CALIFORNIA PUBLIC UTILITIES COMMISSION

Advice Letter Summary Form

CARRIER & AL FILER INFORMATION

Date of Submission: January 28, 2026		Date of Service: January 28, 2026
Carrier Name: Waymo, LLC		PSG #: 0038152
DBA Name:		
Address: 1600 Amphitheatre Pkwy		
City: Mountain View	State: California	ZIP Code: 94043
Filer's Name: Jack Stoddard, BRB Law LLP		
Filer's Email: jack@brblawgroup.com		Filer's Phone: (415) 531-0785

AL INFORMATION

Advice Letter #: 4	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, in connection with DMV's approval of Waymo's Ojai vehicle platform and expanded territory for deployment operations, adding additional portions of Northern and Southern California.	
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 (0004) 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

Waymo LLC
1600 Amphitheatre Pkwy
Mountain View, CA

January 28, 2026

ADVICE LETTER 0004 (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 0004 to the Commission's Consumer Protection and Enforcement Division ("CPED").

PURPOSE

By this advice letter, Waymo seeks Commission approval of Waymo's updated Passenger Safety Plan (January 2026), in connection with Waymo's expanded operational design domain ("ODD") for deployment,[1] which the Department of Motor Vehicles (DMV) approved on November 21, 2025.[2] As amended, Waymo's DMV Deployment ODD authorizes Waymo to expand deployment operations in additional portions of Northern and Southern California, including, but not limited to, San Diego and Sacramento, and to deploy the Ojai vehicle[3] in existing and expanded deployment territories.

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."[4] Waymo plans to expand passenger carrier service provided to the public under our CPUC Phase I Driverless Autonomous Vehicle (AV) Deployment Permit and has revised our CPUC Passenger Safety Plan to reflect these changes 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 November 21, 2025 DMV-approved ODD for deployment operations is appended hereto as Attachment A.
[2] DMV Letter of Deployment Amendment Approval, dated November 21, 2025, is appended hereto as Attachment B.
[3] The Zeekr vehicle platform, which was approved by the DMV for use in Waymo's driverless testing and deployment ODDs, has been renamed the Ojai (pronounced "oh-hi").
[4] The Deployment Decision, Ordering Paragraph 20.

BACKGROUND

Waymo is an autonomous driving technology company with a mission to be the world's most trusted driver. We aim to make it safer, more accessible, and more sustainable[5] to get around - without the need for anyone in the driver's seat. We believe that the widespread adoption of autonomous driving technology will improve access to mobility, accelerate the adoption of electric vehicle technology, and reduce the number of traffic injuries and fatalities.

Since our founding in 2009 as the Google Self-Driving Car Project, we have been headquartered in our home state of California and have launched the world's first and largest ride-hailing service powered by fully autonomous vehicles ("AVs"). Today, Waymo is the leading provider of fared driverless passenger services in the United States, and our ride-hailing service currently provides more than 450,000 weekly "rider only" trips to paying members of the public in California, Arizona, Georgia, and Texas. Waymo AVs have provided more than 10 million trips in California alone. Each mile driven in California and elsewhere has been guided by Waymo's robust and ongoing safety readiness evaluations.[6] Safety is at the core of Waymo's mission and a hallmark of our ride-hail service.[7]

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] Once authorized by the approval of this advice letter, the Waymo fleet used in our fully autonomous, fared service will include the all-electric Jaguar I-PACE vehicle platform as well as the new all-electric Ojai vehicle. Our ride-hailing experience is supported by our Waymo mobile app, available on both iOS and Android platforms.

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[5] 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.

[6] *See* Waymo Safety Impact - Methodology, *available at* https://waymo.com/safety/impact/#methodology.

[7] More about Waymo's safety record and research can also be found at Waymo's Safety Hub (available at waymo.com/safety/impact), 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. Specifically, the Safety Hub data demonstrates that the Waymo Driver when compared to human benchmarks is involved in fewer crashes that result in injuries (both serious injury or worse and any-injury-reported) and airbag deployments.

[8] The CPUC approved Waymo to participate in each of these programs in July 2019, February 2022, November 2022, and August 2023, respectively.

As we expand to include more California communities and riders, we remain committed to improving and evolving our technology and service. Listening to and learning from our riders, community leaders, and other AV transportation stakeholders is essential to our efforts.

Each day, thousands of Californians are riding in Waymo AVs, at all times of day, with no human behind the wheel. It is a privilege to serve each and every one of these trips and we look forward to providing safe and reliable service across more of our home state in the months and years to come.

WAYMO ADVICE LETTER 0004

Waymo seeks CPED's approval of the January 2026 Update of Waymo's Passenger Safety Plan in connection with Waymo's expanded ODD for deployment operations covering additional portions of Northern and Southern California, including but not limited to, Sacramento and San Diego. Waymo's service area expansion, together with the introduction of the Ojai vehicle platform and other updates and revisions consistent with Waymo's robust approach to passenger safety, are reflected in our updated Passenger Safety Plan (Attachment C) for fared passenger carrier service.

Per the Deployment Decision, Waymo's Passenger Safety Plan describes our driverless autonomous vehicle technology and service, and provides an overview of the practices and procedures we use to promote rider safety . Waymo's Passenger Safety Plan demonstrates our continued commitment to enhancing passenger safety and addresses the elements highlighted by the Deployment Decision. Waymo's January 2026 Update includes the following key updates:[9]

- *Throughout:* Describes new features that Waymo has implemented to further enhance passenger safety, comfort, and convenience, including, but not limited to, functionality for real-time, rider-initiated pickup and dropoff location adjustment, and rider-initiated honking of the horn.
- *Throughout:* Describes Waymo's new all-electric Ojai vehicle platform, showing how Waymo has incorporated our passenger safety approach into our latest ride-hail vehicle platform (e.g. showing the easily identifiable vehicle exterior).[10]
- *Throughout*: Provides updated images of the Waymo mobile app display and in-car screens, illustrating updated functionalities and features, including the in-car screen prompt that allows a rider to indicate an urgent need for support.

[9] 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 (March 2025), which CPED approved on May 1, 2025. 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.

[10] Waymo's passenger safety policies and procedures generally apply uniformly across our I-PACE and Ojai platforms; differences relevant to Waymo's Passenger Safety Plan elements are described therein.

- *Section I. Our Mission & Section III. Moving People with Waymo:* Describes Waymo's recent service milestones operating Waymo's autonomous ride hail service. Waymo is now providing over 1 million fully autonomous rides each month across multiple major U.S. cities. In California, Waymo is now providing millions of rides each quarter across the San Francisco Peninsula and the greater Los Angeles areas.
- *Section III. Moving People with Waymo:* Describes the expanded geographic territory approved by the DMV for Waymo deployment, effective as of November 21, 2025.
- *Section VI. Responding to Adverse Events:* Describes new Rider Support tooling that allows agents to arrange for a replacement Waymo ride in the event a trip is interrupted. Provides updated information about Waymo's first responder training and engagement efforts. Describes Waymo's Resilience and Incident Management team, which assesses readiness for potential events impacting Waymo's riders and fleet through exercises and real events, building effective policies and procedures to manage and learn from events to improve resiliency. Waymo is continuing to iterate on these policies and procedures, including exploring ways to more closely coordinate with local emergency management stakeholders where we operate.
- *Section VIII. Health & Safety Protocols:* This section has been removed, consistent 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 (0004) 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.

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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. 25-08-013, 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
Assistant General 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 (November 21, 2025)
B	Waymo DMV Deployment Permit (November 2025 Amendment Approval Letter)
C	Passenger Safety Plan - CPUC Driverless Autonomous Vehicle Deployment Program (January 2026)

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 November 21, 2025, is set forth below. Please note that, other than the geographic areas described below and shown in Figures 1 and 2, these descriptions remain unchanged from Waymo's Amended Deployment Application approved by the DMV on March 17, 2025 (and by the CPUC on May 1, 2025 via Waymo Advice Letter 0003), and apply to both the Jaguar I-PACE and Ojai vehicle platforms.:

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

[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."

	of day, around certain road features, or in certain weather conditions. In both the drivered and driverless configurations, if an AV encounters any conditions outside of the applicable operating parameters, the ADS is 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. 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.

