



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

My name is Sean Arian, Executive Director of LA-Tech.org, and I'm writing in support of Waymo's expansion of its autonomous vehicle service to include the Los Angeles area. LA-Tech.org is a nonprofit coalition founded to expand economic opportunity for Los Angeles' under-served communities. We aim to bring the tech community together around common civic goals and to bring economic opportunities to LA's underserved communities.

Last Fall, Waymo partnered with LA-Tech.org to launch the first-ever "LA Tech X Waymo Career-Readiness Institute." 150 Los Angeles youth participated in the 13-week (60-hour) Institute which focused on preparing students for their first internship in tech by providing professional development opportunities, including a 1-day intensive professional skills bootcamp focused on networking and access to Waymo mentors who worked with them to ensure readiness for entering the job market. Waymo mentors helped students prepare for careers with resume and LinkedIn review sessions and mock interviews.

A select group of these students (46) participated in the inaugural "Autonomous Vehicle Experience," where students explored careers in the nascent autonomous vehicle industry, participated in a field trip to Waymo's facilities, and took a deep dive into Waymo's technology. Program scholars also had the opportunity to take a ride in a Waymo. Of the first cohort of the LA Tech x Waymo Career-Readiness Institute, which included 96% identify as BIPOC and 75% are the first in their family to attend college.

While the exposure to AV careers was extraordinarily valuable, this program succeeded in allowing the program participants to see that the growing AV industry is a place for them - for their creativity, talent, enthusiasm, and unique perspective. As one student remarked - "The most valuable thing I learned from the Waymo Career Readiness Institute is that anyone can have a career in AV. There are so many different job positions available in this growing industry and all it takes is showing genuine interest in the matter. You get so much knowledge and

information from the people at Waymo who are eager to educate you and help you with your journey, it would be a great experience for anyone who wants to try it.”

LA-Tech respects and appreciates Waymo’s commitment to creating a future pipeline for pioneering AV jobs in Los Angeles. Waymo’s vehicles will also provide an additional safe and reliable transportation option for under-served populations. LA-Tech.org urges the CPED to approve Waymo’s advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities.

Sincerely,

Sean Arian  
Executive Director  
LA-Tech.org

*Sean Arian*





February 5, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Tier 2 Advice Letter 0002 – Request for Updated Passenger Safety Plan Approval

Director Curtis,

On behalf of the Bay Area Council, representing over 300 major employers across the Bay Area, I am writing in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan (PSP). The updated PSP contains an expanded service area for farmed autonomous vehicle transportation that includes the many communities on the Peninsula from Daly City to Sunnyvale. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's advice letter request to make Waymo's fully autonomous ride-hailing service available to those traveling between San Francisco and the Peninsula.

The Bay Area Council is proud that the San Francisco Bay Area has long been the epicenter of innovation, pioneering technologies that make the world a better place. Driverless vehicles are no exception. Waymo has developed self-driving technology that is already making our roads much safer, greatly improving mobility and access for residents, and reducing the carbon footprint of trips by providing a zero-emission travel option. Expanding Waymo's autonomous ride-hailing service to Peninsula communities will provide these benefits to many more Bay Area residents and is a logical next step in the deployment of this service.

The Bay Area Council urges the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more Bay Area communities. Autonomous vehicles are already being used daily by thousands of San Francisco residents and visitors and we believe that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Wunderman', with a stylized, flowing script.

**Jim Wunderman**  
President and CEO  
Bay Area Council



## ***Saving Cyclist's Lives***

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Vess Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) – CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

First, let me start this letter by thanking you for your knowledge of safety issues in the cycling community. Based on what I read about you, you have been very helpful to cyclists over the years. I appreciate your efforts and time very much.

Regarding Waymo, I have been converted from a cyclist who wanted the Waymo cars off the road, to a cyclist/father/grandfather who is incredibly hopeful for their future and thrilled about their success.

Here is my story as to why I have changed.

On May 17<sup>th</sup>, 2014, my very close friend, my daughter, and I, were all struck by a vehicle while we were riding in a charity event. My daughter was injured, my shoulder was destroyed, but my friend was killed. She was my riding partner, workmate, and family friend for 14 years. We were able to air-evac her to the hospital, but she died in my arms a few hours later. I have never been the same. Her family is now part of mine and we constantly remind ourselves about her and how happy she was. Celebrating her life is an important process for us to continue, but the sadness is often overwhelming.

After she died, I started to focus my anger on trying to get people to understand the rights cyclists have. I found the "3 Feet Please" organization from Florida and ended up taking over their work. Our

organization operates nationally. Our main goal is to help cyclists and drivers in all states to understand their rights and obligations when it comes to vehicles passing cyclists on the road. I would like to congratulate California for being ranked #4 by the League of American Cyclists. The “3 foot” passing law is a major reason California achieves that level of ranking.

After the crash, it took me a couple of years to get mentally back to where I could commute by bike again. Things had changed since the crash, and one of those changes was Waymo. I saw Waymo vehicles often on my ride to/from work. The Waymo vehicles were in Tempe, Arizona at the time and ran on a good portion of my 19-mile commute to work.

At first, I was not happy to see Waymo vehicles on the road. Even though I am an IT Director, I did not trust their technology. I rode many of the roads where Waymo vehicles traveled, and I would get frustrated thinking that they thought a computer was smarter than a human. Then, one day, a Waymo vehicle happened to come up behind me when I was riding through a residential area on my way home. What surprised me was the Waymo vehicle did not pass me like any other driver would have. Instead, it slowed and followed me and refused to go around me on a narrow residential street. I slowed from 20 mph to about five mph just to see what the car would do. It still didn’t pass me. I realized at that point I was probably irritating the passengers, so I sped up. The Waymo vehicle followed me until we got onto a wide street and then passed me in an area where there was plenty of room and where it did not have to go into the opposing lane. I was impressed.

When I got home from that ride, I wrote a letter to Waymo to compliment them. I was surprised to receive a very quick response and I ended up having very nice conversations with them. They were very interested in what I had to say and suggestions I might offer. Over the years we discussed concepts and what they were working on. I also very much enjoyed it when they participated in a Phoenix Children’s Hospital bike rodeo that I happened to be volunteering at.

Fast forward to 2023. Waymo contacted me and a friend who runs the Tempe Bicycle Action Group and asked if we wanted to see what the completely autonomous vehicle was capable of. We said “yes!” In a nutshell, we were asked to put together a group of cyclists who would ride from downtown Tempe to a downtown area in Phoenix. The goal was to experience the vehicle from both inside the car and as a cyclist. So, we did.

The first thing the Waymo vehicle was supposed to do was follow the group of cyclists over a very preplanned route. It was a very picturesque route that would allow the Waymo film crew the ability to get some great video of the car passing the cyclists in a safe manner. Well, it failed immediately – but in a fantastic way from my perspective.

The car software processed all the information from the cameras/radar/etc. and decided following the group of cyclists was less safe than changing the route from the fastest route to a safer route. I was a

passenger inside the car, and while the Waymo person was apologizing that we would likely not see the cyclists, I was thrilled. How many real vehicle drivers would sacrifice the fastest route for the safest route? Not many. In fact, not likely any.

Eventually the Waymo vehicle got back onto the planned route, and we did get some good video. But my point is that the Waymo software engineers have followed the goal to make sure the car avoids dangerous situations. As a cyclist, I couldn't be happier. I even liked the locking/buzzer mechanism that stops a passenger from opening the back door if a cyclist is coming alongside the vehicle. That's very nice. The bottom line is that we need more of this technology on our streets.

I will close this letter by asking you to read, if you haven't already, the statistics on what Waymo has accomplished. The Waymo autonomous process is much safer than the human driving process. Over 7,100,000 miles so far without a single major injury. That's incredible. It's something we need. Everyone I have met at Waymo believes in the safety goals they are trying to accomplish. Waymo is going to save lives with what they are doing. I believe that any city who adopts the Waymo autonomous vehicle program is going to see a reduction in tragedy.

For me, the one thing I know, with all my heart and soul, is if this technology existed in the car that hit my friend, there would have been no crash, she would still be riding with me, our families would still have a lot of fun together, and most likely, I would not be writing this letter to you. In fact, it's 4:30 in the afternoon, so I would be riding home from work with her laughing about things that happened today and talking about the future.

If you should ever have any questions or want to hear any more about my feelings about Waymo, please feel free to contact me at 480-326-1327.

Sincerely,

A handwritten signature in dark ink, reading "David Blumenthal". The signature is fluid and cursive, with a large, stylized 'D' and 'B'.

Executive Director, Safe Cycling Inc.  
Proud Sponsor of "3 Feet Please"



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of 100 Black Men of Los Angeles in support of Waymo's January 2024 application to expand its autonomous vehicle passenger carrier service to include neighborhoods within Los Angeles. We respectfully ask the Commission to approve Waymo's application, which could expand mobility options as well as create technology career opportunities within Los Angeles.

100 Black Men of Los Angeles is devoted to mentoring and guiding young African American men, providing them with educational support, economic empowerment, and leadership development. Our organization believes in and sees the unprecedented value that Waymo could add to the communities we work with. Considering that Waymo has partnered directly with nonprofits serving students and schools in each of the communities it operates in, Waymo's expansion to Los Angeles could directly benefit our mentees and their families.

Additionally, our organization, having been committed to the empowerment of the African American community in Los Angeles for over three decades, is aware of the importance of exposing our mentees to new innovations and technology to help expand their imagination about what is possible in their own futures.

Approving Waymo's application would let Angelenos like our mentees access, experience, and interact with an emerging technology that has the promise to bolster economic growth

within Los Angeles and cater to the growing need for safe and reliable transportation services.

100 Black Men of Los Angeles strongly encourages the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service commercially within Los Angeles. We believe that the more our community members have access to safe, equitable, and sustainable transportation options and are exposed to new career paths, the more it promotes achievement within our community.

Sincerely,

A handwritten signature in black ink that reads "Kirk Williams". The signature is written in a cursive style and is positioned above a vertical line.

Kirk Williams

Chairman of the Board

100 Black Men of Los Angeles



January 25, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**Re: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion**

Dear Director Curtis,

Established in 1924, Central City Association (CCA) is committed to advancing policies and projects that enhance Downtown Los Angeles' (DTLA) vibrancy and increase opportunity across the Southern California region. Our organization represents over 300 members including businesses, nonprofits and trade associations. We share a vision of a safer, cleaner and more efficient California and we believe the successful integration of autonomous vehicles (AVs) can be an important tool to achieve that goal. We are therefore writing in support of Waymo's January 19, 2024 application to expand its autonomous vehicle passenger carrier service to Los Angeles, including DTLA.

We are also excited by the potential for AVs to support more walkable communities and bolster our public transit networks by providing a solution to first- and last-mile problems. In so doing, this new technology can provide a boost of activity in urban cores like DTLA, creating excitement among residents and visitors, encouraging them to enjoy and explore the city and bringing much needed energy into the local economy. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, we believe this would help foster an environment where more businesses and residents of DTLA and the region can prosper and succeed.

California has long-been a leader in supporting innovative businesses, including in the technology sector. Approving Waymo's application to expand its existing commercial passenger carrier authority to include Los Angeles will help to drive economic growth in California and to meet consumer demand for safe and reliable transportation service.

CCA urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and our organization believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.



Thank you for your consideration of our comments and we respectfully ask the Commission to approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to read "Nella McOsker".

Nella McOsker  
President & CEO  
Central City Association



Date: February 7, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of Access Services (Access), a public paratransit agency in Los Angeles County, in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for fared autonomous vehicle transportation that includes Los Angeles. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles.

Access' mission is to provide the ADA mandated paratransit services to ADA riders on behalf of the 46 fixed route operators in the Los Angeles County. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, Access believes this would help to extend mobility freedom to the ADA community and riders. This will enable our ADA riders to have better access to various opportunities that were not available to them due to lack of transportation choices.

Access' service area is comprised of six regions served by separate contractors: Santa Clarita, Antelope Valley, Northern, Eastern, West-Central, and Southern regions. Across these six regions, Access provides paratransit service in nearly all urbanized areas of the 4,751 square miles of Los Angeles County. In FY 2019, Access performed over 4.5 million passenger trips and 3.5 million vehicle trips. By the end of FY 2023, trip volume was at 83% of pre-pandemic levels. System ridership, measured in vehicle trips, increased by 24% to 2.89 million.

Access core values include safety, equity, accessibility and sustainability. These are in line with Waymo's respective values in their business operations.

Safety:

- Waymo has demonstrated a commitment to safety in the development of its autonomous vehicles,

safety research and focus on the passenger experience. Waymo's efforts and initiatives to improve roadway safety align with ours.

- Waymo's Passenger Safety Plan shows Waymo's focus on passenger safety in its Waymo One ride-hailing service. We especially appreciate the innovative use of external audio messaging to communicate
- Waymo's autonomous vehicles services support current transportation priorities facing California, reducing traffic injuries and fatalities.

#### Equity and Accessibility:

Waymo offers solutions to current transportation priorities facing California, including expanding Transportation options for underserved populations, seniors, and physically disabled populations. Waymo's service provides a much-needed tool in our ever-growing toolkit to further the development of multimodal options for all.

#### Sustainability:

Waymo helps to make electric vehicles accessible to more Californians, including those who may not be able to afford an electric vehicle, by providing passenger service in a shared fleet of all-electric Jaguar I-PACE vehicles.

Access urges the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and Access believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Respectfully,



William Tsuei, CPA, PMP, CSM  
Director of Information Technology  
Access Services

February 8, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

The American Council of the Blind (ACB) writes in support of Waymo's January 2024 application to expand its autonomous vehicle passenger carrier services in Los Angeles and the San Francisco Peninsula. We strongly believe that the commercial use of Waymo's autonomous vehicles would offer a new sense of independence and security for people who are blind or experiencing vision loss.

The American Council of the Blind is the nation's leading member-driven organization of and for individuals who are blind and low vision. Founded in 1961 and comprised of over 65 state and special-interest affiliate organizations, including the California Council of the Blind (CCB), ACB strives to increase the independence, security, equality of opportunity, and to improve the quality of life for all people who are blind or experiencing vision loss. Integral to our mission is improving transportation access for all blind and low-vision individuals, including our thousands of members.

Waymo offers solutions to current transportation priorities facing California, including expanding transportation options for underserved populations, seniors, and people living with physical, visual, cognitive, and sensory disabilities. Waymo's service fills a gap in the current landscape of available multimodal options in California, especially for those who cannot drive or access a personal vehicle.

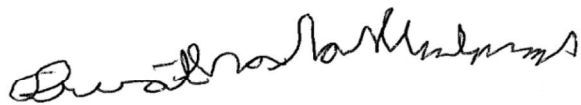
However, we are extremely concerned that the Commission has failed to adopt standards as requested by the California Council of the Blind in order to increase the safety and accessibility of autonomous vehicles. It is critical that any AV operating on California streets have an accessible mode of ride-hailing, ingress and egress, and that the human-machine interface of these vehicles be fully accessible to people with disabilities. It is also critical that AVs operate safely on the road, and that both pedestrians outside the vehicle and passengers inside the vehicle remain safe while it is traveling and while interacting with the vehicle. The commission should not grant this application without simultaneously beginning the process of adopting safety and accessibility standards.

ACB urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service commercially in LA and the SF Peninsula. Autonomous

vehicles are already being used daily by thousands of Californians and by expanding its services, and the Department of Motor Vehicles recently authorized Waymo to commercially deploy its autonomous vehicles in an expanded geography. We ask that the California Public Utilities Commission align with the DMV and approve Waymo's application to expand its services, ensuring a safer and more accessible transportation option. Waymo has the potential to help transform the lives and daily routines of those who need safe, equitable, sustainable, and accessible transportation options the most, including blind and low-vision individuals.

We appreciate the opportunity to provide comments in support of Waymo's application. If you have any questions, or would like to discuss our comments further, please contact Swatha Nandhakumar, ACB's Advocacy and Outreach Specialist, at [snandhakumar@acb.org](mailto:snandhakumar@acb.org) or (202) 467-5081.

Sincerely,

A handwritten signature in black ink, appearing to read "Swatha Nandhakumar". The signature is fluid and cursive, with the first name "Swatha" being more prominent than the last name "Nandhakumar".

Swatha Nandhakumar  
Advocacy and Outreach Specialist

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Assemblymember.Fong@assembly.ca.gov  
<https://ad32.asmr.org>



COMMITTEES  
VICE CHAIR, BUDGET  
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PUBLIC EMPLOYMENT AND RETIREMENT

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing to offer my support of Waymo's application to expand its autonomous vehicle passenger carrier service. I respectfully ask the Commission to approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles.

In representing California's Central Valley, I am committed to protecting road safety for all pedestrians and drivers. Waymo has demonstrated a commitment to safety, safety research, and focus on the passenger experience. It is encouraging to see businesses that innovate in this sector offer such assurances to meet the safety and quality of service demands across California's communities.

As the state's transportation sector evolves, Waymo can be a leader in the Bay Area and Southern California if it can expand its existing commercial passenger carrier authority. This will help to drive economic growth in California and to meet consumer demand for safe and reliable transportation service.

I urge the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians, and I believe that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Sincerely,

A handwritten signature in blue ink that reads 'Vince Fong'. The signature is fluid and cursive, with the first name 'Vince' and last name 'Fong' clearly distinguishable.

Vince Fong  
Assemblymember, 32nd District



February 8, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Support for Waymo's Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update (January 2024)

Dear Director Curtis,

The Autonomous Vehicle Industry Association ("AVIA") writes to express support for Waymo LLC's ("Waymo") Advice Letter 0002 ("Advice Letter"), seeking approval for its Passenger Safety Plan update ("Plan"), expanding its Autonomous Vehicle ("AV") Passenger Service under the Public Utilities Commission's ("Commission") Driverless Deployment program. The California Department of Motor Vehicles ("DMV") has already approved Waymo's expanded deployment operations and we encourage the Commission's Consumer Protection and Enforcement Division ("CPED") to timely approve Waymo's Advice Letter request so that more Californians can experience the numerous benefits of AVs used in passenger carrier service.

As background, AVIA is composed of the world's leading technology, ridesharing, trucking, and automotive companies. Our mission is to realize the benefits of autonomous vehicles (i.e., SAE Levels 4- and 5-capable vehicles) and support the safe and expeditious deployment of these technologies. We have been pleased to be a contributing participant to the Commission's efforts to develop a regulatory framework for AVs and appreciate the opportunity to engage with the Commission on Waymo's Advice Letter.

AVs have tremendous safety, mobility, and environmental benefits, and they are already saving lives, changing the way we move goods and people, and contributing to critical sustainability goals. In Los Angeles alone, 336 traffic deaths occurred in 2023—a record high and more than the number of homicides that occurred in the city last year.<sup>1</sup> The U.S. Department of Transportation has reiterated that human behavior is a contributing factor to the overwhelming majority of these fatalities. For example, a recent study by NHTSA found that over 55% of all people injured or killed in a roadway incident tested positive for drugs or alcohol.<sup>2</sup> The ongoing tragedy on our roadways underscores the need to support AV deployment. AVs are positioned to reduce fatal traffic crashes because, unlike human drivers, AVs will never drive impaired, drowsy,

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<sup>1</sup> *Car Crashes Killed More People Than Homicides in Los Angeles Last Year*, LA TIMES (Jan. 25, 2024), <https://www.latimes.com/california/story/2024-01-25/traffic-deaths-surpass-homicides-in-los-angeles>.

<sup>2</sup> NAT'L HIGHWAY TRAFFIC SAFETY ADMIN., U.S. DEP'T OF TRANSP., DOT HS 813 399, ALCOHOL AND DRUG PREVALENCE AMONG SERIOUSLY OR FATALY INJURED ROAD USERS, 2 (2022), [https://rosap.nhtl.bts.gov/view/dot/65623/dot\\_65623\\_DS1.pdf](https://rosap.nhtl.bts.gov/view/dot/65623/dot_65623_DS1.pdf).





or distracted—all major contributors to roadway deaths. Moreover, California is home to millions of individuals—including seniors and those with visual impairments—who stand to greatly benefit from the increased safety and mobility that widespread AV deployment will bring. In addition to offering safety and mobility benefits, autonomous driving technology can also help reduce traffic congestion, improve environmental quality, and advance transportation efficiency.

Waymo's current AV services support California's transportation priorities, including by reducing traffic injuries and fatalities. On a personal note, I have been a passenger in a Waymo vehicle and was incredibly impressed by its ability to navigate complicated situations on city streets. The robust approach to prioritizing safety in Waymo's transportation operations detailed in their updated Plan clearly demonstrates Waymo's commitment to passenger safety. The Plan describes new features designed and implemented to enhance safety, including by improving communications with first responders via external audio messaging and by elevating the pickup and drop-off experience with external lighting. By expanding its service area for commercial passenger carrier operations into Waymo's DMV-approved deployment ODD, Waymo will be able to offer its services to more communities, further improving transportation options for underserved populations, seniors, and individuals with disabilities. California has long been a leader in supporting the safe deployment of AV technologies, and approving Waymo's Advice Letter to extend its passenger services will further help to drive economic growth in California and meet consumer demand for safe and reliable transportation service.

Approving applications for Autonomous Vehicle Passenger Service Driverless Deployment permits that satisfy all regulatory requirements is a critical step toward bringing the benefits of AVs to the public. To advance the public's interest, we encourage the Commission to give Advice Letter 0002 all due consideration, and to act favorably on any permit submission that satisfies the agency's requirements. We commend the Commission for its intention to permit the continued safe deployment of a fared driverless passenger service.

Sincerely,

Jeff Farrah  
Chief Executive Officer  
Autonomous Vehicle Industry Association



Rashid Bahati  
Executive Director  
**Bahati Foundation**  
421 W. Broadway Ste. #2139  
Long Beach, California 90802

January 31, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
**California Public Utilities Commission**  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

Subject: Support for Waymo and Advancement of Autonomous Vehicle Technology in California

Dear Interim Director Curtis,

I trust this letter finds you well. My name is Rashid Bahati and I am writing on behalf of the Bahati Foundation, a not-for-profit organization committed to promoting community well-being and empowering youth through cycling outreach programs and initiatives.

I am writing to express our strong support for Waymo and the continued development of autonomous vehicle technology in the state of California. Waymo has been at the forefront of advancing self-driving technology, contributing to the evolution of transportation methods and promoting safer and more efficient ways of mobility.

