



Public Utilities Commission
STATE OF CALIFORNIA

CITATION FOR VIOLATION
OF PUBLIC UTILITIES CODE

To: Cruise LLC

Attn: [REDACTED]
[REDACTED]
[REDACTED]

File No.: TCP 39080 P
Citation No.: T.24-11-001
Date: November 1, 2024
Case No.: CSE-000298

VIOLATIONS

You are hereby cited with having violated sections of the Public Utilities (P.U.) Code and California Public Utilities Commission (Commission) General Order (G.O.) as described below.

- (1) **Cruise failed to maintain records for three years, in violation of G.O. 157-E, Part 6.01. [1 count]**
- (2) **Cruise advertised without displaying its operating authority number (TCP 39080 P) in its advertisements, in violation of P.U. Code Section 5386 and G.O. 157-E, Part 3.07. [1 count]**
- (3) **Cruise operated vehicles without displaying its operating authority number (TCP 39080 P) on its vehicles, in violation of P.U. Code Section 5385 and G.O. 157-E, Part 4.04. [1 count]**

STATEMENT OF FACTS

The above violations are documented in the attached Investigation Report, which consists of carrier's records and substantiating documents obtained from other sources.

CITATION RESPONSE

The Transportation Enforcement Branch (TEB) of the California Public Utilities Commission (Commission) used the Penalty Assessment Methodology adopted in Resolution M-4846 and considered mitigating and exacerbating factors in setting the fine.

You are hereby called upon to answer this citation on or before November 21, 2024. By way of such answer, you may either:

- (1) Pay a fine of \$20,000 pursuant to P.U. Code Section 5378. (Submit your check or money order payable to California Public Utilities Commission using the attached *Citation Agreement*. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund and the Commission staff will deem the matter closed, **or**
- (2) Contact Senior Enforcement Analyst Alexander Nera at alexander.nera@cpuc.ca.gov or (415) 622-5166 to make payment arrangements, **or**
- (3) Contest this Citation by filing an Appeal. See attached document "*How to File an Appeal and Instructions for Filing a Notice of Appeal and Certificate of Service for a Citation Appeal.*"

If you fail to respond by November 21, 2024, you will be in default and will have forfeited your right to appeal the Citation. In addition, your operating authority will be immediately suspended and may be subsequently revoked pursuant to Resolution ALJ-187. The Commission may also act through a civil or criminal proceeding to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

Kenneth Bruno

Kenneth Bruno, Program Manager
Transportation Enforcement Branch
Consumer Protection and Enforcement Division
California Public Utilities Commission Consumer
Phone: (213) 220-5980
E-mail: Kenneth.Bruno@cpuc.ca.gov

Attachments

File No.: TCP 39080 P
Citation No.: T.24-11-001
Date: November 1, 2024
Case No.: CSE-000298

CITATION COMPLIANCE AGREEMENT

I (we) hereby agree to comply with this citation dated _____, and herewith pay the fine of \$20,000.

Cruise LLC
Attn: [REDACTED]
[REDACTED]
[REDACTED]

(Signature) (Title)

(Date)

Payment (cashier check or money order) should be made payable to *California Public Utilities Commission* and sent to:

California Public Utilities Commission
Attn: Fiscal Office
505 Van Ness Avenue
San Francisco, CA 94102-3298

Automatic credit and debit card payments are also available through the California Public Utilities Commission’s [Transportation Carrier Portal](#).

INVESTIGATION REPORT

CARRIER: Cruise LLC
Contact: [REDACTED]

AUTHORITY: TCP: 39080 P

MAILING ADDRESS: [REDACTED]
[REDACTED]

PHONE/EMAIL: [REDACTED]

VEHICLES: [REDACTED] (Inactive)

DRIVERS: [REDACTED] (Active)

PL&PD¹ INSURANCE: Mobilitas Insurance Company of Arizona
Policy #: [REDACTED]

WKCP² INSURANCE: AIU Insurance Company
Policy #: [REDACTED]
[REDACTED]

DRUG CONSORTIUM: [REDACTED]

¹ Public Liability and Property Damage Insurance (PL&PD).
² Workers' Compensation Insurance (WKCP).

INTRODUCTION

On May 6, 2024, I was assigned to investigate the operations and practices of Cruise LLC (hereinafter referred to as “Cruise”) for potential violations of the California Public Utilities Commission (hereinafter referred to as “CPUC”) transportation regulations because of the Cruise autonomous vehicle’s (hereinafter referred to as “AV”) August 17, 2023 collision with a San Francisco firetruck at the intersection of Turk Street and Polk Street in San Francisco (hereinafter referred to as “Incident”).

VIOLATIONS

The investigation into the Incident and the operations and practices of Cruise disclosed that Cruise violated certain provisions of the Public Utilities (P.U.) Code and General Order (G.O.) 157-E issued thereunder, as set forth below.³

- **Cruise failed to maintain records for three years, in violation of G.O. 157-E, Part 6.01. [1 count]**

G.O. 157-E, Part 6.01 requires charter-party carriers (TCP) such as Cruise to retain, for three years, records relating to services performed and safety. According to the data retention policy provided by Cruise (Attachment 1, Schedule A), Cruise fails to ensure that the following records concerning Cruise’s services and safety are retained for three years: [REDACTED]

[REDACTED].

- **Cruise advertised without displaying its operating authority number (TCP 39080 P) in its advertisements, in violation of P.U. Code Section 5386 and G.O. 157-E, Part 3.07. [1 count]**

Cruise violated P.U. Code Section 5386 and G.O. 157-E, Part 3.07 thereunder. G.O. 157-E, Part 3.07 requires TCPs such as Cruise to display their operating authority number in their

³ In addition, Cruise’s response to the Incident did not comply with its Passenger Safety Plan (PSP) in two ways. First, the Cruise AV’s automatic crash response system (ACS) [REDACTED]. Second, contrary to the requirements of its PSP, [REDACTED]. Because Cruise represents that appropriate corrective action has been taken, no penalties will be imposed with respect to Cruise’s PSP noncompliance at this time. However, Cruise is hereby put on notice that all appropriate penalties will be imposed should Cruise again fail to comply with the requirements of its own PSP.

advertisements. Cruise admits that it failed to display its TCP number (TCP 39080 P) in its advertisements. Specifically, according to Cruise’s response to Data Request No. TEB 2023: 09, Question 16,⁴ Cruise had not “...previously included Cruise’s CPUC-assigned TCP number in advertising.”