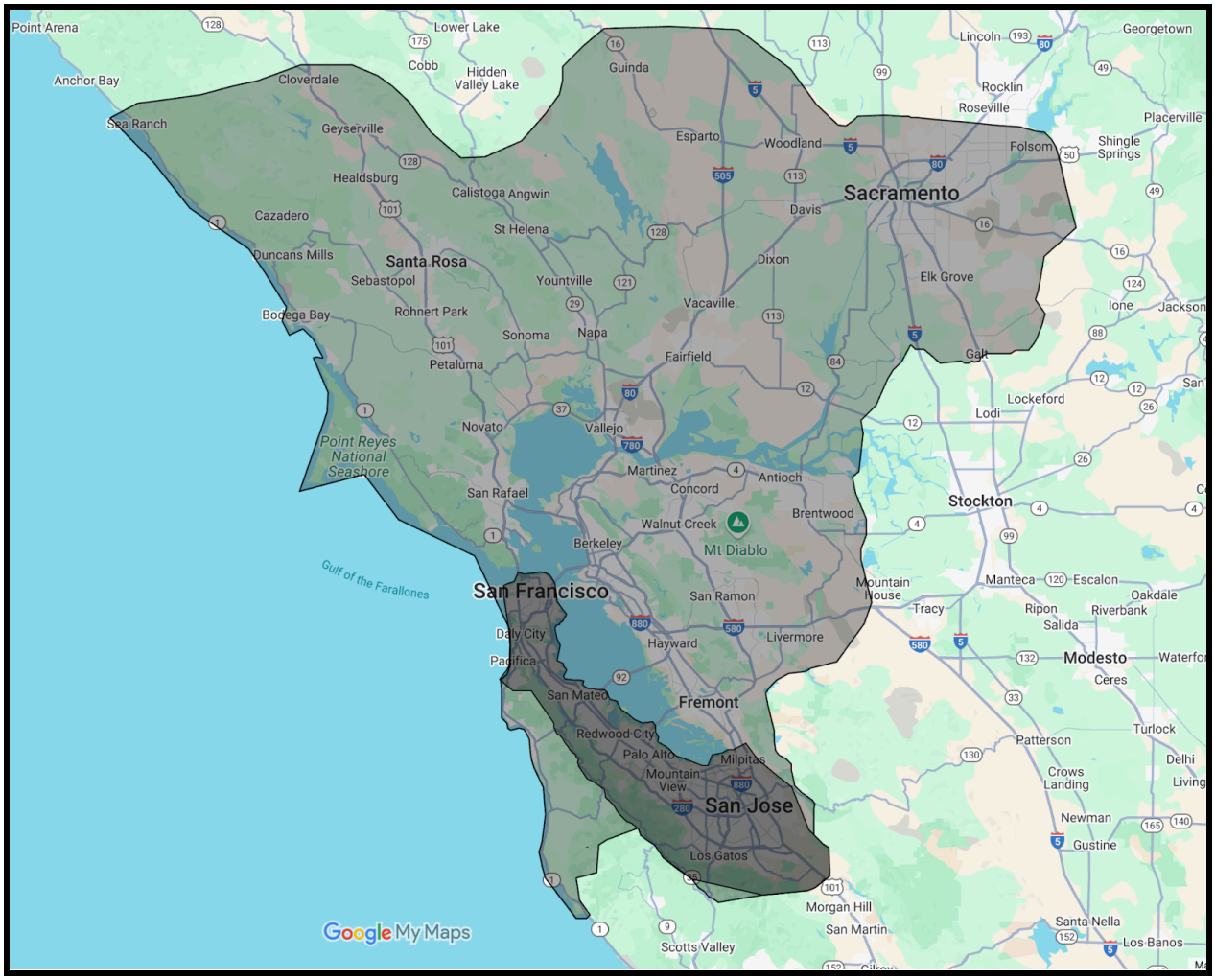

Figure 1. Waymo Operational Design Domain Map - Northern California deployment area. The more lightly shaded area is Waymo's expanded ODD for deployment operations approved by the DMV on November 21, 2025.

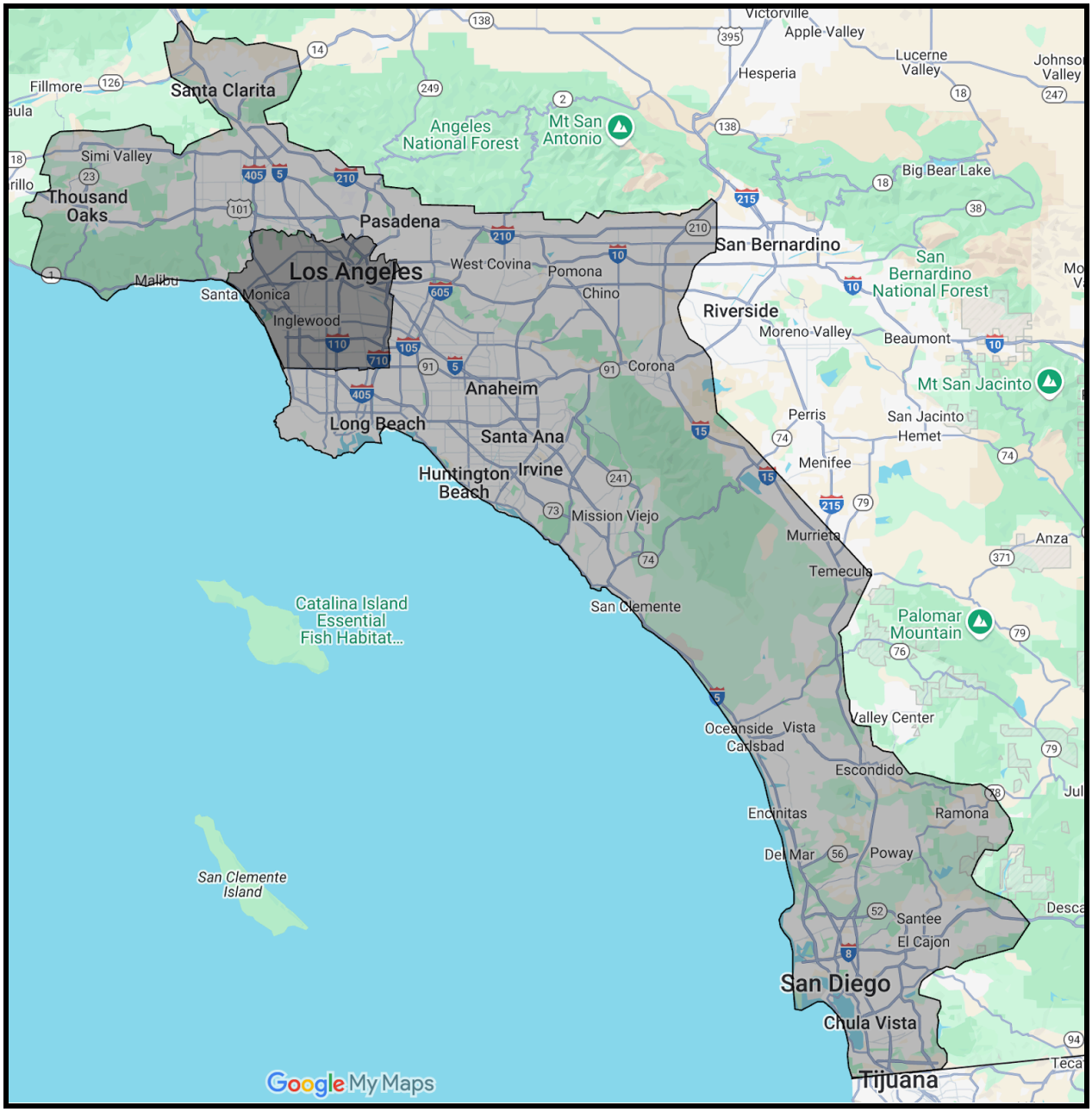

Figure 2. Waymo Operational Design Domain Map - Southern California deployment area. The more lightly shaded area is Waymo's expanded ODD for deployment operations approved by the DMV on November 21, 2025.

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ATTACHMENT B

Waymo CA DMV Deployment Permit Approval (November 2025 Amendment)

Waymo holds an active AV Deployment Permit, originally issued by the DMV on September 30, 2021, and most recently amended on November 21, 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

November 21, 2025

Allison Drutchas
1600 Amphitheatre Parkway
Mountain View, CA 94043

Via Email Only

Dear Allison Drutchas,

On March 24, 2025, 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 November 21, 2025.

This letter authorizes Waymo's request to expand its deployment operations into additional areas of Northern and Southern California, in accordance with the operational timelines outlined in the application. It also authorizes Waymo to operate the Jaguar I-Pace and Zeekr RT vehicles within all previously approved and newly authorized ODDs.

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 (January 2026)

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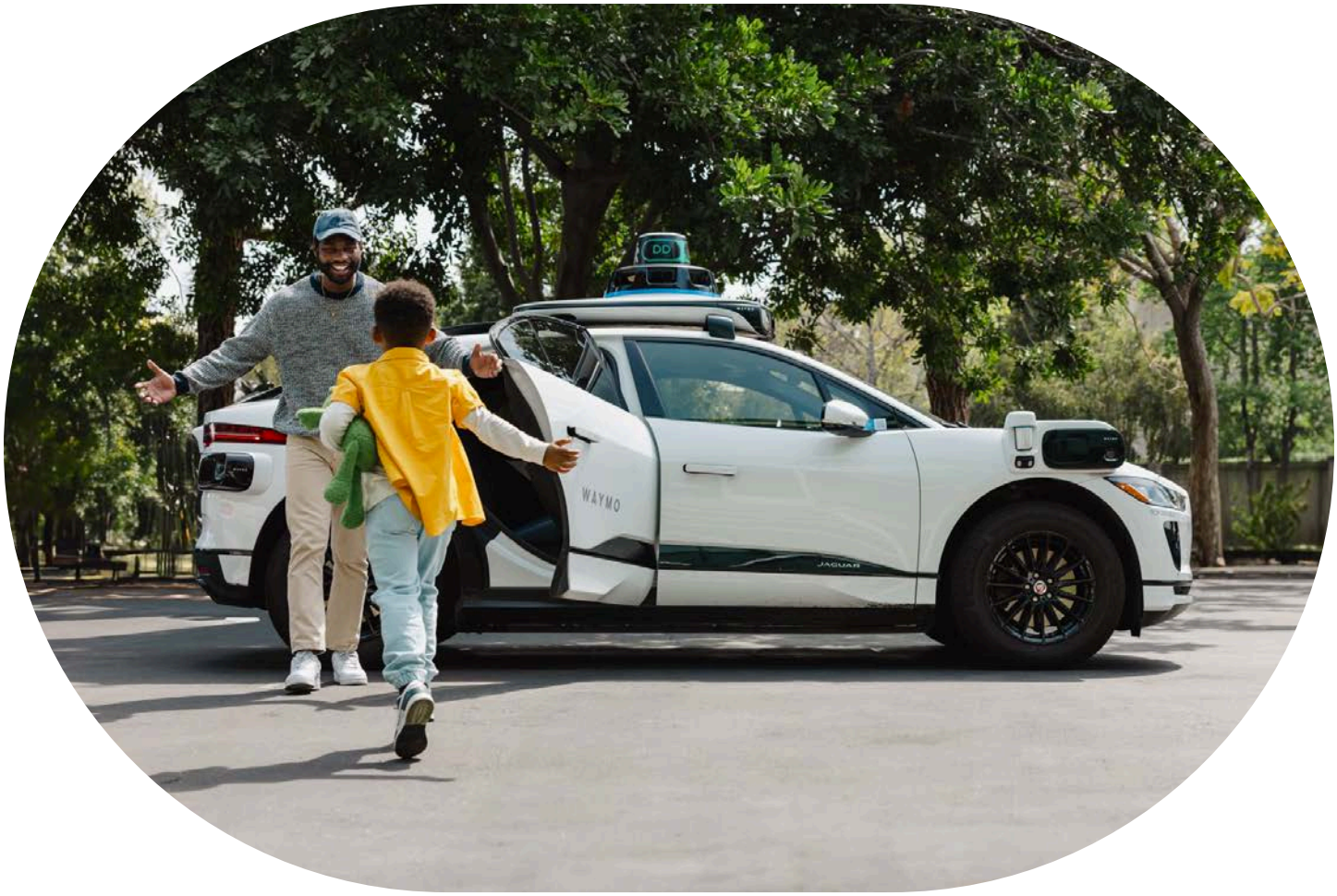
WAYMO

Passenger Safety Plan

CPUC Driverless Autonomous Vehicle Deployment Program
January 2026



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 in 2009 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 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 over 100 million autonomous miles on public roads and tens of billions of miles in simulation.[3] Waymo has also spent years meaningfully engaging with, and learning from stakeholders that include public agencies, local governments,

[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 portions of Northern and Southern California. 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 across Metro Phoenix and includes trips to and from Phoenix Sky Harbor International Airport. Waymo AVs are also available to the riding public through the Uber app in Austin, Texas and in Atlanta, Georgia.