The Bahati Foundation applauds Waymo's commitment to innovation and believes that autonomous vehicles have the potential to revolutionize transportation, making it more accessible, sustainable, and inclusive. The positive impact of autonomous technology aligns with our foundation's values, particularly in creating opportunities and promoting positive changes in the communities we serve.

As an organization deeply involved in providing access to youth through programs and initiatives, we recognize and appreciate the importance of corporate partners who prioritize community impact. Waymo's involvement in supporting local communities resonates with our foundation's mission, and we believe that fostering such collaborations is crucial for the holistic development of our society.

We urge the California Public Utilities Commission to continue supporting and facilitating the growth of autonomous vehicle technology. The advancements made by companies like Waymo not only benefit transportation systems but also open up new possibilities for community development and youth empowerment.





Thank you for your time and attention to this matter. We look forward to witnessing the positive impact of autonomous vehicle technology in California and the broader benefits it can bring to our communities and daily lives.

Sincerely,

A handwritten signature in black ink that reads "Rashid Bahati". The signature is written in a cursive style.

Rashid Bahati  
Executive Director  
Bahati Foundation  
[rashid@bahatifoundation.org](mailto:rashid@bahatifoundation.org)  
323.781.8838

# GREAT FUTURES START **HERE.**



February 7, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update**

Dear Director Curtis,

The Boys & Girls Clubs of Silicon Valley would like to express our support for Waymo's January 19, 2024 application to approve the company's new Passenger Safety Plan, which would create opportunities for expanded service areas of fared autonomous vehicle transportation in the SF-Peninsula and LA.

We respectfully request that the Commission's Consumer Protection and Enforcement Division (CPED) approves Waymo's request, as it will allow more riders to benefit from Waymo's autonomous vehicle service, granting greater mobility and accessibility options in the region.

The Boys & Girls Clubs of Silicon Valley is dedicated to inspiring and empowering all young people to realize their full potential as productive, responsible, and caring adults. We provide after-school programming across the South Bay for nearly 10,000 youth. BGCSV offers a welcoming, positive environment where kids and teens can have fun, participate in life changing programs, and build supportive relationships with peers and adults.

It is our belief that Waymo's mission aligns with ours, with a focus on building safer, more accessible and connected communities. Waymo's autonomous vehicle service provides a reliable, safe and accessible mode of transportation for many California residents today, and we believe that an expansion of this service is important so more community members can have access - including the youth and families that we serve. We believe that autonomous vehicles are an important contributor to community safety, as evidenced by Waymo's safety record. Safer roads and an overall safer community complement the work we do.

The Boys & Girls Clubs of Silicon Valley urges the CPED to approve Waymo's request in order to allow its Waymo One service to operate commercially in more California communities.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Wymer".

Steve Wymer, President & CEO  
Boys & Girls Clubs of Silicon Valley



January 31, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing to you on behalf of the National Multiple Sclerosis Society to express our support for Waymo's application, submitted in January 2024, to extend the area of its autonomous vehicle passenger carrier service in Los Angeles and additional parts of the SF-Peninsula and Los Angeles.

We urge the Commission to approve this request, enabling more individuals, particularly those living with mobility barriers, to enjoy the benefits of Waymo's autonomous vehicles in their daily travels.

The National Multiple Sclerosis Society, since its inception in 1946, has been committed to a world free of MS. We tirelessly work to enhance the quality of life for those living with MS and to bring us closer to ending this disease. We represent a community of dedicated individuals, including over a million people in the US diagnosed with MS, a condition that can limit mobility and independence.

The approval of Waymo's autonomous vehicles in California could significantly contribute to our mission by providing a safer, more accessible mode of transportation for our members there. MS can impair an individual's ability to drive, often leading to a loss of independence and a decreased ability to participate in work, social events, or community activities. Waymo's autonomous vehicles would help extend independence and accessibility to our members in California, significantly enhancing their quality of life in the following ways:

- **Increased Independence:** Waymo's autonomous vehicles can offer people living with Multiple Sclerosis (MS) a renewed sense of independence. Given the mobility limitations often associated with MS, such as fatigue or difficulty with coordination, these autonomous vehicles can help individuals travel freely and safely, reducing their dependence on others for transportation needs.
- **Enhanced Accessibility:** Waymo's vehicles are designed with accessibility in mind, potentially accommodating different physical capabilities of people with MS. For example, Waymo's app and

passenger experience is designed to be accessible to people with disabilities. This could facilitate transportation for individuals with advanced MS symptoms.

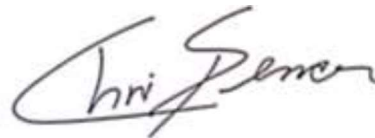
- **Reduced Fatigue:** Driving can be physically and mentally taxing for individuals with MS, potentially exacerbating symptoms such as fatigue. Waymo's autonomous vehicles eliminate the need for users to operate the vehicle themselves, allowing them to rest during their journey and conserve energy for their destination.

The National Multiple Sclerosis Society believes in the potential of Waymo's autonomous vehicles to revolutionize transportation for individuals with MS. We applaud Waymo's commitment to safety, equity, and accessibility, which are of utmost importance to our community members. Moreover, Waymo's initiative aligns with our goals of providing more inclusive and accessible mobility solutions.

We, therefore, urge the California Public Utilities Commission to approve Waymo's request for service expansion. Autonomous vehicles are already a daily transportation mode for thousands of Californians, and we believe that more people, particularly those living with MS, should have access to this safe, equitable, and sustainable transportation option.

Sincerely,

Chris Spencer

A handwritten signature in dark ink, appearing to read "Chris Spencer". The signature is fluid and cursive, with the first name "Chris" and last name "Spencer" clearly distinguishable.

Director, Bike MS, Northern California Chapter  
of the NMSS

January 29, 2024

Terra Curtis, Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**RE: BizFed – Support for Waymo’s CPUC Driverless Deployment Passenger Safety Plan - Advice Letter 0002**

On behalf of the Los Angeles County Business Federation (BizFed), a diverse grassroots alliance of more than 235 business organizations mobilizing 410,000 employers with 5 million employees in Southern California, we wish to express our strong support of Waymo’s request to provide autonomous vehicle passenger carrier service in the CPUC’s Driverless Deployment program in Los Angeles, as described in their January 2024 Passenger Safety Plan. We respectfully urge the Commission’s Consumer Protection and Enforcement Division to approve Waymo’s advice letter at the earliest opportunity, as we eagerly await Waymo bringing its cutting edge Waymo One AV service to Los Angeles.

As you know, BizFed is committed to supporting existing and emerging technology such as autonomous vehicles that will further accelerate and advance the transportation experience. This includes exploring ways to ensure our system is safe, accessible and equitable. We believe that if the CPUC approves Waymo’s advice letter, it would help achieve these goals.

Approving Waymo’s Passenger Safety Plan so that Waymo may proceed to charge fares for AV passenger carrier service in Los Angeles will undoubtedly bring economic benefits not only to the local economy but to California as a whole, while also offering more equitable solutions to transportation priorities facing the state. We hope CPED will agree that Waymo’s Passenger Safety Plan update is robust and that Waymo should be allowed to offer commercial AV passenger service throughout the cities of Los Angeles, Santa Monica, Culver City, West Hollywood, and Beverly Hills, and to collect fares for these rides.

BizFed urges the California Public Utilities Commission to approve Waymo’s pending advice letter. BizFed sees this as the first important step to bringing autonomous vehicles to more communities in support of a safer, more accessible, and more equitable California. If you have any questions, please don’t hesitate to contact our Senior Advocacy Manager Chris Wilson at (562) 201-6034.

Sincerely,



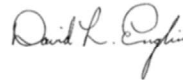
Fran Inman  
BizFed 2024 Chair  
Majestic Realty



David Fleming  
BizFed Founding Chair



Tracy Hernandez  
BizFed Founding CEO  
IMPOWER, Inc.



David Englin  
BizFed President

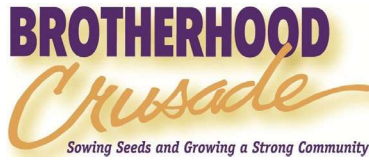
# BizFed Association Members

Action Apartment Association  
Advanced Medical Technology Association  
Alhambra Chamber  
American Beverage Association  
Antelope Valley Chamber formerly Lancaster Chamber of Commerce  
Apartment Association of Greater Los Angeles  
Apartment Association of Orange County  
Apartment Association, CA Southern Cities, Inc .  
Arcadia Association of Realtors  
AREAA North Los Angeles SFV SCV  
Armenian American Business Association  
Armenian Trade & Labor Association  
Arts District Los Angeles  
ASCM Inland Empire Chapter  
Asian American Advertising Federation- 3AF  
Associated Builders & Contractors SoCal (ABC SoCal)  
Associated General Contractors  
Association of Independent Commercial Producers  
AV Edge California  
Azusa Chamber  
Bell Chamber  
Beverly Hills Bar Association  
Beverly Hills Chamber  
BioCom  
Black Business Association  
BNI4SUCCESS  
Boyle Heights Chamber of Commerce  
Bridge Compton Org  
Building Industry Association - LA/Ventura Counties  
Building Industry Association of Southern California  
Building Industry Association- Baldyview  
Building Owners & Managers Association of Greater Los Angeles  
Burbank Association of Realtors  
Burbank Chamber of Commerce  
Business and Industry Council for Emergency Planning and Preparedness  
Business Resource Group  
Calabasas Chamber of Commerce  
CalAsian Chamber  
CalChamber  
California Apartment Association- Los Angeles  
California Asphalt Pavement Association  
California Bankers Association  
California Business Properties  
California Business Roundtable  
California Cleaners Association  
California Contract Cities Association  
California Fashion Association  
California Fuels & Convenience Alliance- Formerly California Independent Oil Marketers Association (CIOMA)  
California Gaming Association  
California Grocers Association  
California Hispanic Chamber  
California Hotel & Lodging Association  
California Independent Petroleum Association  
California Life Sciences Association  
California Manufacturers & Technology Association  
California Metals Coalition  
California Natural Gas Producers Association  
California Restaurant Association  
California Retailers Association  
California Self Storage Association  
California Small Business Alliance  
California Society of CPAs - Los Angeles Chapter  
California Trucking Association  
Carson Chamber of Commerce  
Carson Dominguez Employers Alliance  
Central City Association  
Century City Chamber of Commerce  
Chatsworth Porter Ranch Chamber of Commerce  
Citrus Valley Association of Realtors  
Civil Justice Association of California CJAC  
Claremont Chamber of Commerce  
Commerce Business Council formerly Commercial Industrial Council/Chamber of Commerce  
Community Foundation of the Valleys  
Compton Chamber of Commerce  
Compton Community Development Corporation  
Compton Entertainment Chamber of Commerce  
Construction Industry Air Quality Coalition  
Construction Industry Coalition on Water Quality  
Council of Infill Builders  
Crenshaw Chamber of Commerce  
Culver City Chamber of Commerce  
Downey Chamber of Commerce  
Downtown Center Business Improvement District  
Downtown Long Beach Alliance

DTLA Chamber of Commerce  
El Monte/South El Monte Chamber  
El Segundo Chamber of Commerce  
Employers Group  
Energy Independence Now EIN  
Engineering Contractor's Association  
EXP The Opportunity Engine  
FastLink DTLA  
Filipino American Chamber of Commerce  
Friends of Hollywood Central Park  
FuturePorts  
Gardena Valley Chamber  
Gateway to LA  
Glendale Association of Realtors  
Glendale Chamber  
Glendora Chamber  
Greater Antelope Valley AOR  
Greater Bakersfield Chamber of Commerce  
Greater Coachella Valley Chamber of Commerce  
Greater Downey Association of REALTORS  
Greater Lakewood Chamber of Commerce  
Greater Leimert Park Crenshaw Corridor BID  
Greater Los Angeles African American Chamber  
Greater Los Angeles Association of Realtors  
Greater Los Angeles New Car Dealers Association  
Greater San Fernando Valley Chamber  
Harbor Association of Industry and Commerce  
Harbor Trucking Association  
Historic Core BID of Downtown Los Angeles  
Hollywood Chamber  
Hospital Association of Southern California  
Hotel Association of Los Angeles  
ICBWA- International Cannabis Women Business Association  
Independent Cities Association  
Independent Hospitality Coalition  
Industrial Environmental Association  
Industry Business Council  
Inglewood Board of Realtors  
Inland Empire Economic Partnership  
Irwindale Chamber of Commerce  
Kombucha Brewers International  
La Cañada Flintridge Chamber  
LA County Medical Association  
LA Fashion District BID  
LA South Chamber of Commerce  
Larchmont Boulevard Association  
Latin Business Association  
Latino Food Industry Association  
Latino Restaurant Association  
LAX Coastal Area Chamber  
Licensed Adult Residential Care Association- LARCA  
Long Beach Area Chamber  
Long Beach Economic Partnership  
Long Beach Major Arts Consortium  
Los Angeles Area Chamber  
Los Angeles Economic Development Center  
Los Angeles Gateway Chamber of Commerce  
Los Angeles Latino Chamber  
Los Angeles LGBTQ Chamber of Commerce  
Los Angeles Parking Association  
Los Angeles Regional Food Bank  
Los Angeles World Affairs Council/Town Hall Los Angeles  
MADIA Tech Launch  
Malibu Chamber of Commerce  
Manhattan Beach Chamber of Commerce  
Marina Del Rey Lessees Association  
Marketplace Industry Association  
Monrovia Chamber  
Motion Picture Association of America, Inc.  
MoveLA  
MultiCultural Business Alliance  
NAIOP Southern California Chapter  
NAREIT  
National Association of Minority Contractors  
National Association of Theatre Owners  
CA/Nevada  
National Association of Women Business Owners  
National Association of Women Business Owners - LA  
National Association of Women Business Owners-California  
National Federation of Independent Business Owners California  
National Hookah  
National Latina Business Women's Association  
Norwegian American Chamber of Commerce  
Orange County Business Council  
Orange County Hispanic Chamber of Commerce  
Pacific Merchant Shipping Association  
Panorama City Chamber of Commerce  
Paramount Chamber of Commerce

Pasadena Chamber  
Pasadena Foothills Association of Realtors  
PGA  
Pharmaceutical Care Management Association  
PhRMA  
Pico Rivera Chamber of Commerce  
Pomona Chamber  
Rancho Southeast REALTORS  
ReadyNation California  
Recording Industry Association of America  
Regional CAL Black Chamber, SVF  
Regional Hispanic Chambers  
San Dimas Chamber of Commerce  
San Gabriel Valley Economic Partnership  
San Pedro Peninsula Chamber of Commerce  
Santa Clarita Valley Chamber  
Santa Clarita Valley Economic Development Corp.  
Santa Monica Chamber of Commerce  
Secure Water Alliance  
Sherman Oaks Chamber  
South Bay Association of Chambers  
South Bay Association of Realtors  
South Gate Chamber of Commerce  
South Pasadena Chamber of Commerce  
Southern California Contractors Association  
Southern California Golf Association  
Southern California Grantmakers  
Southern California Leadership Council  
Southern California Minority Suppliers Development Council Inc.  
Southern California Water Coalition  
Southland Regional Association of Realtors  
Specialty Equipment Market Association  
Sportfishing Association of California  
Structural Engineers Association of Southern California  
Sunland/Tujunga Chamber  
Sunset Strip Business Improvement District  
Swiss American Chamber of Commerce  
Thai American Chamber of Commerce  
The LA Coalition for the Economy & Jobs  
The Los Angeles Taxpayers Association  
The Two Hundred for Homeownership  
Torrance Area Chamber  
Tri-Counties Association of Realtors  
United Chambers – San Fernando Valley & Region  
United States-Mexico Chamber  
Unmanned Autonomous Vehicle Systems Association  
Urban Business Council  
US Green Building Council  
US Resiliency Council  
Valley Economic Alliance, The  
Valley Industry & Commerce Association  
Venice Chamber of Commerce  
Vermont Slauson Economic Development Corporation  
Veterans in Business  
Vietnamese American Chamber  
Warner Center Association  
West Hollywood Chamber  
West Hollywood Design District  
West Los Angeles Chamber  
West San Gabriel Valley Association of Realtors  
West Valley/Warner Center Chamber  
Westchester BID  
Western Electrical Contractors Association  
Western Manufactured Housing Association  
Western Propane Gas Association  
Western States Petroleum Association  
Westside Council of Chambers  
Westwood Community Council  
Whittier Chamber of Commerce  
Wilmington Chamber  
World Trade Center





January 26, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, California 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of the Brotherhood Crusade, a longstanding organization dedicated to serving the South Los Angeles community for over five decades. Our mission revolves around improving the quality of life and meeting the unmet needs of low-income, underserved, under-represented, and disenfranchised individuals in our community.

We are writing to express our full support for Waymo's January 2024 application to extend its autonomous vehicle passenger carrier services to Santa Monica and all of Los Angeles. We understand that the Department of Motor Vehicles has recently granted Waymo the ability to operate in these areas, and we sincerely hope that the California Public Utilities Commission will follow suit.

You might wonder why an organization like ours cares about autonomous vehicles. The answer lies in our deep commitment to enhancing road safety, a critical public health issue in Los Angeles, a city notorious for its hazards to pedestrians and cyclists. Sadly, lower-income pedestrians are disproportionately vulnerable to traffic violence, contributing to the city's alarming rates of pedestrian and cyclist fatalities. Waymo's autonomous vehicles offer a promising solution to this pressing issue. With a steadfast dedication to safety research and development, Waymo's technology has the potential to significantly reduce traffic-related injuries and fatalities. Their vehicles are designed to adhere to road

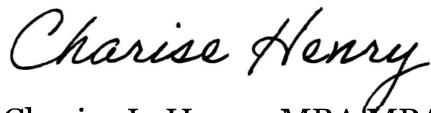
rules, maintain constant vigilance, avoid drowsy or impaired driving, and prioritize the safety of all road users.

At Brotherhood Crusade, we are deeply invested in ensuring that our youth and community members have access to convenient, safe, reliable, and sustainable transportation options. We believe that Waymo's commitment to enhancing road safety aligns perfectly with our vision. By expanding access to safe transportation options, Waymo can positively impact the lives of countless individuals in our community.

Therefore, we urge the California Public Utilities Commission to approve Waymo's bid to commercially operate their Waymo One service across more Californian communities. By doing so, we can collectively work towards a future where safe transportation is accessible to all.

Thank you for your attention to this matter. Should you have any questions or require further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Charise Henry". The script is fluid and cursive, with the first letters of each word being capitalized and larger than the rest of the letters.

Charise L. Henry, MBA MPA  
Senior Vice President,  
Brotherhood Crusade





January 26, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

On behalf of the Blinded Veterans Association (BVA), I am writing to extend our support for Waymo's application, dated January 2024, seeking to expand its autonomous vehicle passenger carrier service to include Los Angeles. The Department of Motor Vehicles has already authorized Waymo to commercially deploy its autonomous vehicles in an expanded geography. We also now entreat the Commission to favorably consider Waymo's request, believing that this service would greatly benefit blinded veterans not only in Los Angeles but across the United States.

Founded in 1945 through an act of Congress, BVA is dedicated to promoting the welfare of blinded and low vision veterans so that they can fully participate in the world around them, regardless of the degree of their visual impairment. We strive to support and advocate for veterans and their families, enhancing their independence and quality of life through our programs and support services.

Waymo's dedication to safety resonates with our mission. Their efforts toward developing a safer transport system that provides additional mobility options parallels our own quest for mobility safety and accessibility for veterans with sight loss. This service could profoundly improve the quality of life for our members, offering them a new, reliable transportation option.

As a technology that is designed to obey road rules, offer a consistent rider experience, and operate 24 hours a day and 365 days a year, Waymo can complement blinded veterans' existing mobility options such as public transportation and relying on others to drive them around.

Waymo may also improve safety for blind pedestrians as Waymo's technology is designed to obey road rules such as speed limits, recognize crosswalks, and identify pedestrians far in advance using its 360-degree LiDAR-powered vision system. The vehicle's technology *can even anticipate* what a pedestrian may do next and make decisions to optimize the safety of everyone on the road.

Waymo has generously supported the national convention of the Blinded Veterans Association for several years. In 2023, Waymo sponsored our first-ever Bow Wow Lounge, a rest and refreshment area for service dogs, at the 78th National Convention in St. Louis, Missouri.

Brenda Arreola, a veteran herself and current employee at Waymo, attended the 2023 convention to meet and greet attendees. At Waymo, Brenda leads Veterans@Waymo, an employee resource group for veterans. Veterans at the convention who spoke with Brenda expressed enthusiasm for the potential of autonomous driving technology for improving safety, reliability, and independence. We are heartened that veterans' perspectives, like those of Brenda Arreola, are embedded in the development of Waymo's technology.

In addition to supporting our annual convention, Waymo takes a keen interest in understanding the mobility preferences of BVA members and exploring how autonomous technology can enhance their independence.

Waymo invited the Blinded Veterans Association to take part in its Waymo Accessibility Network, which includes many other advocacy organizations for people with disabilities and solicits their guidance. This collaboration reflects our shared commitment to inclusivity and equal opportunity, as well as to the belief that advancing technology should serve the collective good.

We, the Blinded Veterans Association, urge the California Public Utilities Commission to grant Waymo permission to expand its autonomous vehicle service. We are optimistic that this advancement will pave the way for a more inclusive, accessible, and equitable transportation future for blinded veterans.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Overton, Jr.", with a stylized flourish at the end.

Donald D. Overton, Jr.  
Executive Director  
Blinded Veterans Association

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of the California Chamber of Commerce (CalChamber) in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes portions of LA County and the San Francisco Bay Area Peninsula. We ask that the California Public Utilities Commission (Commission) approve Waymo's request so that more riders in California can begin using Waymo's transportation services to get to where they need to go.

CalChamber is committed to enhancing the California economy and making the state a better place to live, work and do business. A critical part of our mission is to attract and retain businesses in our State. We believe the expansion of Waymo's services will help to drive economic benefits to California and its residents, while also contributing to the State's competitiveness.

Approving Waymo's advice letter to expand its existing commercial passenger carrier authority to include portions of LA County and the San Francisco Bay Area Peninsula will help to drive economic growth in California and to meet consumer demand for safe and reliable transportation service. In addition, Waymo's autonomous vehicles services support current transportation priorities facing California, including reducing traffic injuries and fatalities.

