INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

WAYMO

Waymo LLC
1600 Amphitheatre Pkwy
Mountain View, CA

August 27, 2024

Scott Simmons, Chief
Advanced and Emerging Technology Division
Office of Defects Investigation
1200 New Jersey Avenue SE.
Washington, DC 20590

Re: Waymo LLC – Clarification to Information Request ID PE24016-2

Dear Mr. Simmons,

Please let this letter serve as an effort to help capture our ongoing scope and timing clarification discussions regarding PE24016-2. Our mutual goal is for Waymo to provide relevant information that facilitates ODI's investigation into Waymo's ADS, while avoiding extraordinary production and review burdens for Waymo and NHTSA ODI that would otherwise have no meaningful benefit to the agency's investigation. After discussions including presentations by Waymo on our processes and our road rule compliance program, on August 13, 2024, NHTSA ODI provided some clear directions and an updated scope for PE24016-2. Waymo is now actively searching for, processing, and preparing responses, has submitted initial responses to Requests 1 and 8, and expects to submit initial responses for Request 9 later this week.

As discussed, given the novelty and breadth of this investigation, Waymo intends to provide responses on an iterative basis. Below please find a summary of Waymo's understanding of the current scope. Please let me know if this is in accordance with your understanding and/or whether you would like to further discuss.

Scope clarifications:

[redacted]

- Request 1f, 2, 3, & 5: Waymo's responses will include the following events and allegations::
  - The 32 events in IR1
  - Allegations (as defined in Request 2a-h) of the following subject behaviors:
    - Physically contacting a stationary object or vehicle
    - Inappropriately responding to traffic lights or stop signs
    - Unauthorized driving in construction zones
    - Unauthorized driving on private properties
    - Inappropriately driving in opposing lane(s) of travel
    - Failing to follow instructions from people authorized to direct traffic
  - All collisions (whether SGO reportable or not) that involve the subject behaviors above

- Request 6:
  [redacted]

Given the recency of the scope clarification, Waymo is requesting an extension for each of the questions in the IR. Waymo will make significant efforts to provide ongoing, iterative responses on a periodic basis and plans to have final responses aligned with the above-mentioned scope by October 7, 2024.

Sincerely,

[redacted]

Matthew Schwall
Director, Safety & Incident Management