[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.

utilities, 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 aspects of the capabilities, features, and procedures that we've integrated into our 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.

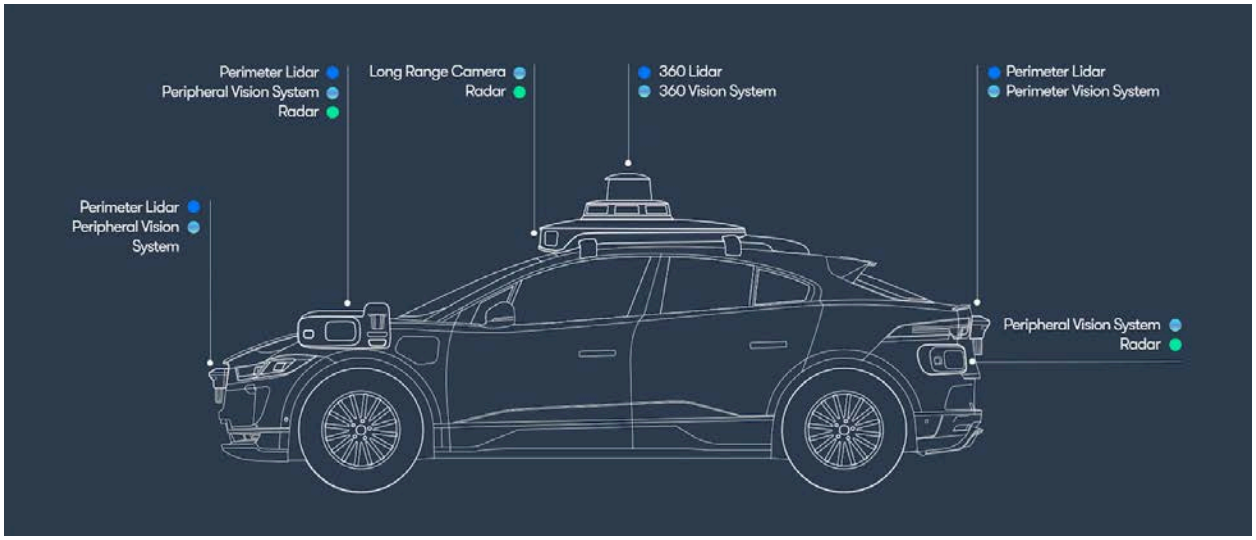


Fig. 1 Illustration of a Waymo Driver sensor suite on the Jaguar I-PACE vehicle

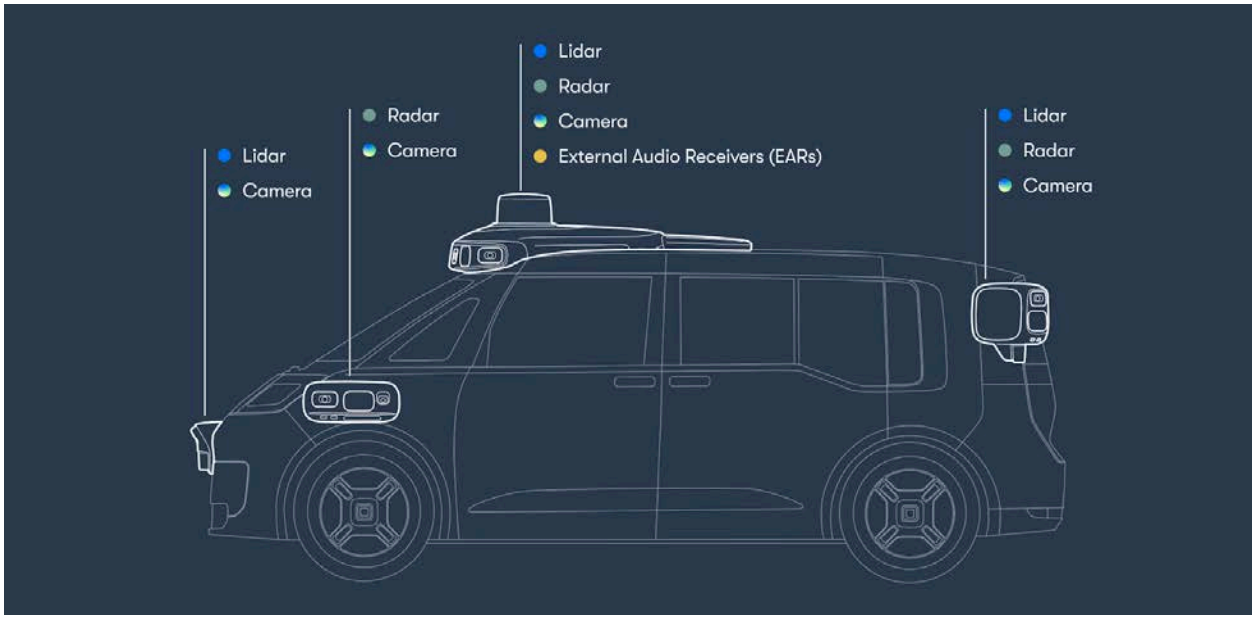


Fig. 2 Illustration of a Waymo Driver sensor suite[4] on the Ojai vehicle

To meet the complex demands of fully autonomous driving, Waymo has developed an array of sensors that enable the Waymo Driver to see a detailed 3D picture of the world, both during the day and at night, as far as three football fields away. This

[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).

multi-layered sensor suite (composed of lidar, radar, cameras, and other sensors[5]) works in concert, making the Waymo Driver capable of identifying dynamic and static objects including pedestrians, cyclists, other vehicles, traffic lights, construction cones, and other road features.

In our California service areas, we've integrated our ADS into the Jaguar I-PACE and Ojai vehicle platforms, both of which are battery-electric and powered by renewable energy.[6] Equipped with our ADS, the Jaguar I-PACE and Ojai vehicles provide our riders with 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 Hyundai IONIQ 5.

III. Moving People in Waymo Autonomous Vehicles

Waymo has been working on fully autonomous driving technology in our home state of California since 2009, learning from each step along the way as we progressed to make our fully autonomous (driverless) Waymo ride-hailing service available to the California public on a commercial basis in August 2023. Waymo is now providing millions of fully autonomous rides across the San Francisco Peninsula and in the greater Los Angeles area, and we look forward to welcoming more Californians to experience Waymo.

A. The Waymo Mobile App

To request rides in Waymo's autonomously driven vehicles, riders in California download the Waymo app to their mobile device (iOS or Android). Riders choose their destination and select a pickup location from those available using an interactive map. Before confirming the trip, riders will see an upfront fare estimate, route overview, and anticipated ETAs. The Waymo app also displays useful information for the rider during their trip, including the estimated time to dropoff (see Figure 3 app display sample below).

Riders also may tailor their Waymo 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.

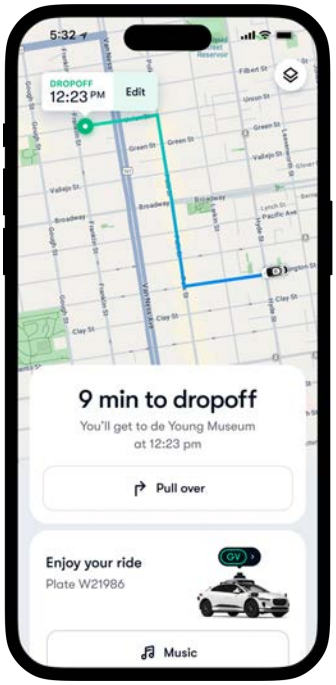


Fig. 3 Waymo mobile app display with mid-trip information and options

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:[8]

- Northern California, including cities and unincorporated territory within the Alameda County, Contra Costa County, Marin County, Napa County, Sacramento County, City and County of San Francisco, the County of San Mateo, and the County of Santa Clara, Santa Cruz County, Solano County, Sonoma County, Yolo County; and
- Southern California, including cities and unincorporated territory within the County of Los Angeles, Orange County, Riverside County, San Bernardino County, San Diego County, and Ventura County.

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

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

[8] Municipalities newly added to Waymo's deployment service area via this 2026 Update include those in the SF Bay Area (including but not limited to Alameda, Antioch, Berkeley, Corte Madera, Half Moon Bay, Oakland, Napa, Santa Rosa, Walnut Creek), Sacramento area (including but not limited to Sacramento, Vacaville, Vallejo), Los Angeles area (including but not limited to Long Beach, Santa Clarita, Thousand Oaks), Orange County (including but not limited to Anaheim, Irvine), and the San Diego area (including but not limited to San Diego, Chula Vista). Waymo's DMV-approved operational design domain (which is coterminous with Waymo's CPUC service area) can be found at https://www.dmv.ca.gov/portal/vehicle-industry-services/autonomous-vehicles/autonomous-vehicle-testing-permit-holders/.