For these reasons, CalChamber urges the Commission to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and we believe that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Sincerely,

Brady Van Engelen



Policy Advocate  
California Chamber of Commerce



February 7, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

On behalf of the California Bicycle Coalition (CalBike), I'd like to express our organization's support of Waymo's January 2024 application to expand its autonomous vehicle service to Los Angeles. We respectfully ask the Commission to approve this request as one more step to support road safety for California's bicyclists and pedestrians.

Founded in 1994, CalBike advocates for equitable, inclusive, and prosperous communities where bicycling helps to enable all Californians to lead healthy and joyful lives. We see the bicycle as an integral part of the transportation network, and work to improve our roadways to make bicycling more safe and convenient. Serious injuries and fatalities disproportionately impact people bicycling and walking, especially in disadvantaged communities throughout the state. Improved infrastructure as well as use of available technology are critical components of fostering a safe roadway network for all.

Waymo has demonstrated a strong commitment to working with our community to take our needs into account as they expand their fleet, sharing information on how their technology detects and interacts with people bicycling and walking, and seeking feedback from us. We appreciate the work Waymo is doing both to improve the technology employed by its vehicles, as well as the work to listen to and respond to concerns from bicyclists throughout California.

If the CPUC approves the commercial use of Waymo's autonomous vehicles, CalBike believes this decision would support our goal of improving the safety of California's transportation infrastructure. CalBike sees autonomous driving technology as an opportunity to improve roadways across California and nationwide. Waymo's technology has the potential to create a safer roadway environment by removing human error and observing rules of the road—such as speed limits—which many human drivers fail to do. Further, decoupling the need for occasional motor vehicle trips from the need to own a personal vehicle can help to make bicycling and walking a more viable option for Californians for other trips, when a household car isn't the default mode choice.

CalBike respectfully requests that the California Public Utilities Commission allow Waymo to offer its fully autonomous Waymo One service commercially in LA, as the DMV has already done.

Sincerely,

Kendra Ramsey, AICP  
Executive Director, California Bicycle Coalition



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I would like to voice my support, on behalf of California Walks, for Waymo's January 19, 2024 updated Passenger Safety Plan for expanded, fare-d autonomous vehicle transportation, including service areas across the SF-Peninsula and LA. California Walks believes this expansion will improve road safety for more community members, including pedestrians and cyclists. Waymo's record for safety has clearly demonstrated that it is more predictable and safer than the average human driver and the more data it is able to gather through more miles driven should only continue to improve that record.

The situation is dire: California - and Los Angeles in particular - are well-recognized for the high instances of traffic fatalities on our streets. Half of these crashes involve pedestrians, cyclists, or other vulnerable road users.

California Walks is a statewide advocacy organization that focuses on creating more walkable and liveable communities for all people in the state. We aspire to a future where Californians can walk, run, and roll throughout their neighborhoods, regardless of race, identity, age, or ability.

We've been appreciative of Waymo's approach to safety: through extensive research, testing, and inclusive design, Waymo has developed technology that accounts for people inside and outside of the vehicle. In particular, we want to recognize that Waymo has invested the time to host conversations with representatives of groups serving vulnerable road users and incorporated concerns from those discussions into their safety approach – a step that other autonomous vehicle companies have not done with the same authenticity. We believe the expanded commercial use of Waymo One's autonomous vehicles would support safer, more accessible mobility options for riders and other people on our roadways.

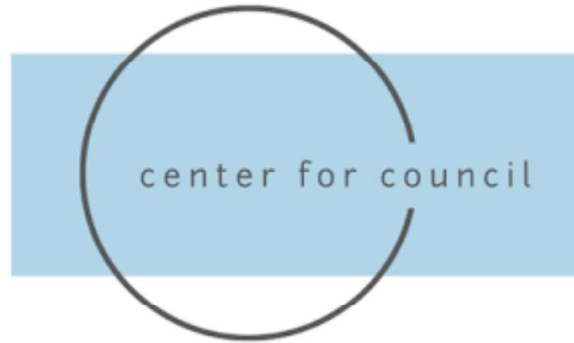
On behalf of California Walks, I encourage the Commission to grant Waymo's request to operate on a commercial basis in Los Angeles and the Peninsula, to expand the access beyond San Francisco. While I rarely believe that technology alone can be the answer to our problems, the safety potential offered by this technology, designed with pedestrian and cyclist safety in

mind, will contribute to safer streets for all Californians while expanding access to transportation choices and reducing dependence on private automobiles.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Shin', with a stylized, cursive script.

Kevin C. Shin  
Co-Executive Director  
California Walks



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of Center for Council in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes Los Angeles. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles.

Center for Council is committed to delivering programs that promote communication, enhance well-being, build community, and foster compassion for those within the re-entry community. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, Center for Council believes this would help to extend accessibility and economic benefits to our membership.

Center for Council concentrates on programs that foster compassion and cooperation. We also offer tailored training for organizations promoting effective communication and community building.

Waymo offers solutions to current transportation priorities facing California, including expanding transportation options for underserved populations, seniors, and physically disabled populations. Waymo's service provides a much-needed tool in our ever-growing toolkit to further the development of multimodal options for all.

Center for Council urges the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and the Center for Council believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Sincerely,

Brie Thiele, Advancement Manager, Center for Council





January 31, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**Re: Chamber of Progress Support for Waymo Advice Letter 0002 (Tier 2) - CPUC  
Driverless Deployment Service Area Expansion**

Dear Director Curtis:

On behalf of Chamber of Progress, a tech industry association committed to ensuring that all Americans benefit from technological leaps, I write to express our support for Waymo's application to expand its autonomous vehicle passenger service. We are strong supporters of autonomous vehicles because of their potential to save hundreds of thousands of lives and benefit our communities – promoting sustainability, mitigating transit and food accessibility gaps, and increasing mobility for the elderly and disabled.

**By approving Waymo's application, the Commission would advance the safe commercial deployment of autonomous vehicles and facilitate the benefits of autonomous vehicles for communities in the state of California.**

**Autonomous vehicles will bring safer streets and reduce the number of accidents.**

Between 2019 and 2021, traffic deaths and fatalities in the United States rose by 17.5 percent - the largest two-year increase since World War II.<sup>1</sup> In Los Angeles, there were more traffic deaths than homicides in 2023.<sup>2</sup>

Research shows that at least 90% of car crashes are caused by human error. By removing human error from the roads, autonomous vehicles can help eliminate the leading causes of crashes and fatalities. In fact, a recently published study found that Waymo's autonomous ridesharing services in Los Angeles, San Francisco, and Phoenix

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<sup>1</sup>David Leonhardt, Vehicle Crashes, Surging, (Feb. 2022),  
<https://www.nytimes.com/2022/02/15/briefing/vehicle-crashes-deaths-pandemic.html>

<sup>2</sup> "Car crashes killed more people than homicides in LA in 2023", LA Times, (Jan. 2024)  
<https://www.latimes.com/california/story/2024-01-25/traffic-deaths-surpass-homicides-in-los-angeles>

experienced 57% fewer police-reported crashes and 85% fewer crashes involving injuries compared to human drivers.<sup>3</sup>

**Autonomous vehicles can promote sustainability efforts.** Through high-speed driving, braking, and re-acceleration, humans burn a lot of gas and energy while driving.<sup>4</sup> According to the Southwest Research Institute, autonomous vehicles can improve fuel efficiency by 20%.<sup>5</sup> Since autonomous vehicles are programmed to follow traffic rules and speed limits, autonomous vehicles will ultimately burn less gas and energy. Waymo will also expand use of electric vehicles by providing passenger services in an all-electric fleet. Deploying more autonomous vehicles can help Los Angeles achieve its goal of a zero-emission transportation system.

**Autonomous vehicles will help mitigate transit and food accessibility gaps.** Traditional transit systems have historically contributed to inequality for disadvantaged minority and disabled communities. Research shows that Black people are more likely to rely upon public transportation accounting for 60% of all public transit riders. Where public transit options are scarce, autonomous vehicles can increase transportation options and connect residents to mobility hubs.<sup>6</sup>

**Autonomous vehicles will increase mobility for the elderly and disabled.** For the blind and other people living with disabilities, safe autonomous vehicles can't arrive fast enough. 13.4 million Americans between the ages of 18 and 64 have self-reported travel limiting disabilities.<sup>7</sup>

**Autonomous vehicles are also popular.** A survey commissioned by Chamber of Progress found that 53% of voters are ready to ride in an AV now or in the next five years, and the same number supported the testing and deployment of AVs in their state.<sup>8</sup> Union members also overwhelmingly support the deployment of AVs, with 75% of respondents saying they supported testing AVs in their state. In San Francisco, in the month after they were opened to the public, autonomous rideshare services logged over 36,000 paid trips.<sup>9</sup> Voters and Californians are excited about the possibilities of autonomous vehicles.

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<sup>3</sup> "Waymo significantly outperforms comparable human benchmarks over 7+ million miles of rider-only driving", (Dec. 2023)

<https://waymo.com/blog/2023/12/waymo-significantly-outperforms-comparable-human-benchmarks-over-7-million/>

<sup>4</sup> Ashleigh Rose-Harman, *The Environmental Benefits of Driverless Cars*, Greener Ideal, (Nov. 2021),

<https://greenerideal.com/news/vehicles/driverless-cars-environmental-benefits/>.

<sup>5</sup> SwRI Achieves 20% Improvement in Vehicle Fuel Efficiency with Connectivity, Automation, Southwest Research Institute, (Nov. 2021)

<https://www.swri.org/press-release/vehicle-fuel-efficiency-improvement-connectivity-automation-arpa-e-nextcar> .

<sup>6</sup> <https://media.maymobility.com/May-Mobility-Cities-Today-AVs-Transforming-Public-Transportation-Case-Study.pdf>

<sup>7</sup> Travel Patterns of American Adults with Disabilities, U.S. Department of Transportation, Bureau of Transportation Statistics (Jan. 2022) <https://www.bts.gov/travel-patterns-with-disabilities>

<sup>8</sup> <https://progresschamber.org/morning-consult-poll-dems-biden-voters-union-members-support-autonomous-vehicles/>

<sup>9</sup> Richard Cano, "Exclusive: Data shows Cruise and Waymo's sudden driverless taxi expansion in S.F." San Francisco Chronicle, (Nov. 2023) <https://www.sfchronicle.com/sf/article/cruise-waymo-san-francisco-18472568.php>

Waymo has demonstrated a commitment to responsible operations, built a positive working relationship with state and local authorities, and driven thousands of miles. That track record should give the CPUC confidence that Waymo's application rests on a strong foundation of safety, communication, and community responsibility.

For the reasons cited above, we urge the California Public Utilities Commission to approve Waymo's Driverless Deployment Permit application, which will allow for a safer, more accessible, and more equitable California. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Singleton', with a stylized flourish at the end.

Robert Singleton  
Director of State & Local Government Relations, Western US

Tuesday, January 30, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**Subject: Chamber San Mateo County Support for Waymo Advice Letter 0002**

Director Curtis,

The Chamber San Mateo County urges the California Public Utilities Commission's Consumer Protection and Enforcement Division (CPUC) to timely approve Waymo's January 19, 2024 Tier 2 advice letter, which would allow Waymo to expand its Waymo One commercial autonomous vehicle ridehail service to include San Mateo County.

Chamber San Mateo County is a dynamic organization that is always looking to the future, representing over 1,500 members with more than 100,000 employees in business, government, labor, education, and non-profit organizations. The Chamber provides leadership on issues critical to our region and local communities, including economic development, education, housing affordability, infrastructure, and government, business relations, health, life science and transportation.

Chamber San Mateo County views our role in our community as a strong voice on critical issues such as economic development and transportation. Bringing Waymo's commercial services to our area will drive economic growth, while also meeting consumer demand for a safe and reliable transportation option. Waymo's updated Passenger Safety Plan provides a detailed description of Waymo's comprehensive approach to serving their riders, including innovative vehicle and app features that demonstrate their commitment to safety. Given the positive impact Waymo's expanded service will have on local businesses and residents, Chamber San Mateo County strongly encourages the CPUC to grant immediate approval.

Chamber San Mateo County has been serving our community for over 126 years and it was founded on opportunity and collaboration and feels San Mateo County residents should have an opportunity for expanded access of Waymo's safe transportation autonomous vehicles to our area and encourage the Commission to allow this service.

Thank you for your consideration.

All my best,



Amy N. Buckmaster  
President and CEO  
Chamber San Mateo County



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Director Curtis,

I am writing on behalf of Community Coalition in support of Waymo's January 2024 application to expand its autonomous vehicle passenger carrier service to include Los Angeles. With all due respect, we ask the Commission to approve Waymo's request so that more people can have access to increased mobility options and have access to easily participate in activism that is critical to organizing, campaigning, and advancing social justice initiatives and interests.

Community Coalition is rooted in the belief that people are the creators of change, and that we are more powerfully united as a community, than when acting alone. That's why we bring community members together to build leadership, launch action campaigns, and create a unified voice for South L.A. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in the region, we feel strongly that this would help grow people's participation in social justice activities that are central to a thriving democracy.

As you may be aware, Community Coalition works to help transform the social and economic conditions in South L.A. that foster addiction, crime, violence, and poverty by building a community institution that involves thousands who create, influence, and change public policy. This building of community is supported by in-person activism, which is why increasing transportation options for those who lack them is central to our work of bringing more community members together and advancing our mission.

Community Coalition urges the Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more Southern California communities. Autonomous vehicles are already being used regularly by thousands of Californians, and we believe more people should have the opportunity to benefit from expanded access to equitable and sustainable transportation. This will ensure that individuals will have access to the resources they need to become active members of their community, while also having the opportunity to organize, campaign, and advance real social justice and change.

Sincerely,

Leslie Cooper Johnson  
Chief Culture Officer  
Community Coalition



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of The Congress of Racial Equality of California in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes Los Angeles. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles.

CORE-CA is committed to eliminating rising tensions between Black and Hispanic youths. We are engaged in research on the definition of Race and the elimination of tensions. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, CORE-CA believes this would help to extend accessibility and economic benefits to our membership.

The Congress Of Racial Equality of California (CORE-CA) is a successor to the Chicago based Civil Rights CORE organization founded in 1942 by the late James Farmer, and a group of Quaker pacifists to launch an aggressive assault on nationwide racial injustice during World War II. CORE immediately became one of the big three organizations in the Civil Rights movement that changed America in the 20th Century. Our original, predecessor Agency was the most aggressive of all three and the first to use non-violence. It was CORE that invented the FREEDOM RIDES and the SIT-INS in the 40's and 50's. It was CORE that first brought non-violence into the Montgomery Bus Boycott that would be led by Dr. King.

Waymo offers solutions to current transportation priorities facing California, including expanding transportation options for underserved populations, seniors, and physically disabled populations. Waymo's service provides a much-needed tool in our ever-growing toolkit to further the development of multimodal options for all.

CORE-CA urges the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and the CORE-CA believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Sincerely,



—





# COUNTY OF SAN MATEO

## OFFICE OF THE COUNTY ATTORNEY

HALL OF JUSTICE AND RECORDS, 400 COUNTY CENTER, 6<sup>TH</sup> FLOOR • REDWOOD CITY, CA 94063-1662

TELEPHONE: (650) 363-4250 • FACSIMILE: (650) 363-4034

[www.smcgov.org/countyatorney](http://www.smcgov.org/countyatorney)

### COUNTY ATTORNEY

JOHN D. NIBBELIN

February 8, 2024

*Please respond to: [jnibbelin@smcgov.org](mailto:jnibbelin@smcgov.org)*

#### Via e-mail

California Public Utilities Commission  
Consumer Protection & Enforcement Division  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

Via electronic mail only<sup>1</sup>

[terra.curtis@cpuc.ca.gov](mailto:terra.curtis@cpuc.ca.gov)

[AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov)

*Re: Protest of Waymo LLC Advice Letter 0002 (Tier 2)*

To Whom it May Concern:

On January 19, 2024, Waymo LLC submitted its Advice Letter 0002 (Tier 2) (“Advice Letter”), asking the California Public Utilities Commission’s Consumer Protection & Enforcement Division (“Commission”) to approve the expansion of Waymo’s Automated Vehicle Passenger Services into a substantial portion of San Mateo County.

The County of San Mateo (“County”) is attempting to assess the potential implications and impacts of such an expansion but we have been hampered, as County staff, in that, prior to submitting this Advice Letter, Waymo failed to communicate in any depth or detail with County staff about the specifics of Waymo’s proposal to expand its operations, largely unfettered, into San Mateo County. Had Waymo meaningfully engaged with County Staff with respect to this matter, we would have shared that this expansion is of significant public interest and requires much closer scrutiny and stakeholder outreach than the advice letter process can provide.

For several years, Waymo has been operating in, and expanding its services in, the City and County of San Francisco (“CCSF”). During this time, as CCSF has stated, “Waymo has actively sought [CCSF] input about its [Autonomous Vehicle] testing and deployment, has

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<sup>1</sup> As required by the definition of a Protest in General Order 96-B Rule 3.11, this protest was sent to [waymo-regulatory-permits@google.com](mailto:waymo-regulatory-permits@google.com), to the attention of Mari Davidson, on the day it was submitted to the Commission.



demonstrated intent to address several city concerns, and appears to have apparently invested significant resources in doing so.”<sup>2</sup>

In stark contrast, I am not aware of substantive conversations between Waymo and County of San Mateo leaders or staff concerning the specifics of Waymo’s proposal to expand its services into the Peninsula, even though Waymo’s request to expand into San Mateo County, if granted, would permit it to engage in near limitless operations, rather than gradually expanding its operations, as it did in CCSF.

Though Waymo’s Advice Letter suggests it has engaged in outreach with local governments and other stakeholders on the Peninsula, I don’t believe that this engagement has meaningfully included the County of San Mateo—the largest local government body in the County. I note that Waymo contacted neither my office, the County Executive’s Office, the Sheriff’s Office, the County’s Department of Public Works, the County Planning Department, nor the County’s Office of Sustainability regarding the proposal that is before the Commission, and all of these departments would have meaningful input with respect to this specific proposal. Further, I observe that Waymo failed to provide the County with sufficient notice of its intent to file the Advice Letter and to seek this expansion.

In light of Waymo’s lack of meaningful, substantive engagement to date with the County regarding the instant proposal, I submit this protest of Waymo’s Advice Letter at this time on the grounds that approval of Waymo’s Advice Letter would be unjust and unreasonable without time and a forum for additional input from local stakeholders.<sup>3</sup>

Moreover, given this lack of local input and the recent public safety incidents involving Waymo and Cruise LLC in CCSF, I submit that the advice letter process is not appropriate for making such an important decision of public interest. The advice letter process will constrain the development of an adequate evidentiary record from which to support the ultimate decision on Waymo’s request.

The “quick and simplified” advice letter review process, which is intended for “requests that are expected neither to be controversial nor to raise important policy questions,”<sup>4</sup> is insufficient to develop the evidence necessary to fully understand the potential impacts and issues Waymo’s expansion into San Mateo County will create, including accounting for the differing needs and hurdles Waymo will face operating in San Mateo County, as compared to CCSF. This is a matter that has potential to be controversial and it does, in fact, raise important policy considerations, as evidenced by the recent introduction in the California State Legislature of Senate Bill 915, which, if adopted, would greatly expand the role of local jurisdictions in the commercial deployment of autonomous vehicles.

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<sup>2</sup> CCSF Protest of Waymo LLC Tier 3 Advice Letter (0001) (Jan. 23, 2023), California Public Utilities Commission, at p. 1. Available at <https://www.cpuc.ca.gov/regulatory-services/licensing/transportation-licensing-and-analysis-branch/autonomous-vehicle-programs/phase-i-driverless-autonomous-vehicle-deployment-program-advice-letter-status>.

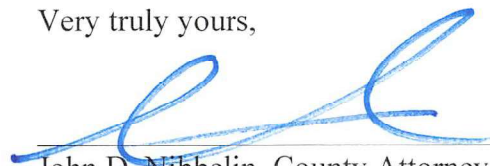
<sup>3</sup> General Order 96-B Rule 7.4.2(6).

<sup>4</sup> General Order 96-B Rule 5.1.

Given the important policy questions Waymo's potential expansion raises, and the need to consider additional evidence of the potential impacts associated with that expansion, I hereby submit this protest on the grounds that approval of Waymo's request is inappropriate for the advice letter process.<sup>5</sup> At a minimum, an evidentiary hearing should take place on these issues to develop a sufficient factual record from which to make a decision on the Advice Letter.<sup>6</sup>

Thank you for your consideration in this matter.

Very truly yours,

  
\_\_\_\_\_  
John D. Nibbelin, County Attorney

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<sup>5</sup> General Order 96-B Rule 7.4.2(5).

<sup>6</sup> General Order 96-B Rule 7.4.1.



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Director Curtis,

I represent DTLA Proud, a 501(c)(3) non-profit organization dedicated to strengthening and empowering the LGBTQ+ community and its allies in Downtown Los Angeles. I would like to respectfully urge you to approve Waymo's request to expand its autonomous vehicle service in Los Angeles, as we believe it will provide people who identify as LGBTQ+ with a much-needed safe and equitable transportation option.

DTLA Proud was founded by a grassroots team of residents, business owners, leaders, and nightlife promoters to create an all-inclusive community for LGBTQ+ members to work, live, and play. Building this community requires our members to feel safe and protected.

Unfortunately, that is not always the case. As hate crimes toward the LGBTQ+ community have increased, many community members are afraid to travel, even in their own cities. The Arizona State University Center for Problem-Oriented Policing noted that fear of being harassed or assaulted restricts people's movement, resulting in individuals limiting their everyday movements to only those environments where they feel safe.

Waymo's autonomous driving service provides community members with a safe means of transportation in the city they love. Waymo's autonomous vehicles do not judge or discriminate, nor do they harass or threaten. Their sole purpose is to get passengers from Point A to Point B in the safest and most comfortable ride possible, and they do it well.

Waymo has always shown solidarity with the LGBTQ+ community and has taken pains to make accessible and equitable transportation for LGBTQ+-identifying people in every city it operates in. The organization listens to the needs of people who identify as LGBTQ+ and design their services around those needs. That's why the company aligns well with DTLA Proud's motto: "by the community, for the community."