- **Cruise operated vehicles without displaying its operating authority number (TCP 39080 P) on its vehicles, in violation of P.U. Code Section 5385 and G.O. 157-E, Part 4.04. [1 count]**

Cruise violated P.U. Code Section 5385 and G.O. 157-E, Part 4.04 thereunder. Specifically, Cruise admits that it failed to display its TCP number (TCP 39080 P) on its vehicles. According to Cruise's response to Question 17 of Data Request No. TEB 2023: 09,⁵ “...Cruise did not display the CPUC-assigned TCP number on Cruise AVs” while operating passenger service.

⁴ Attachments 2 and 3.

⁵ *Id.*

DECLARATION

I have read the foregoing and know the contents thereof and I declare under penalty of perjury that the foregoing is true and correct, except as to those matters stated on information and belief, and to those matters, I believe to be true.

Executed on November 1, 2024, at Sacramento, California.



Alexander Nera, Senior Enforcement Analyst

LIST OF ATTACHMENTS

1. CONFIDENTIAL DR_08 Response 5 Retention Policy Schedule A
2. Data Request TEB 2023: 09 issued on April 8, 2024
3. Cruise responses to Data Request No. TEB 2023: 09 on April 24, 2024

ATTACHMENTS

ATTACHMENT 1

CONFIDENTIAL DR_08 Response 5 Retention Policy Schedule A

Customer Personal Data Retention Policy (Non-incident or non-claim related data)

This standard max retention policy below applies to any data NOT related to an incident or claim or litigation hold

Active Account Users

Category	Retention Policy	Starting when?	Exceptions to Retention Policy, if data is tagged as "Legal Hold" or "Litigation Hold" or "RINO Team Hold" See more [add wiki link]		
			Legal Hold	Legal Hold	Litigation Hold RINO Team Hold
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Deleted Account Users

Category	Deleted Account Retention (de-identified data)	Starting when?	Exemptions (Case by case basis, to be determined by Privacy)
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

Incident & Claim Data Retention Policy

This standard retention policy below applies to any data that is related to an incident or a claim (e.g., any data that's pulled into RINO or RMIS, or data that's otherwise tagged as incident or claim).
Note that this table includes data that needs to be retained for incidents but is not considered personal data.

Category	Retention Policy	Starting when?	Exceptions to Retention Policy, if data is tagged as "Legal Hold" or "Litigation Hold" or "RINO Team Hold" This would override the standard retention (rather than be added to standard retention) See more [add wiki link]		
			Legal Hold	Legal Hold	Litigation Hold RINO Team Hold
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Ride Trip Data



ATTACHMENT 2

Data Request TEB 2023: 09 issued on April 8, 2024

PUBLIC UTILITIES COMMISSION

505 Van Ness Avenue
San Francisco, CA 94102



April 8, 2024

TCP#: 39080

Cruise LLC

Attn: [REDACTED]
President and Chief Administrative Officer

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Re: Data Request No. TEB 2023: 09

Due Date: April 24, 2024

Dear Mr. [REDACTED]:

On October 13, 2023, the Consumer Protection and Enforcement Division (CPED) of the California Public Utilities Commission (CPUC) received Cruise LLC's (Cruise) responses to Data Request No. TEB 2023: 01 through 04. On December 5, 2023, and January 12, 2024, Cruise responded to CPED's follow-up data requests, Data Request No. TEB 2023: 05 through 08. In this data request, the CPED is requesting additional information as described in the attached document pursuant to the Public Utilities Code Section 314.

Please email the requested information and documents via the CPUC's secure File Transfer Protocol (Kiteworks), <https://cpucftp.cpuc.ca.gov>, on or before April 24, 2024, to the undersigned at: bezawit.dilgassa@cpuc.ca.gov.

If you have any questions, do not hesitate to contact me. If you are unable to provide the responses to this data request by April 24, 2024, please provide a written explanation by April 18, 2024, explaining why you cannot meet the due date, and when you anticipate providing the requested information.

Thank you for your cooperation.

Sincerely,

Handwritten signature of Bezawit Dilgassa in cursive script.

Bezawit Dilgassa, Senior Enforcement Analyst
Transportation Enforcement Branch

CPUC – Consumer Protection and Enforcement Division
Bezawit.dilgassa@cpuc.ca.gov
Direct Line: (415) 792-3269

cc: Maria Solis, Program & Project Supervisor, Maria.Solis@cpuc.ca.gov
Kenneth Bruno, Program Manager, Kenneth.Bruno@cpuc.ca.gov
Gautam Dutta, Staff Attorney, Gautam.Dutta@cpuc.ca.gov
Alex Nera, Senior Enforcement Analyst, Alexander.Nera@cpuc.ca.gov

Attachment

ATTACHMENT

Data Request No. 09

On October 13, 2023, the Consumer Protection and Enforcement Division (CPED) of the California Public Utilities Commission (CPUC) received Cruise LLC's (Cruise) responses to Data Request No. TEB 2023: 01 through 04 (hereinafter, Data Request 01, Data Request 02, Data Request 03, and Data Request 04). On December 5, 2023, and January 12, 2024, Cruise responded to CPED's follow-up data requests, Data Request No. TEB 2023: 05 through 08 (hereinafter, Data Request 05, Data Request 06, Data Request 07, and Data Request 08). CPED has the following additional requests.

1. For the August 17, 2023 Cruise autonomous vehicle (AV) collision with a San Francisco Fire Department (SFFD) firetruck, please state the severity level the Cruise AV automatically assigned to the collision.

If Cruise made a different determination in the collision severity level classification after the collision, please state the different severity level classification and provide an explanation why Cruise changed the collision severity level classification.

