



Austin Independent School District

Office of the General Counsel

November 20, 2025

VIA E-MAIL ONLY

Waymo LLC

Mari Davidson, Assistant General Counsel

Jeff Clare, Regulatory Counsel

1600 Amphitheatre Parkway

Mountain View, CA 94043

Re: Continuing Violations of Texas Transportation Code § 545.066 and Austin City Code § 12-1-73 by Waymo LLC Automated Vehicles

Mari and Jeff:

Since our e-mail communication on Tuesday, November 18, 2025, we have been made aware of three (3) additional violations of Texas Transportation Code § 545.066 and Austin City Code § 12-1-73 by Waymo, LLC automated vehicles. There are now a total of **nineteen (19)** different instances of Waymo automated vehicles illegally and dangerously passing Austin ISD school buses in violation of Texas law since the beginning of the 2025-26 school year. Waymo's automated vehicles are averaging 1.5 violations per week. A copy reflecting these violations is attached here for your records.

Alarming, five (5) of these violations occurred after Waymo's November 5, 2025 letter reassuring Austin ISD that certain software updates were in place to resolve the issue. One of these violations underscores the urgent risk posed by Waymo's illegal activity: a Waymo automated vehicle was recorded driving past a stopped school bus **only moments after a student crossed in front of the vehicle, and while the student was still in the road.** The vehicle then proceeds through a cross walk and an intersection, where all other vehicles are stopped. Put simply, Waymo's software updates are clearly not working as intended nor as quickly as required. We cannot allow Waymo to continue endangering our students while it attempts to implement a fix. Accordingly, Austin ISD demands that Waymo immediately cease operation of its automated vehicles during the hours of 5:20 a.m. – 9:30 a.m. and 3:00 p.m. – 7:00 p.m., until more in-depth software updates are completed and Waymo can guarantee its vehicles will comply with the law.

Please confirm that Waymo will temporarily cease its automatic vehicle operations during the hours above by close of business today, November 20, 2025, PST. Please also be advised that Austin ISD is evaluating all potential legal remedies at its disposal and intends to take whatever action is necessary to protect the safety of its students, if required. Once the immediate

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safety concern is addressed, Austin ISD looks forward to working with Waymo, the City of Austin, the Texas Department of Motor Vehicles, and the NHTSA to ensure Waymo's automated vehicles are updated and capable of resuming operations safely. In the meantime, a copy of this correspondence will be shared with these relevant State and Federal agencies.

We look forward to Waymo's agreement.

Regards,

/s/ Jennifer B. Oliaro

Jennifer Bergeron Oliaro, Senior Counsel
Austin Independent School District
4000 S. IH-35 Frontage Rd.
Austin, Texas 78704
[REDACTED]

CC: Amar Mehta, Waymo, LLC [REDACTED]
Rob Patrick, Waymo, LLC [REDACTED]
Kenneth Walker, Austin ISD [REDACTED]
Chief Wayne Sneed, Austin ISD Police [REDACTED]
Assistant Chief Travis Pickford, Austin ISD Police [REDACTED]

Number / Bus	Vehicle Owner / License Plate	Partner	Violation Time	Issued On	Due On	Due
		Us Tx Tra Austin Independent Sd Sd T	2025-11-14 13:54			\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-11-14 08:08	2025-11-21	2025-12-21	\$300.00
		Us Tx Tra Austin Independent Sd Sd T	2025-11-12 17:30	2025-11-20	2025-12-20	\$300.00
		Us Tx Tra Austin Independent Sd Sd T	2025-11-11 16:26	2025-11-19	2025-12-19	\$300.00
		Us Tx Tra Austin Independent Sd Sd T	2025-11-10 08:28	2025-11-17	2025-12-17	\$300.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-24 16:56	2025-11-03	2025-12-03	\$300.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-23 16:11	2025-10-31	2025-11-30	\$300.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-15 07:01	2025-10-20	2025-11-19	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-14 06:01	2025-10-17	2025-11-16	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-09 11:51	2025-10-16	2025-11-15	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-09 15:28	2025-10-16	2025-11-15	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-09 11:45	2025-10-16	2025-11-15	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-08 07:03	2025-10-14	2025-11-13	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-10-02 08:19	2025-10-08	2025-11-07	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-09-30 07:03	2025-10-03	2025-11-02	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-09-29 08:11	2025-10-02	2025-11-01	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-09-25 17:01	2025-10-01	2025-10-31	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-08-26 15:25	2025-09-02	2025-10-02	\$0.00
		Us Tx Tra Austin Independent Sd Sd T	2025-08-22 06:35	2025-08-29	2025-09-28	\$0.00