CALIFORNIA PUBLIC UTILITIES COMMISSION

Advice Letter Summary Cover Sheet

Date of Submission: March 26, 2025	Date of Service: March 26, 2025
Entity Name: Waymo, LLC	PSG #: TCP0038152A
DBA Name:	
Address: 1600 Amphitheatre Pkwy	
City: Mountain View State: California	ZIP Code: 94043
Service Contact: Jack Stoddard, BRB Law Group	
Service Contact Email: jack@brblawgroup.com	Service Contact Phone: (415) 531-0785

Advice Letter #: 3	AL Type: ☒ Tier 2 PSP Update, staff disposition
Description: Seeking approval of Waymo's updated Passenger Safety Plan in connection with Waymo's expanded DMV-approved territory for deployment operations, adding additional portions of the San Francisco Bay Area Peninsula.	
Documents Included: ☒Cover letter ☒Advice Letter ☒Passenger Safety Plan	
Relevant Commission Decisions: D.20-11-046 (as modified by D.21-05-017).	
Protests and Responses: Any person (including individuals, groups, or organizations) may submit a response or a protest to an advice letter (General Order 96-B, Section 7.4). When submitting a response or a protest, please include the carrier's name (Waymo LLC) and the advice letter number (0003) in the subject line. A protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the carrier no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11). A response or protest must be submitted within twenty (20) days of the date the advice letter was served and must be served on the carrier (Waymo LLC) via email on the same day.	

Responses and protests must be submitted to:

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

and to

AVPrograms@cpuc.ca.gov

On the same day the response or protest is submitted to the Commission, the respondent or protestant shall email a copy to Waymo to the attention of Mari Davidson at the following address: waymo-regulatory-permits@google.com

Waymo LLC
1600 Amphitheatre Pkwy
Mountain View, CA

March 26, 2025

ADVICE LETTER 0003 (Tier 2)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In accordance with Decision (D.) 20-11-046 (as modified by D.21-05-017) (the "Deployment Decision") and the *CPUC Autonomous Vehicle (AV) Drivered and Driverless Pilot and Phase I Deployment Programs Application Instructions and Requirements (Version 1.0)* ("Application Instructions"), Waymo LLC ("Waymo") (TCP0038152A) hereby submits this Advice Letter 0003 to the Commission's Consumer Protection and Enforcement Division ("CPED").

PURPOSE

By this advice letter, Waymo seeks approval of Waymo's updated Passenger Safety Plan (March 2025), in connection with Waymo's expanded operational design domain ("ODD") for deployment[1] approved by the Department of Motor Vehicles (DMV) on March 17, 2025.[2] As amended, Waymo's DMV Deployment ODD authorizes Waymo to expand deployment operations in additional portions of the San Francisco Bay Area Peninsula, including the City of San Jose.

Per the Deployment Decision, "if an entity authorized to participate in the driverless deployment program intends to change its operations in a way that would materially affect the approaches outlined in its Passenger Safety Plan, that entity should provide the Commission's Director of Consumer Protection and Enforcement Division with an updated Passenger Safety Plan by way of a Tier 2 Advice Letter."[3] Waymo plans to expand passenger carrier service provided to the public under our CPUC Phase I Driverless Autonomous Vehicle (AV) Deployment Permit. Waymo has revised our CPUC Passenger Safety Plan to reflect this planned expansion and to make other timely updates, as described more fully below. We respectfully request the timely disposition of this advice letter by CPED, pursuant to General Order (GO) 96-B and the authorities referenced above.

[1] A Statement and Map of Waymo's March 17, 2025 DMV-approved ODD for deployment operations is appended hereto as Attachment A.
[2] DMV Letter of Deployment Amendment Approval, dated March 17, 2025, is appended hereto as Attachment B.
[3] The Deployment Decision, Ordering Paragraph 20.

BACKGROUND

Waymo is an autonomous driving technology company with the mission to be the world's most trusted driver, and make it safer, more accessible, and more sustainable to get around - without the need for anyone in the driver's seat. Safety is at the core of Waymo's mission and a hallmark of our Waymo One ride hail service.

Advancing roadway safety is the reason we began our pioneering AV research and development as the Google Self-Driving Car Project more than 15 years ago. Since our start in 2009, Waymo has published dozens of studies and white papers detailing our safety methodologies and analyzing our driving performance.[4] More about Waymo's safety record and research can also be found at Waymo's Safety Hub,[5] which presents a comparison of Waymo's driverless crash rates to human crash benchmarks for surface streets. Waymo's Safety Hub leverages best practices in safety impact analysis and builds upon dozens of Waymo's safety publications. The data to date indicates that the Waymo Driver is already making roads safer in the places where we currently operate.[6]

Waymo's unmatched experience in developing and deploying autonomous vehicle technology includes:

- Tens of millions of fully autonomous (driverless) miles on public roads;
- Billions of miles of simulated driving; and
- Millions of fared and fully autonomous trips served in California.[7]

Headquartered in California, Waymo is authorized by the CPUC to operate as an AV charter party carrier of passengers (TCP) in the Commission's AV Programs (Drivered and Driverless Pilot; Phase I Drivered and Driverless Deployment).[8] The Waymo One fleet used in our fully autonomous, fared service is currently comprised of the all-electric Jaguar I-PACE vehicle platform. Our ride-hailing experience is supported by our Waymo One mobile app, available on both iOS and Android platforms.

As we expand to include more California communities and riders, we remain committed to learning and to making continuous improvements to our service. Listening to our riders is essential to our efforts - as is meaningful engagement with community groups, local governments, and first responders - so that we continue to provide passengers with a safe,

[4] Available at waymo.com/safety/research.
[5] Available at waymo.com/safety/impact.
[6] Specifically, the Safety Hub data demonstrates that the Waymo Driver is better than humans at avoiding crashes that result in injuries, airbag deployments, and police-reported crashes.
[7] Trips provided since the grant of our CPUC Driverless Deployment Permit in August 2023. Waymo provided driverless rides to members of the public for free for nearly a year prior, since having first received our CPUC Driverless Pilot Permit in November 2022.
[8] The CPUC approved Waymo to participate in each of these programs in July 2019, February 2022, November 2022, and August 2023, respectively.

sustainable,[9] and comfortable Waymo One experience.

Each day, thousands of Californians are riding in Waymo AVs, at all times of day, with no human behind the wheel. We're excited to grow our Waymo One service to bring our transformative technology and service to more Californians.

WAYMO ADVICE LETTER 0003

Waymo seeks CPED's approval of the March 2025 Update of Waymo's Passenger Safety Plan in connection with Waymo's expanded ODD for deployment operations covering additional portions of the San Francisco Peninsula and South Bay. Waymo's territory expansion for passenger carrier service, together with other updates and revisions to reflect Waymo's robust approach to passenger safety, are reflected in our updated Passenger Safety Plan (Attachment C).

Per the Deployment Decision, Waymo's Passenger Safety Plan describes our driverless autonomous vehicle technology and service, and provides an overview of the policies and procedures we use to promote the safety, comfort, and convenience of our riders. Waymo's Passenger Safety Plan demonstrates our continued commitment to enhancing passenger safety and addresses the elements highlighted by the Deployment Decision. Waymo's March 2025 Update includes the following key updates:[10]

- *Throughout:* Describes new features that Waymo has implemented to further enhance passenger safety and convenience, including but not limited to, the icon that the Waymo AV displays on the rear of the main ADS sensor module when yielding to pedestrians, the door unlock and handle release feature triggered by rider proximity detection, as well as Waymo's new lost item detection feature.
- *Throughout*: Provides updated images of the Waymo One mobile app display and in-car screens, illustrating updated functionalities and features, including the app display riders may use to edit their drop off destination.
- *Section I. Our Mission & Section III. Moving People with Waymo One:* Describes Waymo's recent service milestones operating Waymo One. Waymo is now providing hundreds of thousands of paid passenger trips each week across multiple major U.S. cities. In California,

[9] Waymo's commitment to sustainability is rooted in our mission to be the most trusted driver, ensuring safer roads for everyone. We achieve this by deploying a fully electric, shared fleet and actively supporting more walkable, bikeable, and transit-oriented communities. To power our fleet, Waymo purchases renewable electricity from a variety of sources, including local utilities and community choice energy programs. Electric vehicle chargers are enrolled in California's Low Carbon Fuel Standard (LCFS) program, contributing to state emissions reduction targets.

[10] Please note that this list is not exhaustive of all revisions but highlights key updates, including advancements and refinements that Waymo has made since the last-updated Passenger Safety Plan (January 2024), which CPED approved on March 1, 2024. Revisions have been made throughout to update, clarify, improve readability, and conform the Passenger Safety Plan to Waymo's current relevant passenger safety policies and practices.

Waymo is now providing over one million driverless rides each quarter across the San Francisco Peninsula and in the greater Los Angeles area.

- *Section III. Moving People with Waymo One:* Describes the expanded geographic territory approved by the DMV for Waymo deployment, effective as of March 17, 2025.
- *Section VI. Responding to Adverse Events:* Updates the description of Waymo's operational teams that are available 24/7 to respond to potentially disruptive events during passenger carrier service, and further details aspects of their respective roles. Provides updated information about Waymo's first responder training and engagement efforts.
- *Section VIII. Health & Safety Protocols:* Makes changes in conformance with applicable health and safety guidance.

EFFECTIVE DATE

Pursuant to Ordering Paragraph 20 of the Deployment Decision, Waymo respectfully requests CPED approval of this Tier 2 advice letter. Per GO 96-B Section 7.3.5, the advice letter will be effective immediately upon CPED's written approval.

PROTESTS AND RESPONSES

Any person (including individuals, groups, or organizations) may submit a response or a protest to an advice letter (General Order 96-B, Section 7.4). When submitting a response or a protest, please include the carrier's name (Waymo LLC) and the advice letter number (0003) in the subject line. A protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the carrier no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11). A response or protest must be submitted within twenty (20) days of the date the advice letter was served and must be served on the carrier (Waymo LLC) via email on the same day.