2. Cruise's response to Data Request 05, Question 3(d), first paragraph, states: "[REDACTED]
[REDACTED]
[REDACTED]."

For the August 17, 2023 collision with a SFFD firetruck, please state if the Cruise AV contacted a Remote Assistance, and if contacted, please provide a description of the assistance the Remote Assistance provided.

3. Cruise's response to Data Request 05, Question 7(a), second paragraph, states: "The Cruise AV is also equipped with OnStar, and when the collision occurred, the AV initiated an automatic "AACN" call (Advanced Automatic Collision Notification) to OnStar that notified OnStar agents that a collision had occurred. OnStar then called 911 to request emergency response personnel, but 911 informed OnStar that first responders were already on the scene. [REDACTED]
[REDACTED]."

- a. How long did it take for OnStar to call 911 after the Cruise AV's AACN call to OnStar regarding the collision?

- b. Please provide a narrative explaining [REDACTED]
[REDACTED]
[REDACTED]

- c. [REDACTED], please state if Customer Support connected with OnStar using other communication methods. If they connected, please provide a description of how Customer Support and OnStar connected, and how long it took them to connect to each other after the collision.
4. Cruise's response to Data Request 05, Question 7(c), first paragraph, states: "Immediately following the collision, a Customer Support Representative used the two-way communication system in the AV to connect into the AV. However, the passenger had already exited the vehicle, so there was no one in the vehicle for Customer Support to talk to. Customer Support, however, stayed on the call (i.e., the two-way communication line) so they could communicate with first responders. This communication through the Cruise AV's two-way communication system was recorded."
 - a. Please provide the mentioned recorded communication with the first responders through the Cruise AV's two-way communication system.
 - b. How long did it take for the Customer Support Representative to connect into the AV through the two-way communication system following the collision?
5. Cruise's response to Data Request 01, Question 1(m)(ii), seventh line, states: "The collision detection system alerted Cruise's Remote Assistance and Customer Support teams that a collision had occurred and both teams were connected automatically. Customer Support spoke to the passenger. Cruise also dispatched a Field Support team member on to the scene to provide passenger support and liaison with first responders." Furthermore, Cruise's response to Data Request 05, Question 7(a), first paragraph, states: "As Cruise's Passenger Safety Plan describes, the Cruise AV is designed to automatically connect to Remote Assistance, Customer Support, and OnStar in the event of a high-severity collision. In this instance, the Cruise AV connected to Cruise's remote teams and OnStar following the collision."
 - a. Please provide a detailed description of the coordination, with timelines, among the Remote Assistance, Customer Support, OnStar, and the Driverless Support Specialist to support the passenger and first responders and to ensure passenger and public safety after the collision.
 - b. Please provide an explanation of how the Remote Assistance, Customer Support, OnStar, and the Driverless Support Specialist facilitated any coordination among themselves to support the passenger and first responders and to ensure passenger and public safety after the collision.
 - c. How long did it take for the Driverless Support Specialist to arrive at the scene of the collision?

6. Please provide a complete description of how Cruise ensures each Cruise AV undergoes a 19-Point Inspection in compliance with the CPUC's Decision (D.) 16-04-041 and General Order (GO) 157-E Part 4.05:
 - a. At a facility licensed by the California Bureau of Automotive Repair,
 - b. Prior to initial operation, and
 - c. Every 12 months or 50,000 miles thereafter, whichever occurs first.
7. Please provide a complete description of how Cruise maintains accurate and verifiable 19-Point Inspection compliance records for three years as required by D.16-04-041 and GO 157-E Part 4.06, demonstrating that each Cruise AV is inspected by a licensed facility prior to initial operation and every 12 months or 50,000 miles thereafter, whichever occurs first.
8. Cruise's response to Data Request 05, Question 2(b), states: "Attachment "CONFIDENTIAL DR 05_Response 2b_Novel Inspection" provides the dates each component of the 19-Point Inspection was completed. Note: Rather than conducting a single 19-Point Inspection, Cruise performs automatic inspections, manual inspections, and continuous monitoring through safety diagnostics, at a minimum, every 12 months or 50,000 miles (whichever is first). As a result, some components of the 19-Point Inspection may have been inspected more recently than others."
 - a. Please provide an explanation why Cruise is not conducting a 'Muffler and Exhaust System' inspection per the 19-Point Inspection requirement.
 - b. Please provide an explanation why Cruise does not perform a 19-Point Inspection that inspects all the 19 components at the same time.
 - c. Please provide a description of what is performed during an automatic inspection, a manual inspection, and a continuous monitoring through safety diagnostic, and provide an explanation how they comply with the 19-Point Inspection requirement.
9. In response to Data Request 05, Question 2(b); Data Request 06, Question 1(b); and Data Request 07, Question 4(b), Cruise provided the dates each component of the 19-Point Inspection was completed and copies of the 19-Point Inspection records for the Cruise AVs named Novel, Seltzer, Cantaloupe, Jubilee, Collie, Butternut Squash, Chapeau, Kohlrabi, Cappuccino, Glory, and Ribeye. The 19-Point Inspection records Cruise has provided appear to be work order records. The following questions are regarding the copies of 19-Point Inspection records (work orders) Cruise has provided.
 - a. Cruise's response does not include a copy of the 19-Point Inspection record for the Cruise AV named Toffee, California (CA) license plate number 67661T3. Please provide Toffee's 19-Point Inspection record.
 - b. The 'Work order name' for the 19-Point Inspection records is 'Full OSIC Inspection.' Please state what OSIC stands for and provide a description of what a

‘Full OSIC Inspection’ entails and how it complies with the 19-Point Inspection requirement.