With your approval, the people of Los Angeles will be able to enjoy and benefit from these /services. As such, we ask you to consider the company's request to bring its ride service to

the area. Waymo's autonomous vehicles won't just make LA roads safer; they'll make transportation safer and more comfortable for the area's large, diverse, and growing LGBTQ+ community.

Sincerely,

Oliver Alpuche , Founder and Executive Director

A handwritten signature in black ink, appearing to be 'Oliver Alpuche', written in a cursive style.

2-1-2024





Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing from Easterseals Southern California to express our support of Waymo's application to expand its autonomous vehicle passenger carrier service to include Los Angeles. We request that the Commission approve Waymo's request so that more riders can begin benefiting from Waymo's autonomous ride-hailing service to get to where they are going in and around our city.

Easterseals Southern California has been committed to enhancing the quality of life and expanding opportunities for people with disabilities for more than 100 years. One in four Americans today has a disability, and to support this community we serve more than 15,000 people each year. Many of the resources and services we provide - healthcare, early childhood programs, independent living services, and more - rely on safe and accessible transportation.

If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, we believe our community would benefit greatly from these services.

Waymo's technology accounts for people inside and outside of the vehicle, recognizing pedestrians and cyclists, and is designed to help address some of California's transportation challenges like traffic injuries and fatalities.

Waymo has also taken the time to incorporate feedback from various community stakeholders, including people with disabilities, into their technology development. Waymo One provides a much-needed service in our ever-growing toolkit to improve mobility for all.

Easterseals Southern California encourages the California Public Utilities Commission to allow Waymo to commercially operate its fully autonomous Waymo One ride-hailing service in more California communities, including Los Angeles. Autonomous vehicles are quickly becoming a common mode of transportation for thousands of Californians everyday, and we believe that

more people, including those with disabilities, should have the opportunity to benefit from access to this safe and equitable transportation option.

Sincerely,

Brynne Jones  
Senior Director, Advancement Partnerships  
Easterseals of Southern California



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

January 26, 2024

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I'm writing to you today on behalf of the Epilepsy Foundation of Northern California (EFNC) to express our support for Waymo's January 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes the SF-Peninsula and LA.

We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request so that more riders living with disabilities can start to use Waymo's autonomous vehicles for greater mobility and accessibility.

EFNC is an organization leading the fight to overcome the challenges facing those living with epilepsy, while accelerating treatment therapies, finding cures and saving lives. Our services reach individuals across 44 counties, spanning from just below the Oregon border to Fresno County. EFNC helps our beneficiaries in a number of ways, including by providing information, resources, and access to support to the over 180,000 Northern Californians who are living with epilepsy every day. Our goal is to ensure that people with seizures are able to participate in all life experiences. Waymo is an important part of that.

Individuals living with epilepsy face numerous transportation challenges. Many of those living with seizures are unable to drive, and may face fear or insecurity about using traditional ridesharing or public transportation services. However, autonomous vehicles bring dignity and independence to those who we serve, providing them with a safe and judgment-free way to travel.

We at EFNC believe that Waymo's fleet of fully-autonomous vehicles is an important step towards providing more modes of accessibility to a larger portion of the population. We urge CPED to allow Waymo to operate commercially in the SF-Peninsula and in Los Angeles. We were pleased to see the Department of Motor Vehicles' recent approval of Waymo's operations, and hope that CPED will follow suit. With this approval, Waymo will be able to provide more individuals with independence and ownership over their choice of transportation, while contributing to a safer, and more accepting environment for all.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tony Zucker".

Tony Zucker, Board Chair



**Greater Los Angeles  
African American  
Chamber of Commerce**

501(C) 6

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January 29, 2023

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

On behalf of the Greater Los Angeles African American Chamber of Commerce (GLAAACC), I am writing in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, for an expanded service area for farmed autonomous vehicle transportation that includes Los Angeles. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles.

GLAAACC is committed to the economic growth and development of the African American business by focusing on legislative advocacy, as well as identifying and developing business opportunities and strategic business alliances. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, GLAAACC believes it would help to extend economic benefit to our membership in the region.

GLAAACC was founded in 1991 by a group of prominent Black business leaders to advocate for and support the growth of African American-owned enterprises. GLAAACC has attracted major corporate sponsorship and hosted esteemed keynote speakers at its annual fundraising events over its 30+ year history. Through initiatives like business leadership programs, technical skills training, and educational scholarships, GLAAACC offers services focused on empowering Black entrepreneurs and expanding their opportunities. With over 330 members, our organization maintains operations today in pursuit of our mission of fostering African American business success in Los Angeles and beyond. Notable supporters have included figures such as Magic Johnson, Maxine Waters, Antonio Villaraigosa and administrators of major companies and civic organizations.

Approving Waymo's updated Passenger Safety Plan, which extends Waymo's autonomous vehicle passenger carrier service to include Los Angeles will undoubtedly bring economic benefits to California as a whole, while also offering more equitable solutions to transportation priorities facing the state.

GLAAACC urges CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. GLAAACC sees this as the first important step to bringing autonomous vehicles to more communities in support of a safer, more accessible, and more equitable California.

Sincerely,

A handwritten signature in black ink that reads "Angela Gibson-Shaw". The signature is fluid and cursive, with the first name "Angela" being more prominent.

**Angela Gibson Shaw**





Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of Goodwill of the San Francisco Bay to offer our support for Waymo's January 2024 application to expand its autonomous vehicle service throughout the SF-Peninsula and Los Angeles. We ask the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request so that more riders can start to use Waymo's autonomous vehicles for increased safety, freedom and independence.

Goodwill of the San Francisco Bay is committed to equipping low-income individuals and those with barriers with the skills required to succeed in the 21st century job market. We also hire our trainees to gain transferable skills and valuable on-the-job experience in our stores and warehouses. For job seekers who want to pursue a sustainable career track, we help place them in jobs at top Bay Area companies. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in California, Goodwill of the San Francisco Bay believes this would help to extend independence, accessibility, and economic benefits to community members who seek an added reliable and safe means of mobility.

We believe that everybody deserves access to the training, job opportunities, and support to succeed in our economy, which Goodwill provides. Waymo offers a transportation solution to underserved populations, including those seeking greater accessibility to the job market.

Goodwill of the San Francisco Bay urges CPED to allow Waymo to offer its fully autonomous Waymo One service commercially in the SF-Peninsula, Los Angeles and more California communities. Autonomous vehicles are already being used daily by thousands of Californians and Goodwill of the San Francisco Bay believes that more people should have the opportunity to benefit from expanded access to this equitable and reliable transportation option.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Karlyn Bennehoof', written over a light blue horizontal line.

Karlyn Bennehoof  
VP, Development  
Goodwill of the San Francisco Bay



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service  
Area Expansion

Dear Director Curtis,

On behalf of Harvest Home, I have the pleasure of expressing our support for Waymo's permit to expand its services to include Los Angeles. Because we believe that autonomous vehicles have the potential to be a force for good in our home communities, we are requesting that the California Public Utilities Commission grants Waymo approval to operate commercially in LA.

For the past 39 years Harvest Home has been empowering unhoused pregnant women to transform their lives by providing housing, support, and programs that equip women to become great mothers. According to the LA County Health Department, nearly 5,000 pregnant women experience homelessness and housing insecurity each year. To further the need for help, there is a lack in housing programs and resources available to women, meaning that thousands of women lack housing during their pregnancy. To combat this need, in 2022 we opened a second home, nearly tripling our service capacity from 10 to 27.

At Harvest Home, we take a whole-person approach, not just providing a bed and a warm meal, but all the necessary interventions designed to increase a mother and baby's physical and mental health as well. Each year we support over 50 resident mothers and their babies, along with over 75 alumni families.

But we cannot do this work without the support of other positive forces in our community. Two of the biggest challenges our city is currently facing are homelessness and unsafe roadways. We will look to our partners at Waymo to fight



the good fight in making our city's roads safer for all who reside here while we continue to carry out our mission of ending homelessness for the next generation.

With Waymo's unprecedented safety record, transparency, and highly sophisticated technology, we believe they will be able to help reduce traffic dangers in our city. They are not just another tech company, but they are innovators in changing the city of Los Angeles and the quality of life for Angelenos. This is why we support Waymo's request to operate commercially in Los Angeles as we work, in tandem, to strengthen the communities of Los Angeles.

With joy and gratitude,

A handwritten signature in black ink that reads "Sarah Wilson". The signature is fluid and cursive, with the first name "Sarah" and last name "Wilson" clearly distinguishable.

Sarah Wilson  
Executive Director  
Harvest Home



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service  
Area Expansion

Dear Director Curtis,

I am writing on behalf of the Hispanic Foundation of Silicon Valley (HFSV), sharing our support for Waymo's January 2024 application to expand its autonomous vehicle service throughout parts of the SF-Peninsula and Los Angeles. We request that the Commission approves Waymo's request, so that more California residents can benefit from Waymo's fleet of autonomous vehicles.

The Hispanic Foundation of Silicon Valley cultivates philanthropy and inspires Hispanic children and families to achieve personal greatness. HFSV engages leadership and bridges resources to invest in a thriving Hispanic community, and is committed to empowering the lives and futures of Latinos through community philanthropy, investment, leadership development, and the convening and engaging of the region's dynamic Hispanic community. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in the SF-Peninsula, the Hispanic Foundation of Silicon Valley is certain that this service will enhance social and economic opportunities for many more California residents.

With over 2,000 students and families served, the Hispanic Foundation of Silicon Valley is proud to be the only foundation in Silicon Valley led and managed by Latino professionals. We continuously work to improve the quality of life for the Latino community in Silicon Valley. Our Foundation is working closely with Waymo to employ more Latinx STEM professionals in their workforce.

The Hispanic Foundation of Silicon Valley hopes that the California Public Utilities Commission will allow Waymo to operate its Waymo One service in more California communities, including the SF-Peninsula and Los Angeles.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ron Gonzales", written in a cursive style.

Ron Gonzales  
President & CEO

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Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I'm writing to you, representing the Hundley Foundation, to express our support for Waymo's January 2024 permit application to expand its autonomous vehicle services to Los Angeles. We kindly request that the California Public Utilities Commission approves Waymo's commercial operations in the city.

The Hundley Foundation is an organization dedicated to serving children and families who are impacted by Epilepsy, which affects more families than most may realize. Nationwide, there are 3.4 million people who have epilepsy. To further explain its reach, 1 in 26 people will develop epilepsy at some point in their lives.

We help our beneficiaries in a number of ways, including mentorship and education, fundraising and giving back, and raising public awareness. Part of how we support our members is by providing them with the tools and support they need to make their day-to-day lives easier.

For example, many individuals who live with epilepsy are unable to drive. This is what drives us to support and advocate for transformative technology like Waymo's autonomous vehicles. The Waymo One service can provide those living with epilepsy and other conditions to access a safe and reliable mode of transportation, without needing to rely on someone else to drive them. Autonomous vehicles provide independence that many living with epilepsy are otherwise unable to obtain, and we believe that the availability of this technology will be a force for good.

The Hundley Foundation kindly urges the Commission to permit Waymo's request to operate commercially in more California communities, including Los Angeles. We've seen the positive impact of this service on many individuals in California and beyond, and we believe that more communities should be able to benefit from this service.

Sincerely,

Shannon Abdul-Wahab  
CEO  
Hundley Foundation





# IBEW LOCAL



# UNION 617

1701 LESLIE STREET  
SAN MATEO, CA 94402

POWERING SAN MATEO COUNTY  
SINCE 1908

(650) 574-4239  
FAX (650) 574-1408

February 6, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

The International Brotherhood of Electrical Workers (IBEW) Local Union 617, proudly represents San Mateo County Electrical Workers including Electricians, Sound and Communications workers and the Air Train Technicians at the San Francisco International Airport. IBEW LU 617 is writing in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for commercial autonomous vehicle transportation that includes cities within San Mateo County.

We strongly urge the Commission's Consumer Protection and Enforcement Division (CPED) to approve the request/advice letter, allowing for Waymo to offer Waymo One service commercially in San Mateo County. This will allow San Mateo County residents the ability to increasingly access electric vehicle trips and accelerate California's energy transition. I have personally taken a ride and would gladly recommend their services to my friends and family.

Waymo makes electric vehicles accessible to more Bay Area residents, including those who may not be able to afford an electric vehicle, by providing passenger service in a shared fleet of all-electric Jaguar I-PACE vehicles, and will provide residents and visitors with a more sustainable transportation option and create more demand for green, environmentally friendly jobs. This will continue to make San Mateo County both economically and sustainably competitive.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Wein".

Scott Wein

Business Manager/Financial Secretary  
IBEW LU 617

SW:mfb  
opeiu29-af/cio





Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue, San Francisco, CA 94102-3214  
January 25, 2024

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of the Integrated Community Collaborative to express our wholehearted support for Waymo's application to expand its autonomous vehicle passenger carrier service in Los Angeles. We understand that the DMV's recent approval authorizes Waymo to commercially deploy its autonomous vehicles in an expanded geography, and we are thrilled about the potential benefits this could offer to our community.

The Integrated Community Collaborative is an organization comprised of self-advocates and parents united in our mission to promote equity and equality for the more than 460,000 individuals in California with intellectual or developmental disabilities (IDD). Our advocacy efforts focus on expanding opportunities for individuals with IDD and ensuring they have equitable access to essential resources, including accessible, reliable, and safe transportation.

Access to Waymo's fully autonomous driving technology represents a significant breakthrough for our community. The commercial use of this service could provide unprecedented opportunities for mobility and increased independence for people with IDD who are otherwise unable to drive, reducing their reliance on the many families, friends, and caregivers who currently provide transportation.

Safety is a paramount concern for individuals with IDD when it comes to transportation, not only in terms of traffic behaviors but also in relation to the driver themselves. Driverless vehicles offer a non-judgmental sense of security that is particularly valuable to our community. Waymo's vehicles are backed by years of research, millions of miles of real-world experience, and have been designed with input from the populations they serve, including people with





disabilities. These vehicles are programmed to strictly adhere to all traffic laws, avoid risky behaviors such as speeding or rolling stops, and account for the behavior of all road users, including pedestrians and cyclists.

The consistent adherence to traffic laws, the accessibility and interactivity of the app and in-car interface, and the predictability of the ride all contribute to providing individuals with IDD the confidence and comfort to rely on this service for their mobility needs.

We strongly urge the California Public Utilities Commission to grant Waymo the ability to offer its fully autonomous Waymo One service commercially here in Los Angeles. The potential benefits for people with IDD and their support networks are immense. We eagerly anticipate a future where everyone, regardless of their abilities, can feel included, valued, and have the freedom to navigate the world with confidence and security.

We firmly believe that Waymo's technology and its commitment to working with our community from the outset can help us realize this vision.

Sincerely,

*Elizabeth Barrios Gomez*

Elizabeth Barrios Gomez  
Co-Founder - Executive Director  
Integrated Community Collaborative  
Home of the Community Integradoras  
Disability Rights are Human Rights!



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of the Independent Living Resource Center San Francisco (ILRCSF), a disability rights advocacy and support organization, offering our support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes the SF-Peninsula and LA.

We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request so that more riders – including those with disabilities - can start to use Waymo's autonomous vehicles for greater mobility and accessibility.

As San Francisco's only cross-disability organization operating within an Independent Living framework, we focus on supporting independent, community-based living. Our mission is to ensure that people with disabilities are full social and economic partners, both within their families and within a fully accessible community. We achieve this mission via systems change, community education, direct service programs, and partnerships with the business community, community organizations and government. Waymo's mission aligns with ours: to create a safer, more accessible world

.Access to a range of transportation methods is a key element of independent living. CPED approval of commercial use of Waymo's autonomous vehicles in the SF-Peninsula and Los Angeles, would not only increase consumers' options, but greatly enhance accessibility and mobility so that people with disabilities can live full, productive and independent lives. ILRCSF has long been a proponent of assistive technology for people with disabilities, and Waymo's autonomous vehicle service clearly falls into this category.

ILRCSF strongly encourages CPED to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in the SF-Peninsula and Los Angeles. Autonomous vehicles are now being used daily by thousands of Californians, including those with a range of sensory, physical and intellectual disabilities. ILRCSF is absolutely passionate that more people should have the opportunity to benefit from expanded access to autonomous vehicle transportation as a means to increase their mobility and improve their lives.

Respectfully,

Lana Nieves  
Executive Director,  
Independent Living Resource Center San Francisco



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of Jobs for the Future in support of Waymo's January 2024 application to expand its autonomous vehicle passenger carrier service to include the SF-Peninsula and Los Angeles. We respectfully ask the Commission to approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to travel to work, their schools and educational programs, or wherever they need to go.

Jobs for the Future is committed to doubling the number of quality U.S. jobs in the next 10 years to 75 million people facing systemic barriers to advancement. This includes people without a 4-year degree, people of color and women of all backgrounds, and people with criminal records. Today, this amounts to 92.3 million Americans who lack a living wage, benefits, advancement opportunities, and the organizational structure and culture they deserve. Transportation and mobility are key components to realizing this vision.

If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in the SF-Peninsula and Los Angeles, we believe this would help accelerate advancement for more of the people and communities we serve.

As Californians know well, our technology sector leads the world in innovation and job-creation. Approving Waymo's application to expand its existing commercial passenger carrier authority to more of the state will help drive economic growth in California and to meet consumer demand for safe and reliable transportation service.

Jobs for the Future urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service commercially in the SF-Peninsula and Los Angeles. We ask that the California Public Utilities Commission approve Waymo's application to expand its services, ensuring safer transportation for all.

Sincerely,

Laura Roberts  
Senior Director  
Jobs for the Future  
lroberts@jff.org

# KARSH CENTER

at WILSHIRE BOULEVARD TEMPLE

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

Guided by Jewish values, the Karsh Family Social Service Center's mission is to improve the lives of the underserved by providing critical and accessible social services through direct service or collaboration with other providers, while also integrating significant volunteer opportunities to create a uniquely powerful way to help repair the world.

A trusted connector in the Koreatown community of Los Angeles, we provide social services both on-site and through 40+ mission-aligned service providers to systematically create and support a safety net for individuals and families who are often marginalized in our society. Our four key program areas are: Food & Nutrition Security, Health & Wellness, Parent & Child Well-Being, and Community Services.

Our community is one of the most ethnically and socially diverse populations in the country, and serving the needs of this community requires thinking of new approaches to old problems. Exemplifying this mindset, I'm reaching out to you today to show our support for Waymo's January 2024 application to expand its autonomous vehicle operations across Los Angeles.

Several years ago, we were selected by Waymo to pilot its technology to learn how it might serve our community. Our staff and volunteers spend countless hours driving to pick up and deliver critical food donations to individuals and families experiencing food insecurity. However, finding volunteers or staff willing to drive daily in LA traffic to locations across the region gets more difficult each year. Waymo's pilot program showed us a future where we could broaden food access across Los Angeles regardless of the availability of our volunteers

"At the Karsh Center, our vision is to work with mission-aligned service providers to help build a future in which every member of our community can thrive," said Frances Nova-Jauregui, Associate Executive Director at the Karsh Center. "We're so excited about this partnership and the potential of autonomous driving technology to help us safely and more efficiently serve our collaborator, HOLA, and the wider community."

## KARSH CENTER

at WILSHIRE BOULEVARD TEMPLE

If the Commission approves Waymo's application for commercial operation in Los Angeles, the Karsh Center believes it would help us extend our reach to significantly more residents in the region. Wilshire Boulevard Temple has been serving the needs of LA's Jewish community since 1862, and the Karsh Center continues this dedication with dozens of programs and services to serve residents Koreatown. Please think of our future as you make this important decision.

Sincerely,

A handwritten signature in blue ink, reading "Lila Guirguis". The signature is fluid and cursive, with the first name "Lila" and last name "Guirguis" clearly distinguishable.

Lila A. Guirguis, MPA  
Executive Director  
Karsh Family Social Service Center  
[lila@karshcenter.org](mailto:lila@karshcenter.org)  
(213) 401-4663



January 29, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Los Angeles Business Council Support for Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless  
Deployment Service Area Expansion

Dear Director Curtis,

On behalf of the Los Angeles Business Council (LABC), a business research and advocacy organization representing over 500 members across greater Los Angeles, I am writing in support of Waymo's January 19, 2024 advice letter to expand its paid autonomous vehicle passenger carrier service to include the Los Angeles area. We respectfully ask the Commission to approve Waymo's request, so that more riders can begin using Waymo's autonomous vehicles to travel in and around L.A.

For over 80 years, the LABC has harnessed the power of business, government, and community to promote progress in the Los Angeles region in the areas of transportation, housing, sustainability, and economic development. Today, our 500+ members represent business and civic leaders from all industry sectors who are focused on innovative public policy that strengthens our economy while improving quality of life for all of us.

For the last decade, the LABC has been the strongest business voice in Los Angeles on issues of livability, sustainability, and equity. The organization has a long history of advocating for investment in a modern and zero-emission transportation network to make our region more economically competitive, while increasing transportation access for all. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, the LABC believes this would help improve the quality of life for Angelenos by increasing access to transportation, reducing congestion, and increasing safety on our roads. It will also enhance our attractiveness to employers looking to expand or relocate in the L.A. area, which is currently at a competitive disadvantage due to long commutes for workers. Further, the LABC greatly values Waymo's focus on utilizing electric vehicles, as the state aims to address its number one source of GHG emissions and local pollutants.

California has long been a leader in supporting innovative businesses, particularly in the technology sector. Approving Waymo's application to expand its existing commercial passenger carrier authority to

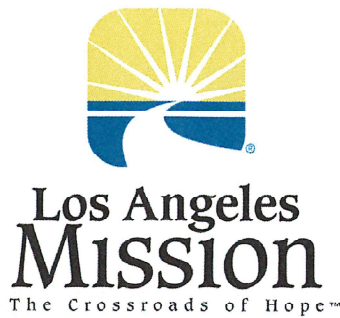
include Los Angeles will help drive economic growth in California and meet consumer demand for safe and reliable transportation service. Waymo's focus on electric vehicles will also help further the push for a zero-emission transportation sector by providing passenger service in a shared fleet of all-electric Jaguar I-PACE vehicles for consumers, including those who may not be able to afford an electric vehicle. Finally, this innovative technology will increase access to reliable transportation to underserved populations, seniors, and the physically disabled. Combined with investments in public transit and first-mile, last-mile solutions, Waymo's service provides a much-needed tool in our ever-growing toolkit to further the development of multimodal options for all.