Responses and protests must be submitted to:

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

and to

AVPrograms@cpuc.ca.gov

On the same day the response or protest is submitted to the Commission, the respondent or protestant shall email a copy to Waymo to the attention of Mari Davidson at the following address:

waymo-regulatory-permits@google.com

NOTICE OF SERVICE

In accordance with Section 4 of General Order 96-B, and D.20-11-046 (as modified by D.21-05-017), a copy of this advice letter is being sent electronically to the service lists for R.12-12-011, R.19-02-012, and R.21-11-014. Address changes to these service lists should be directed to the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov.

Respectfully,

DocuSigned by:
Mari Davidson
B1021588BA0747D...

Mari Davidson
Managing Counsel
Waymo LLC
1600 Amphitheater Parkway
Mountain View, CA 94043

INDEX OF ATTACHMENTS

A	Statement and Map of DMV-Approved Operational Design Domain - Driverless Deployment (March 17, 2025)
B	Waymo DMV Deployment Permit (March 2025 Amendment Approval Letter)
C	Passenger Safety Plan - CPUC Driverless Autonomous Vehicle Deployment Program (March 2025)

ATTACHMENT A

Statement and Map of Operational Design Domain - Deployment

Waymo's deployment ODD[11] as most recently approved by the California Department of Motor Vehicles on March 17, 2025, is as follows:

Roadway Type	The intended operational design domain of Waymo's AVs includes all roadway types and areas accessible for ride-hailing and goods delivery services, such as: ● Freeways, highways, city streets, rural roads, and other roadways. ● Parking lots and driveways.
Speed Range	The intended operational design domain of Waymo AVs includes all speed limits.
Weather	The intended operational design domain for Waymo AVs includes all rain, fog, and other conditions, but will not at this time allow for driverless operation when there is widespread snow or ice accumulation on the roadway. The Waymo ADS is designed to adjust its driving behavior as appropriate for the conditions. For example, the ADS tends to drive more slowly as fog becomes denser or as rainfall increases, which helps the ADS to respond to surrounding traffic that typically moves more slowly in these conditions.
Time of Day	The intended operational design domain of Waymo's AVs includes all times of day and night.
Dynamic Operating Parameters	Controlling the operating parameters of its AVs is a part of Waymo's dynamic operations. Waymo may choose to change the operating parameters for some or all of its AVs at various times. For example, operations may be dynamically adjusted or restricted during certain times of day, around certain road features, or in certain weather conditions. In both the drivered and driverless configurations, if an AV encounters any of conditions outside of the applicable operating parameters, the ADS is

[11] Pursuant to 13 CCR Section 227.02(j), the operational design domain ("ODD") is "the specific operating domain(s) in which an automated function or system is designed to properly operate, including but not limited to geographic area, roadway type, speed range, environmental conditions (weather, daytime/nighttime, etc.), and other domain constraints."

	designed to be capable of achieving a minimal risk condition. In addition, in a drivered configuration, the ADS also alerts the trained driver. To continue a trip, drivers may take over in such conditions. Trained drivers have discretion to take over at any time and are trained to do so as appropriate to support safety, traffic law compliance, or community values. Trained drivers are more likely to take over in atypical traffic conditions.
Geographic Area for Both Drivered & Driverless Configurations	Waymo seeks authorization for deployment operations in both drivered and driverless configurations in the area depicted in the map below. No changes are proposed to the Los Angeles area geographic ODD at this time. As noted in prior materials submitted in connection with Waymo's Deployment Permit, controlling the operating parameters of our AVs is part of Waymo's dynamic operational program. For the purpose of deployment operations, Waymo may dynamically adjust operating parameters, including geographic areas, for some or all of its AVs at various times. Although we have found through experience that Waymo's ADS technology is highly transferable to new environments, before we begin operation in a driverless configuration in any new geographical area, we complete a thorough validation process and continuously monitor performance for potential issues. We plan to continue this process of technology validation and incremental expansion.

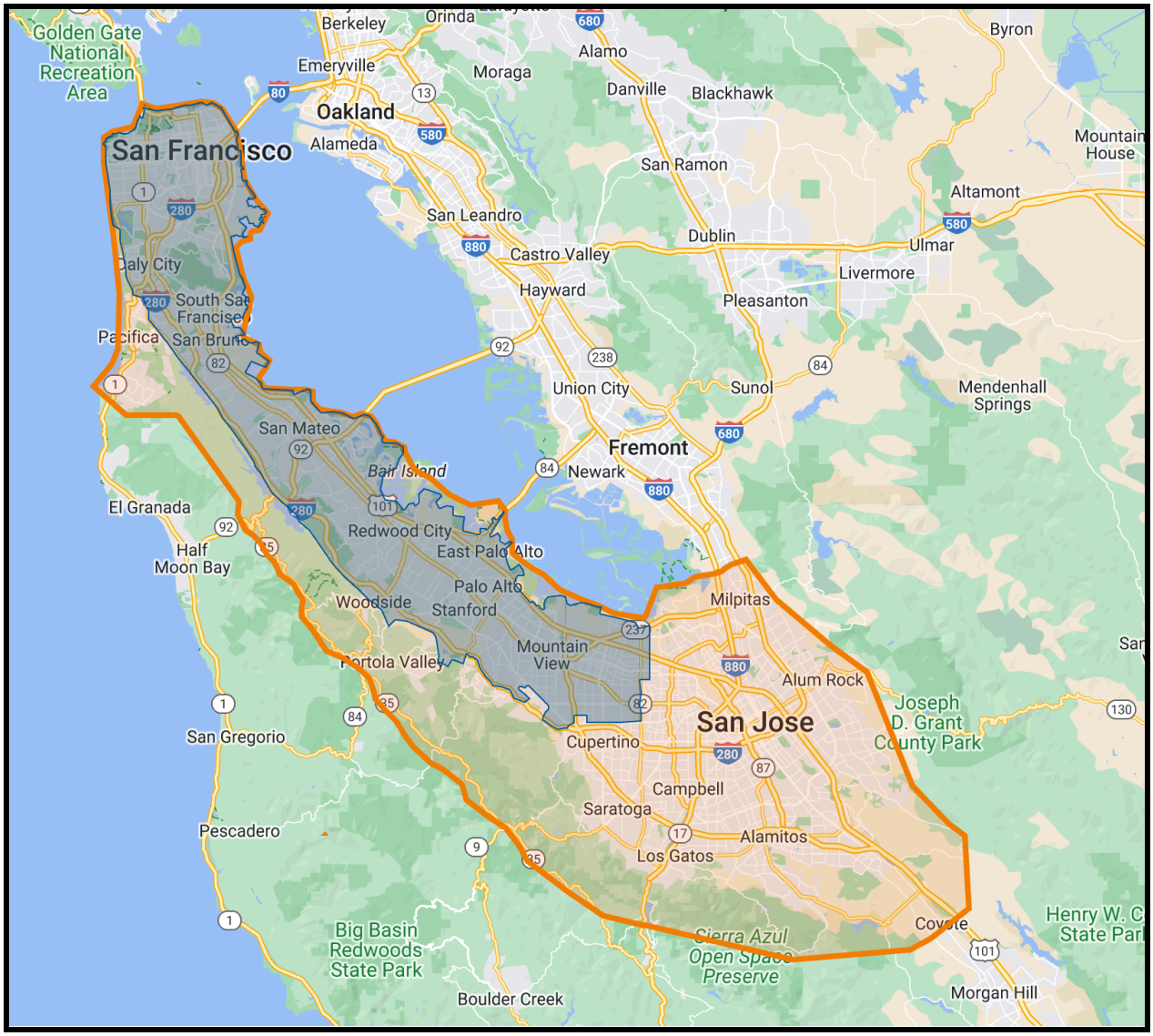

Figure 1. Waymo Operational Design Domain Map. The area shaded in orange is Waymo's expanded ODD for deployment operations approved by the DMV on March 17, 2025.

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ATTACHMENT B

Waymo CA DMV Deployment Permit Approval (March 2025 Amendment)

Waymo holds an active AV Deployment Permit, originally issued by the DMV on September 30, 2021, and most recently amended on March 17, 2025.

CALIFORNIA STATE TRANSPORTATION AGENCY — GAVIN NEWSOM, *Governor*

DEPARTMENT OF MOTOR VEHICLES
POLICY DIVISION
Autonomous Vehicles Branch
P.O. BOX 825393
SACRAMENTO, CA 94232-5393

March 17, 2025

Allison Drutchas
1600 Amphitheatre Parkway
Mountain View, CA 94043

Via Email Only

Dear Allison Drutchas,

On December 10, 2024, the California Department of Motor Vehicles (DMV) received Waymo LLC's (Waymo) application to amend the Permit to Deploy Autonomous Vehicles on Public Streets. The amendment is approved, effective March 17, 2025.

This letter authorizes Waymo's request to expand its deployment to San Jose and the surrounding areas as outlined in the application.

Waymo must not implement any changes specified in the California Code of Regulations, Title 13, Division 1, Chapter 1, Article 3.8, § 228.10(b), until an amended application is submitted and approved by the DMV.

If you have any questions, please contact me at (916) 417-1025.

Sincerely,

MIGUEL ACOSTA, Chief
Autonomous Vehicles Branch

California Relay Telephone Service for the deaf or hard of hearing from TDD Phones: 1-800-735-2929; from Voice Phones: 1-800-735-2922

POL 1 (NEW 8/2022) **DMVWeb** — *A Public Service Agency*

ATTACHMENT C

Waymo's Passenger Safety Plan (March 2025)

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WAYMO

Passenger Safety Plan
CPUC Driverless Autonomous Vehicle Deployment Program
March 2025

Subject Index

BECAUSE SAFETY IS URGENT™

I. Our Mission

Waymo is an autonomous driving technology company with a mission to be the world's most trusted driver, making it safer, more accessible, and more sustainable to get around — without the need for anyone in the driver's seat. We're building *The World's Most Experienced Driver™* and believe our technology will improve access to mobility and make roads safer for all.

Safety is at the core of Waymo's mission — it's why we were founded more than 15 years ago as the Google Self-Driving Car project. Our commitment to safety is reflected in everything we do, from our company culture, to how we design, test, and deploy our automated driving system ("ADS"), which we call the Waymo Driver™. Safety is also the hallmark of our rider experience.