- c. Please provide an explanation why “OSIC Inspection is tasked [REDACTED].”
 - d. The 19-Point Inspection records show a ‘Service Instruction Link’. Please provide a copy of the service instructions.
 - e. [REDACTED]. Please state what EBCM stands for and provide a description of what an ‘EBCM Manual OSIC’ work order entails and how it complies with the 19-Point Inspection requirement.
 - f. From the 19-Point Inspection records, please provide an explanation how Cruise determines a Cruise AV has passed each of the 19-Point Inspection components.
10. Cruise’s response to Data Request 07, Question 4(b), seventh line, states: “Note, the AV Toffee started passenger service on July 27. The inspections for AV Toffee were completed after the AV began passenger service.”
- a. In response to Data Request 07, Question 4(c), the spreadsheet Cruise provided entitled “CONFIDENTIAL DR 07_Response 4c_Vehicle Fleet Statuses” states that the Cruise AV named Toffee started passenger service on July 29, 2023. Please state which is the correct date.
 - b. Please provide an explanation why the 19-Point Inspection for the Cruise AV named Toffee was not completed prior to the initial passenger service as required by D. 16-04-041 and GO 157-E Part 4.05.
11. For Cruise AV named Novel, CA license plate number 67641T3, please provide the date on which the AV started providing passenger service and the dates on which the AV discontinued providing passenger service.
12. In response to Data Request 05, Question 1, Cruise provided a spreadsheet showing the waybill information for the passenger service the Cruise AV was performing at the time the AV collided with a SFFD firetruck on August 17, 2023. In addition, in response to Data Request 08, Question 1, Cruise provided a spreadsheet with waybill information from June 2, 2022 to October 24, 2023. However, these two spreadsheets do not indicate the addresses of those who requested the passenger services as required by GO 157-E Part 3.01(4). Please update both spreadsheets to include the address of each person requesting or arranging the ride and resubmit the waybill information spreadsheets.
- a. Please provide a complete description of how Cruise ensures compliance with GO 157-E Part 3.01.

- b. For the fourth element of a waybill, “Name and address of person requesting or arranging the charter”, please provide an explanation of what information Cruise collects for address.
 - c. Please describe how Cruise retains waybill records and produces such records for inspection as described in GO 157-E Part 3.01.
13. In response to Data Request 07, Question 1, Cruise described its compliant intake and resolution process. Please provide a copy of Cruise’s complaint intake and resolution procedure currently in place and in use by Cruise employees.
 14. In response to Data Request 08, Question 3, Cruise provided evidence of its third-party vendors’ Workers’ Compensation insurances for the personnel they supply to operate Cruise AVs. Adecco, Inc.’s Workers’ Compensation insurance expired on January 1, 2024. Please provide the renewed or current Workers’ Compensation insurance for Adecco, Inc.
 15. In response to Data Request 08, Question 5, Cruise provided copies of the company’s Data Retention and Disposition Policy Schedule A and Schedule B. From the retention policy documents provided, please provide a narrative identifying and describing those retentions that are relevant to and required by GO 157-E Part 6.01.
 16. Please provide a complete description of how Cruise ensures compliance with GO 157-E Part 3.07 and includes the CPUC-assigned charter-party carrier (TCP) number “... in every written or oral advertisement, broadcast, or other holding out to the public for services.”
 17. Please provide a complete description of how Cruise ensures compliance with GO 157-E Part 4.04 and displays the CPUC-assigned TCP number on all Cruise AVs that are providing passenger services.

ATTACHMENT 3

Cruise responses to Data Request No. TEB 2023: 09 on April 24, 2024



April 24, 2024

Ms. Bezawit Dilgassa
Transportation Enforcement Branch
CPUC – Consumer Protection and
Enforcement Division

VIA KITEWORKS

Re: Cruise LLC’s Response to Data Request No. Cruise 24-04-001

Dear Ms. Bezawit Dilgassa:

Enclosed is Cruise LLC’s (Cruise) response to the California Public Utilities Commission’s (CPUC) Transportation Enforcement Branch (TEB) Data Request No. 09 issued on April 8, 2024.

Portions of the response include confidential and proprietary information and trade secrets protected from disclosure. Accordingly, we will request confidential treatment of that material pursuant to General Order 66-D. We also include confidential and non-confidential versions of Cruise’s response and supporting materials to this letter.

We are prepared and stand ready to support the CPUC TEB in its review of this response to answer any questions or help with any issues in reviewing the materials provided. Please contact me or [REDACTED], Government Affairs Senior Manager, [REDACTED], if you require further information about this response.

Sincerely,

[REDACTED]

[REDACTED]

Chief Safety Officer
Cruise LLC

[REDACTED]

Cruise's Response to Data Request No. TEB 2023: 09
April 24, 2024
REDACTED

Data Request No. 09

On October 13, 2023, the Consumer Protection and Enforcement Division (CPED) of the California Public Utilities Commission (CPUC) received Cruise LLC's (Cruise) responses to Data Request No. TEB 2023: 01 through 04 (hereinafter, Data Request 01, Data Request 02, Data Request 03, and Data Request 04). On December 5, 2023, and January 12, 2024, Cruise responded to CPED's follow-up data requests, Data Request No. TEB 2023: 05 through 08 (hereinafter, Data Request 05, Data Request 06, Data Request 07, and Data Request 08). CPED has the following additional requests.

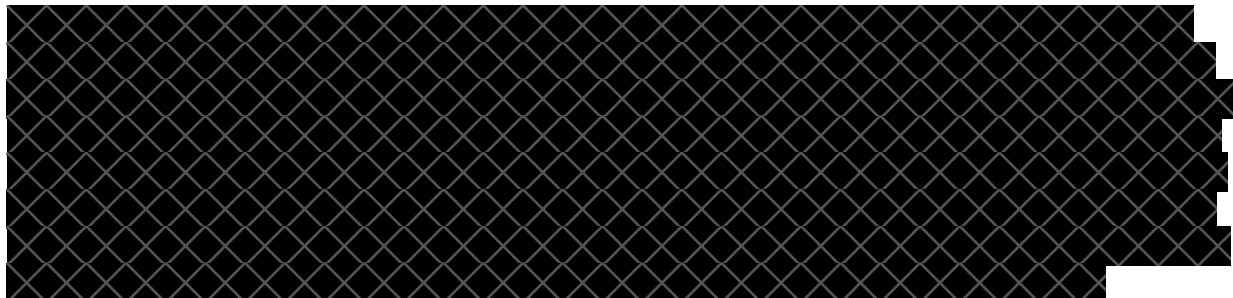
QUESTION 1: For the August 17, 2023 Cruise autonomous vehicle (AV) collision with a San Francisco Fire Department (SFFD) firetruck, please state the severity level the Cruise AV automatically assigned to the collision.