The LABC respectfully urges the CPUC to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and the LABC believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Sincerely,

A handwritten signature in dark ink that reads "Mary Leslie". The signature is written in a cursive, flowing style.

Mary Leslie  
President  
Los Angeles Business Council



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

February 8, 2024

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am representing the Los Angeles Mission, reaching out in support of Waymo's application dated January 2024, to expand its autonomous vehicle passenger carrier service to include Santa Monica and all of Los Angeles. We humbly request the Commission's approval, as this expansion could make transportation more accessible to our community members and improve road safety for pedestrians, cyclists, and micro-mobility users.

Los Angeles Mission, established in 1936, has been serving the homeless population of Los Angeles for over 84 years, providing meals, shelter, and vital services to those in need. According to the Los Angeles Homeless Services Authority's 2020 Greater Los Angeles Homeless Count<sup>[1]</sup>, there are approximately 66,436 individuals experiencing homelessness in LA County. This figure represents a 12.7% rise from the previous year<sup>[2]</sup>.

Waymo's autonomous driving technology is designed to prioritize safety and respect for all road users, including pedestrians, cyclists and micro-mobility (motorized chair) users, many of whom are individuals experiencing homelessness.

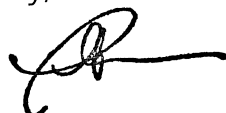


Waymo's technology is equipped with a cutting-edge vision system that provides 360-degree visibility, enabling them to detect and respond to pedestrians and cyclists effectively, even in complex urban environments. Also, Waymo's technology can anticipate and react to unpredictable pedestrian behavior, thus further enhancing safety. By reducing the chance of crashes and enhancing overall road safety, Waymo's efforts could provide an additional layer of protection for the most vulnerable road users, including people experiencing homelessness.

Waymo's commitment to safety, evidenced by their impactful research and dedication to providing a secure passenger experience, aligns perfectly with our mission. Their efforts in reducing traffic injuries and fatalities could make our streets safer for everyone, including the vulnerable populations we serve.

Los Angeles Mission ardently encourages the California Public Utilities Commission to approve Waymo's request. By allowing Waymo to extend its fully autonomous Waymo One service commercially, we believe we can create safer and more inclusive communities in California.

Sincerely,

A handwritten signature in black ink, appearing to read 'Troy Vaughn', with a stylized, flowing script.

Troy Vaughn

President/CEO

Los Angeles Mission

## **SOURCES**

[^1^]: Los Angeles Homeless Services Authority. (2020). 2020 Greater Los Angeles Homeless Count. <https://www.lahsa.org/documents?id=4558-2020-greater-los-angeles-homeless-count-los-angeles-county.pdf>

[^2^]: Holland, G., & Smith, D. (2020). Homelessness in L.A. is a catastrophe in motion, and our leaders are largely to blame. Los Angeles Times. <https://www.latimes.com/california/story/2020-06-16/homelessness-los-angeles-county-black-residents-rent>

February 6, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

Dear Director Curtis,

Drunk driving is the number one (1) cause of deaths and injuries on America's roads, taking the lives of more than 13,000 people in 2021. Drivers are increasingly testing positive for other drugs and combinations of substances, contributing to historic rises in roadway deaths. We know that we need technology to step in when people refuse to make the right choice to never drive impaired.

That's why MADD is proud of our partnership and our shared mission with autonomous vehicle companies like Waymo. Autonomous technology that is now in development will help prevent tragedies on our roads, including those caused by drivers impaired by alcohol and other drugs, and distracted and drowsy drivers. Autonomous vehicles don't drive impaired or get tired or distracted, and they increase access to transportation.

Advanced vehicle technology such as autonomous vehicles is a pillar of MADD's Campaign to Eliminate Drunk Driving. As the largest non-profit organization serving victims of these 100% preventable crimes and advocating for laws that will stop the crisis on our roads, MADD supports the safe development and deployment of autonomous technology.

Since our founding in 1980, Mothers Against Drunk Driving (MADD) has helped to save more than 400,000 lives, reduce drunk driving deaths by more than 50% and promote designating a non-drinking driver. While great progress in highway safety has been made over the past four decades, traffic fatalities, injuries and crashes continue to take an enormous toll on our country. We welcome all efforts to end impaired driving and make our streets safer.

Sincerely,



**Patricia Rillera**  
California State Executive Director



February 1, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Mountain View Chamber of Commerce submitting support for Waymo Advice Letter 0002

Dear Director Curtis,

I am writing on behalf of the Mountain View Chamber of Commerce in support of Waymo's January 19, 2024 advice letter seeking approval of its updated Passenger Safety Plan and expanded autonomous vehicle passenger carrier service territory for the Bay Area. As one of the cities served by this expansion, we respectfully ask the Commission's Consumer Protection and Enforcement Division to approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Mountain View and the greater Bay Area.

Mountain View is home to 80,000 residents, yet over 83% of them work elsewhere. At the same time, we house some of the world's leading corporations and thousands of small businesses who employ a significant number of individuals from all around the Bay – so transportation options are critically important to our economic and social vitality.

California has long-been a leader in supporting innovative businesses, and Mountain View is known for being a vibrant part of Silicon Valley and a center of innovation. We embrace leading edge technology that improves the lives of people everywhere, and autonomous vehicles factor strongly in that equation. Waymo in particular has been actively participating in our wildly popular local Technology Showcases, as well as numerous community events and activities.

The Chamber and residents of Mountain View have consistently and publicly endorsed the development and deployment of autonomous vehicles, as we believe the industry drives economic growth, improves public safety, and delivers a key consumer demand.

The Mountain View Chamber of Commerce urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. It benefits the economy and way of life for our city and the region at large.

Sincerely,

A handwritten signature in dark ink, appearing to read "Peter Katz", is written over a light blue horizontal line.

Peter Katz  
President & CEO  
Mountain View Chamber of Commerce



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of the National Council on Independent Living (NCIL), a nationwide organization that advocates for the human and civil rights of individuals with disabilities, in support of Waymo's January 2024 application to expand its autonomous vehicle passenger carrier service to Los Angeles and additional parts of the SF-Peninsula.

We are advocating for the approval of Waymo's application. The Department of Motor Vehicles has already approved Waymo's application to commercially deploy its autonomous vehicles in an expanded geography. More importantly, Waymo's vision also aligns with NCIL's vision of a society in which people with disabilities are valued equally and participate fully.

Established in 1982, NCIL is a pioneering cross-disability, grassroots organization representing thousands of individuals and organizations that comprise the independent living movement, is committed to removing barriers and creating inclusive societies. We envisage a world where people with disabilities enjoy the freedom of choice, equal opportunities, and self-determination in every aspect of their lives.

Despite its efforts, NCIL knows that the vision of equality is yet to be fully realized as many individuals with disabilities are still institutionalized or live in isolation. As a membership organization, NCIL calls for the support of all advocates to achieve its goals and further the disability rights movement.

If the California Public Utilities Commission approves Waymo's commercial service, NCIL believes this could extend independence and accessibility to some of our members throughout California.

In our pursuit to promote disability rights, we have found that individuals with disabilities often face significant transportation challenges. Waymo's commitment to safety and passenger experience makes it a valuable solution in our toolkit to improve the quality of life for our community members by expanding:

1. The number of mobility options available.
2. The hours of availability and routes served.

3. General road safety. Waymo is designed to obey road rules like speed limits and drive conscientiously, as well as to make decisions with the safety of passengers and all other road numbers in mind.
4. The ways people can interact with transportation modes available (i.e., through an accessible app)
5. The level of safety for pedestrians, micro-mobility users, and cyclists, a portion of whom are people with disabilities.
  - a. People with disabilities may often walk or bike or use motorized chairs to get from point A to point B, and Waymos technology is designed to identify and drive with their safety in mind. Waymo is designed to obey road rules like speed limits, stop fully at crosswalks, and be constantly vigilant of pedestrians with its 360-degree vision system.

Furthermore, Waymo's technology represents a new way to interact with transportation that may offer people with disabilities a greater degree of autonomy and independence. If they are able to use an app or receive assistance using the app, they can take control of every aspect of their journey, from pickup to drop off, while enjoying a high degree of consistency, predictability, and safety during the ride.

Waymo's passenger screen provides riders with a view of the street and everything the technology views. This sense of involvement and insight into the journey can offer people with disabilities a sense of safety, security, certainty, and control. Waymo has solicited feedback from organizations working directly with people with disabilities to further evolve its technology's ease of use for everyone.

NCIL urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. We believe that more individuals should have the opportunity to benefit from this safe, equitable, and sustainable transportation option.

Sincerely,



Theo Braddy

Executive Director

National Council on Independent Living



**Tim Elder, President**

National Federation of the Blind of California  
*president@nfbcal.org*

4226 Castanos Street  
Fremont, CA 94536  
(916) 382-0372

February 8, 2024

VIA ELECTRONIC MAIL

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

**RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion**

Dear Director Curtis,

I am writing to you on behalf of the National Federation of the Blind of California to strongly urge the approval of Waymo's permit to operate a commercial autonomous vehicle service in Los Angeles. As the president of our affiliate, I have witnessed firsthand the challenges faced by blind and low vision residents in accessing reliable transportation options. Waymo's service has the potential to significantly enhance the lives of blind Californians in several critical ways.

1. **Expanded Transportation Opportunities:** For blind individuals, access to equitable, affordable transportation can be a major barrier to independence. Waymo's autonomous vehicles offer an equitable mode of transportation that does not rely on eyesight. By expanding their service to Los Angeles, Waymo will provide blind residents with greater mobility, allowing us to have greater access to employment, education, healthcare, and social activities.
2. **Increased Employment Opportunities:** Access to reliable transportation is essential for gaining and maintaining employment. With Waymo's service, blind Californians can commute to work without the need for assistance from others. This independence will open up job opportunities across various industries, empowering blind individuals to contribute actively to the workforce.
3. **Improved Overall Quality of Life:** Navigating public transportation or relying on others for rides can be stressful and time-consuming for blind individuals. Autonomous vehicles

offer a seamless and efficient travel experience. By reducing travel-related stress, blind residents can focus on other aspects of their lives, such as education, personal enrichment, and community engagement.

I have personally observed how some blind people have benefited from the daily use of this technology in San Francisco. Blind individuals who use service animals in San Francisco have reported a dramatic improvement in local transportation access. They no longer encounter the discriminatory ride denials from Uber or Lyft drivers who unlawfully refuse to transport a dog. We believe the public transportation challenges and geographic spread of the greater Los Angeles area, coupled with the significant population density of the region, make this a very welcome service for blind and otherwise disabled individuals. This new tool for transportation will help supplement existing options and give blind people more choices and flexibility than the existing infrastructure.

We appreciate your attention to this matter and hope that you will consider the immense positive impact that Waymo's service can have on the blind community in California. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Tim Elder". The script is fluid and cursive, with the first letters of "Tim" and "Elder" being capitalized and prominent.

Tim Elder, President  
National Federation of the Blind of California



696 North Santa Cruz Ave., Los Gatos, CA 95030  
(408) 458-9863 e-mail: [info@norcalsci.org](mailto:info@norcalsci.org)  
[www.norcalsci.org](http://www.norcalsci.org)  
A 501(c)(3) non-profit foundation - EIN 82-2423561

January 29, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

Back in 2021, the NorCal Spinal Cord Injury Foundation (NorCal SCI), which I represent, began an exciting partnership with Waymo to ensure that the company's planned ride hailing service in San Francisco, Waymo One, would be designed with the needs of people with disabilities in mind. They wanted to hear directly from our beneficiaries about the challenges that people affected by or living with spinal cord injuries or disorders experience with transportation. This interest alone was a revelation.

Few transportation companies reach out to our community with sincere empathy and openness to hear about our unique needs. Waymo's willingness and proactivity in inviting our community to help shape the future of autonomous driving is the reason I am writing to you today, to ask you to keep this in mind as you make a determination on Waymo's application to expand its AV passenger carrier service in the SF-Peninsula and Los Angeles, and its future in the state.

If you are not familiar with NorCal SCI, we enable people living with a Spinal Cord Injury/Disorder in Northern California to experience life not defined by a disability, helping these citizens to not only live more productively but to thrive. Through our many programs and grants, we help hundreds of people every year access free or low cost equipment and provide support for people who are newly injured. We also help those on the road to recovery and host a wide range of support groups and events.

On behalf of the extensive community of people living with or affected by spinal cord injuries, I respectfully ask that the Commission approve Waymo's request so that our community has a



greater opportunity for safe, equitable and well designed transportation options for populations such as ours, that are so often neglected by new transportation advancements.

If the CPUC approves the commercial use of the Waymo One service, the expansion would help fuel the continued innovation of Waymo's technology and the vehicles it uses to deliver its autonomous driving services. On behalf of all those we serve, we ask the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service commercially in the SF-Peninsula and Los Angeles. NorCal SCI believes that all people should have access to safe, equitable, and sustainable transportation. Expanding the Waymo One service will do just that.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Bayatmakou', with a stylized flourish at the end.

Arash Bayatmakou

Executive Director - NorCal SCI

**Board of Directors****Chair**

Temitayo Oyegbile-Chidi, MD, PhD  
*UC Davis  
Georgetown University Hospital*

**Vice Chair**

Thomas DiSalvi, CDS  
*Schneider National, Inc.*

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*Stanford University  
School of Medicine*

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John Lopos

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment  
Service Area Expansion

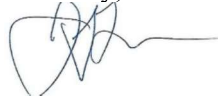
Dear Director Curtis,

National Sleep Foundation is an independent, non-profit organization that educates the public about the importance of sleep to health. As an extension of our mission to promote sleep health and safety, we are longstanding advocates for the prevention of drowsy driving. One of the four “Ds” of impaired driving among drunk, drugged, and distracted driving, drowsy driving is underestimated to account for 1 in 5 fatal motor vehicle crashes in the US. Importantly, our own recent research indicates the majority of US drivers have driven while they were so tired they could not keep their eyes open; and where drivers say they understand the high risk and dire consequences of drowsy driving, they do not consider it to be as dangerous as other forms of impaired driving. So, people at alarming rates continue to drive while drowsy, and this behavior begins among young people within just their first two years as new drivers. NSF’s position is the public needs options, and technology and innovation can help promote sleep health and safety while the public learns more and does more to change these behaviors.

We understand the CPUC will soon be considering an application from Waymo to extend its autonomous vehicle ride-hailing service across Los Angeles. Waymo has supported NSF’s public education and advocacy work in drowsy driving. We are encouraged they have this opportunity to further develop a mobility platform by deploying their technology and increasing access to their rideshare solutions. Autonomous ride-hailing services can promise an option for the public, in alignment with our focus on sleep health and safety.

Please accept this letter of support for Waymo’s application. We heard the Department of Motor Vehicles has authorized Waymo to commercially deploy its vehicles in an expanded geography, and we hope the California Public Utilities Commission will take a similar step.

Sincerely,



John G. Lopos  
CEO  
National Sleep Foundation



**Palo Alto Chamber of Commerce  
355 Alma Street  
Palo Alto Ca. 94301**

February 8 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

The Palo Alto Chamber of Commerce's mission is to be a catalyst for business growth and a champion for a stronger community in Palo Alto. As such, I am writing in support of Waymo's January 19, 2024 request for Commission approval of Waymo's updated Passenger Safety Plan, together with an expanded service area for farmed autonomous vehicle transportation that includes Palo Alto.

Our focus at the Chamber is to promote an enviable quality of life for Palo Alto residents and its local workforce. The CPUC approving Waymo's application for expansion would contribute greatly to both communities.

We are delighted that Waymo is an active member in the Palo Alto Chamber of Commerce.

Our Chamber has nearly 400 businesses, including Education, Healthcare systems and Hospitals, global businesses and individual professionals and small businesses, plus over 20 nonprofits, located in the Palo Alto and mid-Silicon Valley area, all together representing our members over 75,000 local employees and active volunteers.

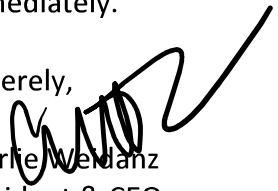
The Chamber is committed to creating a positive environment for doing business in Palo Alto. In addition, we promote the Civic, Economic, Commercial and Social Welfare of our community at large.

We regularly communicate with City leadership and elected officials to advocate in the best interest of our businesses at City, County and State levels, and this letter of support does just that.

Given the variety of transportation challenges our cities face, we believe the Waymo service will complement existing public transportation options in our region.

Palo Alto has been the birthplace of so many innovative steps forward for California. Allowing Waymo's commercial expansion of its autonomous vehicle services to Palo Alto would not only allow our region and state to continue to be leaders, but allow for the expansion of an important, safe, and accessible transportation solution. We at the Palo Alto Chamber of Commerce encourage the CPUC to approve Waymo's expanded commercial service immediately.

Sincerely,



Charlie Wendanz  
President & CEO  
Palo Alto Chamber of Commerce



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of The Pico Union Project in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes Los Angeles. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles.

Pico Union Project is a diverse group of people who are dedicated to building an equitable community. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, Pico Union Project believes this could help to extend accessibility and economic benefits to our membership. This access must include free rides and greatly reduced fares for individuals facing economic hardship.

Our city faces many critical challenges that can only be addressed by breaking down the cultural and economic barriers that have plagued at-risk populations for generations. The Pico Union Project hosts various events and programs that serve the neighborhood.

Waymo offers solutions to current transportation priorities facing California, including expanding transportation options for underserved populations, seniors, and physically disabled populations. This services must continue and become of even greater ease and value to underserved populations as the autonomous car market rolls out.

The Pico Union Project urges the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Pico Union Project believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and free for the underserved transportation option.

Sincerely,

Ross Chait, Office Manager, Pico Union Project



**RESPONSIBILITY.ORG**

February 6, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

The Foundation for Advancing Alcohol Responsibility (Responsibility.org) supports Waymo's application to expand its autonomous vehicle ride-hailing service to Los Angeles and an expanded area of the SF-Peninsula in California.

For over 30 years Responsibility.org has been funded by the nation's leading distilled spirits producers to focus on three core mission areas: to eliminate drunk driving and all forms of impaired driving; eliminate underage drinking; and empower adults to make responsible alcohol choices. We believe that impaired driving, which is a leading cause of traffic crashes in the United States, is entirely preventable, and we are proud to partner with Waymo in efforts to stop drunk and impaired driving to ultimately save lives.

Every day, over 30 people are killed in car crashes involving a drunk driver. That comes down to one fatality every 39 minutes. Responsibility.org believes in a comprehensive approach to eliminate impaired driving, which includes actively encouraging individuals to plan for a safe ride home. Waymo's autonomous driving technology is part of that comprehensive approach to facilitate safer driving on our roads and mitigate safety threats such as drunk and impaired drivers to prevent lives lost. We urge the California Public Utilities Commission to grant Waymo the ability to commercially operate its fully autonomous Waymo One service in Los Angeles and the SF-Peninsula.

Sincerely,

Leslie Kimball  
Executive Director  
Responsibility.org



February 8, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing to express my support for Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes Los Angeles and the Bay Area.

As a professor at the University of San Francisco and expert in the transportation industry, I have dedicated my career to advancing sustainable and socially just future mobility. Leading the Autonomous Vehicles & the City Initiative at University of San Francisco, I have delved deep into the intersection of technology and urban transportation, recognizing autonomous vehicles (AVs) as a critical component of our transportation future.

AVs provide a vital solution to filling gaps and addressing asymmetrical routes in existing transit networks, particularly in areas underserved by traditional public transportation. By enhancing accessibility and connectivity. My research has shown that AVs are already contributing to a more inclusive and equitable transportation system during hours and locations when/where transit frequent. Moreover, this technology plays a crucial role in improving safety for all road users, especially vulnerable populations paramount to achieving Vision Zero goals. With their advanced sensing capabilities and adherence to strict safety protocols, AVs have the potential to significantly reduce collisions.

For example, having reviewed their comprehensive Passenger Safety Plan, I have noticed that includes innovative safety features such as dooring-prevention mechanisms and external audio communication which can help improve interactions with non-motorized roadway users. These capabilities can help our cities address critical transportation priorities in California by reducing traffic injuries and fatalities.



CHANGE THE WORLD FROM HERE

To drill down on the topic safety, I have had the privilege of closely observe with Waymo's support-of and engagement-with first responders. Through my work, I have become aware of the exceptional training provided to thousands of firefighters and police that have been led by former emergency responders who possess intimate knowledge of the intricacies involved with vehicles interactions during emergency situations. This experience has solidified my impression that Waymo's processes in such situations are highly detailed and robust.

In sum, Waymo's demonstrated commitment to safety, coupled with their innovative technology, will contribute to realizing a safer, more accessible transportation ecosystem for residents of Los Angeles and the San Francisco Bay Area. I respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request, enabling more individuals to benefit from the transformative potential of autonomous vehicles in our communities.

Sincerely,

A handwritten signature in black ink, appearing to read "WRiggs", written in a cursive style.

William (Billy) Riggs, PhD, AICP, LEED AP  
Professor and Director  
Autonomous Vehicles & the City Initiative  
University of San Francisco  
wriggs@usfca.edu



## Streets Are For Everyone

1110 Virgil Ave, Suite 353  
Los Angeles, CA 90029  
Phone: (844) 88-4-SAFE

7 February 2023

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I'm writing on behalf of [Streets Are For Everyone](https://www.streetsareforeveryone.org) (known as SAFE) to express our support for Waymo's January 2024 application to expand autonomous vehicle services to include Los Angeles. We kindly ask the Commission to approve Waymo's request to allow more riders to begin using Waymo's vehicle fleet to travel safely in Los Angeles, as the DMV has done with its recent authorization of commercial service by Waymo One.

SAFE advocates for safer, more equitable roads in Southern California. Founded in January 2015, our organization aims to improve the quality of life for pedestrians, bicyclists, and drivers by reducing traffic fatalities to zero. We work to address this issue in several ways, including direct education, generating awareness, forging partnerships, conducting community outreach, supporting those impacted, and informing policy and legislation.

However, LA has a long way to go to reach zero traffic fatalities. In fact, in 2023, LA surpassed 336 traffic fatalities – a tragic number that represents a 20-year high. Per a 2023 study by Waymo comparing the crash data for human drivers to Waymo rider-only vehicles that have logged a cumulative total of 7.1 million miles, Waymo vehicles are 6.8 times less likely to be involved in a traffic collision than a human driver.

