



August 4, 2023

California Public Utilities Commission
Public Advisor's Office
505 Van Ness Avenue
San Francisco, CA 94102

Commissioners,

We ask you to vote against unlimited expansion for Waymo and Cruise vehicles during the CPUC's Aug. 10 meeting. The technology is simply not there, and the public isn't getting the full picture. There is a clear disconnect between what Waymo and Cruise are saying about the safety of their vehicles and what the public and first responders are dealing with on a day-to-day basis.

Cars have been abruptly stopping, blocking traffic, flashing wrong turn signals, and impeding emergency responders from doing their jobs. The city of San Francisco has reported over 240 such incidents since the beginning of the year. But we wouldn't know it if we asked the CPUC or the robotaxi companies themselves. These numbers don't have to be reported. The resolutions before you do not mention them.

While we commend you for looking into the issue of data reporting, you cannot leapfrog this safety concern and go ahead with the vote. The incident data reporting requirement at a minimum must be on the books first. Once the CPUC sees the full picture, it should understand that robotaxis can't operate on city streets. These robotaxis would never pass a driver's license test.

The CPUC shouldn't just take Waymo's word for it. City departments estimated Waymo vehicles were involved in collisions with injuries reported at a rate 1.3 times higher than the national average of human-driven vehicles. This analysis is based on data that Waymo submitted to federal regulators, the CPUC and the California Department of Motor Vehicles.

Further, CPUC voting member John Reynolds, a former Cruise lawyer, must recuse himself from the Cruise expansion vote. He did so last year in a vote involving Cruise.

An unlimited approval would be irresponsible. The CPUC needs to pump the brakes on expansion. Thank you for your work.

Best,

Justin Kloczko
Consumer Watchdog

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