Waymo's Passenger Safety Plan describes how we deliver our California[1] riders with a safe, comfortable, and delightful rider experience each and every day. The features and service enhancements highlighted in this Plan are drawn from our experience providing hundreds of thousands of paid passenger trips each week across multiple major U.S. cities,[2] and from driving tens of millions of autonomous miles on public roads

[1] Waymo is authorized to operate drivered and driverless AV passenger carrier service pursuant to the jurisdiction of the California Public Utilities Commission ("CPUC") under TCP Permit No. 38152-A in the San Francisco Bay Area and in the Los Angeles area. Waymo's Passenger Safety Plan is specific to Waymo's California service areas and is submitted pursuant to Decision 20-11-046, as modified by Decision 21-05-017.

[2] Waymo also operates commercial autonomous ride hail services in Arizona, where our service area currently extends over 315 square miles of Metro Phoenix and includes trips to and from Phoenix Sky Harbor International Airport. Waymo AVs are also available to the riding public in Texas, where rides are available through the Uber app across 37 square miles of Austin.

and tens of billions of miles in simulation.[3] Waymo has also spent years meaningfully engaging with, and learning from, safety and transportation stakeholders from public safety agencies, local governments, and research institutes; accessibility, road safety, and sustainability organizations; as well as neighborhood associations, schools, and other community groups.

As we grow, Waymo is committed to advancing the capabilities of the Waymo Driver, discovering and developing features to enhance our rider experience, and refining our operational programs. Waymo's Passenger Safety Plan highlights certain of the capabilities, features, and procedures that we've integrated into our Waymo One passenger carrier service, demonstrating how Waymo prioritizes rider safety.

II. The Waymo Driver

Waymo's automated driving system is designed to perform the entire dynamic driving task, operating within a defined geography and set of conditions, without the need for a human driver. Our ADS includes the software, hardware, and compute that, when integrated into the vehicle, performs the entire dynamic driving task.

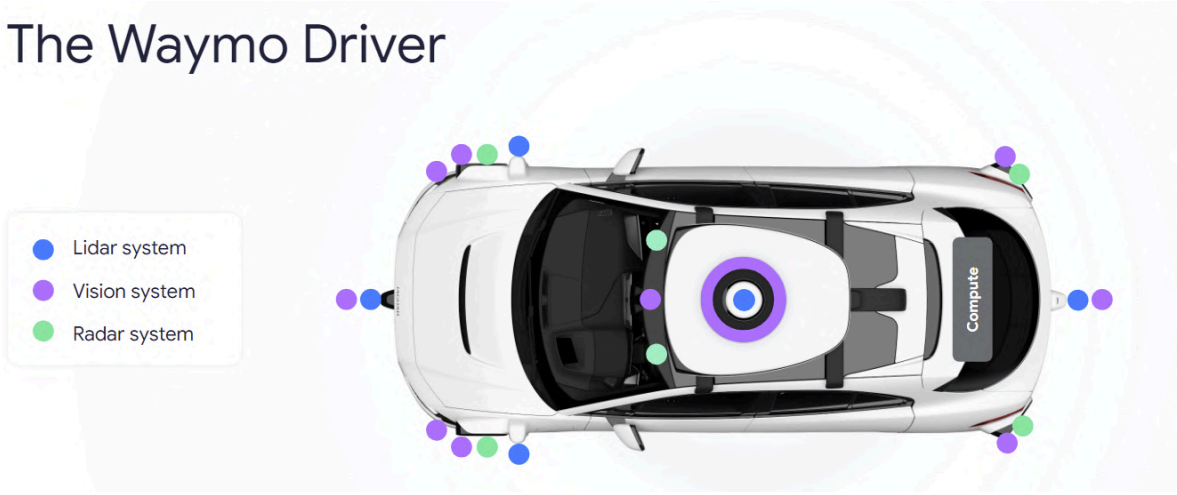

Fig. 1 Illustration of the Waymo Driver sensor suite[4]

[3] See Waymo's public road safety performance data publications, including an analysis of Waymo performance relative to human benchmarks over millions of miles of fully autonomous driving. The latest Safety Impact assessment is available at our Safety Hub at waymo.com/safety/impact. More in-depth performance assessments in our scientific publications are available at waymo.com/safety/research

[4] Please note that Waymo's website, mobile app, and other materials referenced in this Plan may be modified from time to time in consideration of new information and operational updates, and are provided here for illustrative purposes. Any Plan updates will be submitted in accordance with D.20-11-046 (as modified by D.21-05-017) and the CPUC AV Programs Application Guidance (last updated August 16, 2024).

To meet the complex demands of fully autonomous driving, Waymo has developed an array of sensors that allow our vehicle to see a detailed 3D picture of the world, both during the day and at night, as far as three football fields away. This multi-layered sensor suite (composed of lidar, radar, cameras, and other sensors[5]) works together seamlessly, making it capable of identifying dynamic and static objects including pedestrians, cyclists, other vehicles, traffic lights, construction cones, and other road features.

In our Waymo One service areas, we've integrated our ADS into the battery-electric Jaguar I-PACE vehicle platform.[6] The Jaguar I-PACE, equipped with our ADS, provides an exceptional autonomous vehicle ("AV") passenger carrier experience in a variety of urban and suburban environments.

[5] Other sensors include an array of external audio receivers (EARs) used to detect and pinpoint the location of emergency vehicle sirens.

[6] Waymo plans to integrate additional vehicle platforms into the fleet over time, including the all-electric Zeekr RT and the all-electric Hyundai IONIQ 5. Waymo will secure any necessary regulatory approvals prior to making new vehicle platforms available to our California riders.

III. Moving People with Waymo One

Waymo has been working on fully autonomous driving technology in our home state of California for over 15 years, learning from each step along the way as we progressed to make our fully autonomous (driverless) Waymo One™ ride-hailing service available to the California public on a commercial basis in August 2023. Waymo is now providing well over one million driverless rides each quarter across the San Francisco Peninsula and in the greater Los Angeles area, and we look forward to welcoming more Californians to experience Waymo One.

A. Waymo One

Waymo One is Waymo's autonomous ride-hailing service, powered by our Waymo Driver and supported by our Waymo One mobile app. To request rides in Waymo's autonomously driven vehicles, riders in California download the Waymo One app to their mobile device (iOS or Android). Riders choose their destination and set a pickup location using an interactive map. Before confirming the trip, riders will see an upfront fare estimate, route overview, and anticipated ETAs. The Waymo One app also displays useful information for the rider during their trip, including the estimated time to dropoff and how to reach out to Waymo for support (see Fig. 2 app display sample below).

Riders also may tailor their Waymo One app and trip experience to their accessibility needs, as described in more detail in Part XI.A. *Accessibility* below.

Waymo riders may request rides immediately after downloading the app and successfully creating an account with Waymo, except in areas where we may have limited service capacity and are growing to meet anticipated rider demand. Waymo is not currently offering riders the option to arrange a driverless ride shared by more than one chartering party. Waymo's service offerings will grow and change over time.

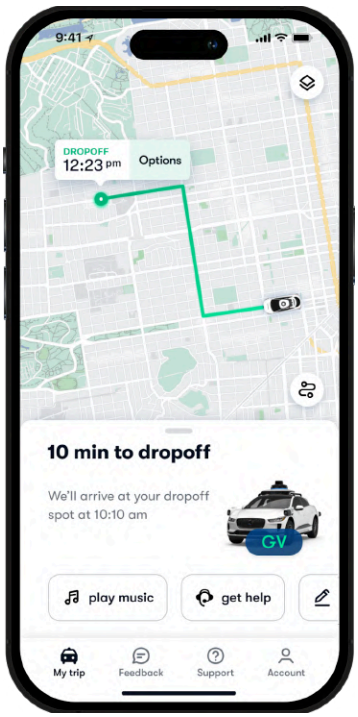

Fig. 2 Waymo One mobile app display with mid-trip information and options

B. Waymo's California Driverless Service ODD

Waymo provides CPUC-authorized driverless passenger carrier service exclusively within the operational design domain ("ODD") authorized by the California Department of Motor Vehicles ("DMV") for driverless testing (CPUC pilot) and deployment. Driverless passenger carrier operations are conducted under a variety of weather conditions (e.g. rain, fog, and hail), on roadway types such as city streets, parking lots, and freeways, at all times of day and night.[7]

Waymo's driverless pilot and deployment geographic ODDs cover parts of:

- The San Francisco Peninsula,[8] including cities and unincorporated territory within the City and County of San Francisco (excluding Treasure Island), the County of San Mateo, and the County of Santa Clara; and
- The Los Angeles area, including cities and unincorporated territory within the County of Los Angeles.

Waymo's ADS is designed so each vehicle does not operate autonomously outside of its approved ODD. For example, our riders cannot select a destination outside of our approved geography, and our software will not create a route that travels outside of our ODD. The Waymo Driver also can detect changes in ODD-relevant conditions and adjust its behavior accordingly (e.g. by slowing down in heavy rain or fog). Furthermore, the Waymo AV is designed to come to a safe stop when conditions outside the ODD are present (e.g. widespread snow or ice accumulation on the roadway).[9]

We also design our vehicles to be capable of complying with federal, state, and local laws within our geographic areas of operation. Through our internal programs and processes, we identify applicable legal requirements relevant to safe driving and build those requirements into our system. Before our vehicles drive in a new area, our team works to understand the nuances of driving in that locale, and we update our software so our vehicles are capable of operating safely and appropriately.

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[7] Maps and descriptions of Waymo's DMV-authorized ODDs are contained in Waymo's Law Enforcement Interaction Protocol for the Jaguar I-PACE, which ODD may be modified from time to time pursuant to 13 CCR 227.30.

[8] Jurisdictions newly included in Waymo's Passenger Safety Plan via this 2025 Update include the cities of Campbell, Cupertino, Los Gatos, Milpitas, Monte Sereno, Pacifica, San Jose, and Saratoga.

[9] See Part IV.C. *Every Waymo Ride* (*Pulling Over and Safely Exiting)* for more on how the Waymo Driver identifies a safe location to pull over, including in the process of achieving a "minimal risk condition."

Waymo is pioneering fully autonomous driving technology. As our service capacity and system capabilities grow, we will bring our technology to more California communities.

