U.S. Department of Transportation
National Highway Traffic Safety Administration

NHTSA

May 15, 2026

Matthew Schwall
Director, Safety & Incident Management
Waymo LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

Subject: Information Request ID PE25013-03

Dear Mr. Schwall,

This second Information Request letter seeks information in connection with Preliminary Evaluation (PE) 25013, in which ODI is investigating the performance of the Waymo ADS around stopped school buses, including the system's ability to follow relevant traffic safety laws.

ODI sent its first Information Request on December 3, 2025 (the "Initial Request"). As indicated herein, Waymo's response to that request necessitates that ODI receive further data and information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject Vehicles:** All vehicles equipped with the Waymo 5th Generation ADS in the United States, including, but not limited to, current U.S. territories and possessions.
- **Subject System:** The suite of software, hardware, data, and any other related systems on or off the vehicle that contributes to the operation of the automated driving system (ADS) of the subject vehicles.
- **Subject Incidents:** In addition to the subject incident described in Information Request ID PE25013-1, subject incidents include any additional instance in which Waymo is aware of an allegation of a subject behavior defined herein.
- **Subject Behavior:** Subject behavior includes any of the following subject vehicle driving behaviors with the subject system in use:
    - Passing a school bus exhibiting behavior indicative of preparation to load or unload passengers (e.g. commencing the extension of a stop arm);
    - Passing a school bus in the process of loading or unloading passengers;

- Passing a school bus concluding the process of loading or unloading passengers; or

- Passing a school bus at any time while the school bus stop arm is extended .

- **Traffic Control Device:** Traffic control devices include all signs, signals, markings, channelization devices, or other devices that use colors, shapes, symbols, words, sounds, and/or tactile information for the primary purpose of communicating a regulatory, warning, or guidance message to road users on a street, highway, pedestrian facility, bikeway, pathway, or site roadway open to public travel. This includes school bus mounted signs and signals.

- **Operational Design Domain (ODD):** The operating conditions under which a given driving automation system or feature thereof is specifically designed to function, including, but not limited to, environmental, geographical, and time-of-day restrictions, and/or the requisite presence or absence of certain traffic or roadway characteristics.

- **Passengers:** Occupants of the subject vehicles who are not intended to perform driving tasks or to supervise the subject system.

- **Waymo:** Waymo LLC, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Waymo (including all business units and persons previously referred to), who are or were involved in any way as of January 1, 2014, with any of the following related to the Waymo 5th Generation ADS:

  a. Design, engineering, analysis, modification or production (e.g., quality control);

  b. Testing, assessment or evaluation;

  c. Consideration or recognition of potential or actual defects; reporting, record-keeping and information management (e.g., complaints, field reports, warranty information, part sales); analysis; claims, lawsuits or arbitrations; or

  d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports,

newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, documents generated through litigation, arbitration, or mediation, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Waymo, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where initial and any non-identical copies are not available, "document(s)" also means any identical copies of the initial and all non-identical copies thereof. Any document, record, graph, chart, film or photograph initially produced in color must be provided in color. Furnish all documents whether verified by Waymo or not. If a document is not in the English language, provide both the initial document and an English translation of the document.

- Other Terms: To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

In order for my staff to continue its investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Waymo has previously provided a document to ODI, Waymo may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Waymo's response to each request, identify the source of the information and indicate the last date the information was gathered. Please provide any data tables in Excel compatible format.

1. Provide the portions of Waymo's safety case evaluating ADS performance around stopped school buses (i) as it existed between April 1, 2024 and November 17, 2025; and (ii) as it

has existed since November 17, 2025. Note in your response any changes made during these periods.

2. For all consumer complaints, state all actions taken by Waymo in response to those complaints, from the date on which the complaint was received through the present.

3. Describe the training and provide training records for Remote Assistants concerning school buses, traffic laws involving school buses, or the Subject Behavior. If not so marked, provide the date on which each training document or session was given.

4. Update your responses to question 4 through 8 of the Initial Request to include any Subject Incidents beginning three years prior to the date of the Initial Request to the date of this letter.

5. Provide an assessment of 25E084's remedy in light of your responses regarding, among other things, post-remedy Subject Incidents. As part of this assessment, update your responses to questions 9 and 10 of the Initial Request.

6. Identify and explain any corrections and additions to your response from the Initial Request.

Legal Authority for This Request

This letter is being sent to Waymo pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. It constitutes a new request for information.