We have been engaged with Waymo in work to ensure that Waymo vehicles are safe around the most vulnerable road users – pedestrians, cyclists, e-scooters, and kids. We have been impressed with Waymo's dedication to safety, transparency, and proactive engagement with concerned groups and community members as part of this work.

Besides being safer than most human drivers, SAFE sees Waymo vehicles as a way to encourage people to go "car-free" by using public transportation and Waymo vehicles as a first-mile/last-mile solution to travel to locations that aren't near a bus or metro location. This could be part of the solution to reduce congestion and pollution in our community.





## Streets Are For Everyone

1110 Virgil Ave, Suite 353  
Los Angeles, CA 90029  
Phone: (844) 88-4-SAFE

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We were excited to see the Department of Motor Vehicles approve Waymo for operations in Los Angeles.

We urge the Commission to allow Waymo to operate its autonomous Waymo One service commercially in Los Angeles. Their technology has already become a way of life for many across California and other cities to travel safely without using a personal vehicle. With your approval, Waymo can provide that same service for even more people in Los Angeles.

Sincerely,

A handwritten signature in black ink that reads "Damian Kevitt". The signature is fluid and cursive, with the first name "Damian" and last name "Kevitt" clearly distinguishable.

Damian Kevitt  
Executive Director and Founder  
Streets Are For Everyone





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January 25, 2024

Terra Curtis, *Interim Director*  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

### RE: SAMCEDA Support for Waymo Advice Letter 0002

Dear Director Curtis,

For seven decades, the San Mateo County Economic Development Association (SAMCEDA) has been a leading voice for the economic engine that is San Mateo County. SAMCEDA believes in the power of a strong economy driven by an appreciation of what that engine provides to our ecosystem on the Peninsula.

By working with employers of all sizes and industries, engaging with our public sector and our elected leadership, recognizing that we have 21 individual jurisdictions (20 cities and one county) and collaborating and communicating with the Chambers of Commerce, non-profit organizations and our educational institutions, SAMCEDA tackles the most difficult challenges through goal-oriented solutions.

On behalf of SAMCEDA, we encourage the *Commission's Consumer Protection and Enforcement Division* to approve Waymo's request to expand its services to include the San Mateo County region and neighboring communities. The California Public Utilities Commission's approval of the commercial expansion of Waymo's autonomous vehicles in San Mateo County would drive economic growth and expand transportation options in our communities.

SAMCEDA believes San Mateo County residents should have the opportunity to benefit from expanded access to Waymo's safe transportation option - as demonstrated by Waymo's *Passenger Safety Plan* - and encourages the Commission to allow this expanded service.

Thank you for your consideration.

Sincerely,

Rosanne Foust  
*President & CEO, SAMCEDA*



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Terra Curtis, Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of Santa Monica Chamber of Commerce in support of the Waymo request to provide autonomous vehicle passenger carrier service in the CPUC's Driverless Deployment program in the Los Angeles area, as described in their January 2024 Passenger Safety Plan. We respectfully urge the Commission's Consumer Protection and Enforcement Division to approve Waymo's advice letter at the earliest opportunity, as we eagerly await Waymo bringing its cutting edge Waymo One AV service to the Los Angeles region.

The Chamber works to build the environment that helps members prosper and succeed through a proactive working partnership with all levels of government and community organizations to achieve a healthy local economy and a vibrant quality of life.

If Waymo's advice letter is approved, The Chamber believes the commercial use of Waymo's autonomous vehicles would help to extend economic benefits to the region. Waymo has been involved with our Chamber of Commerce for a year now, often joining our committee meetings and events and overall being a great member and part of our community.

We are rapidly approaching our 100th year of operation and our mission is just as important as ever. Our membership is just shy of 700 businesses, both small and large, and we are heavily involved in the community, local college, and government to ensure our beautiful city remains beautiful and continues to grow as a economic and socially responsible juggernaut.

Approving Waymo's Passenger Safety Plan so that Waymo may proceed to charge fares for AV passenger carrier service in Santa Monica and the greater Los Angeles area will undoubtedly bring economic benefits not only to the local economy but to California as a whole, while also offering more equitable solutions to transportation priorities facing the state. Santa Monica is known for attracting innovators and entrepreneurs to Silicon Beach, we are excited that our community can help shape the early chapters of Waymo's cutting edge tech.

We hope CPED will agree that Waymo's Passenger Safety Plan update is robust and that Waymo should be allowed to offer commercial AV passenger service throughout the cities of Los Angeles, Santa Monica, Culver City, West Hollywood, and Beverly Hills, and to collect fares for these rides.

The Chamber urges the California Public Utilities Commission to approve Waymo's pending advice letter. SMC sees this as the first important step to bringing autonomous vehicles to more communities in support of a safer, more accessible, and more equitable California.

Judy Kruger  
President/CEO

Younes Atallah  
2023-24 Board Chair

**Board Continued**

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Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

As parents and community members advocating for safer streets for our community's children, Santa Monica Families for Safe Streets, enthusiastically requests that the Commission approve Waymo's January 2024 application to expand its services to include Santa Monica.

Our experiences biking and walking with our children around Waymo vehicles have set new expectations for the respect and patience all drivers should have for children and others using the road as pedestrians or on bicycles. Having more of these vehicles on the road in our city, demonstrating safe and responsible driving, will help enhance safety by demonstrating safe driving behavior and giving pedestrians and cyclists with peace of mind.

Santa Monica Families for Safe Streets is a group of motivated families and neighbors committed to making our community and schools as walkable and bikeable as possible through investments in infrastructure such as protected bike lanes, sidewalk extensions, and traffic calming. We are passionate about improving the quality of life for families in Santa Monica, especially for those who are walking or biking, whether it is by choice or due to financial restraints.

With more than 50 million injuries worldwide due to vehicle crashes each year, our members are bonded by their vow to protect their children and family members from the consequences of unsafe driving behavior and poor road conditions. If the Commission approves the commercial use of Waymo's autonomous vehicles in Santa Monica, our organization strongly believes this decision would support our efforts and ongoing fight to improve roadway safety.

Waymo has demonstrated its commitment to safety in the development of its autonomous vehicles, safety research, and focus on passengers' and fellow roadway users' experience. Waymo's autonomous vehicles services support current transportation priorities facing California, including reducing traffic injuries and fatalities, which is why we believe Waymo should be a part of the solution.

Santa Monica Families for Safe Streets urges the California Public Utilities Commission to allow Waymo to offer its Waymo One service commercially in Santa Monica. Autonomous vehicles are already being used by thousands of Californians, and we are hopeful that with expanded access to this safe, equitable, and sustainable option, infrastructure across the city and state will see drastic safety improvements.



Sincerely,

Leonora Camner, Eli Gill, Juan Matute, Sirinya Matute, Boris Suchkov, Caro Vilain  
Co-Founders, Santa Monica Families for Safe Streets



**Self-Help for  
the Elderly**  
安老自助處

[www.selfhelpelderly.org](http://www.selfhelpelderly.org)

731 Sansome Street, Suite 100 | San Francisco, CA 94111-1725  
t: (415) 677-7600 | f: (415) 296-0313 | e: [info@selfhelpelderly.org](mailto:info@selfhelpelderly.org)  
*Providing strength, hope and empowerment to seniors since 1966*

January 26, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

On behalf of Self-Help for the Elderly, I want to express our support for Waymo's January 2024 application to expand its autonomous vehicle service throughout additional parts of the SF-Peninsula and Los Angeles.

Self-Help for the Elderly has assisted and supported seniors and their families in San Francisco and the surrounding area since 1966. Our mission is to contribute to longer and healthier lives for senior citizens and ensure their well-being, independence, and dignity. We have locations and services throughout San Francisco, Oakland, San Mateo, Millbrae, and South Bay.

Seniors often need assistance traveling to medical appointments, stores, and other places. Offering viable and equitable transportation and accompaniment services is foundational to the comprehensive and culturally aligned services we provide consistently to the community.

Autonomous vehicles, such as those offered by Waymo, support our mission to help seniors get to their destinations safely. Waymo's commitment to safe mobility equals our own and is reflected in the company's ongoing research and dedication to providing a secure and comfortable ride. Additionally, Waymo's language capabilities help Chinese-speaking members of our community travel more easily.

Rest assured, we would not support Waymo as a transportation option if we did not feel confident about the company's track record. Self-Help for the Elderly clients and employees who have ridden in Waymo's vehicles have shared firsthand how they appreciate the convenience, safety and independence the vehicles provide.

Self-Help for the Elderly encourages the California Public Utilities Commission to approve Waymo's application to extend its autonomous vehicle passenger services throughout the SF-Peninsula and Los Angeles.

Sincerely,

Anni Chung  
President & CEO  
Self-Help for the Elderly

**San Francisco**  
415.677.7500  
601 Jackson Street  
San Francisco, CA 94133

**San Mateo**  
650.342.0822  
50 East Fifth Avenue  
San Mateo, CA 94401

**South Bay**  
408.733.1883  
550 East Remington Drive  
Sunnyvale, CA 94087

**Alameda & Contra Costa**  
510.336.0144  
2400 MacArthur Boulevard  
Oakland, CA 94602

# :LIGHTHOUSE:

FOR THE BLIND AND VISUALLY IMPAIRED

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of the San Francisco LightHouse for the Blind and Visually Impaired. I want to offer my unequivocal support for Waymo's January 2024 request to expand its autonomous vehicle service throughout the SF-Peninsula and Los Angeles. We ask the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request so that more riders with disabilities can start to use Waymo's autonomous vehicles for increased safety, freedom and independence.

LightHouse is committed to a world where blind and low vision people flourish. We take pride in our ability to navigate our lives as blind and low vision people, and are committed to advancing equity and interdependence. If CPED approves the commercial use of Waymo's autonomous vehicles throughout the Bay Area and Los Angeles, LightHouse believes this service will exponentially increase accessibility and mobility options for blind and visually impaired community members in that region.

Founded in 1902, LightHouse promotes independence, equality and self-reliance. We offer blindness skills training and relevant services such as access to employment, education, technology, information, recreation, transportation and the environment. We also pursue the development of new technology, encourage innovation, and amplify the voices of blind individuals around the world.

LightHouse provides the highest quality services to our community members, and we continually strive to learn, improve and innovate. Waymo's autonomous vehicle technology service offers an incredibly valuable means of transportation for blind and visually impaired residents, and we can't emphasize enough how critical the availability of this means of transportation is.

LightHouse urges CPED to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles

are already being used daily by thousands of Californians, and LightHouse strongly feels that more people should have the opportunity to benefit from expanded access to this viable transportation option.

Sincerely,

Sharon L. Giovinazzo

CEO

LightHouse for the Blind and Visually Impaired – San Francisco

1155 Market Street

San Francisco CA 94103

(415)-260-0757

[sharong@lighthouse-sf.org](mailto:sharong@lighthouse-sf.org)



# SHE IS HOPE LA

SINGLE MOMS, HOUSING & EMPOWERMENT INSPIRING SELF-CONFIDENCE  
HOPE, OPPORTUNITY, PERSEVERANCE & EDUCATION LOS ANGELES

1/25/24

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am reaching out to you as a representative of SHE IS HOPE LA, a beacon of resilience, hope, and empowerment for single mothers in Los Angeles. We wholeheartedly support Waymo's January 2024 application to widen its autonomous vehicle passenger carrier service to include Santa Monica and all of Los Angeles.

We hope the Commission will approve Waymo's application, which would allow our community members in LA to benefit from Waymo's advanced transport solution.

SHE IS HOPE LA was founded on the principle of providing support, guidance, and resources to single mothers working their way toward self-sufficiency. We believe autonomous vehicles like Waymo's present an opportunity for independence and flexibility.

According to the "Inrix 2019 Global Traffic Scorecard," in Los Angeles, the average commute time is approximately 32 minutes – notably higher than the national average of 26 minutes. For single mothers like those in our community, this translates to over an hour each day spent on the road, time they could utilize as Waymo passengers spending time with their children, planning their day, making calls, and taking care of life's business.

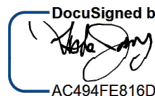
Incorporating Waymo's autonomous vehicle services can significantly alleviate this burden, empowering these resilient women with more control over their time and their lives.

The fact that Waymo's ride-hailing service operates 24/7 is a significant factor in enhancing the sense of safety and security for single mothers in our community. Our members, often single mothers, may work several jobs and attend evening classes, all without a vehicle. Commuting can be a significant challenge and present safety concerns. The convenience and safety Waymo offers could be transformative. With Waymo, that member could independently and safely travel to her classes while doing homework, pick up her children from childcare and visit with them in the vehicle, perhaps even squeezing in a few relaxing moments before they get home.

Traditional public transportation or other ride-sharing services often pose safety concerns for women that use our services. Waymo offers a reliable, autonomous solution, eliminating the worry of being alone in a vehicle with a stranger. This advantage, coupled with their commitment to safety, offers a sense of comfort and assurance that is invaluable for women navigating their journeys alone, at any hour.

SHE IS HOPE LA acknowledges Waymo's dedication to safety, equity, and sustainability - values that align with our pursuit of a better future for single mothers in our community. We urge the California Public Utilities Commission to follow the lead of the Department of Motor Vehicles to approve Waymo's expansion proposal, thereby granting more Californians the opportunity to experience this safe, equitable, and sustainable mode of transportation.

Thank you for your time and consideration.

DocuSigned by:  
  
AC494FE816D84D5...

SHE IS HOPE LA  
Executive Board

Tisha Janigian  
President

Timber McCarthy  
Vice President

Sonja Kelly  
Marketing

Gwendolyn Osborne  
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Tiffany Phillips  
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Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis:

Safe Kids Worldwide is writing to express our strong support for Waymo's application submitted in January 2024, advocating for the expansion of their autonomous vehicle passenger service to LA. The Department of Motor Vehicles recently authorized Waymo to commercially deploy its autonomous vehicles in an expanded geography, and we hope the California Public Utilities Commission (CPUC) will approve Waymo's application to expand its services in LA.

We have had the privilege of collaborating with Waymo on several occasions. It is apparent to us that their commitment to public safety echoes our own, evidenced by their record of driving millions of miles on public roads without any fatalities. This partnership has been instrumental in fostering increased safety measures for children on the road, particularly those commuting to school on foot or by bicycle. The autonomous technology employed by Waymo has promising implications for the safety of these young commuters.

The overall motor vehicle crash rate has surged during the pandemic due to speeding and distracted driving. This crisis presents a grave risk to our children, whether as drivers, passengers, pedestrians, or cyclists. We believe that autonomous driving technology, such as that developed by Waymo, offers dramatic promise to reduce the childhood injury rate in preventable traffic crashes. Such systems are designed to obey important road safety laws such as speed limits and are not at risk of impairment from distraction, alcohol, or drug use. We are also encouraged by Waymo's use and further development of systems to detect pedestrians and cyclists in challenging visibility conditions, an especially important factor given the injury risks faced by these vulnerable road users.

Safe Kids Worldwide is a non-profit organization dedicated to preventing childhood injuries, a leading cause of death to children in the United States. For over three decades we have been relentlessly working towards this cause with a network of nearly 400 Safe Kids coalitions in the United States and partners in over 30 countries. In addition to our ongoing advocacy work, we announced the formation of the Safe Kids in Automated Vehicles Alliance (SKAVA). This alliance aims to ensure that the development of new vehicle designs, industry standards, laws, and educational messaging around autonomous driving technology actively incorporate child safety considerations.

Safe Kids Worldwide urges the CPUC to grant Waymo permission to extend its fully autonomous Waymo One service to more communities throughout California. These vehicles, already in use by thousands of Californians, represent a safe, equitable, and sustainable transportation future that we believe should be available to all. Please join with the Department of Motor Vehicles to authorize the Waymo One commercial service to operate in LA.

Sincerely,

A handwritten signature in blue ink that reads "Torine Creppy".

Torine Creppy  
President  
Safe Kids Worldwide





Southern California  
Resource Services for  
Independent Living

**Corporate Office**  
133 N. Altadena Dr. Ste 425  
Pasadena, CA 91107  
Telephone: (626) 587-5010  
Fax: (626) 382-2501  
VP: (626) 407-3562  
[www.scrs-ilc.org](http://www.scrs-ilc.org)



California  
Resource Services for  
Independent Living

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Brian E. Ewing  
*Attorney at Law*

Jennifer R. Komsky  
*Attorney at Law*

Rebecca Gombos  
*Attorney at Law*

**LETTER OF SUPPORT:**

*Via E-Mail Only*

**TO:** Tierra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**DATE: January 24, 2024**

**SUPPORT FOR WAYMO ADVICE LETTER 0002:**

Dear CPUC,

I am writing on behalf of *Southern California Rehabilitation Services, Inc. (DBA: Southern California Resource Services for Independent Living)* to express our strong support for Waymo in anticipation of the Consumer Protection and Enforcement Division considering the driverless-deployment permit submitted.

Southern California Resource Services for Independent Living (SCRS-IL) is a 501(c)3 non-profit Independent Living Center that empowers people with disabilities to achieve their personalized goals through community education and individualized services that provide the knowledge, skills and confidence to maximize their quality of life. For over 45 years, SCRS-IL has valued diversity and an ability to fully serve the community through direct services, community education and effective outreach. Through excellent Independent Living services provided by well-trained staff, SCRS-IL supports persons with disabilities as they transform their lives through their own choices of how they live, work and participate in the community. The center's community is accessible and welcoming to persons with all disabilities. SCRS-IL provided direct independent living skills



and vocational services to more than 15,500 people with disabilities over the past year and over 750,000 people since our founding.

SCRS-IL would like to express its strong support for the widespread adoption of driverless vehicles and the advancements in autonomous driving technology. As the CEO at SCRS-IL, I have closely followed the developments in this field and am convinced that embracing autonomous vehicles is a pivotal step towards a safer, more efficient, and sustainable future for transportation that is inclusive of the disability community.

Driverless vehicles have the potential to revolutionize the way we move people with disabilities that have become so dependent on paratransit providers that are not meeting our needs and goals, addressing key challenges faced by traditional transportation methods. I would like to highlight several reasons for endorsing the integration of autonomous vehicles into our transportation ecosystem:

1. **Safety Improvement:** Autonomous vehicles are equipped with advanced sensor technologies, artificial intelligence, and machine learning algorithms that significantly reduce the risk of accidents caused by human error. The potential to save lives and prevent injuries is a compelling reason to support the adoption of driverless vehicles.
2. **Traffic Efficiency:** Driverless vehicles have the capability to communicate with each other, optimize routes in real-time, and maintain consistent speeds. This can lead to reduced travel times for our disability community that has been consistently let down by our current transit system.
3. **Accessibility and Inclusivity:** Autonomous vehicles have the potential to provide transportation solutions for individuals who may face mobility challenges, including the elderly and people with disabilities. This can contribute to a more inclusive and accessible transportation system.
4. **Economic Benefits:** The development and deployment of autonomous vehicle technology have the potential to stimulate economic growth, create jobs for our communities, and drive innovation in various sectors related to transportation and technology for people with disabilities.

It is our communities hope that policymakers, industry leaders, and the public will work collaboratively to embrace this transformative technology, recognizing the numerous benefits it offers for safety, efficiency, accessibility, and sustainability.

Thank you for considering my perspective on this matter. I look forward to witnessing the positive impacts that the widespread adoption of driverless vehicles will have on our society.

Please contact me at [rcontreras@scrs-ilc.org](mailto:rcontreras@scrs-ilc.org) if you have any questions

Sincerely,

A handwritten signature in black ink, appearing to read 'R Contreras', with a stylized, cursive script.

Rudy Contreras, M.A. | CEO  
[www.scrs-ilc.org](http://www.scrs-ilc.org)



**BEST  
BUY**  
**Teen Tech  
Center**

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

On behalf of South LA Best Buy Teen Tech Center, I would like to express our organization's support for Waymo's January 2024 application to expand its autonomous vehicle services to include Los Angeles. We kindly ask the Commission to approve Waymo's request so that more Angelenos can safely navigate the city using Waymo's fleet of autonomous vehicles.

South LA Best Buy Teen Tech Center is a safe and encouraging space where youths aged 10 to 24 from disinvested communities throughout Los Angeles can gain exposure to various career fields such as web development, entrepreneurship, engineering, intellectual property, and generational wealth. Our center is committed to providing a supportive environment for teens of all backgrounds to develop their skills, redefine problems as opportunities, and build a network with like-minded peers. In addition to being a creative hub, the organization also serves as a resource center for the surrounding LA community, offering internships, scholarships, and professional development opportunities.

Best Buy is committed to bringing 10-12 Teen Tech Centers to Los Angeles County, and we firmly believe that the California Public Utilities Commission's approval of Waymo's commercial use in Los Angeles would greatly support our existing and new centers as youths with limited access to transportation would have an opportunity to safely travel to our centers, pursue in-person career opportunities, and foster their independence in new ways.

The team from Waymo brought one of their Waymo One vehicles to our center this fall. Let me share a passionate description of the effect of this visit on our youth by one of our young professionals:

*"Waymo's spectacle of potential at the Center sings promises into the ears of the community. It spoke of seamless integration and the blossoming of jobs, like the WRA Specialists, who maintain these vehicles as vigilant sentinels, troubleshooting and guarding reliability as if it were sacred.*

*Waymo's demonstration was an exposition of self-driving cars and a narrative of opportunities for enhanced safety, employment, and bridging community-technology divides. It showcased a future where technology serves the people, convenience doesn't sidestep safety, and progress rides alongside heritage and human values. As South LA stood witness to this liaison between today and tomorrow, a single truth echoed in the smiles and awe-struck gazes:*

*Here, at this crossroad of civilization and silicon, we embark on a journey into a horizon where our technological dreams steer the chariots of our communal destiny."*

This is precisely the kind of innovation we want to expose your youth to at the Center, and we admire Waymo's dedication to working with organizations like ours to change the trajectory of their children's lives through hope and inspiration.

It is for this reason that I write to you today asking the California Public Utilities Commission to allow Waymo to bring its autonomous Waymo One commercial service to the city and its citizens.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Thai Buckman', with a long horizontal flourish extending to the right.

Thai Buckman  
Program Manager  
South LA Best Buy Teen Tech Center





Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

On behalf of South Park Neighborhood Association (a 501(c)(4) a California Nonprofit Mutual Benefits Corporation, representing many of the 11,000 residents residing in South Park), we would like to express our support for Waymo's January 2024 application to expand its Waymo One autonomous vehicle service to Los Angeles. We see the benefit of further accessibility in our city and hope to make autonomous vehicles a reality for our residents.