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.

[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."

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 (waymo.com/blog), which provides updates on Waymo's service and technology. Our website also links to our published safety papers (waymo.com/safety/research), our law enforcement interaction plans (waymo.com/firstresponders), details of our commitment to sustainability

(waymo.com/sustainability), 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 4 and 5).

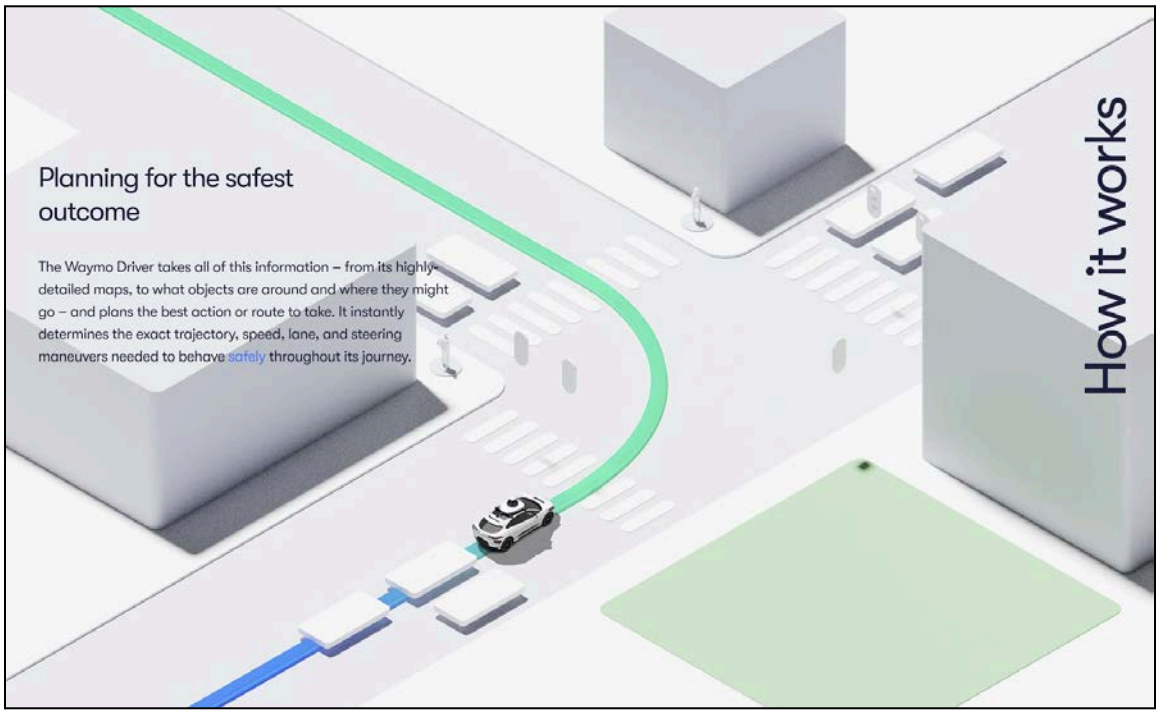


Fig. 4 “How it works” slide story at *https://waymo.com/waymo-driver/ (English)*

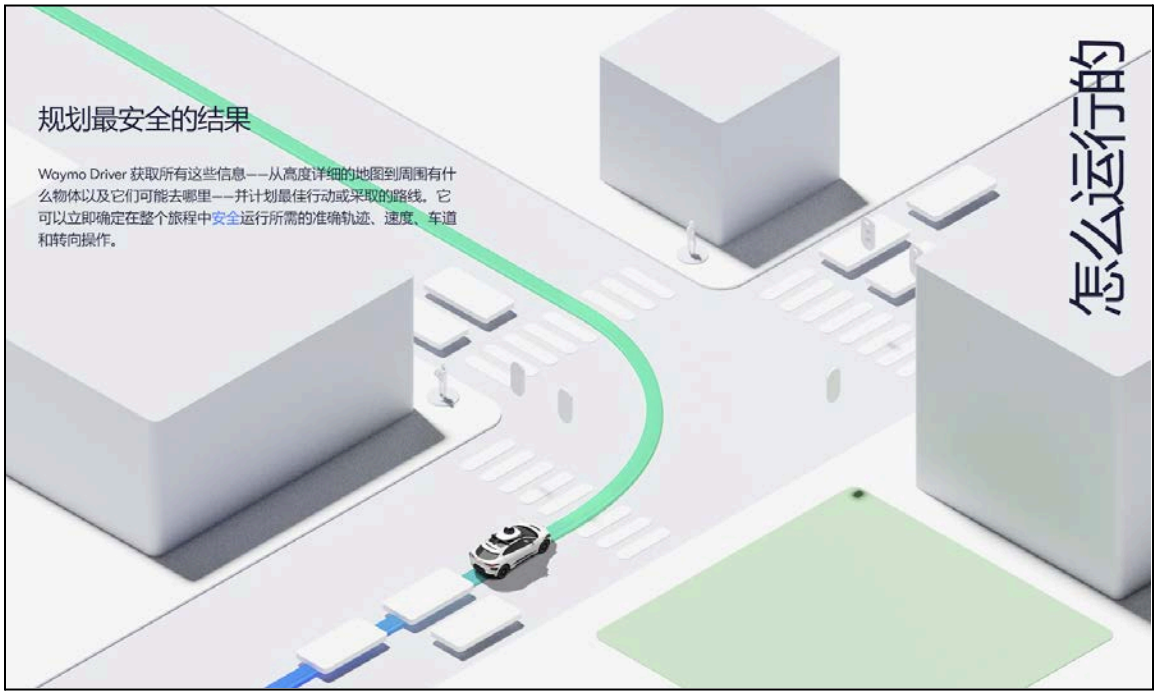


Fig. 5 “How it works” slide story at *https://waymo.com/waymo-driver/ (Chinese - simplified)*

- 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.

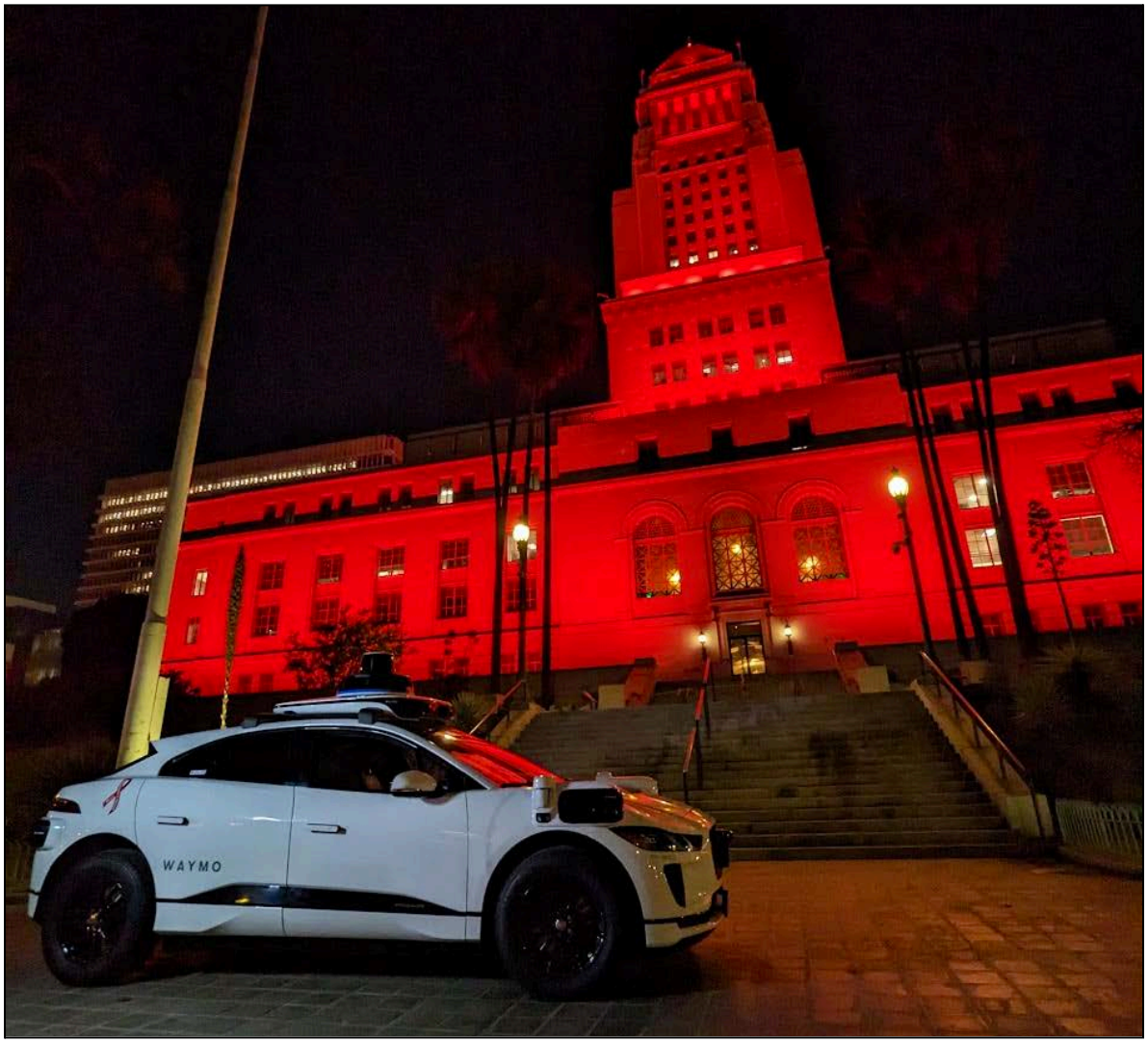


Fig. 6 Waymo with red ribbon decal encouraging people to "designate a driver" at the annual Illuminate MADD California Press Conference and Vigil, Los Angeles City Hall

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 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.