IV. Rider Education

Our automated driving technology is cutting edge, but how we talk about it isn't complicated. Our rider-oriented communications educate our riders about how our technology and services work, what they can expect in riding with us, and what precautions and processes we have in place to transport them safely and comfortably.

A. Public Engagement

Before signing up to ride with Waymo, potential riders may be introduced to our service through various media and methods. Waymo also seeks to reach beyond our potential customers to the broader public, to familiarize people with the Waymo AV's capabilities.

- Waymo's Website. Waymo maintains a website with useful information about Waymo's service, experience, and safety information. For example, Waymo's website hosts our blog, which provides updates on Waymo's service and technology. Our website also links to our published safety papers (waymo.com/safety), our law enforcement interaction plans (waymo.com/firstresponders), and other informative resources. Key resources are provided in Spanish, Filipino, and Chinese (traditional and simplified) as illustrated in the two sample images below (see Figures 3 and 4).

Fig. 3 “How it works” slide story at *https://waymo.com/waymo-driver/ (English)*

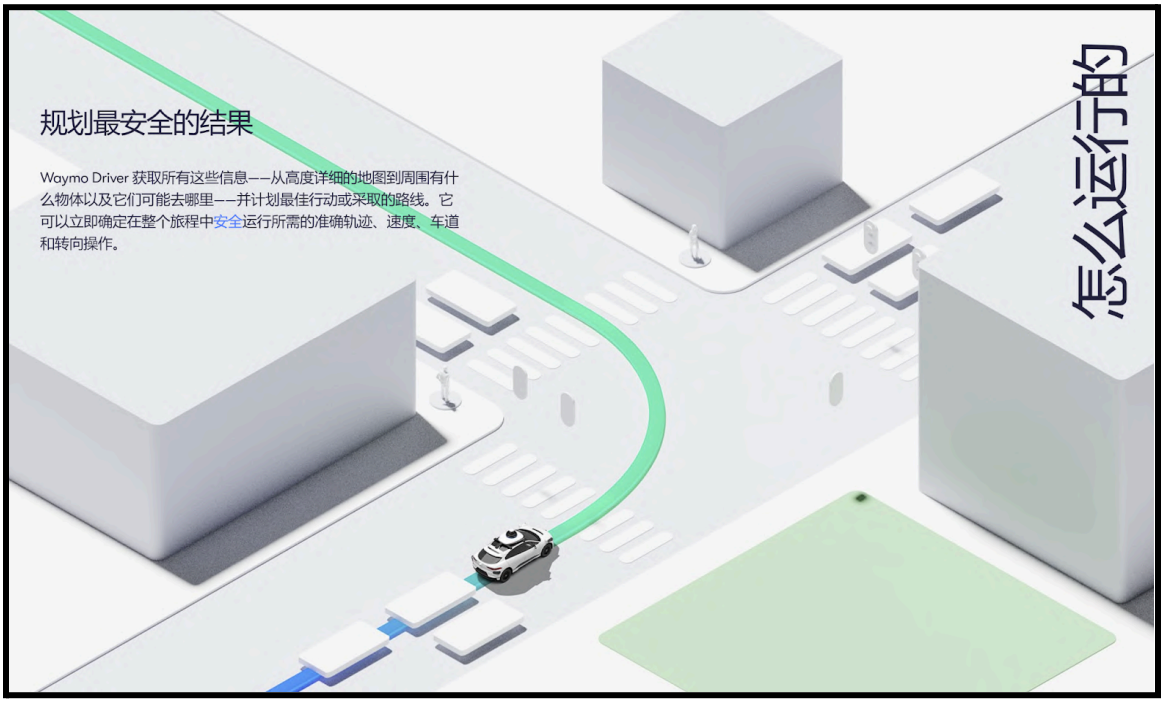


Fig. 4 “How it works” slide story at *https://waymo.com/waymo-driver/ (Chinese - simplified)*

- Waymo's Community Engagement. Waymo supports local and national nonprofits through event sponsorships, charitable delivery, free and reduced ride programs, educational vehicle showcases, providing rides to and from partner events, volunteerism, and more. Waymo works in partnership with local and national safety, disability, equity, mobility, and senior organizations to engage and educate the public about how Waymo's AV technology works and the public benefits it may unlock. We invite nonprofit partners to participate in user experience research studies as well as Waymo's Accessibility Network to ensure Waymo is listening to and learning from a diverse set of communities to better equip us to serve the unique needs of all riders. Please see waymo.com/community for more information.

Fig. 5 Waymo with red ribbon decal encouraging people to "designate a driver" at the annual Illuminate MADD California Press Conference and Vigil, Los Angeles City Hall

Waymo also hosts informational events in the communities in which we operate. These events help us to inform, and be informed by, our neighbors and local organizations. We typically include a static showcase of our ADS-equipped Jaguar I-PACE vehicle, with Waymo representatives available to answer questions and share their experiences. We may also set up interactive displays at events that describe Waymo's technology, mission, and vision for the future. For certain events, we've also employed digital content, video tutorials, and other media to educate about our technology. These informational events are a user-friendly way to introduce Waymo's state-of-the-art automated driving system and ride-hailing service to the public.

Fig. 6 Waymo Los Angeles Tour Pop-ups, late 2023 and early 2024

B. Getting Started with Waymo

Waymo's onboarding process provides our prospective riders with a variety of resources about the Waymo One ride experience and what to expect from our vehicles. Those seeking to take driverless trips in our California service areas have the opportunity to review our terms of service and privacy policy in the process of setting up a Waymo account. Onboarding[10] also includes notice to account holders that they will be receiving driverless AV service provided by Waymo under the Commission's jurisdiction, and account holders acknowledge and agree to receiving such service as

[10] Waymo account onboarding may change and streamline over time as our Waymo One service expands to serve more riders, but essential notices and acknowledgments will remain.

part of creating a Waymo account. Account holders are also required to confirm that they are at least 18 years of age to ride with Waymo (riders under 18 must be accompanied by an adult account holder) in California.

Key actions taken in the onboarding flow are memorialized in communications sent to the account holder by email. A new Waymo account holder will receive confirmation that they can now ride with Waymo One, together with useful information about taking their first autonomous ride using the Waymo One mobile app.

Riders have 24/7 access to FAQs and articles hosted in the Waymo One mobile app and through the Waymo One (online) Help Center. Waymo's Help Center provides text and video resources describing the rider experience and familiarizing riders with the vehicle and mobile app (see Figure 7 example below showing riders how to start their ride with a reminder to use seat belts). Riders can also learn more about how the Waymo One app keeps them informed of their vehicle's arrival status, how to enable or change accessibility settings, the vehicle's seating capacity, how to access the trunk, and many other practical tips intended to optimize their experience.

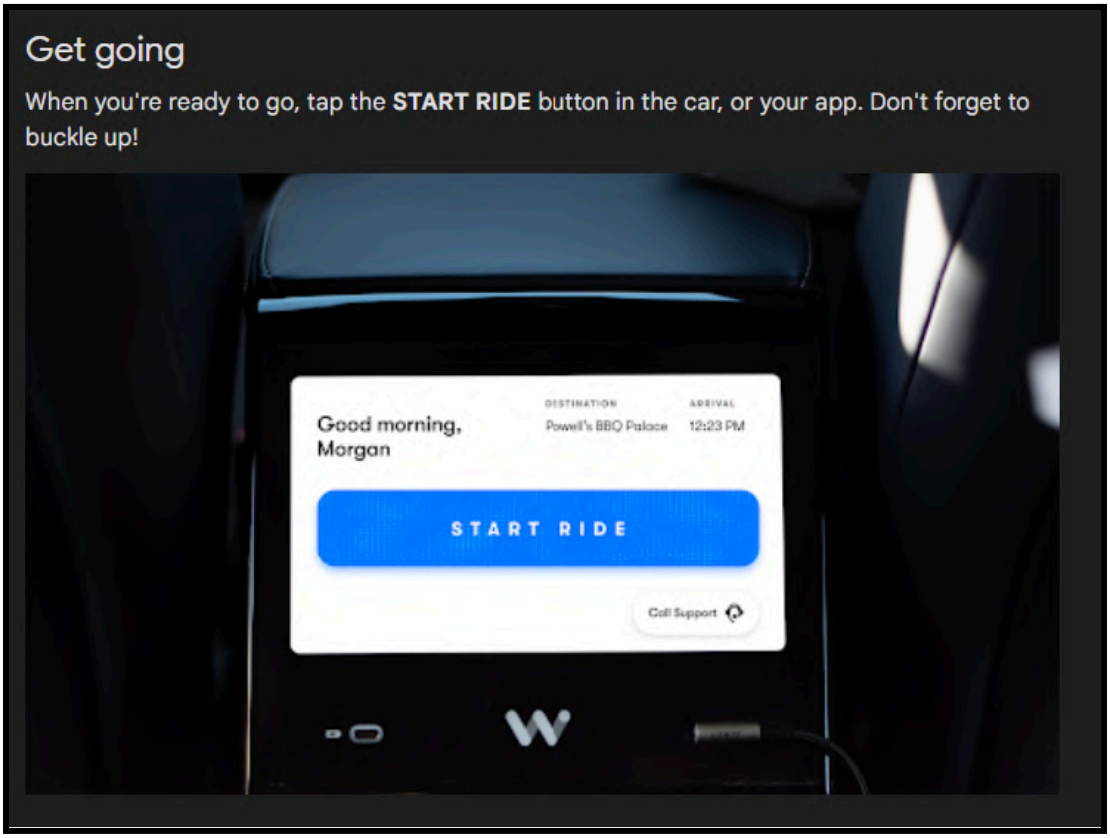
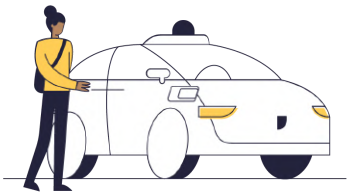


Fig. 7 Help Center sample from "Your first ride" article



C. Every Waymo Ride

Each time a rider hails a Waymo AV, we have an opportunity to educate them about how our service can safely serve them. Together, the Waymo One app and the features we integrate into the in-car experience help our riders understand how our fully autonomous vehicles operate. We enhance rider safety and comfort through timely and relevant communications and with an ever-expanding suite of safety features and functionality. These communications and features include the following:

- Seat Belt Reminders. Buckling up saves lives, and Waymo has developed multiple ways of keeping seat belts top of mind for our riders.[11] In our driverless vehicles, riders will be reminded to buckle their seat belt through in-vehicle screen notifications (e.g. our in-vehicle screen alert shown in Figure 8 below), and other media (e.g. rider safety video). Riders also receive automated visual and/or audio alerts if the vehicle's sensors detect unbuckled seat belts.

