomous Vehicle Program Requirements and Administration filed by the California Public Utilities Commission (“CPUC”) on September 4, 2026.

A. Response to OIR Section 4.3 Operational Design Domain (“ODD”) Disclosure and 30-Day Attestation for ODD Changes

Zoox, Inc. adds that public disclosure of the ODD is made public by the DMV already (Zoox, pg. 5). Tesla, Inc. further notes that requiring a carrier to re-submit the ODD for airport purposes would be redundant and should be modified to eliminate the ODD submission requirement for airport service (Tesla, pg. 7). Though reference to the DMV-approved ODD streamlines processes for carriers, the DMV-approved ODD provides no details of carriers testing with a driver and is not directly tied to CPUC passenger-service authority, which would leave airports without sufficient notice and information. An elimination of CPUC ODD submission requirements for airport service would create obstacles for airports’ ability to operate, plan, and safely and effectively manage roadways and congestion. Further, SFO supports CPUC’s PD to require carriers to identify the DMV-approved ODD that geographically encompasses the proposed airport service area because airport authorities would receive consistent ODD information and Deployment expansions would remain publicly noticed.

Waymo, LLC requests Tier 2 letters for Driverless Deployment ODD changes only when the change materially affects the Passenger Safety Plan (“PSP”). The Tier 2 letter is how Deployment expansions are notified to the public. SFO has concerns that carriers may not seek Tier 2 letters if an expansion to an airport does not materially affect the PSP. As a result, a potential expansion reaching an airport’s roadways could occur without public notice, and airports would not have a chance to weigh in. In addition, SFO is supportive of the PD’s and Waymo’s recommendations to allow service

to continue during the review if the airport package is tied to a time-bound review period, and Commission staff receives authority to review within that timeframe.

Concerning proof of airport permission and public posting, SFO requests that the Commission require a simple and standard consent letter issued by the airport authority, the name of the carrier, the authorized areas, and the effective expiration date. SFO is also supportive of Zoox's recommendation of posting a list of authorized airports per carrier.

B. Response to OIR Section 4.4 Airport Authority

Tesla proposes dropping an airport-specific passenger safety plan (PSP) entirely (Tesla, pg. 7). SFO disagrees and supports CPUC's PD to require an updated carrier PSP that includes an airport operations section addressing unique passenger safety and security risks at the airport, with an airport-specific addendum provided to the relevant airport authority. However, Airport personnel should have the ability to request changes before Commission staff approve. That airport-specific section should include: site-specific contacts, emergency response procedures for breakdowns, medical events, security and cyber threats, coordination with the airport's emergency plan and operations, congestion and scaling plans, third-party dispatch procedures, subcontracting accountability, and an airport-specific stalled vehicle standard with details about remote-assistance response times, maximum time to clear a vehicle on airport roads, and a 24/7 direct contact for airport operations and airport police. Any security-sensitive aspects of the updated PSP could be submitted confidentially.

CONCLUSION

The introduction of commercial AVs onto our roadways is an exciting prospect. With proper oversight by the Commission, California could become a model for the nation. We look forward to further development of sensible regulations that balance the drive for implementing new transportation technologies with the challenge of smart transportation planning and public safety.

Dated: September 29, 2026

Respectfully submitted,

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On behalf of: THE SAN FRANCISCO
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