Civil Penalties

Waymo's failure to respond promptly and fully to this letter could subject Waymo to Civil Penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, 49 U.S.C. § 30165(a)(3), provides for Civil Penalties of up to $27,874 per violation per day, with a maximum of $139,356,994 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 C.F.R. § 578.6(a)(3). This includes failing to respond completely, accurately, or in a timely manner to ODI information requests.

If Waymo cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney client, attorney work product, or other privilege, Waymo does not submit one or more requested documents or items of information in response to this information request, Waymo must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

If Waymo's response contains any information that you claim is confidential business information (CBI), you will need to upload a "confidential version" file and a redacted

"public version" file of each file for which Waymo is requesting confidential treatment to NHTSA's Safety Defect Investigations (SDI) Portal. For each file submitted through the SDI Portal for which Waymo is requesting confidential treatment, Waymo must check the "Contains CBI" box. Once all Waymo's files have been uploaded in the SDI Portal, Waymo will need to click on the "Finalize CBI Submission" button in the SDI Portal and then submit its request letter for confidential treatment and Part 512 certification directly to the Office of the Chief Counsel in NHTSA's Confidential Business Information (CBI) Portal.

After Waymo submits its request for confidential treatment and certificate in NHTSA's CBI Portal, the CBI Portal will assign a package identification number for your future reference and all "confidential version" and "public version" files submitted as part of the CBI request will be accessible by both NHTSA's Office of the Chief Counsel and NHTSA's Office of Defects Investigation.

Please refer to PE25013-03 in Waymo's response to this letter and in any request for confidential treatment that Waymo may submit in response to this letter.

Please see enclosure 1 for additional instructions on submitting a request for confidential treatment that is compliant with 49 CFR Part 512 (specifically, a request for confidential treatment must include the required parts that are discussed in enclosure 1).

Due Date

Waymo's response to this letter must be submitted to this office by June 19, 2026. If Waymo finds that it is unable to provide all of the information requested within the time allotted, Waymo must request an extension from me through the Safety Defects Investigation Portal no later than five business days before the response due date. If Waymo is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Waymo then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please email Paul Parker of my staff at paul.parker@dot.gov.

Sincerely,

Neil Dold

Neil Dold, Acting Chief
Advanced and Emerging Technology Division
Office of Defects Investigation

ENCLOSURE 1 - INFORMATION FOR REQUESTS FOR CONFIDENTIAL TREATMENT

If you believe that your response contains any material that you claim is confidential business information, submit these materials to NHTSA's Office of the Chief Counsel in accordance with 49 C.F.R. Part 512. **All requests for confidential treatment should be submitted directly to the Office of the Chief Counsel via NHTSA's Confidential Business Information (CBI) Portal. If you do not currently have a user account in the CBI Portal, you may send a registration request to the CBI Portal's Help Desk at** cbi-helpdesk@dot.gov.

Prior to directly submitting your request for confidential treatment to the Office of the Chief Counsel in the CBI Portal, you will need to upload all "confidential version" and "public version" files in NHTSA's Safety Defect Investigations (SDI) Portal.

Requests for confidential treatment are governed by Part 512. A current version of this regulation is available on the internet at http://www.ecfr.gov. by selecting Title 49 "Transportation," next selecting "Parts 500 - 599," and finally selecting Part 512 "Confidential Business Information."

How to request confidential treatment:

NHTSA is treating electronic submission as an acceptable method for submitting confidential business information to the agency under Part 512. If you claim that any of the information or documents provided in your response constitutes confidential business information within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, you must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with Part 512, to the Office of the Chief Counsel. Requests for confidential treatment should be submitted to the Office of the Chief Counsel in NHTSA's CBI Portal. Do not send a hardcopy of a request for confidential treatment to NHTSA's headquarters.

Your request must include a request letter that contains supporting information, pursuant to Part 512.8. Your request must also include a certificate, pursuant to Part 512.4(b) and Part 512, Appendix A.

You are required to submit one unredacted "confidential version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.6, the words "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS" (as applicable) must appear at the top of each page containing information claimed to be confidential. In the latter situation, where not all information on the page is claimed to be confidential, identify each item of information for which confidentiality is requested within brackets: "[ ]."

You are also required to submit one redacted "public version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.5(a)(2), the redacted "public version" should include redactions of any information for which you are seeking confidential treatment (i.e., the only information that should be unredacted is information for which you are not seeking confidential treatment).

For questions about a request for confidential treatment, please contact Dan Rabinovitz in the Office of the Chief Counsel at Daniel.Rabinovitz@dot.gov.