If Cruise made a different determination in the collision severity level classification after the collision, please state the different severity level classification and provide an explanation why Cruise changed the collision severity level classification.

RESPONSE 1: Cruise interprets this question to request the severity level classification made by the Cruise AV rather than the Incident Response team. Where the AV detects a collision that results in airbag deployment, as here, the AV automatically enters degraded state 5 (DS5), discussed below, in which the AV holds in place and does not attempt further movement.

There are two independent Collision Detection systems integrated into the Cruise AV:

- General Motors' base-vehicle system powered by the Sensing Diagnostic Module ("SDM"). In general, the SDM reads multiple sensors around the vehicle which detect impact or pressure differences. If any of these sensors detects an issue, the SDM determines if the issues/impact exceeds a calibrated deployment threshold, and if so, airbags are deployed (along with other passive safety systems) and the Advanced Automated Collision Notification (AACN) is sent to OnStar.
- The "Cruise" collision detection system, which independently monitors for and detects collisions that occur during AV operation. This system detects and responds to collisions which are below the SDM thresholds that trigger the passive safety systems, while providing independent detection of high severity collisions. This system directly commands a stopping response from the Cruise autonomy system.



[REDACTED]

[REDACTED]

[REDACTED]

QUESTION 2: Cruise’s response to Data Request 05, Question 3(d), first paragraph, states:

[REDACTED]

For the August 17, 2023 collision with a SFFD firetruck, please state if the Cruise AV contacted a Remote Assistance, and if contacted, please provide a description of the assistance the Remote Assistance provided.

RESPONSE 2: In Cruise’s response to Data Request 05, Question 3(d), Cruise describes the AV’s design and clarified that [REDACTED]

As described in Cruise’s response to Data Request 05, Question 3, the Cruise AV detects emergency vehicles with a combination of visual and audible inputs to the [REDACTED] system.

[REDACTED]

[REDACTED]

¹ As discussed in Cruise’s Response to Data Request 05, Question 3, [REDACTED]

After the collision, the RA Advisor assisted by maintaining connection with the vehicle to provide scene visibility to Cruise Customer Support and Cruise Driverless Support Specialists and to communicate with first responders. The Remote Assistance Advisor and Customer Support Specialist were connected to the AV's telephony and the RA Advisor communicated with first responders at [REDACTED]. The Remote Assistance Advisor stayed connected to the vehicle for approximately [REDACTED].

Due to the severity of the collision detection, the RA Advisor was, by system design, unable to maneuver the vehicle. This is because, based on the [REDACTED] as explained above. See Response to Question 5a (below) for a detailed timeline of events following the collision, including RA's assistance.

QUESTION 3a: Cruise's response to Data Request 05, Question 7(a), second paragraph, states: "The Cruise AV is also equipped with OnStar, and when the collision occurred, the AV initiated an automatic "AACN" call (Advanced Automatic Collision Notification) to OnStar that notified OnStar agents that a collision had occurred. OnStar then called 911 to request emergency response personnel, but 911 informed OnStar that first responders were already on the scene. [REDACTED]"

a. How long did it take for OnStar to call 911 after the Cruise AV's AACN call to OnStar regarding the collision?

RESPONSE 3a: OnStar called 911 at [REDACTED]

QUESTION 3b: Please provide a narrative explaining [REDACTED]

RESPONSE 3b: OnStar is Cruise's emergency services provider. Any time a Cruise AV needs law enforcement or other emergency services (e.g., fire, EMT), Cruise contacts OnStar, and OnStar contacts the Public-Safety Answering Point (PSAP – i.e., 911) to dispatch services to the AV. Cruise Customer Support and Remote Assistance perform Cruise-specific tasks related to the AV, such as assisting the AV to maneuver, unlocking doors, dispatching Cruise Driverless Support Specialists to the scene, and/or escalating to Incident Management.

OnStar may be engaged by Cruise (a) automatically when the Cruise AV's high-speed collision detection system registers a collision and generates an automatic AACN; or (b) manually by Cruise Customer Support or Remote Assistance when it determines emergency services are needed (e.g., low-speed collisions or non-collision situations). In both cases, the Cruise AV first contacts the Cruise data center which is designed to relay certain AV data (e.g., AACN) to OnStar and initiate a conference call that a Cruise Customer Service Agent and OnStar Advisor may join with the Cruise AV (i.e., automatically in the case of AACN or manually for other emergency situations). [REDACTED]

The system is designed so that both Cruise and OnStar can communicate via voice and work together simultaneously, each providing the support according to the established division of responsibilities noted above. The purpose of this architecture is to facilitate Cruise AV customer support and remote assistance and, when needed, engage OnStar for situations requiring emergency services.

[REDACTED]

QUESTION 3c: [REDACTED] please state if Customer Support connected with OnStar using other communication methods. If they connected, please provide a description of how Customer Support and OnStar connected, and how long it took them to connect to each other after the collision.

RESPONSE 3c: [REDACTED]

QUESTION 4a: Cruise’s response to Data Request 05, Question 7(c), first paragraph, states: “Immediately following the collision, a Customer Support Representative used the two-way communication system in the AV to connect into the AV. However, the passenger had already exited the vehicle, so there was no one in the vehicle for Customer Support to talk to. Customer Support, however, stayed on the call (i.e., the two-way communication line) so they could communicate with first responders. This communication through the Cruise AV’s two-way communication system was recorded.”

a. Please provide the mentioned recorded communication with the first responders through the Cruise AV’s two-way communication system.

RESPONSE 4a: Please see CONFIDENTIAL Attachment DR 09 Q4a Novel Two-Way Communications Recording.

QUESTION 4b: How long did it take for the Customer Support Representative to connect into the AV through the two-way communication system following the collision?

RESPONSE 4b: Cruise Customer Support connected to the AV approximately [REDACTED] after the collision.

