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

NHTSA

March 23, 2026

Matthew Schwall
Waymo LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

Subject: Information Request ID PE26001-01

Dear Matthew Schwall,

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is investigating in Preliminary Evaluation (PE) 26001 whether the Waymo automated vehicle (AV) that struck a child near an elementary school (SGO Report 13850) exercised appropriate caution and whether the automated driving system (ADS) acted as intended while in the school zone and neighboring areas. ADS-equipped vehicles exhibiting unexpected driving behaviors or not complying with traffic safety laws—particularly around young pedestrians—may increase the risk of, injury, and property damage. ODI is further investigating the appropriateness of Waymo's post-impact response. This letter seeks information in connection with PE26001.

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

- Subject vehicles: All Waymo 5th Generation automated driving system (ADS) manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and 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 incident reported in SGO Report 13850, subject incidents include any instance in which Waymo is aware or otherwise in possession of that relates to an allegation of the Subject Behavior defined below.
- Subject Behavior: Subject behavior includes any of the following subject vehicle driving behaviors with the subject system in use:
    - A traffic infraction that resulted in a citation;
    - Contact with a vulnerable road user (VRU) in a designated school zone;

- Alleged unsafe operation in a designated school zone reported by a public or consumer complaint;
- Pickup/ drop offs within a designated school zone during normal school pick up and drop off hours;
- Hard acceleration (i.e. Acceleration of +2.25 m/s2 or greater) in a designated school zone.

- **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:** 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 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 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 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 Waymo 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 the alleged defect, 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. Provide data tables in Microsoft Excel, or a compatible format.

1. Describe Waymo’s approach to safety in school zones, around schools, and in areas with a large population of child VRUs; and how your safety case addresses these areas of operation.

Please include in your response a detailed explanation of the role of remote assistance and the criteria for either the ADS or remote assistance to determine whether the Waymo vehicle may proceed forward after an incident has occurred; to escalate the issue and notify authorities; and to interact with witnesses to the incident, the general public, and first responders.

Further include in your response whether Waymo believes its approach complies with each applicable traffic safety law related to safe operation in school zones. If Waymo's approach has changed or is anticipated to change, please describe and date the changes

2. For each subject vehicle operated on public roadways in the United States to date by Waymo, state the following:

   a. Vehicle identification number (17-character VIN);

   b. ADS version equipped on the subject vehicle when first operated on public roadways;

   c. Date of initial operation on public roadways (MM/DD/YYYY);

   d. The state(s) and jurisdiction(s) in the United States where the vehicle and system have been operated (postal abbreviation);

   e. The operational design domain ("ODD") in each geographical area;

   f. The number of times that the vehicle has traversed a school zone; and

   g. The number of times that vehicle has made a pickup or drop-off in a designated school zone.

3. Describe Waymo's process for identifying and mapping school zones and describe how Waymo determines the applicable speed limit in a school zone. And state whether the subject system's approach to school zones varies by (i) ODD and (ii) geographic location. If so, specify how and provide all reasons why the system or ODD was so designed.

4. State the number of each of the following, received by Waymo, or of which Waymo is otherwise aware, which relate to, or may relate to, the subject incidents or subject behaviors involving the subject vehicles beginning three years prior to the date of this letter through the date of this letter:

   a. Consumer complaints;

   b. Witness/ bystander complaints;

   c. Fleet operator complaints or reports;

   d. Field reports;

   e. Reports involving a crash, injury or fatality;

   f. Property damage claims;

   g. Third-party arbitration proceedings or mediation, both pending and closed, where Waymo is or was a party to the arbitration or mediation;

h. Lawsuits, both pending and closed, in which Waymo is or was a defendant or codefendant;

i. Legal claims asserted against Waymo before formal proceedings began; and

j. Citations and other similar correspondence from school districts, local authorities, and law enforcement.

For subparts "a" through "j" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

For items "g" through "i," identify the parties to the action, and where applicable, identify the caption, court or arbitral forum, docket number, and date on which the complaint or other document initiating the action was filed.

5. Separately, for each subject incident dated three years prior to the date of this letter through the date of this letter, and for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 4, state the following information:

a. Waymo's file number or other identifier used;

b. The category of the item, as identified in Request No. 4 (i.e., consumer complaint, field report, etc.);

c. The identification number for any related incident report submitted in response to Standing General Order 2021-01;

d. The subject vehicle's 17-character VIN;

e. The subject vehicle's ADS version at the time of the incident reported at a level of specificity to capture software and hardware updates;

f. Incident date (MM/DD/YYYY) and local time;

g. Report or claim date (MM/DD/YYYY);

h. Incident location (GPS coordinates);

i. Whether the subject vehicle was operating with or without onboard human supervision;

j. If the vehicle was operating with human supervision, the precise time at which the human supervisor requested teleoperational assistance and the full extent of the interaction between the human supervisor and all relevant teleoperational assistance;

k. If the vehicle was operating without human supervisor, the time at which the system requested teleoperational assistance;

l. The location of teleoperational assistance;

m. Any latency associated with teleoperational assistance;

n. The number of passengers in the subject vehicle;

o. Whether a potential or actual collision was detected by the subject vehicle or subject system;

p. Whether a collision was verified;

q. Whether property damage is alleged;

r. Number of alleged injuries, if any;

s. Number of alleged fatalities, if any;

t. Whether property damage is alleged; and

u. Whether a citation was issued.