Fig. 8 In-vehicle screen seat belt alert

[11] Waymo was recently awarded a 3-star rating in the FIA Road Safety Index - the highest possible recognition - in account of these seat belt reminders and Waymo's other safety practices.

- COVID-19 Prevention. We follow current COVID-19 health and safety guidance issued by relevant local, state, and federal authorities, as directed by Commission Resolution TL-19131. Waymo's Health & Safety Protocol is provided in Part VIII below.

- Setting and Changing Pickups and Dropoffs. We want our riders to enjoy a smooth trip experience and sometimes that means they'll want to adjust their pickup or dropoff location. Riders can do so in the Waymo One app, even after having arrived at their original destination, including in response to in-app prompts for the availability of this feature (see Figure 9).

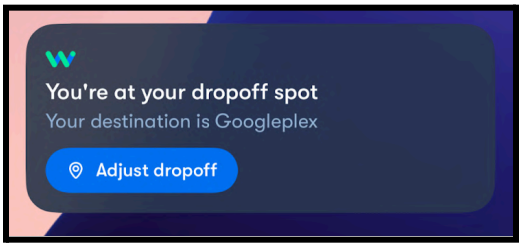


Fig. 9 In-app display of location adjustment prompt

Instructions for creating and editing a trip are available in-app and also in the Waymo One Help Center. Figure 10 below illustrates the dropoff location editing functionality in the Waymo One app.

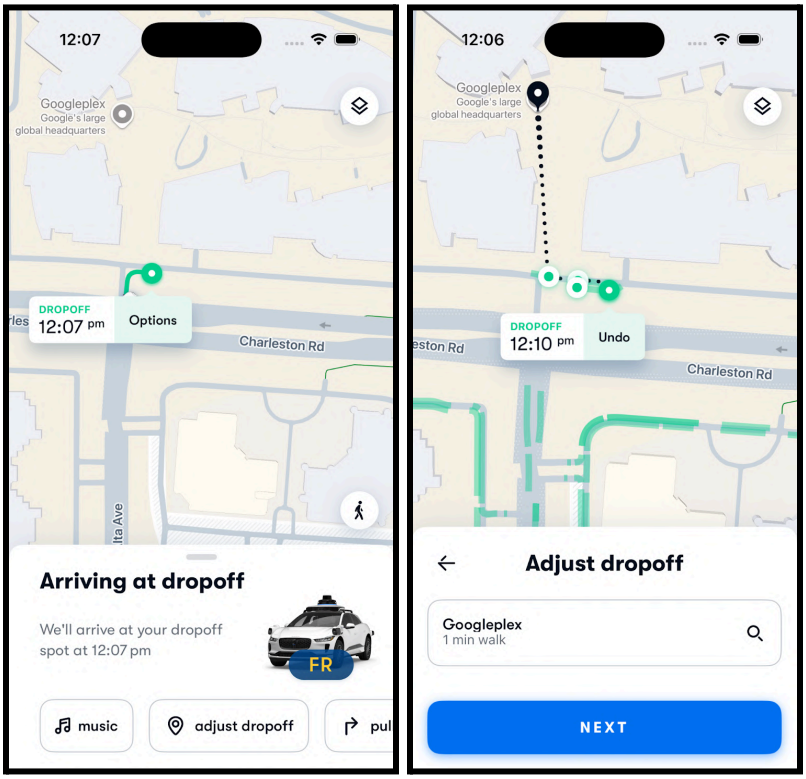


Fig. 10 In-app displays demonstrating dropoff location adjustment

- Identifying and Boarding the Vehicle. For each trip, the rider is shown an image of the vehicle model in the app. Each Waymo AV is easily identifiable by the automated driving system's roof assembly and front fender additions, which bear Waymo's distinctive blue ring, and the Waymo name on the sides of the vehicle and TCP number.

Fig. 11 Vehicle Identification (Hardware, Name, TCP)

To make it easier for riders to find and board their unique vehicle in driverless operation, Waymo AVs have a vehicle identification feature that displays two (2) letters and a color unique to the hailing rider on the AV's main ADS sensor module. Riders can select the letter and color combination for each trip in the app, or the display will default to the rider's first and last initials. This feature is displayed on the vehicle when the AV arrives at the pickup location and is ready for the rider to board.

Fig. 12 Vehicle Identification (Initials Display)

The Waymo app also allows riders to prompt their Waymo AV to emit a distinctive chime sound or to honk the vehicle's horn (see Part VI.A *Accessibility* for more about this feature). This functionality helps riders identify and find their way to their vehicle using sound.

Having arrived at the vehicle, the rider will receive additional cues that they have located the correct car. These cues include door unlock and handle release triggered by the rider unlocking the vehicle in-app or via rider proximity detection. In addition, a distinctive welcome chime will play a greeting using the rider's first name once the door is opened, and their name will appear on the in-vehicle screen display (see Figure 14).

Waymo also enhances the safety of the boarding process for the benefit of our riders and other road users by displaying a boarding icon on the rear-facing side of the main ADS sensor module. This boarding icon turns on once the vehicle comes to a stop at the pickup location and is waiting for the rider to arrive, indicating to other road users that the vehicle is stopped for a rider to board.

Fig. 13 Rider Boarding Notification Icon

- In-Vehicle Screen Display. Each Waymo AV has two in-vehicle screen displays that are for the dedicated use of the riders during their trip. The screen enables the rider to take certain actions throughout their ride, which include the following functionalities: Start Trip, Call Rider Support, Pull over, and Lock Door. The screen displays notifications about the rider's trip that are important to know along the way, such as: ETA, destination details, and instructions in the event of a trip interruption. Our rider safety video also automatically plays on the in-vehicle screen as a rider's first trip begins. The video covers important safety points and is available for replay via on on-screen button at any time.

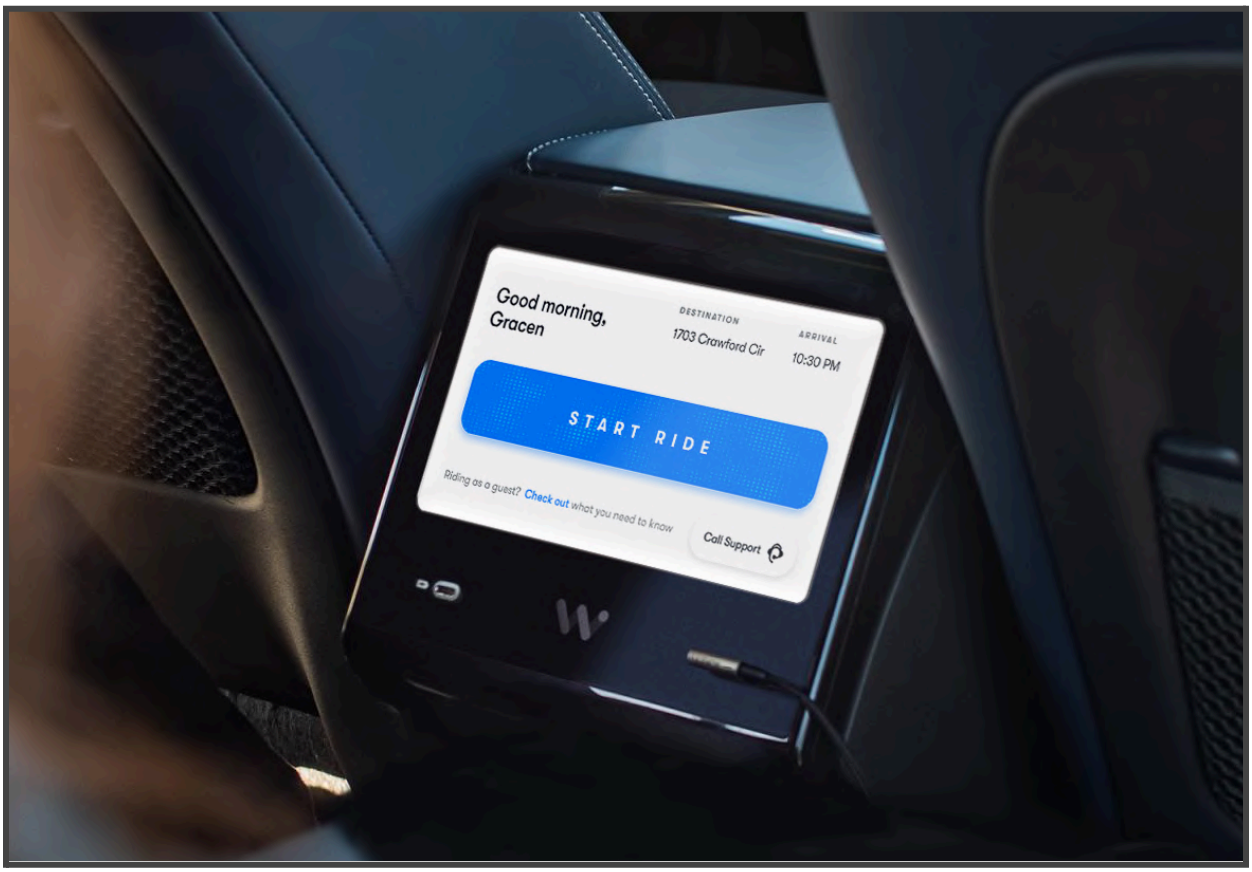


Fig. 14 In-Vehicle Screen in Jaguar I-PACE

- In-Vehicle Cameras. Cameras inside our AVs help to ensure trips go smoothly and improve the service. Among other things, we may use cameras to check that our vehicles are clean, find lost items, provide help in case of emergency, check that in-car rules are being followed and improve products and services.