QUESTION 5a: Cruise’s response to Data Request 01, Question 1(m)(ii), seventh line, states: “The collision detection system alerted Cruise’s Remote Assistance and Customer Support teams that a collision had occurred and both teams were connected automatically. Customer Support spoke to the passenger. Cruise also dispatched a Field Support team member on to the scene to provide passenger support and liaison with first responders. Furthermore, Cruise’s response to Data Request 05, Question 7(a), first paragraph, states: “As Cruise’s Passenger

Safety Plan describes, the Cruise AV is designed to automatically connect to Remote Assistance, Customer Support, and OnStar in the event of a high-severity collision. In this instance, the Cruise AV connected to Cruise’s remote teams and OnStar following the collision.

a. Please provide a detailed description of the coordination, with timelines, among the Remote Assistance, Customer Support, OnStar, and the Driverless Support Specialist to support the passenger and first responders and to ensure passenger and public safety after the collision.

RESPONSE 5a: See the timeline below.

August 17, 2023



[REDACTED]

[REDACTED]

[REDACTED]

QUESTION 5b: Please provide an explanation of how the Remote Assistance, Customer Support, OnStar, and the Driverless Support Specialist facilitated any coordination among themselves to support the passenger and first responders and to ensure passenger and public safety after the collision.

RESPONSE 5b: Customer Support and Remote Assistance coordinated their response to first responders and any needed support for the passenger using the shared two-way communication line with the AV and their operator tooling, including viewing interior and exterior cameras of the incident to gain additional scene context. Remote Assistance escalated the incident to Cruise’s Operational Command Center (OCC) and dispatched the Driverless Support Specialist to the scene. Internally, Cruise personnel (RA, CS, OCC, DSS) coordinated their response and external communications and support via slack messaging, and in-person verbal updates as the situation unfolded.

Separately, the Cruise AV is also equipped with OnStar, and when the collision occurred,

[REDACTED]

Per OnStar procedures, OnStar then called 911 to request emergency response personnel, and 911 informed OnStar that first responders were already on the scene.

QUESTION 5c: How long did it take for the Driverless Support Specialist to arrive at the scene of the collision?

RESPONSE 5c: A Driverless Support Specialist arrived on scene at [REDACTED] after the collision occurred.

QUESTION 6: Please provide a complete description of how Cruise ensures each Cruise AV undergoes a 19-Point Inspection in compliance with the CPUC’s Decision (D.) 16-04-041 and General Order (GO) 157-E Part 4.05:

- a. At a facility licensed by the California Bureau of Automotive Repair,
- b. Prior to initial operation, and

c. Every 12 months or 50,000 miles thereafter, whichever occurs first.

RESPONSE 6a-c:

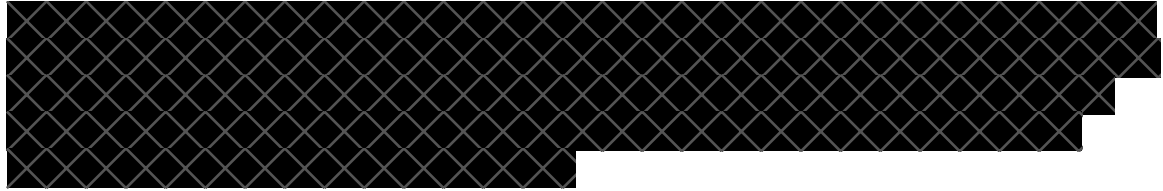
[REDACTED]

[REDACTED]

[REDACTED]

² [REDACTED]
³ [REDACTED]

⁴ Cruise AVs are electric vehicles and do not have muffler and exhaust systems.



QUESTION 7: Please provide a complete description of how Cruise maintains accurate and verifiable 19-Point Inspection compliance records for three years as required by D.16-04-041 and GO 157-E Part 4.06, demonstrating that each Cruise AV is inspected by a licensed facility prior to initial operation and every 12 months or 50,000 miles thereafter, whichever occurs first.

RESPONSE 7: Cruise retains all inspection work order history records in both the Midas and Oracle Enterprise Resource Platforms (ERP) platforms. The data retention period for these records across both platforms is a minimum of 3 years.

QUESTION 8a: Cruise’s response to Data Request 05, Question 2(b), states: “Attachment “CONFIDENTIAL DR 05_Response 2b_Novel Inspection” provides the dates each component of the 19-Point Inspection was completed. Note: Rather than conducting a single 19-Point Inspection, Cruise performs automatic inspections, manual inspections, and continuous monitoring through safety diagnostics, at a minimum, every 12 months or 50,000 miles (whichever is first). As a result, some components of the 19-Point Inspection may have been inspected more recently than others.”

- a. Please provide an explanation why Cruise is not conducting a ‘Muffler and Exhaust System’ inspection per the 19-Point Inspection requirement.

RESPONSE 8a: Cruise does not conduct a “Muffler and Exhaust System” inspection on Cruise AVs as these vehicles are electric and do not have muffler and exhaust systems.

QUESTION 8b: Please provide an explanation why Cruise does not perform a 19-Point Inspection that inspects all the 19 components at the same time.

RESPONSE 8b: Please see Response 6a-c for more details. All Full OSIC inspections are performed at the same time by the technician completing the inspection work order. Prior to August 21, 2023, when Cruise was using OSIC Lite inspections as well as Full OSIC, certain components of the 19-point inspection were inspected every 2,500 miles which resulted in different inspection dates described in Cruise’s response to Data Request 05, Question 2(b).

QUESTION 8c: Please provide a description of what is performed during an automatic inspection, a manual inspection, and a continuous monitoring through safety diagnostic, and provide an explanation how they comply with the 19-Point Inspection requirement.

RESPONSE 8c: Please see 

[REDACTED]

QUESTION 9a: In response to Data Request 05, Question 2(b); Data Request 06, Question 1(b); and Data Request 07, Question 4(b), Cruise provided the dates each component of the 19-Point Inspection was completed and copies of the 19-Point Inspection records for the Cruise AVs named Novel, Seltzer, Cantaloupe, Jubilee, Collie, Butternut Squash, Chapeau, Kohlrabi, Cappuccino, Glory, and Ribeye. The 19-Point Inspection records Cruise has provided appear to be work order records. The following questions are regarding the copies of 19- Point Inspection records (work orders) Cruise has provided.

a. Cruise’s response does not include a copy of the 19-Point Inspection record for the Cruise AV named Toffee, California (CA) license plate number 67661T3. Please provide Toffee’s 19-Point Inspection record.