6. For each incident within the scope of your response to Request No. 4, provide a summary description of the incident and identify causal and contributing factors, material underlying facts, as well as Waymo's assessment of the incident, with a summary of the significant underlying facts and evidence. This summary shall include but not be limited to:

a. Waymo's file number(s) or other identifier(s) used for any item(s) within the scope of your responses above related to this action;

b. How Waymo initially learned of the incident. For complaints, identify the reporting mechanism through which Waymo received the report. For internally identified incidents, identify the internal process or mechanism through which Waymo learned of the incident; Relative position and description of traffic control devices relevant to any unexpected or inappropriate behavior;

c. Whether the subject vehicle and subject systems were operating within the specified ODD and within any other expected operational limits;

d. Whether the subject vehicle or any subject system was operating in a degraded state;

e. Cause(s) of any subject system disengagement, exit of the specified ODD or any other expected operational limits, inappropriate behavior, or degraded state(s);

f. Whether the subject system was returned to operation immediately;

g. If applicable, how the subject vehicle was removed from the scene of the incident;

h. Whether, following the incident, the subject vehicle or any subject vehicle was grounded from operation on public roadways or if public roadway operations were otherwise altered or restricted;

i. Reason(s) for any grounding or public roadway operation restrictions;

j. Any action(s) taken to return the subject vehicle or subject system to operation on public roadways; and

k. Any resulting actions taken that affected other subject vehicles or subject systems.

7. Produce copies of all documents related to each item within the scope of Request No. 4. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Waymo used for organizing the documents.

8. For each subject incident, provide the following video information:

   a. For subject incidents reported or reportable under the SGO, provide all video recorded by or of each Waymo vehicle involved in the incident of the 30 seconds leading up to contact with any crash partner and through the conclusion of the crash event. A crash event includes any safety-relevant activity that occurs after a collision, such as the vehicle achieving a stable stopped condition or reaching a final point of rest. If the vehicle did not achieve a stable stopped condition, provide video ending no less than 30 seconds following the contact event.

   b. For subject incidents that Waymo considers not reportable under the SGO, provide all video recorded by or of each Waymo vehicle involved in the incident, including at Provide a composite rendering for the same timeframe specified in requests 8a or 8b (as applicable) showing video of each crash partner and each involved traffic control device alongside synchronized renderings of the ADS planned paths, the predicted trajectories of relevant road users, the velocity of the Waymo vehicle and other relevant road users, and the acceleration of the Waymo vehicle.

   c. Furnish a brief explanation of each Waymo ADS's decision-making that led to a collision or a potential traffic safety law violation. To the extent that the driving behavior is not fully interpretable by the video specified in 8a-d, supplement the video submission with additional composite views showing additional perception, planning, or other elements that influenced the ADS decision-making.

   d. Provide a composite rendering for the same timeframe specified in requests 8a or 8b (as applicable) showing video of each crash partner and each involved traffic control device alongside synchronized renderings of the ADS planned paths, the predicted trajectories of relevant road users, the velocity of the Waymo vehicle and other relevant road users, and the acceleration of the Waymo vehicle.

   e. Furnish a brief explanation of each Waymo ADS's decision-making that led to a collision or a potential traffic safety law violation. To the extent that the driving behavior is not fully interpretable by the video specified in 8a-d, supplement the video submission with additional composite views showing additional perception, planning, or other elements that influenced the ADS decision-making.

9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the subject incidents or subject behaviors that have been conducted, are being conducted, are planned, or are being planned by, or for, Waymo. For each such action, provide the following information:

   a. Action title or identifier;

b. The actual or planned start date;

c. The actual or expected end date;

d. Waymo's file number(s) or other identifier(s) used for any item(s) within the scope of your responses above related to this action;

e. Summary of the subject and objective of the action;

f. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;

g. A description and values of all measures, metrics and criteria used to assess the safety, reliability, and prediction performance of the subject vehicles and subject systems, individually and in aggregate, operating with and without onboard human supervision; and

h. A summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action

10. Describe all modifications or changes made by, or on behalf of, Waymo in the design of the subject system since three years prior to the date of this letter through the date of this letter, which relate to, or may relate to, the subject incidents or subject behaviors. For each such modification or change, provide the following information:

    a. The date or approximate date on which the modification or change was incorporated into the subject system;

    b. A detailed description of the modification or change;

    c. Which sets of subject vehicles the change was deployed on (e.g., supervised, unsupervised, etc.);

    d. The reason(s) for the modification or change;

    e. The version of the subject system prior to modification;

    f. The version of the modified subject system;

    g. Whether the original unmodified subject system was withdrawn from operation, and if so, when; and

    h. Whether the modified component can be interchanged with earlier versions.

    Also, provide the above information for any modification or change that Waymo is aware of which may be incorporated into the subject vehicles within the next 120 days which relate to, or may relate to, the subject incidents or subject behaviors.

11. 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 or 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. How Waymo AVs detect and classify school zones (e.g. geolocation, perceive signage,et al.)

b. How Waymo AVs detect and classify children and groups of children.

12. Furnish Waymo's assessment of each subject behavior in the subject vehicles, including:

a. The causal or contributory factor(s);The failure mechanism(s);

b. The failure mode(s);

c. The risk to motor vehicle safety that it poses;

d. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the subject behavior was occurring, or subject system was malfunctioning; and

e. The subject incident described in this Information 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 PE26001-01 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 May 8, 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,

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.