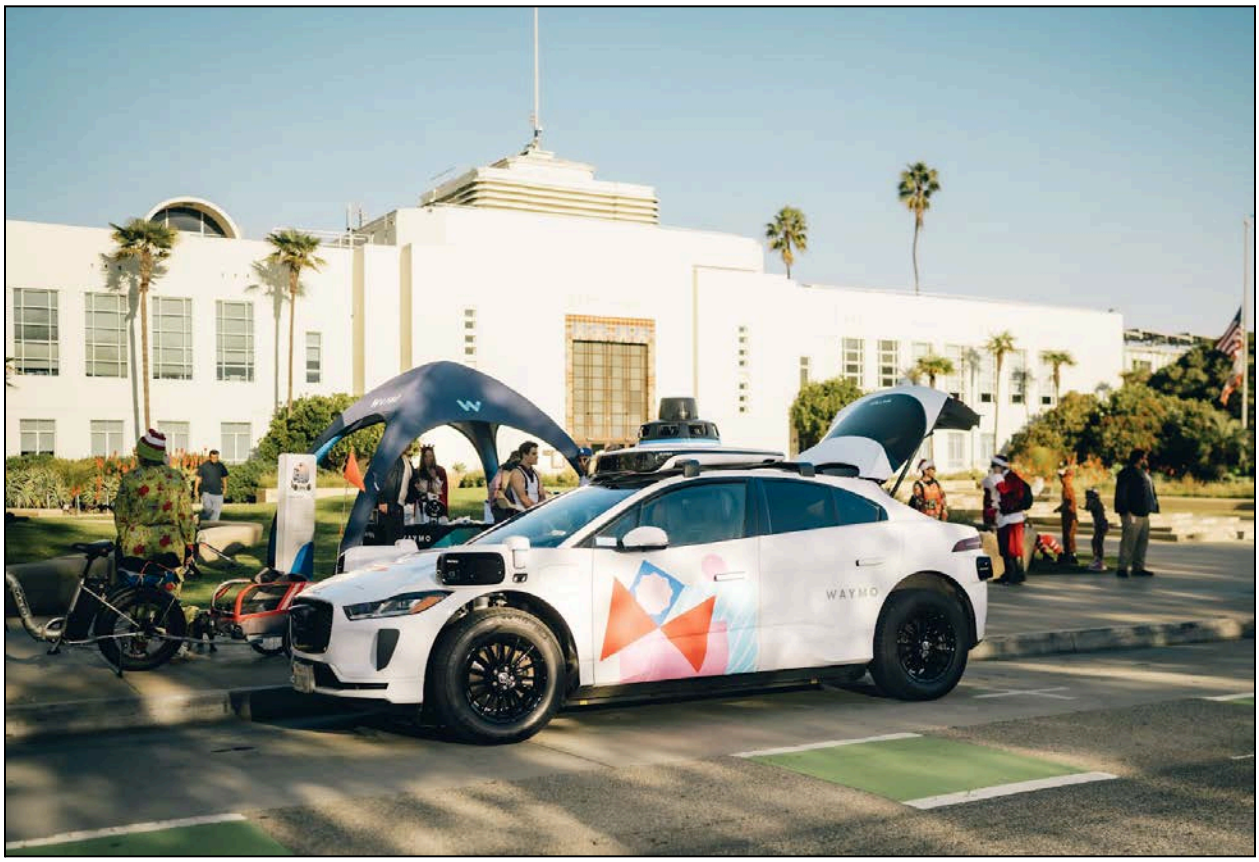


Fig. 7 Waymo at the Santa Monica Boys and Girls Club Toy Drive with Beyond the Board at Santa Monica City Hall in December 2025

B. Getting Started with Waymo

Waymo's onboarding process provides our prospective riders with a variety of resources about the Waymo 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 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, together with useful information about taking their first autonomous ride using the Waymo mobile app.

Riders have 24/7 access to FAQs and articles hosted in the Waymo mobile app and through the Waymo (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 8 example below showing riders how to start their ride with a reminder to use seat belts).

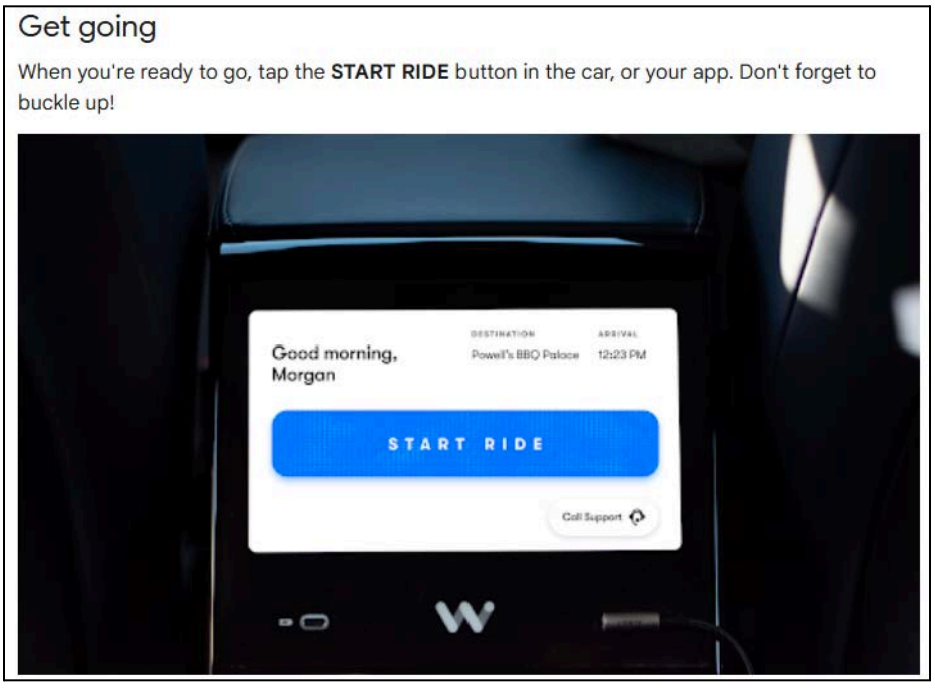


Fig. 8 Help Center sample from "Your first trip" article

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

Riders can also learn more about how the Waymo app keeps them informed of their vehicle's arrival status, how to enable or change accessibility settings, the vehicle's seating capacity (see Figure 9 example below), how to access the trunk, and many other practical tips intended to optimize their experience.

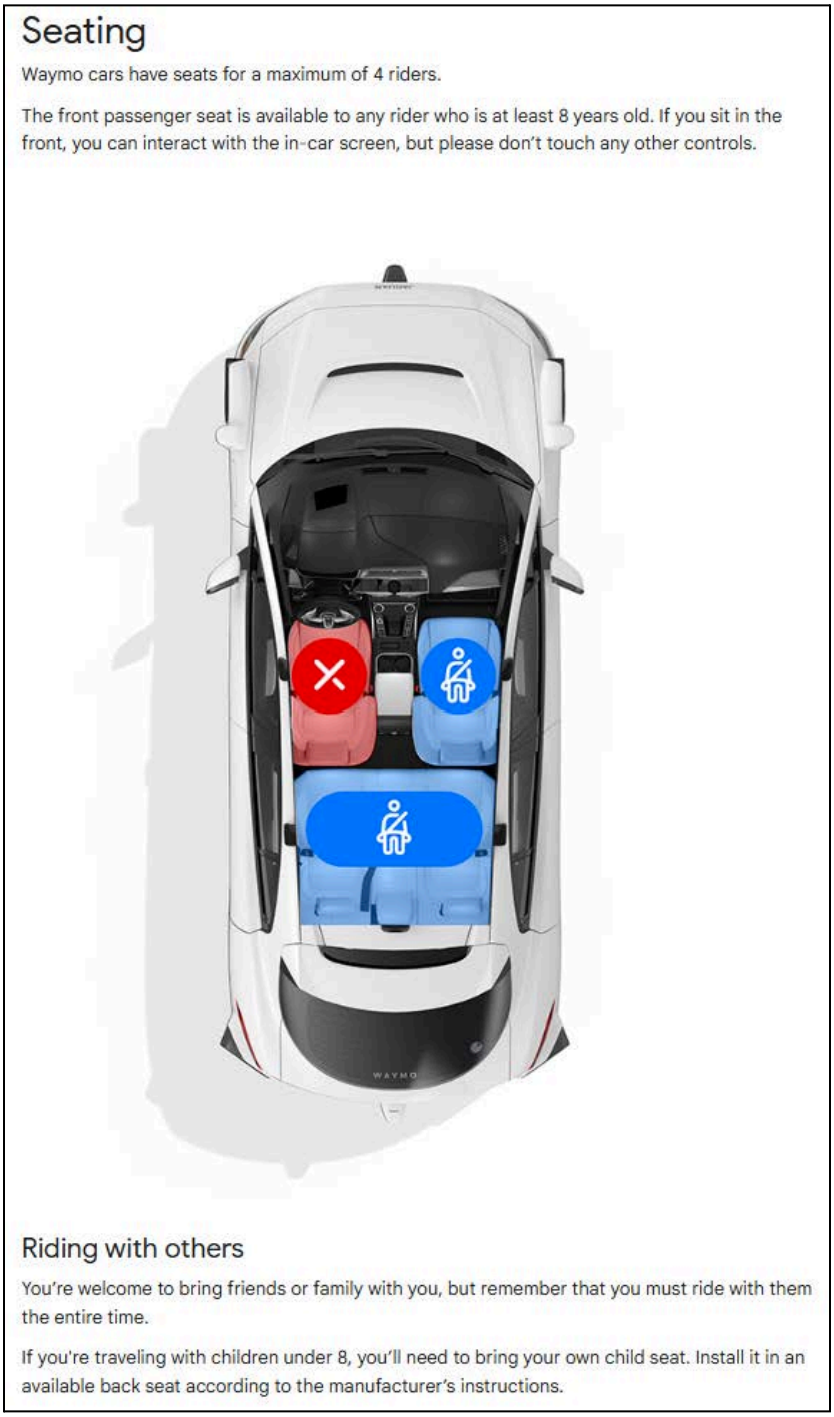


Fig. 9 Help Center sample from "Seating" article (Jaguar I-PACE)

The Waymo Help Center also includes reminders to riders - those who are new to our service and those who ride with us often - such as the “10 things to know about your trip” article (see Figure 10 for an excerpt reminding riders of the car and rider rules).