RESPONSE 9a: Cruise previously provided Toffee’s 19-Point Inspection record in its Supplemental Response to TEB 05-08. Cruise includes Toffee’s Inspection record here as CONFIDENTIAL Attachment DR 09 Q9a Toffee Inspection with the dates each relevant component of the 19-Point Inspection was completed.

QUESTION 9b: The ‘Work order name’ for the 19-Point Inspection records is ‘Full OSIC Inspection.’ Please state what OSIC stands for and provide a description of what a ‘Full OSIC Inspection’ entails and how it complies with the 19-Point Inspection requirement.

RESPONSE 9b: OSIC stands for “Operational Safety and Integrity Checks.” CONFIDENTIAL Attachment DR 09 Q9b Operational Safety and Integrity Checks details the components of the inspection.

QUESTION 9c: Please provide an explanation why “OSIC Inspection is tasked [REDACTED]”

RESPONSE 9c: [REDACTED]

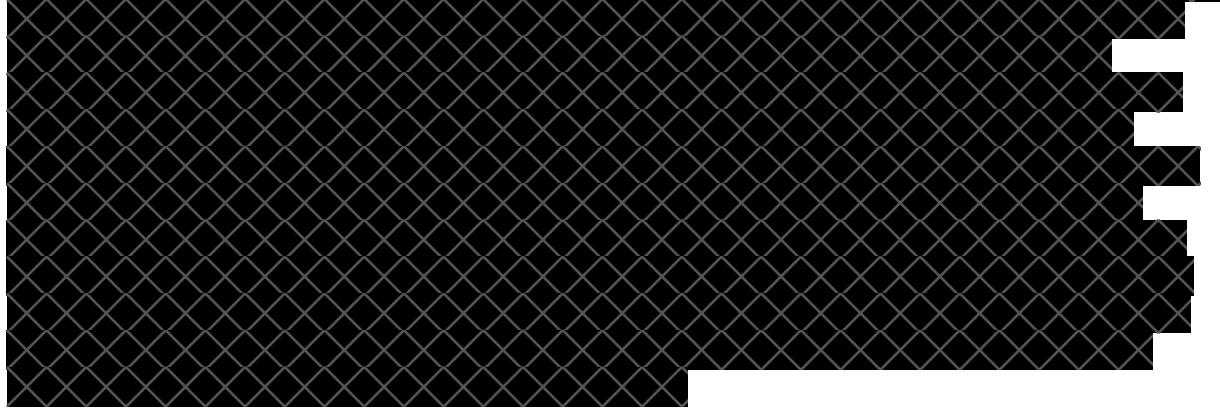
QUESTION 9d: The 19-Point Inspection records show a ‘Service Instruction Link’. Please provide a copy of the service instructions.

RESPONSE 9d: Please see CONFIDENTIAL Attachment DR 09 Q9d Service Instruction Link for a copy of the service instructions.

QUESTION 9e: [REDACTED]

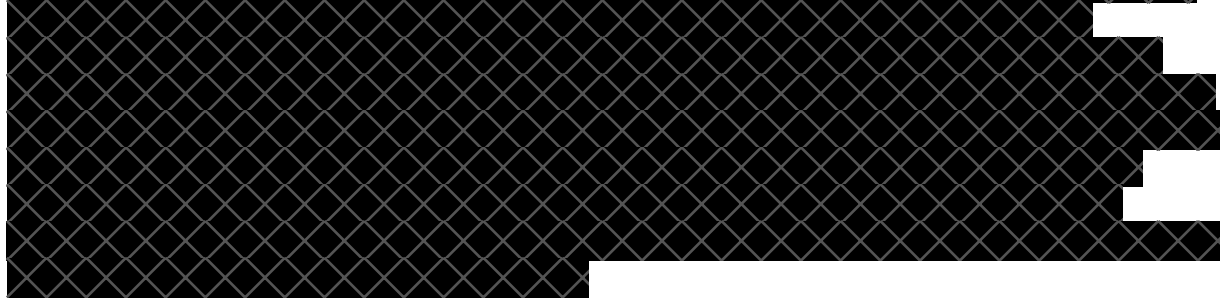
Please state what EBCM stands for and provide a description of what an ‘EBCM Manual OSIC’ work order entails and how it complies with the 19-Point Inspection requirement.

RESPONSE 9e:



QUESTION 9f: From the 19-Point Inspection records, please provide an explanation how Cruise determines a Cruise AV has passed each of the 19-Point Inspection components.

RESPONSE 9f:



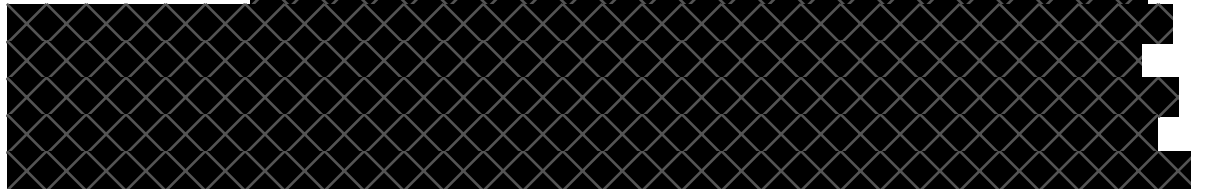
QUESTION 10a: Cruise’s response to Data Request 07, Question 4(b), seventh line, states: “Note, the AV Toffee started passenger service on July 27. The inspections for AV Toffee were completed after the AV began passenger service.”


a. In response to Data Request 07, Question 4(c), the spreadsheet Cruise provided entitled “CONFIDENTIAL DR 07_Response 4c_Vehicle Fleet Statuses” states that the Cruise AV named Toffee started passenger service on July 29, 2023. Please state which is the correct date.

RESPONSE 10a: Cruise AV Toffee provided its first unfared passenger ride on July 26, 2023 under the pilot permit and its first fared passenger ride on July 29, 2023 under the deployment permit.

