



May 29, 2023

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

RE: Chamber of Progress Support of Draft Resolution TL-19144 to Approve Waymo Application (Advice Letter 0001)

Dear Commissioners,

On behalf of the Chamber of Progress, a tech industry association committed to ensuring that all Americans benefit from technological leaps, I write in support of Draft Resolution TL-19144, which would grant Waymo's application to provide transportation service to the public in autonomous vehicles under the ongoing jurisdiction of the CPUC.

Chamber of Progress supports public policies at the federal and state level that seek to build a fairer, more inclusive country in which all Americans benefit from technological leaps. We strongly support the expansion of driverless vehicles across California as it has the potential to improve road safety, promote sustainability, and increase access to transit for the elderly, disabled, and those living in underserved communities

Over the past year, San Francisco experienced record traffic fatalities¹, making the safety benefits of AVs urgently needed. In 2015, NHTSA issued a study finding that human error played an essential role in 94% of all auto accidents.² Since driverless cars have 360-degree sensors and split-second reaction times, they aren't affected by blind spots and unpredictable driver behavior that lead to most accidents. Research suggests that AV deployment could ultimately result in hundreds of thousands of lives saved.³

We applaud the Commission's commitment to promoting safety in its regulation of passenger carriers, particularly as it relates to AVs. According to the draft resolution,

¹ <https://sfstandard.com/transportation/sf-just-had-its-worst-year-for-road-deaths-since-plan-to-end-them-began/>

² Traffic Safety Facts: Crash Stats, U.S. Department of Transportation, National Highway Traffic Safety Administration (February 2015) <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812115>

³ Kalra, Nidhi and David G. Groves, The Enemy of Good: Estimating the Cost of Waiting for Nearly Perfect Automated Vehicles. RAND Corporation (2017) https://www.rand.org/pubs/research_reports/RR2150.html.

Waymo's technology, policies, and procedures successfully demonstrate its commitment to passenger safety by meeting the following Passenger Safety Plan (PSP) minimum requirements:

- Minimize safety risks to passengers traveling in a ride operated without a driver in the vehicle
- Minimize safety risks to passengers traveling in a shared, driverless ride, including prevention and response to assaults and harassment
- Respond to unsafe scenarios outside and within the vehicle, such as hostile individuals
- Educate and orient passengers about the technology, experience, and safety procedures
- Ensure customers can safely identify, enter, and exit the AV they requested;
- Enable passengers to contact the AV service provider during the ride and to ensure the passengers receive a timely and complete response
- Collect, respond to, and retain any passenger comments and complaints
- Ensure the safety measures described above are accessible to and apply to all passengers, including those with limited mobility, vision impairments, or other disabilities

Despite concerns regarding the speed of AV expansion raised by city agencies, the resolution clearly states that "San Francisco's arguments are not within the grounds for a proper protest, as it would require relitigating a prior order of the Commission. Further, a protest may not rely purely on policy objections".

Based on the Draft Resolution, we agree that Waymo should be allowed to offer commercial AV ride services throughout San Francisco and collect fares. Therefore, we urge the Commission to vote to approve Waymo's draft resolution at the June 29 meeting so it can continue to advance the safe commercial deployment of autonomous vehicles and bring their benefits to more Californians, including San Francisco's residents and workers.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Pascal". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jamie Pascal
Director of Civic Innovation Policy
Chamber of Progress