- Pulling Over the Vehicle and Safely Exiting. Riders may request to end their trip early and exit the Waymo AV before reaching their destination by using the Pull over button. This feature is conspicuously displayed on the in-vehicle screen and in the Waymo app. If activated, the rider will receive confirmation that a pullover has been initiated by audio and visual alerts inside the vehicle (in-vehicle screen and speakers), including a notification that the car is looking for a safe spot to pull over.

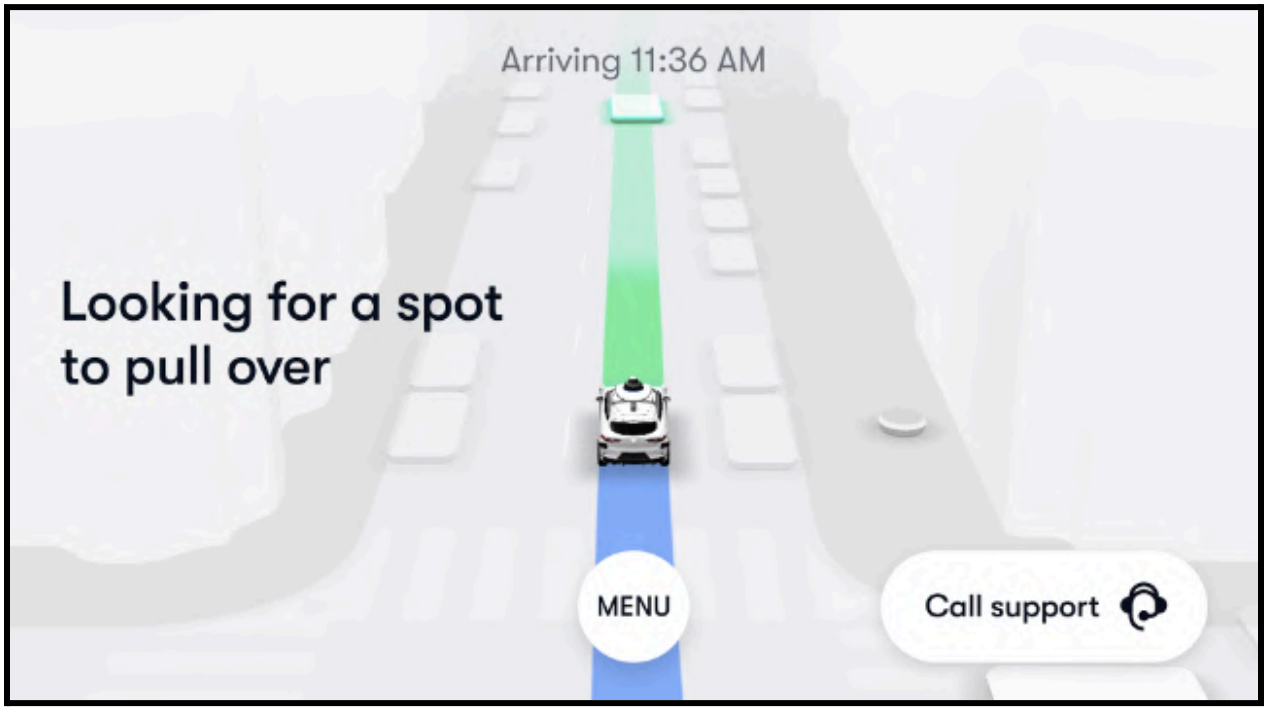


Fig. 15 Showing pullover in progress display on in-vehicle screen

When selecting and safely navigating pull over locations, Waymo prioritizes rider and road user safety. The Waymo AV factors in compliance with applicable stopping, standing, and parking laws, the quality of the rider experience, and potential community impacts (e.g. congestion). We analyze various data points to select a pull over location that balances these considerations, based on real time conditions (e.g. open curb, presence of other road users) and information from our detailed 3D maps (e.g. roadway type). We use this same holistic approach to pull over under circumstances that are routine (e.g. rider-requested pickups and dropoffs), as well as those that are more infrequent (e.g. events where the Waymo AV seeks to achieve a minimal risk condition).[12]

[12] 13 CCR Section 227.02(i) defines "minimal risk condition" as "a low-risk operating condition that an autonomous vehicle resorts to when either the automated driving system fails or when the human driver fails to respond appropriately to a request to take over the dynamic driving task."

Once the vehicle is pulled over, it's always prudent for a rider to look out the window before opening the door. Waymo's dooring prevention feature provides both visual and audible notifications to alert the rider to use caution when opening the door if a cyclist, scooter, or other fast-approaching road user is detected near the door.

The Waymo AV enhances the safe interaction of our riders with other road users, including pedestrians and cyclists, by displaying a de-boarding icon on all four sides of the main ADS sensor module. This display indicates to other road users that a rider is in the process of exiting the vehicle.

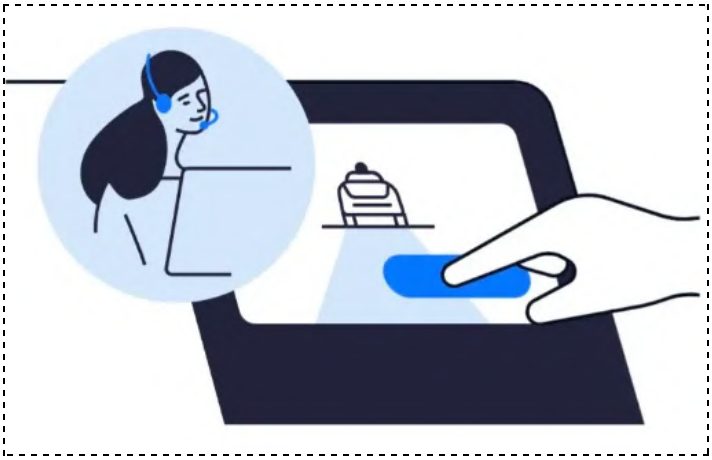
Fig. 16 Rider De-boarding Notification Icon

- Lighting. Waymo also uses lighting to enhance the rider experience, including by facilitating safe entry and exit from the vehicle with puddle lamps that illuminate the ground outside of the Waymo AV during pickup and dropoff.

- Pedestrian Yielding Signal. The Waymo AV promotes safe interactions with other road users for the benefit of our riders and pedestrians by displaying a pedestrian yielding icon on the rear of the main ADS sensor module.

Fig. 17 Pedestrian Yielding Notification Icon

- Contacting Rider Support. Riders are encouraged to contact Waymo's Rider Support team for 24/7 assistance, as described more fully in Part 5 *Waymo Rider Support* below.



V. Waymo Rider Support

Waymo's Rider Support agents are available 24/7 to assist riders with questions and concerns. Waymo's Rider Support team provides essential and timely customer support for our AV passenger service and will respond to outreach from riders, or initiate contact if the Waymo AV's diagnostics indicate such a need (e.g. if riders do not buckle their seat belts). Once notified, a Rider Support agent is assigned with live information about the state of the trip through our Rider Support tool. Issues may also be escalated to Waymo's Event Response team as described in more detail in Part VI. *Responding to Adverse Events* below.

Whether a trip is in progress, planned, or already completed, riders can reach Rider Support via phone, chat, or email through the Waymo One app. During a trip, riders may also connect with Rider Support by pressing the Rider Support button on the in-vehicle screen to communicate via the vehicle's built-in two-way communication system. All riders, including those accompanying the Waymo One account holder, can use this latter method while riding with Waymo.

To allow for optimal routing of rider requests for assistance, Waymo's in-app help functionality allows riders to select their desired method of reaching out to our Rider Support team or to request urgent assistance by dialing 911 directly from the mobile app, as displayed below.

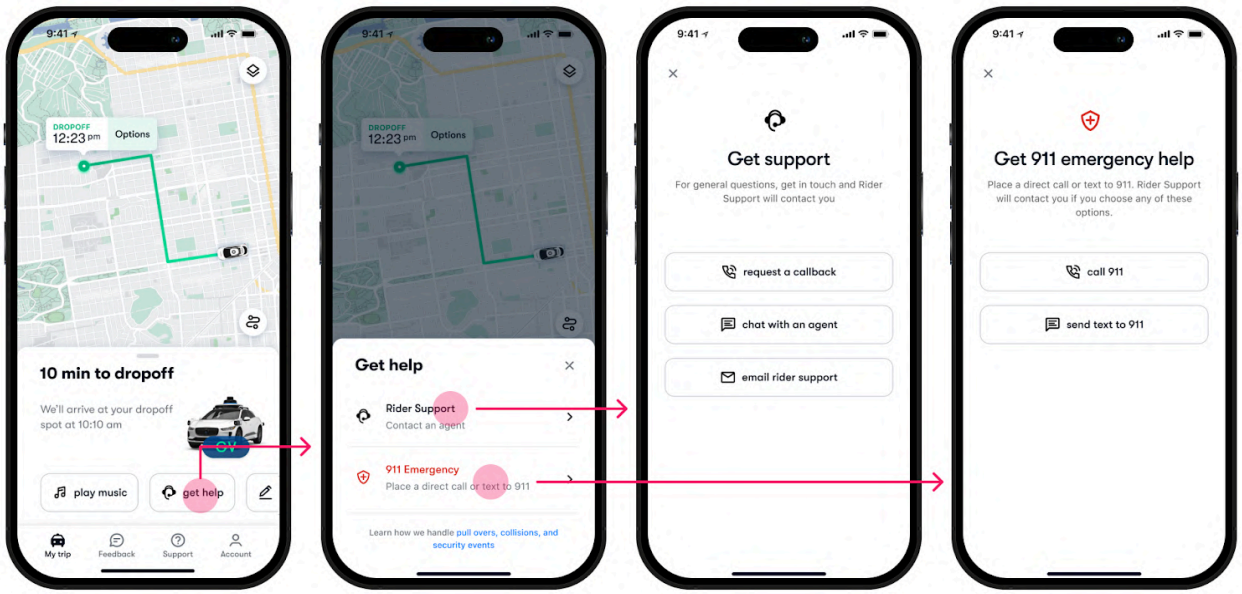


Fig. 18 In-app help functionality

Rider requests for contact communicated by calls and chats are typically answered within 60 seconds. Inquiries sent by email to Rider Support are acknowledged within 24 hours. Agents make every effort to resolve concerns or issues raised by a rider during the initial communication and are supported by an escalation lead. Where further investigation is needed, agents escalate to our cross-functional team for further consultation and resolution. Escalations are meant to help resolve specific concerns, and also to flag learnings from these contacts for future service improvements.