QUESTION 10b: Please provide an explanation why the 19-Point Inspection for the Cruise AV named Toffee was not completed prior to the initial passenger service as required by D. 16-04-041 and GO 157-E Part 4.05.

RESPONSE 10b:





QUESTION 11: For Cruise AV named Novel, CA license plate number 67641T3, please provide the date on which the AV started providing passenger service and the dates on which the AV discontinued providing passenger service.

RESPONSE 11: Cruise AV Novel started providing unfared rides under the pilot permit on July 25, 2023, and fared rides under the deployment permit on August 15, 2023. Cruise AV Novel was discontinued from operation on all rides on August 17, 2023.

QUESTION 12a: In response to Data Request 05, Question 1, Cruise provided a spreadsheet showing the waybill information for the passenger service the Cruise AV was performing at the time the AV collided with a SFFD firetruck on August 17, 2023. In addition, in response to Data Request 08, Question 1, Cruise provided a spreadsheet with waybill information from June 2, 2022 to October 24, 2023. However, these two spreadsheets do not indicate the addresses of those who requested the passenger services as required by GO 157-E Part 3.01(4). Please update both spreadsheets to include the address of each person requesting or arranging the ride and resubmit the waybill information spreadsheets.

a. Please provide a complete description of how Cruise ensures compliance with GO 157-E Part 3.01.

RESPONSE 12a: Please see revised waybills in CONFIDENTIAL Attachment DR 09 Q12a DR5Q1 and CONFIDENTIAL Attachment DR 09 Q12a DR8Q1.

QUESTION 12b: For the fourth element of a waybill, “Name and address of person requesting or arranging the charter”, please provide an explanation of what information Cruise collects for address.

RESPONSE 12b: Cruise collects and retains the addresses that passengers input for pick-up in the Cruise mobile app.

QUESTION 12c: Please describe how Cruise retains waybill records and produces such records for inspection as described in GO 157-E Part 3.01.

RESPONSE 12c: Pursuant to GO 157-E Part 3.01, Cruise retains all waybill data for three years. The underlying data used to create waybill records is pulled by querying our data warehouse to populate a table with the required waybill information. Note that if Cruise receives a verified deletion request from a customer pursuant to the California Consumer Privacy Act or other applicable law, Cruise will delete the customer’s personal data but retain a copy of the data to fulfill regulatory reporting obligations, including the maintenance of waybill records, for at least three years. This data will be stored in a secure location and may only be accessed by the teams who need it to fulfill Cruise’s regulatory obligations.

QUESTION 13: In response to Data Request 07, Question 1, Cruise described its compliant intake and resolution process. Please provide a copy of Cruise’s complaint intake and resolution procedure currently in place and in use by Cruise employees.

RESPONSE 13: Cruise receives public and rider communications through a variety of channels, including through the Cruise app (riders only), email, and the online web intake form. These communications are handled by the Cruise customer support team. The team handles all communications and triages/escalates them based on the issue being described. Customer support works with relevant teams across Cruise to ensure that new issues are tracked and resolved where appropriate. All communication is handled using the below processes, regardless of whether it is feedback or a complaint.

Note that communications that are received through complaints@getcruise.com, or through the complaint path via the intake portal are considered complaints. For the purposes of CPUC quarterly reporting obligations, most other communications are retroactively reviewed to determine if they are a complaint.


Below are the Standard Operating Procedures (SOPs) that describe the intake and handling of feedback:

[Redacted]

[Redacted]

[Redacted]

[Redacted]



QUESTION 14: In response to Data Request 08, Question 3, Cruise provided evidence of its third-party vendors' Workers' Compensation insurances for the personnel they supply to operate Cruise AVs. Adecco, Inc.'s Workers' Compensation insurance expired on January 1, 2024.

Please provide the renewed or current Workers' Compensation insurance for Adecco, Inc.

RESPONSE 14: Please see CONFIDENTIAL Attachment DR 09 Q14 Adecco WC Insurance.”

QUESTION 15: In response to Data Request 08, Question 5, Cruise provided copies of the company's Data Retention and Disposition Policy Schedule A and Schedule B. From the retention policy documents provided, please provide a narrative identifying and describing those retentions that are relevant to and required by GO 157-E Part 6.01.

RESPONSE 15: Data elements subject to GO 157-E Part 6.01's three-year retention requirement that are considered customer personal information under applicable data protection laws—such as customers' names and pickup and drop off addresses in waybills, as well as customer support tickets (which include consumer complaints)—are governed by Cruise's Data Retention and Disposition Policy for Cruise Personal Data, including Schedule A to the Policy, which Cruise provided in response to Data Request 08, Question 5. All other data elements subject to GO 157-E Part 6.01 that are *not* considered personal information—such as vehicle license plate number and method by which the ride was requested in waybills, as well as safety, maintenance, inspection, and driver records—are retained as business records for at least three years to comply with GO 157-E Part 6.01.

QUESTION 16: Please provide a complete description of how Cruise ensures compliance with GO 157-E Part 3.07 and includes the CPUC-assigned charter-party carrier (TCP) number “... in every written or oral advertisement, broadcast, or other holding out to the public for services.”

RESPONSE 16: Cruise has not previously included Cruise's CPUC-assigned TCP number in advertising. Going forward, Cruise will ensure all advertising in California will include Cruise's CPUC-assigned TCP number.

QUESTION 17: Please provide a complete description of how Cruise ensures compliance with GO 157-E Part 4.04 and displays the CPUC-assigned TCP number on all Cruise AVs that are providing passenger services.

RESPONSE 17: While operating passenger service previously, Cruise did not display the CPUC-assigned TCP number on Cruise AVs. Cruise has begun the process to install stickers in a size and font that complies with GO 157-E Part 4.04 on both sides of Cruise vehicles in California. Please see ATTACHMENT DR 09_Response 17_TCP Numbers that captures a prototype Cruise is evaluating ahead of installation across the California fleet. Cruise will ensure all Cruise AVs are equipped with the CPUC-assigned TCP number ahead of resuming passenger service in California.