South Park Neighborhood Association in downtown Los Angeles is a group of residents and stakeholders focused on fostering community building, support for local businesses, and political advocacy for the betterment of our neighborhood. We are a group of volunteers living in, working in, and investing in our community. The Association creates a forum for neighbors to interact, share thoughts and concerns, and act for a safer environment and overall better community. We are an active local group of advocates.

We featured Waymo at last year's Earth Day event where residents learned about the service and viewed the Waymo car. A few months ago, two of our SPNA newsletter reporters took advantage of the trial offer to ride in Waymo and shared the review (a glowing review) of their experience in our monthly newsletter.

We believe that Waymo can be a complementary force to our efforts, as their mission aligns with ours. Waymo hopes to create safer roadways for vehicles and pedestrians (downtown has a lot of pedestrians) and offer an easier, safer, and more equitable method of transportation across the cities in which it operates. We believe that there is a need for this type of solution in our community and beyond.

Transportation remains a challenge for many living in Los Angeles, and it is our belief that a service like Waymo One can help fill that gap. Waymo's autonomous vehicles provide a safe, accommodating ride for a variety of accessibility needs. We support Waymo's commercial operations in Los Angeles and hope that the service will provide more individuals with a method of transportation that they can rely on even when using other transit methods but needing transportation the first or last mile of the trip.

South Park Neighborhood Association urges the Commission to grant Waymo's application approval. Autonomous vehicles are quickly becoming a part of day-to-day life for many in California and other cities across the country, and we hope that the residents of Los Angeles are given the opportunity to benefit from this technology as well.

Sincerely,  
South Park Neighborhood Association  
Marty Goldberg, President **Marty Goldberg**  
Michael Robleto, Vice-President Michael Robleto  
Debra Shrout, Vice-President **Debra Shrout**  
[spandtla@gmail.com](mailto:spandtla@gmail.com)



## **STREET RACING KILLS**

***A Youth Traffic Safety Organization***

3545 Lomita Blvd.  
Suite D  
Torrance, CA 90505  
(310) 303-0164  
lili@streetracingkills.org

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area  
Expansion

Dear Director Curtis,

I am writing on behalf of Street Racing Kills, the organization that I founded after my 16-year-old daughter Valentina was killed by a young man who was street racing and crashed while giving her a ride home. We support Waymo's January 2024 application to expand its autonomous vehicle passenger carrier service to Los Angeles. We ask the Commission to consider all the dangers posed by human drivers and then approve Waymo's request so that more citizens can use Waymo's autonomous vehicles to safely get to where they are going in and around the city.

Street Racing Kills is a nonprofit devoted to the mission of raising awareness and mentoring youth about the dangers of street racing and other reckless driving behaviors that take the lives of far too many of our children every year. We have grown to a nationwide outreach (and beyond), education, and advocacy campaign, partnering with many groups that work toward similar missions, including law enforcement and the Auto Club of Southern California (AAA). As we have seen, far too many have lost their loved ones to reckless driving caused by street racing, impaired driving, aggressive driving, and other human-caused crashes, and we believe that greater adoption of autonomous vehicles can be part of the solution to reduce future deaths. The Waymo Driver follows all road rules, never speeds, and never drives drunk, drowsy, or distracted.

Waymo recently released new crash data based on the company's first 7.1 million miles of fully driverless operations in Arizona and California. Waymo vehicles have driven 5.3 million driverless miles in Phoenix, 1.8 million driverless miles in San Francisco, and a few thousand driverless miles in Los Angeles through the end of October 2023.

SRK urges the California Public Utilities Commission to allow Waymo to operate. Its e-service is on a commercial basis in Los Angeles. Autonomous vehicles are already being used for daily safe transportation by thousands of Californians, and Street Racing Kills believes that the autonomous vehicles that Waymo has already deployed in California have surely set us on a path to creating safer roadways for our children and citizens.

Sincerely,  
Lili Trujillo Puckett  
Executive Director / Street Racing Kills



**@StreetRacingKills**



**www.streetracingkills.org**



**@ValentinaSRK**



**STREET RACING KILLS**  
***A Youth Traffic Safety Organization***

3545 Lomita Blvd.  
Suite D  
Torrance, CA 90505  
(310) 303-0164  
lili@streetracingkills.org



**@StreetRacingKills**



**[www.streetracingkills.org](http://www.streetracingkills.org)**



**@ValentinaSRK**





**CITY COUNCIL 2024**

JAMES COLEMAN, MAYOR (DIST. 4)  
EDDIE FLORES, VICE MAYOR (DIST. 5)  
MARK NAGALES, COUNCILMEMBER (DIST. 2)  
MARK ADDIEGO, COUNCILMEMBER (DIST. 1)  
FLOR NICOLAS, COUNCILMEMBER (DIST. 3)

SHARON RANALS, CITY MANAGER

**OFFICE OF THE CITY MANAGER**

February 8, 2024

**VIA EMAIL ONLY**

Terra Curtis, Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214  
Email: [terra.curtis@cpuc.ca.gov](mailto:terra.curtis@cpuc.ca.gov)

**CC:**  
[AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov)

and

[waymo-regulatory-permits@google.com](mailto:waymo-regulatory-permits@google.com)

**Re: Submission of Protest related to Waymo LLC's Advice Letter 0002(Tier2)  
Seeking Expanded Operational Design Domain for Deployment**

Dear Ms. Curtis:

This protest is being submitted on behalf of the City of South San Francisco ("City") pursuant to Section 7.4.2(6) of California Public Utilities Commission ("CPUC") GO-96-B. The City contends that approval of Waymo LLC's ("Waymo") Advice Letter 0002 seeking expanded operational design domain ("ODD") for deployment in San Mateo County would be "unreasonable" pursuant to Section 7.4.2(6), as the Tier 2 Advice Letter process does not provide adequate and meaningful notice and public participation in light of the substantial expansion sought by Waymo. The City understands that Waymo is seeking approval of ODD for deployment of operations in the driverless configuration for all freeways, highways, city streets, rural roads, and other types of roadways, as well as parking lots. The City further understands that Waymo is seeking to operate on roadways with posted speed limits up to 65 miles per hour, in some inclement weather situations (rain and fog), all times of the day and night, and to transport members of the public who may pay a fare. If approved, Waymo could operate in the aforementioned configuration continuously along the San Francisco Bay Peninsula from San Francisco to Sunnyvale.


Section 5.1 of GO-96-B states that the advice letter process provides "a quick and simplified review of the types of utility requests that are expected neither to be controversial nor raise

Terra Curtis  
February 8, 2024  
Page 2

important policy questions.” Section 5.1 goes on to state that “The advice letter process does not provide for an evidentiary hearing; a matter that requires an evidentiary hearing may be considered only in a formal proceeding.” A Tier 2 Advice Letter provides for review and approval by CPUC staff.

As Waymo’s Advice Letter 0002 seeks substantial expansion of its service model in San Mateo County, the City requests that the CPUC engage in a more robust public noticing and outreach process than provided for under the Tier 2 Advice Letter approval process. As Waymo’s proposed service expansion could significantly impact the traveling public, the City believes that the CPUC should provide greater opportunity for the public to provide testimony and submit evidence on the potential implications of this expansion. The City expresses no position on the substance of Waymo’s desired service expansion as expressed in Advice Letter 0002, but instead, urges the CPUC to engage in more meaningful public participation and broader public noticing prior to taking the contemplated action.

Sincerely,

DocuSigned by:  
  
8A40B2F441FD4BA...

Sharon Ranals  
City Manager, South San Francisco

5594795.1



January 27, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

Silicon Valley Bike Coalition's mission is to build healthier and more just communities by making bicycling safe and accessible for everyone. Waymo's autonomous vehicle service supports this mission. As such, we strongly encourage the Commission's Consumer Protection and Enforcement Division to approve Waymo's advice letter request so they may begin service in the greater Bay Area.

Silicon Valley Bicycle Coalition has worked to improve transportation options for residents in Santa Clara and San Mateo Counties for 30 years. Our advocacy spans 35 cities and towns and includes 10 local teams – cities where residents are civically engaged and meet regularly on bike and active transportation issues. Our network includes over 34,000 individuals and over 2,300 active members.

With commute patterns changing since the pandemic, our two counties are experiencing an uptick in reckless driver behavior, associated crashes, and road fatalities. We see autonomous vehicles (AVs) as part of the ecosystem of transportation alternatives that can reduce private vehicle ownership and solo driving. Our goals are to ensure that emerging technologies like AVs and Transportation Network Companies operate safely and at high capacity. We also aim to ensure that these emerging technologies incorporate the experiences of people of color, low-income individuals, bicyclists, and pedestrians, and are deployed in a manner that advances social equity and safety.

I have been on Waymo rides on two separate occasions alongside delegations of transportation advocates at the Waymo campus in Mountain View a few years ago. Those experiences have convinced me of the safety of Waymo's AV technology – especially when compared to the distracted and reckless driving that most individuals behind the wheel espouse.

**Building healthier and more just communities by making  
bicycling safer and more accessible for all**

155 S 11<sup>th</sup> Street, San Jose, CA 95112 | [bikesiliconvalley.org](http://bikesiliconvalley.org) | 408-287-7259

Waymo continuously puts in the work to be a safe and considerate road user with everyone, especially cyclists. As cyclists, we feel more comfortable on the road because Waymo vehicles give us wider berths and ample space when possible and appropriate as they pass. Additionally, Waymo develops features that counter problems that directly plague our community — like “dooring” (when a vehicle door is opened into the path of a cyclist, resulting in collision) — by introducing audio and visual cues that alert riders when a cyclist, scooter, pedestrian, or car is approaching as they exit the vehicle. Likewise, they display visuals on the car’s exterior to signal that a person may enter or exit the vehicle.

Silicon Valley Bike Coalition believes that all road users, including cyclists, will greatly benefit from the expanded access to Waymo, and encourages the California Public Utilities Commission to allow Waymo to offer its fully autonomous service commercially to more areas within California.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clarrissa', with a long horizontal flourish extending to the right.

Clarrissa Cabansagan  
Executive Director  
Silicon Valley Bicycle Coalition  
408-287-7259



## SILICON VALLEY LEADERSHIP GROUP

January 31, 2024

**Ahmad Thomas, CEO**  
Silicon Valley Leadership Group

**Jed York, Chair**  
San Francisco 49ers

**Eric S. Yuan, Vice Chair**  
Zoom Video Communications

**James Gutierrez, Vice Chair**  
Luva

**Victoria Huff Eckert, Treasurer**  
Google

**Aart de Geus**  
Synopsis

**Vintage Foster**  
AMF Media Group

**Raquel Gonzalez**  
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**Paul A. King**  
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**Alan Lowe**  
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**Judy C. Miner**  
Foothill-De Anza Community  
College District

**Rao Mulpuri**  
View

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CrowdSmart

**Sharon Ryan**  
Bay Area News Group

**Siva Sivaram**  
Western Digital

**Tom Werner**  
SunPower

▼ 2460 North First St., Suite 260  
San Jose, California 95131

☎ (408) 501-7864

🌐 [svlg.org](http://svlg.org)

Terra Curtis, Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: SVLG Support for Waymo Advice Letter 0002 (Tier 2) - CPUC Passenger Safety Plan Update (Driverless Deployment Service Area Expansion)

Dear Director Curtis,

I am writing on behalf of the Silicon Valley Leadership Group (SVLG) to urge the California Public Utilities Commission (CPUC) to approve Waymo's Tier 2 Advice Letter (0002), submitted on January 19, 2024, without delay.

SVLG serves as the nation's most effective and dynamic business association representing the innovation economy and its ecosystem. Since 1977, SVLG has worked on behalf of more than 300 member companies spanning the public, private and nonprofit sectors to bolster and maintain the business competitiveness of the state. Under new leadership, we've expanded our efforts to include an ambitious vision for corporate citizenship, designed to catalyze positive change and create a more inclusive, equitable and sustainable future for California.

SVLG encourages the CPUC to continue to thoughtfully implement its regulatory framework for autonomous vehicle passenger carrier service, as set forth in Decisions 20-11-046 and 21-05-017. Specifically, Waymo's Advice Letter requests that the CPUC's Consumer Protection and Enforcement Division (CPED) approve Waymo's January 2024 Passenger Safety Plan, which reflects Waymo's expanded operational design domain (ODD) for deployment operations previously approved by the Department of Motor Vehicles (DMV). Waymo's Passenger Safety Plan describes Waymo's innovative and considered approach to safe operations - demonstrating Waymo's continued commitment to passenger safety through rider education, accessible service, and vehicle and in-app features that prioritize a safe and enjoyable rider experience.

We believe that the California Public Utilities Commission's approval of the wide-scale commercial use of Waymo's autonomous vehicles is key for not only meeting the state's environmental goals, but also for achieving economic development and business competitiveness goals. The state's economic future is uncertain, and right now, what's needed are innovative businesses like Waymo. Waymo's service can help revitalize these regions by creating excitement among residents and visitors, encouraging them to enjoy and explore the areas - bringing much needed energy, rooted in leading technology and innovation, into the local economy.



**SILICON VALLEY**  
LEADERSHIP GROUP

SVLG appreciates the opportunity to provide these comments in support of Waymo's Advice Letter 0002 and we urge CPED to approve Waymo's request, which will allow for safe and regulated deployment of autonomous vehicles on our streets.

Respectfully,

Peter Leroe-Muñoz  
General Counsel & SVP of Technology and Innovation  
Silicon Valley Leadership Group



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

Dear Public Utilities Commission,

I am writing as a representative of the TEC Leimert organization, advocating for the expansion of Waymo's autonomous vehicle service to encompass the heart of Los Angeles, including Leimert Park. We are writing to the Public Utilities Commission to support Waymo's January 2024 application to expand its service in Santa Monica and all of Los Angeles. We firmly believe this would create opportunities for our community members to take part in shaping the future of transportation and mobility technology.

TEC Leimert is a non-profit organization founded in 2014 that is deeply rooted in Leimert Park, serving as an epicenter for bridging the technology divide amongst our youth. We aim to empower marginalized communities through innovative technology, media, and art.

Over the years, we have successfully organized numerous workshops, panels, and networking events, enabling access to knowledge, resources, and opportunities within tech industries for thousands of youth. Our impact spans various sectors as our initiatives have led to substantial improvements in digital literacy, access to technology, and employment opportunities for our community.

It is no secret that the technology divide in Los Angeles is stark, especially among our youth of color. Limited access to advanced technology and resources impairs



their ability to compete in a rapidly evolving digital world. This disparity imposes a cap on their potential, restricting their growth and opportunities, and we are determined to combat this issue by advocating for more equitable access to technology.

Waymo's autonomous vehicle service could serve as a powerful catalyst for change in this regard. By introducing this innovative technology in our communities, we not only provide accessible transportation but also open a window to potential employment opportunities in the burgeoning field of autonomous driving technology. Learning, understanding, and being a part of this technology could unlock doors for our youth to vibrant careers in tech-forward industries. Direct interaction with Waymo's services could inspire them to explore and engage with STEM fields, thus fostering a generation of tech-savvy leaders.

We see every day how these youth have the potential to help drive our community forward. With Waymo, they could be part of helping create a safer road ahead for everyone in our community, as Waymo's technology is designed to obey road rules like speed limits, and be constantly vigilant of other road users including cyclists and pedestrians.

As TEC Leimert, we salute California's trailblazing reputation in championing innovative enterprises, especially within the technology sector. We stand in full support of Waymo's bid to expand its current commercial passenger carrier service in California by including Los Angeles. We firmly believe this move will catalyze economic development in Los Angeles while addressing the public's need for dependable and safe transportation services.

TEC Leimert firmly believes in the potential of Waymo's services to create a positive impact in our community. We urge the California Public Utilities Commission to allow Waymo to expand its autonomous Waymo One service in Los Angeles, thereby enabling our youth to experience, engage with, and benefit from this innovative technology firsthand.

Sincerely,

*Terry Hart*, Business Development Manager  
TEC Leimert



**TECHNET**  
THE VOICE OF THE  
INNOVATION ECONOMY

TechNet Southwest | Telephone 505.402.5738  
915 L Street, Suite 1270, Sacramento, CA 95814  
[www.technet.org](http://www.technet.org) | @TechNetSW

February 7, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**Re: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion**

Dear Director Curtis,

TechNet appreciates the opportunity to provide these comments in support of Waymo's January 19, 2024, application to expand its autonomous vehicle passenger carrier service to include Los Angeles County and the San Francisco Bay Area Peninsula. TechNet supports bringing autonomous vehicles to an expanded market to offer a safer, more sustainable transportation option for more Californians to get where they are going.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over 4.2 million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

The development of autonomous vehicles can enable tremendous societal benefits, including for disabled people, the elderly, and others who currently cannot drive themselves. It can significantly enhance the safety and efficiency of goods movement, helping better meet consumer demand while promoting innovation and growth across various sectors of the economy. Autonomous vehicles may likewise improve safety by reducing the severity and frequency of automobile accidents and mitigate other inefficiencies of current motor vehicle use, such as congestion.

Waymo's vehicles contribute to California's transportation goals by making roads safer. Waymo's latest safety plan outlines their strong commitment to passenger well-being. New features like external audio messaging for first responders enhance safety further. Expanding Waymo's service area will bring this safe and reliable transportation option to more communities, especially underserved populations, seniors, and individuals with disabilities. California has been at the forefront of supporting the safe deployment of AV technology, and approving Waymo's expansion will boost the economy and meet consumer demand for safe and reliable transportation.

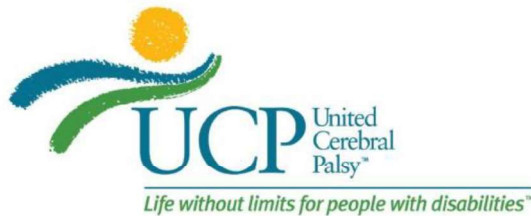
TechNet urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and TechNet believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

If you have any questions or concerns regarding our letter, please contact Jose Torres, Deputy Executive Director at [jtorres@technet.org](mailto:jtorres@technet.org) or 909-380-2783.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JT', with a stylized flourish extending from the end.

Jose Torres, MPA  
Deputy Executive Director for California and the Southwest  
TechNet



**Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214**

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

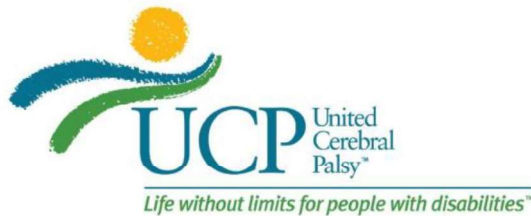
Dear Director Curtis;

I'm writing on behalf of United Cerebral Palsy to express our support for Waymo's submitted application to expand its autonomous vehicle ride-hailing service to Los Angeles.

For 75 years, United Cerebral Palsy has served people with cerebral palsy (CP) and a wide range of other neurodevelopmental disabilities, along with their families and communities across the U.S. and Canada. UCP provides services and programs for people including Down Syndrome, autism spectrum disorder, traumatic brain injury (TBI) and other intellectual and developmental disabilities. We provide services and support at a local and regional level, while working at a national level to initiate change and advocate for adults and children with disabilities.

Many of our affiliates offer housing, therapy, family support, employment assistance, early intervention programs, and much more. UCP affiliates rely on people being able to travel to receive the services they need. While most people with disabilities are able to drive, some are not, and some have days when physical challenges can be wholly debilitating. For the families and caregivers of people with serious disabilities, transportation to and from hospitals and service providers can be a major burden.

It's with this in mind that United Cerebral Palsy strongly supports bringing autonomous vehicles to market as a way to provide a safer, more sustainable transportation option to more Californians—and someday, we hope, to Americans nationwide.



Please note that United Cerebral Palsy is a member of the Waymo Accessibility Network, which provides us with an opportunity to share our perspective to inform and shape the development of this technology and its accessibility features. From wheelchairs and walkers to adaptive a multiple range of adaptive devices, our organization and the disability community passionately embrace the growing availability and sophistication of assistive technologies that enhance the lives of the wider community in as inclusive a manner as possible.

Fully autonomous vehicles are among the most promising pieces of technology that will ultimately benefit tens of millions of people with disabilities and their families by expanding their mobility, and thus accessibility, on an exponential scale.

UCP believes the Commission's approval of Waymo's application could help the communities we serve by expanding safe and reliable mobility opportunities for people with cerebral palsy and other conditions, while providing accessibility needs for those who live and work in a diverse array of underserved communities across the nation's demographic spectrum.

We strongly recommend the Commission approve Waymo's application to expand its autonomous vehicle ride-hailing service in Los Angeles so more people with special needs can benefit from the independence afforded as a result of the cutting-age technology offered by driverless vehicles.

Respectfully,



**Armando Contreras**  
President & CEO

United Cerebral Palsy  
8401 Old Courthouse Road  
Vienna, VA 22182  
(202) 776-0406  
acontreras@ucp.org

February 8, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**Re: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update**

Dear Director Curtis,

I am writing on behalf of Veloz in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for fared autonomous vehicle transportation that includes portions of Los Angeles County and the San Francisco Bay Area Peninsula. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around the abovementioned areas.

Veloz is a unique public-private nonprofit driving toward 100% zero-emission vehicles through strategic communications, unprecedented collaborations and purposeful convening. Our mission is that the future of transportation is electric for all and that is achieved through the work of our 40+ member organizations from throughout the transportation electrification ecosystem, including Waymo.

Veloz supports the efforts of expanded service areas for Waymo because they offer solutions to current transportation priorities facing California, including expanding transportation options for underserved populations, seniors, and physically disabled populations. Waymo's service provides a much-needed tool in our ever-growing toolkit to further the development of multimodal options for all. In addition, Waymo helps to make electric vehicles accessible to more Californians, including those who may not be able to afford an electric vehicle, which directly matches Veloz's vision of Electric For All.

Veloz urges the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and Veloz believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Please do not hesitate to contact me at the following email if you have any questions: [Josh.Boone@veloz.org](mailto:Josh.Boone@veloz.org).