Every Rider Support contact generates a case record, which is categorized according to the nature of the issue raised (e.g. problem with Waymo account setup, request for Waymo service area expansion, additional time needed for pickup, promotions question). This process of categorization enables Waymo to provide uniform and consistent support to our riders, and allows us to monitor trends in rider reach-outs to identify opportunities for future service improvements. Case records are maintained in accordance with Section 6.01 of the Commission's General Order 157-E.

In addition, anyone (riders, as well as non-riders) can reach out to Waymo using our "Contact Us" form available on our website (waymo.com/contact). Communications received through this form are timely reviewed by our cross-functional community support team, and are routed to Rider Support for an initial follow-up with the individual within 24 hours.

Waymo's Rider Support team plays an important role in providing a safe and reliable Waymo One experience. We staff our Rider Support team based on service levels, so as Waymo One and our ridership grow, we adjust our team capacity accordingly to continue to meet and exceed our riders' expectations.

VI. Responding to Adverse Events

Waymo prepares for events that may interrupt a trip or present a safety risk for a rider. We have designed our driverless service to reduce the risk of these events and respond when they occur.

In addition to Rider Support, Waymo maintains operational teams that are available 24/7 to respond to potentially disruptive events. These teams include the Waymo Remote Assistance team, the Waymo Event Response team, and the Waymo Roadside Assistance team.

Waymo Remote Assistance	Waymo Event Response	Waymo Roadside Assistance
Waymo AVs encounter countless dynamic scenarios while operating on public roads. As the Waymo AV interprets the myriad inputs and scenarios it encounters, using its robust sensor suite and onboard computing system, the Waymo AV sometimes reaches out to Waymo Remote Assistance for additional information to contextualize its environment. The Waymo Remote Assistance team supports the Waymo AV with information and suggestions in order to enhance overall vehicle performance.	The Waymo Event Response Team manages the operational response to disruptive in-field events. ERT agents efficiently respond, report, and resolve potentially complex situations, using their training across tasks relevant to remote assistance, authorities (e.g. first responder interactions), and support for riders.	Waymo Roadside Assistance provides in-field assistance to Waymo AVs, including those transporting riders in passenger carrier service. Waymo Roadside Assistance may be dispatched to assist in case of, for example, a collision. WRA may communicate with law enforcement and other parties, assist in the exchange of vehicle information (e.g. insurance), coordinate vehicle retrieval, and assist riders.

Each of these teams has a role in facilitating safe and comfortable rides with Waymo One, as illustrated in the various scenarios below.

A. Trip Interruptions. In the event that the Waymo AV's onboard software detects a potential collision or other trip interruption, Waymo's operational teams (Remote Assistance, Rider Support, and/or the Event Response Team, as circumstances may warrant) will be immediately notified. Waymo will check on the status of the riders and, in the case of a collision or similar event, will inquire as to whether there are injuries or circumstances requiring emergency medical assistance. If so, Waymo will contact 911 emergency services and initiate Waymo's response procedures for such events.

Remote Assistance or Event Response will review the scene using camera feeds from the AV and other signals to determine possible reasons for the interruption, and to

assist the ADS to resolve it, if possible.[13] Various tools may be deployed in such scenarios, depending on the specific circumstances in the field. For example, the Waymo AV may be assisted in routing away from a roadway obstruction or performing a multi-point turn. Additionally, Waymo personnel may select and play audio messages from the Waymo AV's external speakers to help road users around the AV to understand what the Waymo AV intends to do. Messages include, *"I'm planning to move but need more space. Can you back up please?"* and *"I can't move at the moment but help is on the way. Thank you for your patience."*[14] Messages may also caution that "*Unsafe behavior [has been] detected, authorities may be contacted." or* direct law enforcement to "*Please approach the driver-side window to speak with a Waymo representative.*" These tools are designed to minimize the impact of trip interruptions and enhance the safe operation of the Waymo AV.

The Event Response Team is also available to communicate directly with on-scene first responders through the Waymo AV's in-car speakers. Event Response agents are trained to authorize law enforcement to transition the Waymo AV to manual mode so it may be manually driven, if needed.

Where the Waymo AV is not able to continue driving autonomously, Waymo's Roadside Assistance team will be promptly dispatched to the scene. As may be required under the circumstances, Waymo's Roadside Assistance team may communicate with law enforcement and other parties, assist in the exchange of vehicle information (e.g. insurance), coordinate vehicle retrieval, and assist riders.

B. Assaults and Harassment. We work to make every Waymo AV a safe place to be. Engaging in harassing or threatening behavior while using our service (whether aimed at other riders, road users, or a member of the Waymo team) is strictly prohibited. If Rider Support is alerted to or observes potentially criminal behavior by a rider during an active trip in our driverless service, Rider Support will end the trip to allow the vehicle to pull over at a safe location, and will call 911. Waymo will review any

[13] During a trip interruption, the Waymo AV may request additional context about the circumstances from Remote Assistance. Depending on the nature of the request, assistance is designed to be provided quickly - in a matter of seconds - to help get the Waymo AV on its way with minimal delay. For a majority of requests that the Waymo AV makes during everyday driving, the Waymo AV is able to proceed driving autonomously on its own. In very limited circumstances such as to facilitate movement of the AV out of a freeway lane onto an adjacent shoulder, if possible, our Event Response agents are able to remotely move the Waymo AV under strict parameters, including at a very low speed over a very short distance.
[14] The Waymo AV is also capable of playing certain external audio messages without assistance from the Waymo Remote Assistance team.

such event for potential deactivation of the offending rider's Waymo account and will cooperate with any related law enforcement request.

C. Rider Medical Events. Waymo anticipates that a rider may experience a medical event, including, for example, a condition that renders a rider unresponsive. If Rider Support is alerted to the event either through the in-car screen or the rider's mobile app, or observes an apparent medical event occurring with a rider, agents are trained to quickly assist. Rider Support will, for example, contact 911 if emergency services need to be dispatched to the location of the Waymo vehicle.

D. Unsafe Scenarios Outside of the Vehicle. Potentially unsafe scenarios include, but are not limited to, physical security events by hostile individuals (e.g. vehicle vandalism), spontaneous road closures (e.g. for construction), as well as natural disasters. In addition to supporting our riders with the 24/7 availability of Rider Support and 911 emergency services (described in Part V. *Waymo Rider Support* above), the Waymo ADS and operational processes described herein were developed with such scenarios in mind, in order to safeguard those in and around the Waymo AV.

The first means of protecting against risks associated with potentially unsafe conditions is to avoid them wherever possible. Waymo minimizes the likelihood of being involved in such situations by redirecting vehicles away from such areas. For example, if one vehicle encounters an unplanned road closure, the rest of the fleet can be quickly routed away from the affected area. Waymo also employs other avoidance approaches, which include temporarily reducing our presence in close proximity to known areas of potential concern (e.g. parade) and partnerships with select public safety agencies to receive rapid notice of first responder avoidance areas.

In the event the Waymo AV encounters an unsafe scenario, the vehicle's driving functionality can help protect against the risk of physical harm. For example, the Waymo AV is designed to detect emergency scenes at a distance, giving the vehicle adequate time and space to safely maneuver away from a scene, including by performing a multi-point turn. Waymo vehicles also can detect approaching emergency vehicles,[15] and crowds of pedestrians gathered in or traversing the roadway, to protect against a collision, for example. External audio messages may also be utilized to indicate that law enforcement has been called to the scene, as may be

[15] The Waymo vehicle is designed to yield as appropriate to moving emergency vehicles, no matter which direction they are headed.

appropriate. In addition, the Waymo AV can signal for support from Waymo teams trained in incident response procedures to quickly address a triggering event, including requesting law enforcement and medical assistance, as may be needed. These and other key capabilities have been designed, tested, and implemented to prioritize the safety of our Waymo One riders and the broader public.

Waymo works with law enforcement and other first responders in the areas in which we operate. Our dedicated team of experienced public safety executives have over 120 years of combined experience as first responders.[16] Waymo prioritizes proactively conducting regular in-person training sessions detailing best practices for safe interactions with the Waymo AV, including how to quickly reach Waymo in the case of an emergency event. To date, Waymo has trained over 9,500 of California's first responders, providing information to those in the areas we operate who may interact with our vehicles. Waymo also seeks first responder input regarding AV operations in individual jurisdictions and has incorporated suggestions from first responders into our operations.[17]

E. Vehicle Tampering. Waymo instructs riders not to touch the Waymo AV's sensors (e.g. lidar), vehicle controls (e.g. gear shift), or driving mechanisms (e.g. steering wheel). Upon detection that the AV's external sensors have been manipulated, Waymo's security controls will prompt the vehicle to come to a safe stop (or remain stopped) until safe to proceed, and Rider Support will be alerted. Depending on the nature of the event, Rider Support may end the trip, and the rider may have their Waymo account status impacted or be reported to law enforcement authorities.

F. Items Left Behind. Riders who inadvertently leave items behind in a Waymo AV may reach out to Rider Support (see Part V *Waymo Rider Support* above) to have the vehicle returned to a Waymo facility for item retrieval. Waymo has also developed certain features meant to help keep riders from forgetting their things to begin with. At the end of a trip, if the Waymo AV detects that an item (such as a phone or wallet) may have been left behind after the rider has exited, the rider will be alerted by a message played via the Waymo AV's external speakers. A notification will also appear on the rider's phone, allowing them to retrieve their item before the Waymo AV proceeds.

[16] See https://waymo.com/firstresponders/
[17] See Waymo's Law Enforcement Interaction Protocol for the Jaguar I-PACE vehicle.

VII. Safe & Inclusive Service

A. Accessibility

Improving mobility access is core to Waymo's mission, and we are dedicated to improving personal independence and access to transportation through the broad deployment of our technology. To better understand rider needs, including riders with disabilities, we conduct targeted research studies and collect feedback on an ongoing basis, including from the trips we provide to members of the public. Waymo actively engages individuals and organizations spanning a breadth of access issues to better understand ways to improve accessibility for our riders, including through the Waymo Accessibility Network described further below.

