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

NHTSA

October 13, 2026

Alex Tarnow
Avride Inc.
10 State Street
Newburyport, MA 01950

Subject: Information Request ID AQ26003-01

Dear Mr. Tarnow,

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened an Audit Query (AQ26003) to investigate Avride Inc.'s (Avride) compliance with Standing General Order 2021-01 (SGO) reporting requirements. ODI's Advanced and Emerging Technologies Division (AETD) has identified several incident reports submitted by Avride in response to the SGO that may contain inaccurate or incomplete information related to injuries. AETD has identified six SGO reports related to these potential reporting issues: 31101-13612, 31101-13761, 31101-14509, 31101-14813, 31101-15099, 31101-15189.

AETD is requesting certain information in this letter to assess these potential reporting issues including: the causes and scope of any potentially inaccurate or incomplete reporting; whether any reports of prior incidents remain outstanding; and whether the reports that have been submitted reflect complete and accurate data based on the available information. AETD will further assess any mitigations that Avride has put in place to address any potential reporting issues.

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

- Avride: Avride Inc., 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 Avride (including all business units and persons previously referred to).

- Document: "Document(s)" is used in the broadest sense of the word and shall mean all original 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, 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 Avride, 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 original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Avride or not. If a document is not in the English language, provide both the original 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 evaluate Avride's SGO reporting compliance, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Avride has previously provided a document to ODI, Avride 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 Avride's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. For each incident identified by SGO report ID above, provide copies of all associated documents, including internal and external communications (e-mail, chat applications, etc.), to which Avride has access, whether generated by Avride or another party contracted to perform functions of or services for Avride (a contractor) including transportation network company (TNC) partners. Additionally, for each incident provide the following:

   a. The date on which Avride (including any of its contractors) first learned of the incident;
   b. How Avride (including any of its contractors) first learned of the incident;
   c. The process by which Avride determined the incident to meet the criteria for reportability under the SGO and all information Avride relied upon;
   d. The names and titles of all employees involved in the process and determination identified in response to 1.c;
   e. The name of any Avride employee (including contractor employees) involved in the incident;
   f. Whether any employee identified in response to 1.e provided a report or any other information related to the incident to Avride (including any of its contractors);
   g. Whether Avride (including any of its contractors) received or otherwise learned of any report of alleged injury associated with the incident;
   h. The date on which Avride (including any of its contractors) received or otherwise learned of any report of alleged injury;
   i. The method by which Avride (including any of its contractors) received or otherwise learned of any report of alleged injury;
   j. Whether Avride (including any of its contractors) received or gathered further information about the alleged injury or injuries;
   k. The injury status determination made by Avride (including any of its contractors);
   l. The names and titles of all employees involved in the determination identified in response to 1.k;
   m. If information regarding an actual or alleged injury was first received after the date of an SGO report submission:
      i. Identify the ID, including version number, of the updated SGO report, if any;
      ii. If an updated SGO report was not submitted, provide Avride's justification;

   n. If an updated SGO report was submitted by Avride involving a change to the "Highest Injury Severity Alleged" data field of the prior report version from an injury code to a non-injury code:
      i. Identify the ID, including version number, of the updated SGO report, if any;
      ii. Provide a detailed justification for the change with reference to supporting evidence; and

   o. How the process identified and described in response to 1.a-1.n for each incident compares to Avride's standard procedures and processes.

2. Produce documents, including internal and external communications (e.g., e-mail, chat applications, etc.), that establish or otherwise affect Avride's processes for identifying incidents that may be reportable under the SGO, determining whether a particular incident is reportable, ensuring that reported information is complete and accurate, submitting a report, and submitting an updated report when errors or new material information are identified. Include all documents for these processes as they existed on October 1, 2024 and for any subsequent changes to date. To the extent that the documents

cover the topics below, identify the relevant documents, and in all other cases provide the following:

a. List and describe all process steps;
b. List and describe all sources from which Avride learns of potentially reportable incidents;
c. List and describe all processes or systems Avride has established to ensure potentially reportable incidents are identified;
d. Describe any investigative process steps and other follow-up actions taken after learning of a potentially reportable incident;
e. Describe Avride's process for determining whether an incident is reportable under the SGO;
f. List and describe the roles, responsibilities, and authority of every individual and organizational unit involved in the identification and disposition of potentially reportable incidents, including any external parties (e.g., contracted employees, their employer, and other contractors including TNC partners);
g. For information received by contracted employees and their employer, TNC partner, or others involved in Avride's operations, describe how Avride processes such data;
h. List and describe all IT systems used to perform the processes described and how they are used;
i. Describe each change to these processes, the reason for the change, and provide the effective date of each change;
j. Describe how Avride resolves internal disputes or disagreements related to SGO incident reporting and whether Avride maintains an anonymous internal process for reporting concerns related to safety and/or SGO reporting compliance;
k. For incidents in which Avride learns of actual or alleged injury, describe whether and how Avride:
    i. Investigates the occurrence of injury and/or hospitalization;
    ii. Determines the appropriate injury severity for the purpose of reporting under the SGO;
    iii. Determines that it has sufficient evidence to refute a previous injury claim or allegation for the purpose of submitting an updated report under the SGO; and

l. For incidents in which an Avride ADS-equipped vehicle (AV) was not physically impacted, describe how Avride determines whether its AV contributed to another vehicle's physical impact and when this may constitute a reportable incident under the SGO.

3. State whether Avride has identified any incidents or has performed or plans to perform searches intended to identify incidents that meet the SGO crash definition, including those in which an Avride AV was not physically impacted but may have contributed to a crash, that have not been reported under the SGO to-date. For each identified incident provide:

    a. Avride's internal unique identifier; and
    b. An explanation of how the incident did or did not meet the SGO reporting requirements.

4. Produce documents, including internal and external communications (e.g., e-mail, chat applications, etc.), that establish or otherwise affect Avride's processes for identifying, investigating, and reporting of injuries – included alleged injuries – sustained by employees, contracted workers, other passengers, and other road users related to

incidents involving an Avride AV and for addressing contributing hazards. Include all documents for these processes as they existed on October 1, 2024 and for any subsequent changes to date. To the extent that the documents cover the topics below, identify the relevant documents, and in all other cases provide the following:

a. List and describe all sources from which Avride learns of actual or alleged employee or contract worker injuries;
b. List and describe any processes or systems Avride has established to ensure employee or contract worker injuries are identified;
c. List and describe all sources from which Avride learns of actual or alleged injuries for Avride AV passengers and for other road users;
d. List and describe any processes or systems Avride has established to ensure injuries are identified for Avride AV passengers and for other road users;
e. List and describe all investigative process steps and other follow-up actions taken after learning of the occurrence or alleged occurrence of an injury;
f. List and describe the roles, responsibilities, and authority of every individual and organizational unit involved including any external parties (e.g., contracted employees, their employer, and other contractors including TNC partners);
g. For information received by contracted employees and their employer, TNC partner, or others involved in Avride's operations, describe how Avride processes such data;
h. List and describe all IT systems used to perform these processes and how they are used;
i. Describe any interaction(s) between these processes and those described in response to Request 2; and
j. Describe each change to these processes, the reason for the change, and provide the effective date of each change.

Legal Authority for This Request

This letter is being sent to Avride 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

Avride's failure to respond promptly and fully to this letter could subject Avride 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 Avride 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, Avride does not submit one or more requested documents or items of information in response to this information request, Avride 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 Avride'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 Avride is requesting confidential treatment to NHTSA's Safety Defect Investigations (SDI) Portal. For each file submitted through the SDI Portal for which Avride is requesting confidential treatment, Avride must check the "Contains CBI" box. Once all Avride's files have been uploaded in the SDI Portal, Avride 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 Avride 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 AQ26003-01 in Avride's response to this letter and in any request for confidential treatment that Avride 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

Avride's response to this letter must be submitted to this office by November 24, 2026. If Avride finds that it is unable to provide all of the information requested within the time allotted, Avride must request an extension from me through the Safety Defects Investigation Portal no later than five business days before the response due date. If Avride 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 Avride then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please email Thomas Haugh of my staff at thomas.haugh@dot.gov.

Sincerely,

Scott Simmons

Scott Simmons, Chief
Vehicle Defects Division AETD
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.