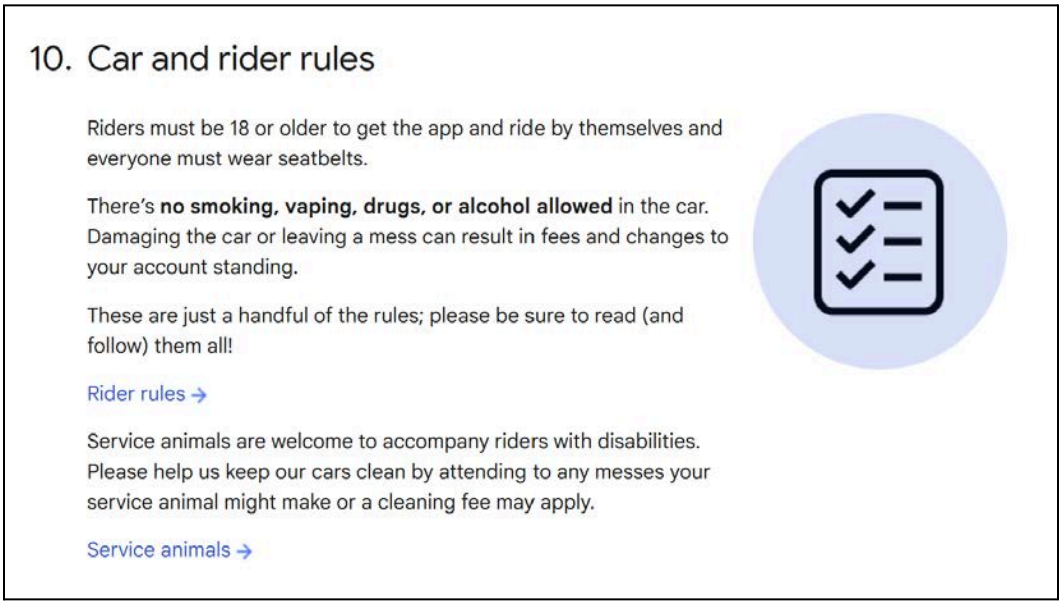
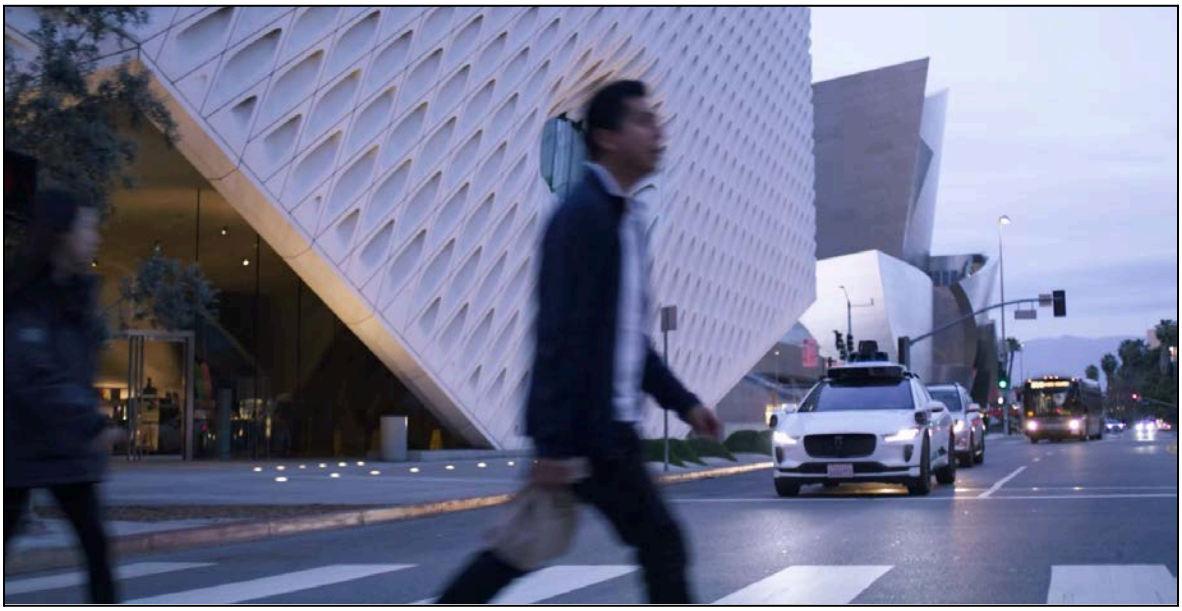
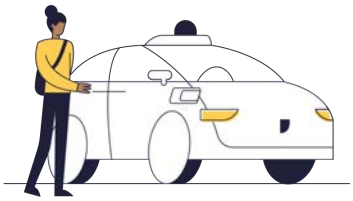


Fig. 10 Help Center sample from “10 things to know about your ride” article highlighting car and rider rules

The Waymo Help Center is updated with new information as the service grows and evolves.

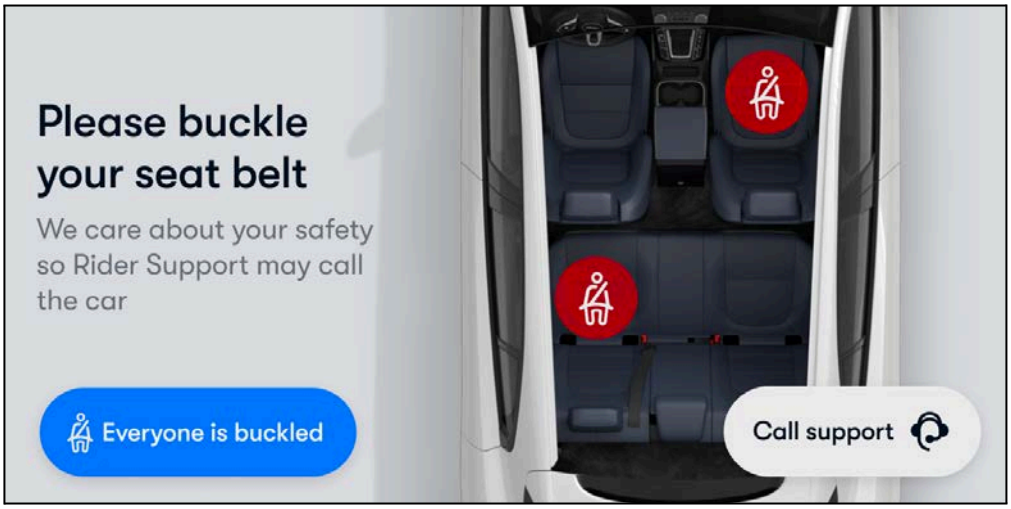




C. Every Waymo Ride

The Waymo 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,[11] and Waymo has developed multiple ways of keeping seat belts top of mind for our riders.[12] 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 11 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. Waymo's Rider Support agents may also connect with riders through the in-car speakers to instruct on seat belt usage.



[11] See Waymo's publication *Ride-hailing in the Safe System: Increased Seat Belt Compliance and Late Model Year Vehicles* available at https://waymo.com/research/ride-hailing-in-the-safe-system-increased-seat-belt-compliance-and-late/

[12] Waymo was 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 aimed at reducing serious injuries and fatalities.

Fig. 11 In-vehicle screen seat belt alert

- 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 from the in-car screen or in the Waymo app. Riders can change their dropoff location even after having arrived at their original destination and can choose to simply pull the car ahead a short distance or change their destination entirely. (see Figure 12).

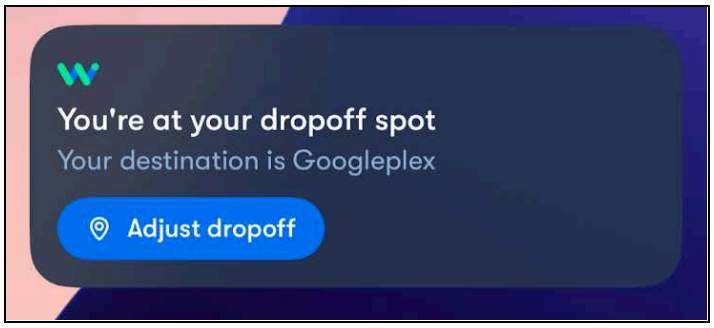


Fig. 12 In-app display of location adjustment prompt

Instructions for creating and editing a trip are available in-app and also in the Waymo Help Center. Figure 13 below illustrates the dropoff location editing functionality in the Waymo app.

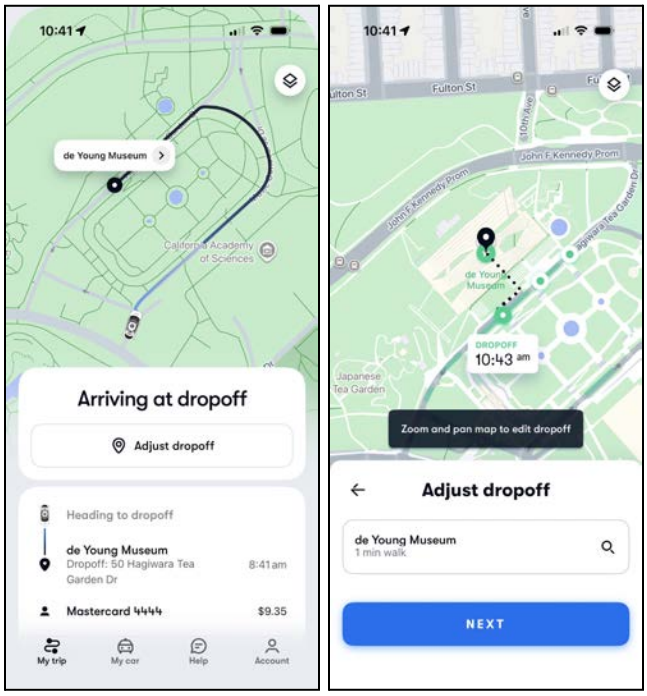


Fig. 13 In-app displays demonstrating dropoff location adjustment

- Identifying 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, the Waymo name on the vehicle, and Waymo's CPUC-assigned TCP number. Waymo vehicles are also recognizable by the light display on the rooftop sensor, which may also show a "W" logo, two-letter rider initials, or other icons (e.g. boarding, pedestrian crossing).[13]

Fig. 14 Vehicle Identification (Hardware, Name, TCP) on the Jaguar I-PACE

Fig. 15 Vehicle Identification (Hardware, Name, TCP) on the Ojai

[13] Elements of the platform aesthetic not listed here (e.g. exterior color; interior materials) may change over time.

