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

September 9, 2024

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

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

Dear Mr. Simmons,

This letter serves as Waymo's second, partial response to the Office of Defects Investigation's Preliminary Evaluation Information Request ID PE24016-2 dated June 11, 2024. The documents produced reflect the "actions" (described below) currently employed by Waymo.

Responses

Request 9

9. Describe and produce documents related to any policies, practices, processes, procedures, or safeguards (collectively, "actions") which Waymo employs that are intended to identify, characterize, reduce, or mitigate the safety risks to passengers and other road users associated with risks arising from the subject incidents and behaviors. This request includes any actions pertaining to the conditions under which subject vehicles are operated with and without onboard human supervision. At minimum, include documents pertaining to:
    a. Incident response processes that can lead to fleet grounding, implementing operational restrictions, and changes to ODD or other operational specifications.
    b. How Waymo designs and initiates changes to the remote assistance interface.
    c. How Waymo chooses specific roadways, publicly accessible areas, and private properties within a given geographical area for mapping.
    d. Waymo's approach for detecting, classifying, and ensuring authorized ADS operation near or within gated properties and private properties.
    e. Waymo's approach for minimizing the impact to ADS operations of traffic control devices that are repositioned after initial mapping of an ODD.
    f. Waymo's methodology for documenting and evaluating changes to its ODD specification(s).
    g. How Waymo defines and designs for conditions under which vehicle can operate in opposing lanes or other lanes of travel (e.g., bike lanes) where the vehicle should not travel when a normal travel lane is unobstructed.

CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS

h. How the subject system accounts for objects that are normally stationary, but are detected as moving (e.g., objects being towed in a trailer).
i. How Waymo monitors and assesses ADS competency in obeying traffic control devices and traffic safety laws.

Response 9

Waymo's initial, partial response to Request 9, including responsive documentation to 9, 9a, and 9i, is contained in Bates number PE24016-2_0000000031-636.

[redacted]

- **Waymo's Incident Management documents, PE24016-2_0000000031-110; PE24016-2_0000000116-121; PE24016-2_0000000127-135; PE24016-2_0000000180-217**

[redacted]

  - PE24016-2 0000000031-33_Confidential Bus Info.pdf;
  - PE24016-2_0000000034-43_Confidential Bus Info.pdf;
  - PE24016-2_0000000044-62_Confidential Bus Info.pdf;
  - PE24016-2_0000000063-94_Confidential Bus Info.pdf;
  - PE24016-2_0000000095-107_Confidential Bus Info.pdf;
  - PE24016-2_0000000108-110_Confidential Bus Info.pdf;
  - PE24016-2_0000000116_Confidential Bus Info.pdf;
  - PE24016-2_0000000117-121_Confidential Bus Info.pdf;
  - PE24016-2_0000000127-135_Confidential Bus Info.pdf;
  - PE24016-2_0000000180-194_Confidential Bus Info.pdf;
  - PE24016-2_0000000195-217_Confidential Bus Info.pdf.

- **Waymo's Internal Knowledge Base ("IKB") procedure documents, PE24016-2_0000000334-636**

[redacted]

  - PE24016-2_0000000334-336_Confidential Bus Info.pdf;
  - PE24016-2_0000000337-353_Confidential Bus Info.pdf;
  - PE24016-2_0000000354-358_Confidential Bus Info.pdf;
  - PE24016-2_0000000359-367_Confidential Bus Info.pdf;
  - PE24016-2_0000000368-369_Confidential Bus Info.pdf;
  - PE24016-2_0000000370-374_Confidential Bus Info.pdf;
  - PE24016-2_0000000375-382_Confidential Bus Info.pdf;
  - PE24016-2_0000000383-398_Confidential Bus Info.pdf;

CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS

- PE24016-2_0000000399-423_Confidential Bus Info.pdf;
- PE24016-2_0000000424-430_Confidential Bus Info.pdf;
- PE24016-2_0000000431-439_Confidential Bus Info.pdf;
- PE24016-2_0000000440-442_Confidential Bus Info.pdf;
- PE24016-2_0000000443-452_Confidential Bus Info.pdf;
- PE24016-2_0000000453-464_Confidential Bus Info.pdf;
- PE24016-2_0000000465-470_Confidential Bus Info.pdf;
- PE24016-2_0000000471-480_Confidential Bus Info.pdf;
- PE24016-2_0000000481-487_Confidential Bus Info.pdf;
- PE24016-2_0000000488-497_Confidential Bus Info.pdf;
- PE24016-2_0000000498-503_Confidential Bus Info.pdf;
- PE24016-2_0000000504-512_Confidential Bus Info.pdf;
- PE24016-2_0000000513-518_Confidential Bus Info.pdf;
- PE24016-2_0000000519-541_Confidential Bus Info.pdf;
- PE24016-2_0000000542-563_Confidential Bus Info.pdf;
- PE24016-2_0000000564-566_Confidential Bus Info.pdf;
- PE24016-2_0000000567-569_Confidential Bus Info.pdf
- PE24016-2_0000000570-575_Confidential Bus Info.pdf;
- PE24016-2_0000000576-579_Confidential Bus Info.pdf;
- PE24016-2_0000000580-582_Confidential Bus Info.pdf;
- PE24016-2_0000000583-587_Confidential Bus Info.pdf;
- PE24016-2_0000000588-591_Confidential Bus Info.pdf;
- PE24016-2_0000000592-594_Confidential Bus Info.pdf;
- PE24016-2_0000000595-597_Confidential Bus Info.pdf;
- PE24016-2_0000000598-600_Confidential Bus Info.pdf;
- PE24016-2_0000000601-602_Confidential Bus Info.pdf;
- PE24016-2_0000000603-636_Confidential Bus Info.pdf.

- **PE24016-2_0000000145-179_Confidential Bus Info.pdf,** [redacted]

- **Waymo's safety policies and published papers PE24016-2_0000000027-30; PE24016-2_0000000111-115; PE24016-2_0000000122-126; PE24016-2_0000000136-144; PE24016-2_0000000218-333** [redacted]
  - PE24016-2_0000000027-30_Confidential Bus Info.pdf;
  - PE24016-2_0000000111-115_Confidential Bus Info.pdf;
  - PE24016-2_0000000122-126_Confidential Bus Info.pdf;
  - PE24016-2_0000000136-144_Confidential Bus Info.pdf;
  - Waymo's Safety Methodologies and Safety Readiness Determinations.pdf;
  - Waymo_Safety_Report_02-2021.pdf; and
  - Waymo_Safety_Case_Approach.pdf.

Conclusion

Please call me if you have any questions about this topic and would like to discuss further.

Sincerely,

[redacted]

Matthew Schwall
Director, Safety & Incident Management