Sincerely,



Josh D. Boone

Executive Director, Veloz



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

Re: Support for Waymo Advice Letter  
CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of Vista Center for the Blind and Visually Impaired in support of Waymo's January 2024 application to expand its autonomous vehicle service throughout parts of the SF-Peninsula and Los Angeles. We respectfully ask that the Commission approves Waymo's request, so that more riders can begin using Waymo's autonomous vehicles to travel in California.

Vista Center is committed to being a premier service provider for people who are blind or have low vision, offering a complete range of rehabilitative services to residents of the Bay Area and beyond. Our services and Interdependence Immersion Program enables the blind and low vision community to regain control of their lives, so that they can live the life that they desire.

With over 3,700 community members in the Bay Area, Vista Center places a high priority on increasing travel and mobility options for people who are blind or have low vision. Waymo's AV technology has proven to be a reliable source of transportation that our community members can use to independently travel in the Bay Area, and we welcome its expansion to increase accessibility in more areas. Waymo has also demonstrated a commitment to safety research, and a focus on the passenger experience, which our community members appreciate.

Access to viable and accessible transportation options is critical for maintaining independence for the blind and low vision community for education, employment and entertainment. We believe autonomous vehicles will meet this need and we are highly supportive of the work of Waymo in this arena.

Vista Center urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in the SF-Peninsula communities. Autonomous vehicles are already used daily by thousands of Californians and Vista Center believes that more people should have the opportunity to benefit from expanded access to this equitable and incredibly useful transportation option.

**Karae M. Lisle, CEO**

**Vista Center for the Blind and Visually Impaired**

[klisle@vistacenter.org](mailto:klisle@vistacenter.org)

650-776-7087





February 7, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214  
RE: Support for Waymo Advice Letter 0002

Dear Director Curtis,

Today, I would like to voice our support at BikeLA for Waymo's January 2024 Passenger Safety Plan update, which would create opportunities for expanded service areas of fared autonomous vehicle transportation in Los Angeles. Our organization supports Waymo's request so that more cyclists and micromobility users have increased peace of mind while riding on our roads.

Instances of road violence outnumber homicides in our city, and half of all fatalities in vehicle crashes are pedestrians, cyclists or other vulnerable road users. This request isn't just for people who will use Waymo as a transportation service, but to create safer roads for all.

Sadly, transportation plays a significant role in both creating and maintaining inequality in our region, and California's existing freeways and the infrastructure for the movement of goods place disproportionate air quality burdens on LA's low-income and communities of color. Our roadways fail to meet the mobility needs of those same communities, who are more likely to rely on walking, biking, and public transit as primary forms of transportation.

BikeLA is committed to making the entire LA community safer for all road users. We believe that cycling is not only a great form of recreation, but is also an important form of transportation that not only helps improve the physical and mental health of the community, but also brings Angelenos together. With 15 chapters across Los Angeles County, Bike LA is actively working to create healthier, more vibrant communities connected via bicycling.

If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, BikeLA believes this would help to extend accessibility, sustainability, and a healthy lifestyle to the greater Los Angeles community.

Waymo has demonstrated a commitment to safety in the development of its autonomous vehicles, safety research, and focus on the experience of all roadway users, aligning with Bike LA's mission to improve roadway safety. In addition, Waymo offers one important solution to current transportation priorities facing California, including expanding transportation options for underserved populations, seniors, and physically

disabled populations. Waymo's technology has the potential to create a safer roadway environment by reducing human error and observing rules of the road which many human drivers do not follow.

On behalf of BikeLA, I ask the California Public Utilities Commission to allow Waymo to operate on a commercial basis in our city of Los Angeles - just as the CPUC has already done in SF. Autonomous vehicles are already being used daily by thousands of Californians, and we believe the communities we serve would benefit from expanded access to this equitable, transportation option, which was designed and continues to be refined with the safety of bicyclists and other vulnerable roadway users in mind.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eli Akira Kaufman', followed by a long horizontal line.

Eli Akira Kaufman,  
Executive Director Bike LA



HEART OF LO  
2701 Wilshire E  
Suite 100  
Los Angeles, CA 90047  
T 213-389-1148  
F 213-389-1085  
[www.heartofla.org](http://www.heartofla.org)

February 8, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

On behalf of Heart of Los Angeles, I would like to express our support for Waymo's January 2024 application to operate its autonomous vehicle services in Los Angeles. We kindly request that the Commission approves Waymo's request, as we have directly benefitted from Waymo's commitment to community improvement and partnership.

Our mission is to foster a Los Angeles where every young person has the opportunity to realize their full potential. We do this by providing exceptional, free, integrated programs and personalized guidance in a trusted, nurturing environment. Heart of Los Angeles, or HOLA, serves over 3,100 youth in central and south central Los Angeles between the ages of 6-24. Our programs span across music, visual arts, sports, leadership, STEM, counseling, alumni support, scholarships, family resources and more.

We believe that our services play an important role in providing overall safer and more welcoming communities across Los Angeles. HOLA works to partner with other organizations to identify ways that our services can complement theirs, which is where we believe Waymo has a rightful place in our city.

Heart of Los Angeles operates in a neighborhood with one of the highest rates of density in the country, so traffic safety is of paramount importance. Further, as many of the families who we serve do not have the means to own personal vehicles, other forms of accessible transportation are critical to their ability to live healthy and productive lives. We have seen that Waymo shares these perspectives and values with us through their philanthropic and community engagement activities with our organization and around our neighborhood.

Heart of Los supports the approval of Waymo's request to expand commercial operations of its autonomous vehicle service to Los Angeles. We see that the service could become a valuable resource in the lives of our clients.

Sincerely,

Tony Brown  
Chief Executive Officer



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

February 08, 2024

Dear Director Curtis,

As the President of the National Federation of the Blind, I am writing to express our unwavering support for granting Waymo a permit to provide commercial autonomous vehicle service in Los Angeles.

The National Federation of the Blind is the transformative membership and advocacy organization of blind Americans, led by elected blind leaders. We are deeply committed to advancing the rights and independence of blind and low-vision Americans. Accessible transportation is not merely a convenience; it is a fundamental necessity that empowers our community to participate fully in society, access employment opportunities, and engage in daily activities.

By extending their fully autonomous ride-hailing service to Los Angeles, Waymo can significantly enhance mobility options for blind and low-vision individuals. Imagine the newfound freedom of using a self-driving vehicle independently, without relying on sighted assistance or traditional transportation services. This fulfills the dreams of countless blind Americans to have full autonomy over our transportation in the same manner as every other citizen who has a driver's license.

Autonomous vehicles empower blind and low-vision individuals to travel fully independently, reducing dependence on others and fostering self-sufficiency. Waymo's commitment to accessibility features, such as voice-guided interfaces and tactile feedback, ensures that blind passengers can confidently use their service, bridging existing gaps in transportation accessibility.

Blind and low-vision Americans deserve equal access to cutting-edge technology, and the CPUC has the opportunity to advance this technology in the second largest city in the United States by granting Waymo a permit, the CPUC can actively contribute to inclusion and equity in reimagining transportation opportunities. As someone who demonstrated the first blind drivable vehicle in 2011 and who has ridden in autonomous vehicles here and in other nations, I believe that Waymo is demonstrating the highest commitment to addressing the concerns and needs of the broadest range of people.

In conclusion, the National Federation of the Blind firmly believes that Waymo's autonomous vehicle service aligns seamlessly with our vision of an inclusive and accessible future. We respectfully request the CPUC's favorable consideration in granting Waymo the necessary permit, allowing them to bring their innovative technology to Los Angeles and positively impact the lives of countless residents.

Thank you for your attention to this matter. Should you require additional information or wish to discuss this further, please do not hesitate to reach out to me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Riccobono", with a stylized flourish at the end.

Mark A. Riccobono, President  
National Federation of the Blind



[BreatheSoCal.org](https://BreatheSoCal.org)

5858 Wilshire Blvd., Suite 300

Los Angeles, CA 90036

P: (323) 935-8050

F: (323) 935-1873

February 7, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Ms. Curtis,

I am writing on behalf of Breathe Southern California (Breathe SoCal) to express our support for Waymo's January 2024 application to expand its autonomous vehicle passenger carrier service to include Los Angeles. We ask the Commission to approve Waymo's application so that individuals can begin using and benefiting from Waymo's fleet of autonomous electric vehicles to get where they need to go in a safe and environmentally friendly way.

Of the 1.2 million California children who have asthma, 200,000 live in Los Angeles – a city with some of the nation's worst air quality. In 2022, 94 days were classified as unhealthy/hazardous air days, which means those struggling with asthma and other respiratory conditions were faced with concerning conditions for more than a quarter of the year.

Breathe SoCal is committed to promoting clean air and healthy lungs through research, education, advocacy, and technology. We are passionate about providing under-resourced neighborhoods with effective lung health services to change how they live their everyday lives. They can increase their access to proper healthcare, improve their overall health, and keep children in school. We are also passionate about the transition to zero emission vehicles, which Waymo utilizes in their system. But besides being zero-emission, autonomous vehicles also communicate, adjust speeds, and choose optimal routes, reducing stop-and-go traffic in densely-populated areas, which results in fewer emissions.

Breathe SoCal asks the California Public Utilities Commission to approve Waymo's application to offer its Waymo One service on a commercial basis in Los Angeles and other California communities. This decision would benefit Los Angeles residents with respiratory-related chronic conditions, making a sustainable, all-electric transportation option accessible to them.

While the challenges posed by air pollution indeed represent a tough battle for people living with asthma, adopting technologies such as Waymo's autonomous driving technology is a step in the right direction.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marc Carrel", written in a cursive style.

Marc Carrel  
President and CEO



**AutoNation, Inc.**  
200 SW 1<sup>st</sup> Avenue, Suite 1600  
Fort Lauderdale, FL 33301

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I am writing on behalf of AutoNation in support of Waymo's application to expand its autonomous vehicle passenger carrier service to include portions of Los Angeles County and the San Francisco Bay Area Peninsula. We urge the California Public Utilities Commission to approve Waymo's request so that more riders can use Waymo's autonomous vehicles to get to where they are going.

AutoNation is committed to being a provider of personalized transportation services that are easy, transparent, and customer-centric. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles across more communities, AutoNation believes this would help to extend independence, accessibility, and environmental benefits to our customers, and the general public.

AutoNation has over 24,000 Associates from coast to coast, representing the remarkable diversity of backgrounds, cultures, and perspectives of the nation. As a partner of Waymo, AutoNation employs many technicians dedicated to repairing and maintaining Waymo's self-driving fleet in California.

California has long been a leader in supporting innovative businesses, including in the automotive technologies sector. We believe that approving Waymo's application to expand its existing commercial passenger carrier authority to include the Los Angeles County and the San Francisco Bay Area Peninsula areas will help to drive economic growth and create opportunities for Californians to start careers in automotive fields.

AutoNation urges the California Public Utilities Commission to allow Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ivan Mihov", is written over a light gray horizontal line.

**Ivan Mihov**  
**Vice President – Mobility**  
AutoNation, Inc.

AutoNation Confidential



February 7, 2024

Terra Curtis, Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

**RE: Waymo Deployment in Los Angeles County**


To Whom It May Concern:

The Los Angeles County Economic Development Corporation (LAEDC) is a non-profit, public benefit organization dedicated to collaboratively advancing opportunity and prosperity for all in Los Angeles County. The LAEDC supports the growth of industries that will help keep our region competitive and we are in support of advanced transportation technologies that would advance our industry cluster development for the region.

The LAEDC views Waymo's participation in the CPUC's Driverless Deployment program as an important first step towards bringing autonomous vehicles to more communities in support of our region's goals around safer, more accessible, and equitable transportation. Waymo's offering for commercial AV passenger service provides a unique opportunity for the Los Angeles region to be at the forefront of a developing industry and bring economic benefits not only to the local economy but to California as a whole, while also offering more equitable solutions to transportation priorities facing the state. This program's implementation also will enable Los Angeles County to leverage the region's robust research and workforce training assets to grow the Advanced Transportation industry cluster to become a national leader in this space.

The opportunity for Los Angeles County to feature the rollout of new autonomous vehicle technology likewise presents multiple layers of benefits to our region: fostering a dynamic collaboration among the industry, local governments, community groups, labor organizations, residents, and nonprofit organizations to ensure the development of this technology not only maximizes public safety, and also catalyzes substantial job creation. It will be imperative that this wide group of stakeholders work collaboratively together to ensure that our region is able to address any potential issues that may arise and to develop strategies to prioritize public safety, educational awareness, and job creation for local communities as the AV industry continues to expand in our region going forward.

Sincerely,



Stephen Cheung  
President & Chief Executive Officer



2/1/2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

Dear Mx. Curtis,

I am writing in advance of Waymo's CPUC Driverless Deployment permit application, to share about their support for our organization, Best Buddies International. Since the inception of the partnership in the Bay Area in 2020, I have witnessed Waymo's great dedication to the Best Buddies mission of social inclusion for people with disabilities. They provide ongoing support for the organization with the financial support necessary to deliver our programs. Waymo leads by example with their commitment to mobility and our common mission of improving connectedness and independence.

Best Buddies is a nonprofit dedicated to ending the social, physical, and economical isolation of individuals with intellectual and developmental disabilities worldwide. As a tenured team member at Best Buddies, I have seen the impact of the physical barrier that transportation can provide on living an independent life. Due to the small percentage of our participants who have a driver's license, most rely on public transportation, walking, or support from family to get them to work, events, and out in the community. I believe access to more diverse transportation opportunities could only continue to support independence, which in turn could lower the 82% unemployment rate of people with disabilities, as well as decrease the social isolation many individuals with disabilities experience.

Best Buddies in California currently has offices in seven cities across the state and supports people with and without disabilities through three main pillars- friendship, employment, and leadership opportunities. We currently have over 5,000 participants in our friendship program, support 260 in supported employment, and have trained over 200 individuals in public speaking and advocacy skills this year, thus impacting over 50,000 individuals in California.

Waymo believes autonomous vehicles offer solutions to current transportation priorities facing California, including improved safety, environmental quality, and expanded transportation options for various populations and that by providing an affordable and convenient alternative to move around the state, transportation can come closer to becoming a service that includes a diverse set of passengers in an equitable fashion.

We appreciate Waymo's continued partnership and dedication to mobility and our shared mission of independence and connectedness. I am looking forward to seeing more accessibility and Waymo vehicles in the greater Bay Area and Los Angeles.

Sincerely,

A handwritten signature in dark blue ink that reads "Katelyn Quintero". The signature is written in a cursive, flowing style.

Katelyn Quintero  
State Director, California  
Best Buddies International



February 7, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update Waymo Advice Letter 0002 (Tier 2) - CPUC Driverless Deployment Service Area Expansion

Dear Director Curtis,

I serve as the Principal Investigator of the Center of Excellence on New Mobility and Automated Vehicles at UCLA. The Center, which was awarded a five-year, \$7.5 million grant, is focused on understanding the land use, transportation and equity impacts of Autonomous Vehicles and other new mobility technologies.

I am writing in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes Los Angeles. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles. Granting this request will provide both social benefits and research benefits, and I am writing to support Waymo's application to expand its commercial services to Los Angeles County.

A representative from Waymo serves on the Steering Committee for our Center of Excellence, along with representatives from the Federal Highways Administration, San Francisco County Transportation Authority, Uber, research institutions, transit agencies, and non-profit organizations. The Center of Excellence and our research partners at Carnegie Mellon University, University of Alabama, the National Renewable Energy Laboratory, Shared Use Mobility Center, and Metrolab Networks, will benefit from the research opportunities.

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The Center of Excellence on New Mobility and Automated Vehicles (Mobility COE) was authorized by the 23 U.S. Code section 503(c)(6) and funded through a cooperative agreement with FHWA. The Mobility COE collects, conducts, and funds research on the impacts of new mobility and highly automated vehicles on land use, urban design, transportation, real estate, equity, and municipal budgets.



In meetings with the Center of Excellence and partner researchers, Waymo has demonstrated a commitment to safety in the development of its autonomous vehicles, especially in the development of robust systems to ensure the safety of people outside of the Waymo vehicle.

California and the United States will benefit from services like Waymo that prioritize safety, use an all-electric fleet, and partner with government agencies to improve access to opportunities for disabled individuals.

I urge the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Ma'.

Jiaqi Ma  
Director, Center of Excellence on New Mobility and Automated Vehicles  
Associate Professor, UCLA Department of Civil & Environmental Engineering



Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Los Altos Chamber Support for Waymo Advice Letter 0002  
CPUC Driverless Deployment Service Area Expansion

Dear Terra:

I am writing on behalf of the Los Altos Chamber of Commerce to encourage the California Public Utilities Commission to approve Waymo's January 19, 2024 request of their updated Passenger Safety Plan, which includes an expanded commercial service area that includes Los Altos, Los Altos Hills, and the larger San Francisco Peninsula area.

The Los Altos Chamber of Commerce was founded in 1952 to build a strong and vibrant economy in the charming communities of Los Altos & Los Altos Hills. We strive to make our community a better place to work, live, and play. In line with this mission, the Los Altos Chamber serves our community as a *catalyst* for business growth, a *convener* of leaders, and *champion* for a thriving community.

Our Chamber consists of 400 member organizations which include not only brick-and-mortar businesses such as restaurants, retail, and service providers, but also technology companies, hospitals, non-profit organizations, legal & financial institutions, school districts, and community colleges. We are a connected network of creative entrepreneurs, visionaries, and community leaders who are working together to build a strong and vibrant economy!

We take pride in being a center for innovation in the heart of the Silicon Valley. Los Altos has been a leader in creating and supporting innovative businesses. Many of the employees of the world's most innovative companies live in our communities of Los Altos & Los Altos Hills.

Expanding Waymo's commercial services here would allow our residents an opportunity to benefit from not only innovative technology, but also showcase our region's innovation to visitors and tourists, and expand residents' access to additional transportation options.

As such, we would ask that the Commission move forward to allow Waymo's expanded service without delay. We strongly urge the California PUC's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request to grant our community wider access to this innovative transportation option.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Mosley", written over a light blue horizontal line.

Kimberly Mosley  
President & CEO  
Los Altos Chamber of Commerce  
321 University Avenue, Los Altos, CA 94022  
O: 650.948.1455 C: 650.704.3505



February 8, 2024

Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Burlingame/SFO Chamber of Commerce Support For Waymo Advice Letter 0002 (Tier 2)  
- Passenger Safety Plan Update

Dear Director Curtis,

On behalf of the Burlingame/SFO Chamber of Commerce, I am writing in support of Waymo's January 19, 2024 request for Commission approval of Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes Burlingame and the larger San Francisco Peninsula area (Advice Letter). We urge the Commission's Consumer Protection and Enforcement Division (CPED) to approve Waymo's request, allowing wider public access to Waymo's autonomous vehicles within our community.

Burlingame/SFO Chamber of Commerce's mission is to nurture a progressive business environment by offering the business community together in defining issues, developing programs, and effective public policy through active membership involvement. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in our area, Burlingame/SFO Chamber of Commerce believes this would help to extend economic benefits and accessible transportation, amongst other benefits, to our residents. Founded in 1913, the Burlingame/SFO Chamber of Commerce is an independent, non-profit, voluntary association of businesspeople working to improve and invest in the City's economic and civic vitality. The Burlingame/SFO Chamber of Commerce currently has hundreds of members. It is comprised of small businesses, retailers, hotels, restaurants, non-profit organizations, educational and health institutions, major corporations, professionals, and many other types of businesses.

The Burlingame/SFO Chamber of Commerce is the voice of the local business community, encouraging collaboration and cooperation between businesses, government, residents, and other stakeholders. Members benefit from advocacy, education, networking, and marketing that help them thrive.

Burlingame/SFO Chamber of Commerce | 417 California Drive | Burlingame | CA | 94010  
650-344-1735 Main





California, a champion of tech innovation, can solidify its leadership by approving Waymo's expansion in the Bay Area Peninsula. This move helps fuel California's economic engine while meeting residents' desire for safe and dependable transportation.

The Burlingame/SFO Chamber of Commerce strongly encourages the CPED to approve Waymo's Advice Letter. Doing so would pave the way for Waymo to expand its fully autonomous Waymo One service commercially to more California communities, including our own. Autonomous vehicles are already incredibly popular among residents, visitors and tourists and we believe even more should have the opportunity to experience this innovative transportation option.

Sincerely,

A handwritten signature in blue ink that reads 'Susan'.

**Susan Baker,**

President/CEO

[sbaker@burlingamechamber.org](mailto:sbaker@burlingamechamber.org)





Terra Curtis, Interim Director  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3214

RE: Waymo Advice Letter 0002 (Tier 2) - Passenger Safety Plan Update

Dear Director Curtis,

I am writing on behalf of Westwood Village Improvement Association in support of Waymo's January 19, 2024 request to approve Waymo's updated Passenger Safety Plan, reflecting an expanded service area for farmed autonomous vehicle transportation that includes Los Angeles]. We respectfully ask the Commission's Consumer Protection and Enforcement Division (CPED) approve Waymo's request so that more riders can begin using Waymo's autonomous vehicles to get to where they are going in and around Los Angeles.

Westwood Village Improvement Association is committed to enhancing Westwood Villages' well-being by promoting local businesses, implementing maintenance and hospitality measures, and organizing invigorating programs and events. If the California Public Utilities Commission approves the commercial use of Waymo's autonomous vehicles in Los Angeles, Westwood Village Improvement Association believes this would help to extend economic benefits to our membership.

Westwood Village, a vibrant commercial hub on the Westside of Los Angeles. The Westwood Village Improvement Association (BID) consists of a 13-member Board of Directors representing diverse stakeholders. The association actively participates in various activities to enhance the overall quality of the neighborhood.

California has long-been a leader in supporting innovative businesses, including in the technology sector. Approving Waymo's advice letter to expand its existing commercial passenger carrier authority to include Los Angeles will help to drive economic growth in California and to meet consumer demand for safe and reliable transportation service.

Westwood Village Improvement Association urges the CPED to approve Waymo's advice letter, thereby allowing Waymo to offer its fully autonomous Waymo One service on a commercial basis in more California communities. Autonomous vehicles are already being used daily by thousands of Californians and Westwood Village Improvement Association believes that more people should have the opportunity to benefit from expanded access to this safe, equitable, and sustainable transportation option.

Sincerely,

A handwritten signature in black ink that reads "Michael Russell". The signature is fluid and cursive, with the first name "Michael" and last name "Russell" clearly legible.

Michael Russell  
Executive Director

Westwood Village Improvement Association  
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Los Angeles, CA 90024  
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