- Personalized Vehicle ID. To make it even easier for riders to find 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. 16 Vehicle Identification (Initials Display Jaguar I-PACE)

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 (I-PACE) or door button activation (Ojai) triggered by the rider unlocking the vehicle in-app or via rider proximity detection. A distinctive welcome chime will also 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 18 below).

- Safely Boarding a Waymo AV. Waymo 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. 17 Rider Boarding Notification Icon

- In-Vehicle Screen Display. Each Waymo AV has 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: 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 to start a rider's first trip. The video covers important safety points and is available for replay via an on-screen button at any time.

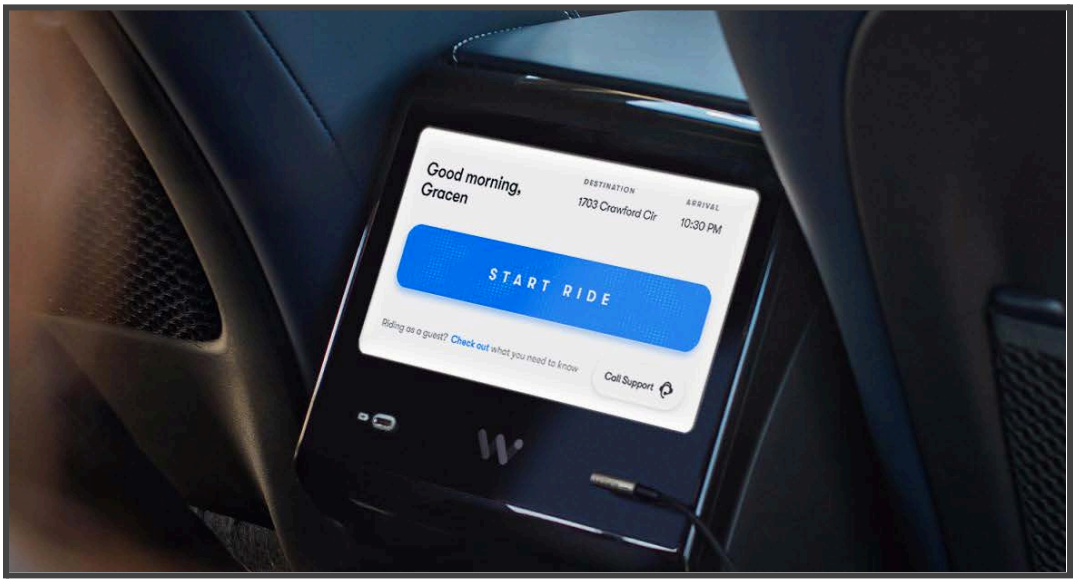


Fig. 18 In-Vehicle Screen in Jaguar I-PACE

- In-Vehicle Languages. In addition to English, riders may tailor their Waymo experience to meet certain language needs; the Waymo app can be displayed in Spanish, Chinese, French, German, Italian, or Polish. The in-vehicle experience can be enjoyed in Spanish or Chinese;[14] no extra settings are needed — if the hailer's phone is set to one of these languages, the in-car content will automatically be provided in the same language.

- 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 available during a ride through 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. Riders can also cancel a pullover, if desired.

Fig. 19 Showing a pullover in progress display on in-vehicle screen

[14] Additional in-vehicle language display options are presently in development.

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).[15]

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

In the event that a rider arrives at a dropoff location and wants to adjust it without changing their ultimate destination - whether for safety or convenience - the Waymo AV's "Pull ahead" functionality empowers riders with a quick and low-effort way to prompt the vehicle to move to the next eligible pull over location. Upon making the "Pull ahead" request, riders may review the proposed updated dropoff location and may choose whether to proceed or to cancel.

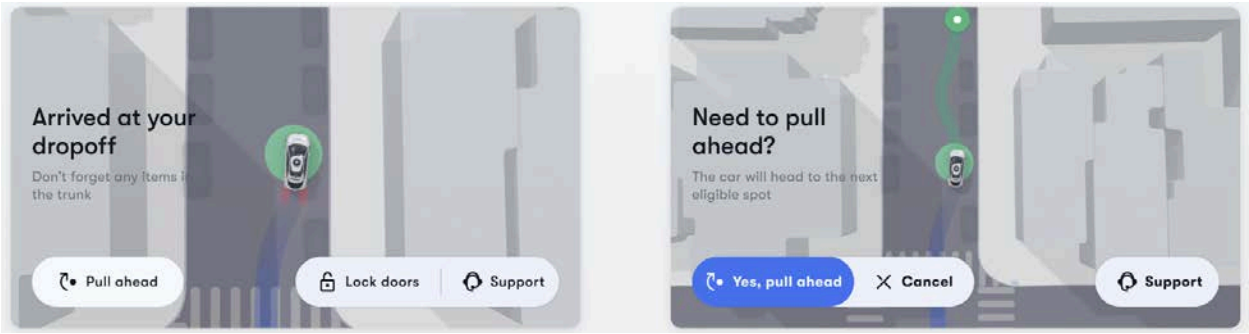


Fig. 20 Showing the Pull ahead functionality on the in-vehicle screen

[15] 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."

The Waymo AV also 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. 21 Rider De-boarding Notification Icon

- Lighting. Waymo uses lighting to enhance the rider experience, including by facilitating safe entry and exit from the vehicle with puddle lamps that illuminate the ground and by automatically turning on cabin lights during pickup and dropoff. Riders can also choose to turn on cabin lights during a ride using the in-vehicle screen.

- 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 main ADS sensor module.

Fig. 22 Pedestrian Yielding Notification Icon (Jaguar I-PACE)

- 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 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 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.

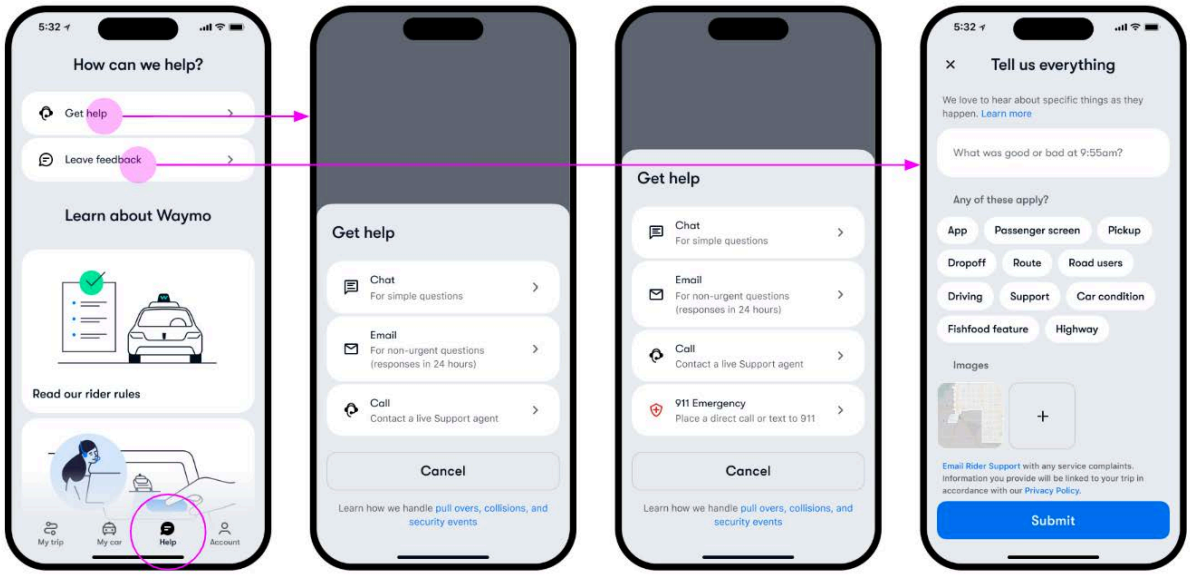


Fig. 23 In-app help functionality

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 experience. We staff our Rider Support team based on service levels, so as Waymo 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 (e.g. vehicle retrieval) 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. Waymo may also utilize third-party tow services, as the circumstances may warrant.

Each of these teams has a role in facilitating safe and comfortable rides with Waymo, 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 use camera feeds from the AV and/or other signals to review the scene and determine possible reasons for the interruption, and to assist the ADS to resolve it, if possible.[16] 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."*[17] Messages may also caution against unsafe behaviors with honking or a warning to *"Stop. Authorities are on their way."* Messages may also direct law enforcement to "*Please approach the front 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. Each Waymo AV also has a QR code affixed to the window that connects first responders to Waymo's first responder hotline, facilitating communication via phone. 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 Remote Assistance or Event Response Teams may assist riders by hailing them a new Waymo AV to complete their trip. In addition, Waymo's Roadside Assistance team or a third-party tow service may be dispatched to the scene to assist.

[16] 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 reposition the Waymo AV under strict parameters, including at a very low speed over a very short distance.

[17] The Waymo AV is also capable of playing certain external audio messages without assistance from the Waymo Remote Assistance team.