Fig. 19 Waymo hosting educational and experiential opportunities for visitors to the Fairfax Senior Citizens Center, Los Angeles, September 2024

- **Engagement.** Waymo's work to develop mobility solutions that work for riders of all abilities is accomplished in collaboration and learning with the disability community. We partner with organizations that advocate on behalf of different constituencies lacking adequate mobility options, including as part of the *Waymo Community* public education initiative described in Part IV.A. *Public Engagement* above.

Participating organizations include: San Francisco-based LightHouse for the Blind and Visually Impaired, one of the largest and most established comprehensive blindness organizations in North America; Independent Living Resource Center of San Francisco; Self-Help for the Elderly; Support for Families of Children with Disabilities; Northern California Spinal Cord Injury Foundation; Curry Senior Center; National Federation of theBlind; Los Angeles-based Integrated Community Collaborative; Easterseals Southern California; Best Buddies; Epilepsy Foundation; the Arc and more.

In October 2022, Waymo launched the Waymo Accessibility Network to partner directly with organizations that support people of all ages living with physical, visual, cognitive, and sensory disabilities. The network was created to formalize and scale Waymo's longstanding collaboration with disability advocates, and facilitates the sharing of valuable feedback and perspectives with Waymo's product and user experience teams to shape the future of transportation.

Local road safety and disability advocacy organizations have been among the first community members to take rides with Waymo. Waymo has engaged with disability organizations including Easterseals Southern California; Integrated Community Collaborative; Braille Institute; local chapters and affiliates of Best Buddies and the Epilepsy Foundation; Alzheimer's Association California Southland Chapter and more.

Waymo also continues to work directly with disability nonprofits to welcome their members into our ridership. Organizations that we engage with include: the Northern California Spinal Cord Injury Foundation (NorCal SCI); Independent Living Resource Center SF; Vista Center for the Blind and Visually Impaired and United Spinal Bay Area.

- **Features and Service Improvements.** Our work is ongoing but already has generated features and service improvements to assist and accommodate riders of all abilities. These include the following:

Honk Horn or Chime When the car is stopped at pickup, riders can press a button in the app to honk the car's horn or ring a distinctive chime sound. Riders can use the sound of the horn or chime to locate the car. Limits on the honk horn button prevent the horn from being honked too frequently and bothering bystanders.	**Wheelchair Accessible Vehicles** Using the Waymo app, riders may hail a ride in a WAV provided by a Waymo partner in a conventional (not autonomous) ADA wheelchair accessible van. Partner drivers are trained to industry-leading standards to work with disabled riders. Riders with mobility needs other than WAV can also hail these vehicles. Waymo is working to expand this offering to other service areas.	**Minimize Walking Setting** Riders can select a setting to minimize walking, even if a shorter walk means the car may need to take a longer route and add to their overall trip time. This setting also makes it much less likely for the car to pull over on the opposite side of the street from where the rider requested.
Screen Reader Support Our Android and iOS apps are regularly tested with Talkback and VoiceOver screen readers to ensure blind and low-vision riders can navigate them.	**Assistive Audio** Riders can enable a setting that provides more audio cues and information throughout the ride (e.g. why the car is yielding) which is particularly helpful for those with vision disabilities.	**Vehicle ID** Waymo riders can set a unique two-letter car ID and color that is displayed atop the vehicle, making it easier to distinguish their Waymo vehicle from others and confirm it's their ride.
Long Walk Warnings Before requesting a ride, riders are informed if a long walk will be required at pickup or dropoff. This allows the rider to plan accordingly. If a rider is having trouble finding or getting to the car, a rider can request that Rider Support delay the vehicle's departure.	**Adaptive App Navigation** Navigation wayfinding experiences with haptic cues assist riders with turn-by-turn walking directions and a compass that points in the direction of the vehicle providing distance and direction.	**Rider Support** Riders can connect with our Rider Support team by phone, chat, or email making assistance accessible to those with speech or hearing disabilities. Agents are trained to assist riders who have accessibility needs with wayfinding, including by looking through the car's cameras to understand the rider's environment.

Riders may adjust and tailor the accessibility settings in the Waymo One app in order to meet their needs. This includes a setting for riders in eligible service areas to request a wheelchair accessible vehicle through the Waymo One app (see Figure 20 below).

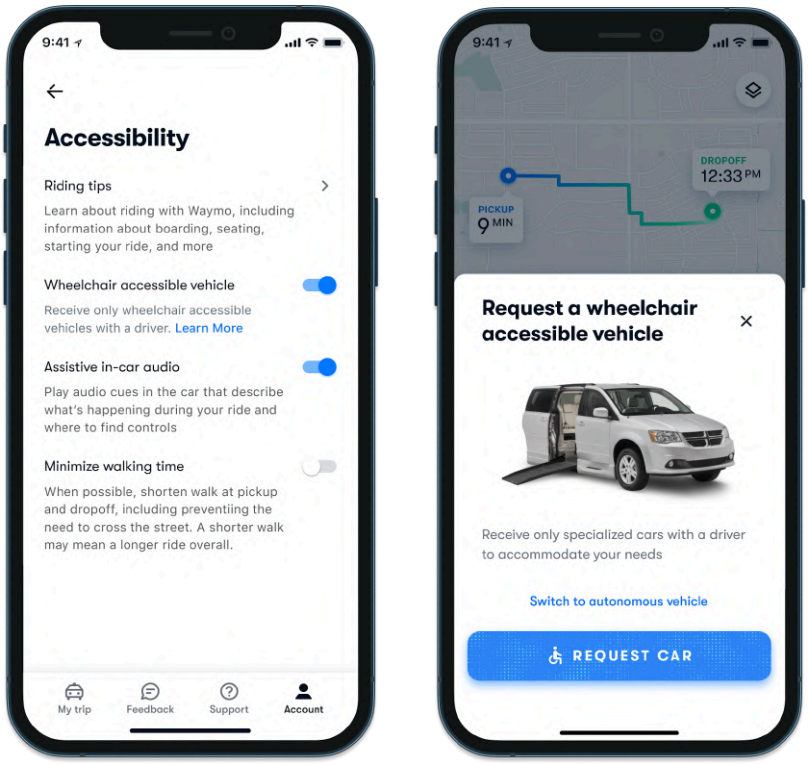


Fig. 20 In-app accessibility settings, illustrating WAV ride hailability

- **Service Animals.** Service animals are always welcome to ride with Waymo. There is no need to notify us or bring any paperwork for a service animal to ride with us. Riders may take extra time at boarding to secure their service animal before starting their ride.

B. Minor Riders

We require Waymo account holders in California to be at least 18 years of age, but minors who are accompanied by an adult account holder are welcome to ride. If a minor requires a car seat or booster, it must be provided by the accompanying adult, as indicated in the Waymo seat-back safety card (see Part IV.C. *Every Waymo Ride* above). Riders may take extra time at boarding to install a car seat before starting their ride.

Waymo has fostered - and immensely benefited from - years-long relationships with organizations that champion road safety for youth and families. Engagement is meant to help inform our service development, and also to increase awareness of road safety issues in the communities in which we operate. Our nationally recognized partner organizations include Safe Kids Worldwide, Mothers Against Drunk Driving (MADD), Students Against Destructive Decisions (SADD), Support for Families of Children with Disabilities and Governors Highway Safety Association (GHSA) and more. Locally, in markets such as Los Angeles, we've worked with the organizations Street Racing Kills and Streets Are For Everyone to support in-school presentations about the dangers of reckless driving. An example of a road safety asset we've created includes a road safety and AV curriculum for high school students created in partnership with MADD and SADD and distributed to high school SADD chapters throughout the United States. For more information about Waymo's engagement in the communities in which we operate, please see waymo.com/community.

C. Rail and Transit

Waymo AVs use detailed maps that incorporate dedicated transit lanes (e.g. bus and taxi lanes) as well as railway crossings and alignments, including those used by light and heavy rail vehicles. Our AVs are designed to respect the intended use of these roadway types and features. The AV's behavior also is tailored to specific roadway features unique to rail and transit. For example, the AV is designed to avoid stopping on rail tracks, including when traversing intersections in heavy, slow-moving traffic.

Waymo conducts robust and methodical testing of our ADS, which includes assessing safety and traffic law compliance. Waymo's testing methods and approach to performance validation are detailed in our published white paper, *Waymo's Methodologies and Safety Readiness Determinations* (October 2020).[18] Waymo utilizes a variety of safety methodologies, supported by three types of system-level testing

[18] Available at https://waymo.com/safety/research

(simulation, closed-course driving, and public road driving), which are in turn supplemented by various forms of component and subsystem testing. These types of testing are in constant interaction; each complements and informs the others.

With respect to rail, Waymo AVs are designed to interact with the specific types of railway crossings, railway alignments, and railway vehicles it will encounter in driverless operations in Waymo's driverless ODDs. We conduct thorough testing for specific types of railway crossings, as well as specific individual rail crossings, where appropriate. In the design and testing process, we consider how railway features and trains differ from other types of roadway features and vehicles.

VIII. Health & Safety Protocols

WAYMO

Health & Safety Protocols
California Ride-Hail Operations[19]

At Waymo, the health and safety of our riders, partners, and team members is our number one priority. We work to design our mobile app and the entire Waymo One rider experience—our autonomously driven vehicle, the ride itself, and our Rider Support services—to meet our riders' expectations. With this goal in mind, we have thoughtfully implemented protocols that prioritize health and safety in our passenger carrier service operations, Waymo One. Waymo may update these protocols as conditions and requirements change.

Vehicle cleaning: Our vehicles are cleaned regularly. Vehicles that require additional care between rides are routed to our facilities for additional cleaning.

[19] Submitted pursuant to D.20-11-046 (as modified by D.21-05-017) and in accordance with CPUC Resolution TL-19131 and applicable state and local law and guidance.

Vehicle ventilation: Our vehicles have been assessed, tested, and verified to have an effective ventilation system.

Please contact us with questions. If riders have any questions or concerns, or want to provide feedback, riders are encouraged to contact us at any time, including through the Rider Support tab in the Waymo One app.

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