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

C. Rider Medical Events. 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.

Secondly, 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,[18] and crowds of pedestrians gathered in or traversing the roadway, to protect against a collision, for example. External audio messages and honking may also be utilized to communicate vehicle intent, including to indicate that law enforcement has been called to the scene, as may be 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. Waymo empowers riders in these scenarios; riders may be prompted to alert Waymo to an urgent need for support or honk the Waymo AV's horn through an in-car screen or in-app interface (see Figure 24 in-car screen display sample below). These and other key capabilities have been designed, tested, and implemented to prioritize the safety of our Waymo riders and the broader public.

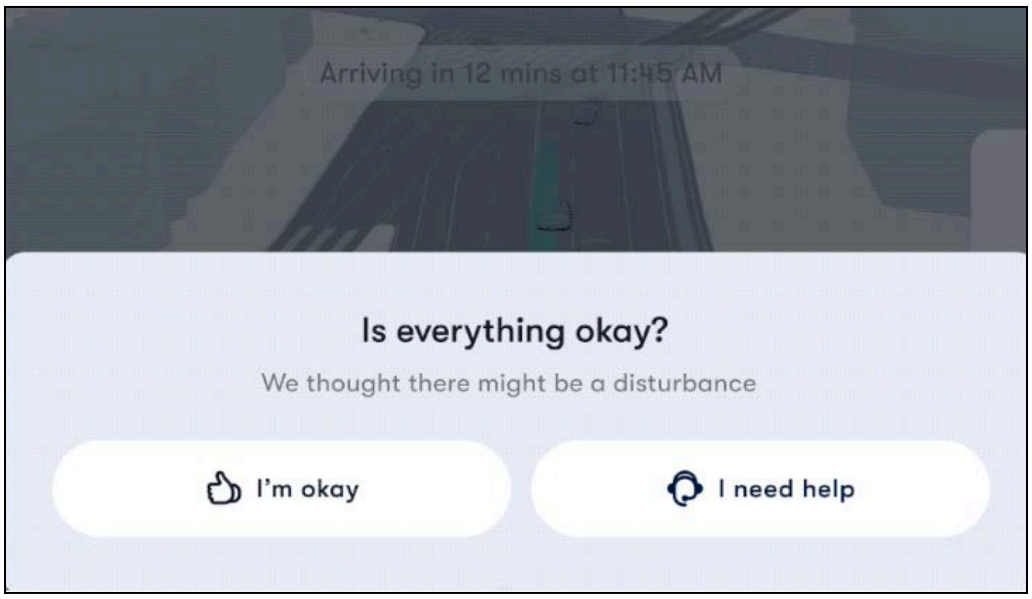


Fig. 24 In-car screen rider help functionality

Lastly, preparedness for unsafe scenarios outside of the vehicle necessitates a proactive, robust, and continually-adapting approach to potential events that might impact a broad subset of Waymo's ridership and/or fleet. Waymo's Enterprise Resilience team assesses readiness through exercises and real events, builds effective policies and procedures to manage events, acts to coordinate event response, and incorporates learnings from events to improve resiliency. A key facet of Waymo's approach is to work closely with law enforcement and other first responders in the

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

areas in which we operate. Our dedicated team of experienced public safety executives have over 200 years of combined experience as first responders.[19] Waymo prioritizes proactively conducting regular in-person training sessions with first responders, 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 11,500 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.[20]

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.

[19] See https://waymo.com/firstresponders/

[20] See Waymo's Law Enforcement Interaction Protocols for the Jaguar I-PACE vehicle and the Ojai 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. 25 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. In fact, local road safety and disability advocacy organizations have been among the

first community members to take rides with Waymo, and we continue to work directly with disability-focused nonprofits to welcome their members into our ridership.

Organizations that we are directly engaged with, certain of which we've partnered with on public education initiatives, include:

- San Francisco-based LightHouse for the Blind and Visually Impaired, one of the largest and most established comprehensive blindness organizations in North America;
- Vista Center for the Blind and Visually Impaired
- 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 (NorCal SCI);
- Curry Senior Center;
- National Federation of the Blind;
- Los Angeles-based Integrated Community Collaborative;
- Easterseals Southern California;
- local chapters and affiliates of Best Buddies;
- the Epilepsy Foundation;
- the Arc San Francisco;
- Disability Voices United;
- Southern California Resource Services for Independent Living (SCRS-IL);
- Vista Center for the Blind and Visually Impaired;
- United Spinal Bay Area; and
- the Braille Institute.

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.

- **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 arrange for 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 within our growing 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 (see Figure 26 for sample display).	**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.

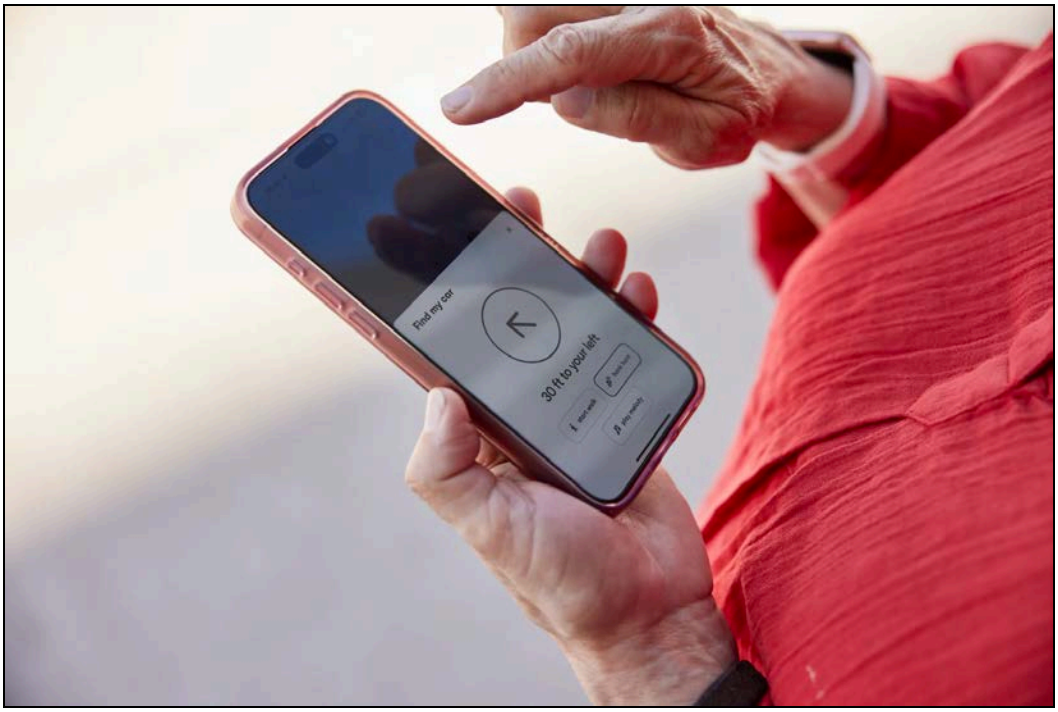


Fig. 26 Adaptive app navigation

Riders may adjust and tailor the accessibility settings in the Waymo 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 app (see Figure 27 below).

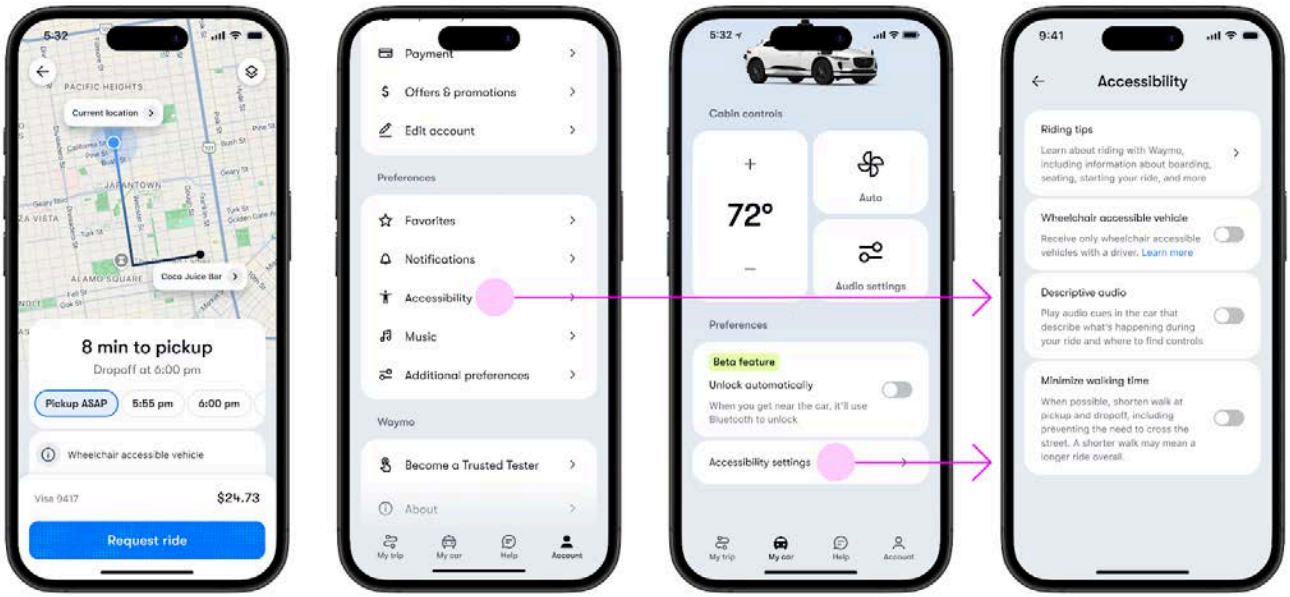


Fig. 27 In-app accessibility settings navigation

- **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. Violations of this requirement, and Waymo's terms of service generally, may result in account deactivation.

For younger children, an accompanying adult is responsible for properly installing and securing any child car seats or booster seats that may be needed in accordance with law. Waymo provides riders with 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, *Determining Absence of Unreasonable Risk: Approval Guidelines for an Automated Driving System Deployment* (May 2025).[21] Waymo utilizes a variety of safety methodologies, supported by three types of system-level testing (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.

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[21] Accessible on Waymo's website at https://waymo.com/safety/research.