

CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)



Waymo LLC
1600 Amphitheatre Pkwy
Mountain View, CA

July 8, 2026

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

Re: Waymo LLC – Waymo's Second Responsive Submission to PE26001-01

Dear Mr. Simmons,

This letter serves as Waymo's second response to the Office of Defects Investigation's Preliminary Evaluation Information Request ID PE26001-01 dated March 23, 2026. Our responses are based on information available to Waymo on the date of the Information Request. Our responses are consistent with the clarifications discussed with NHTSA ODI and captured in the letter "Waymo LLC – Clarification to Information Request ID PE26001-01" dated May 1, 2026.

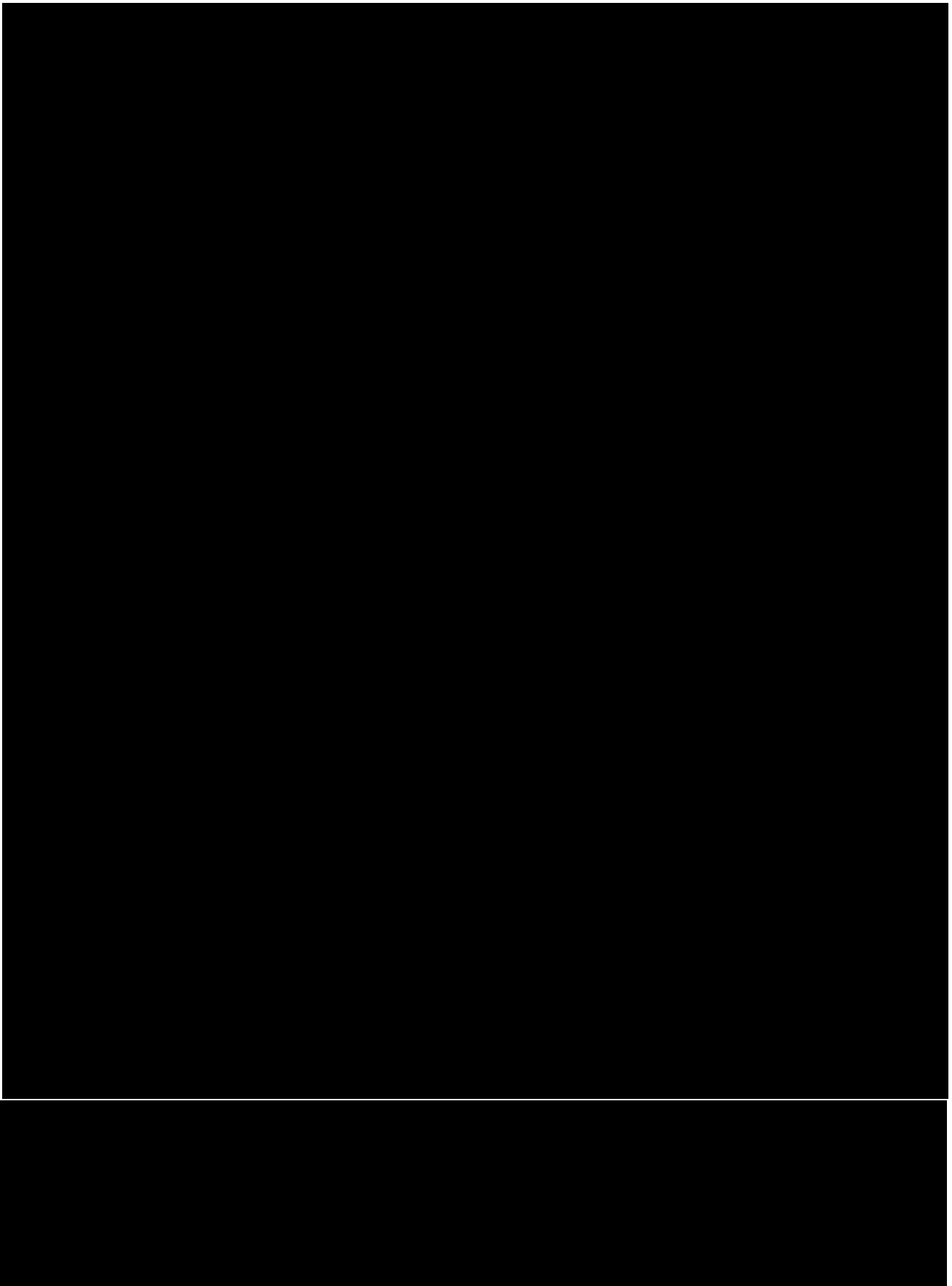
Responses

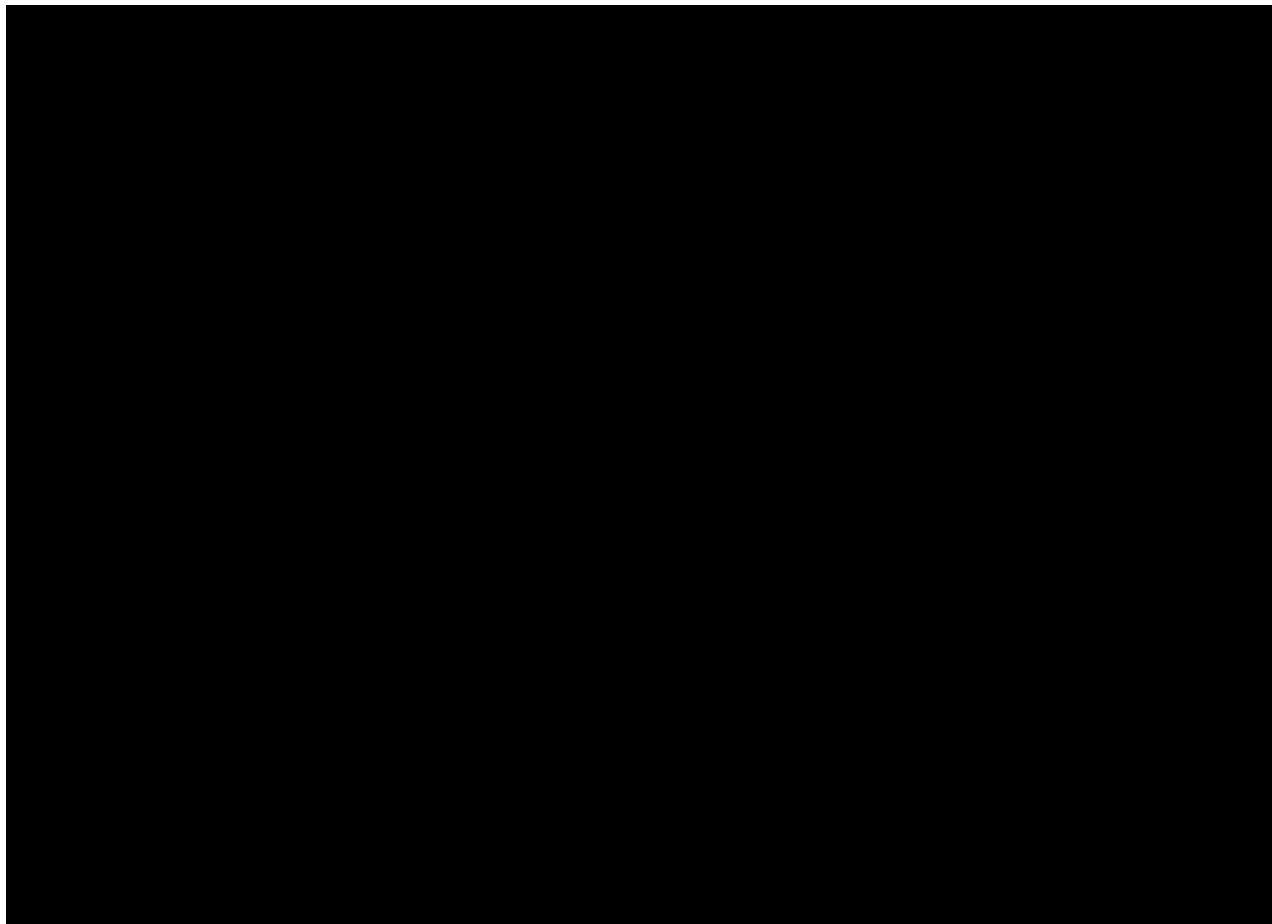
Request 1:

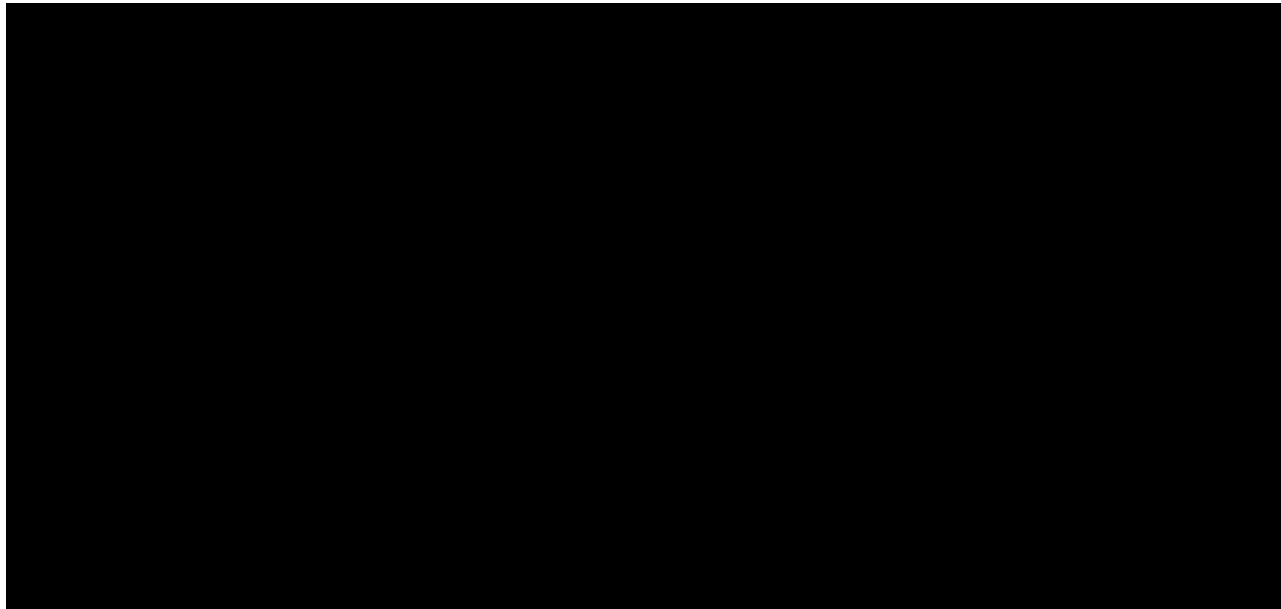
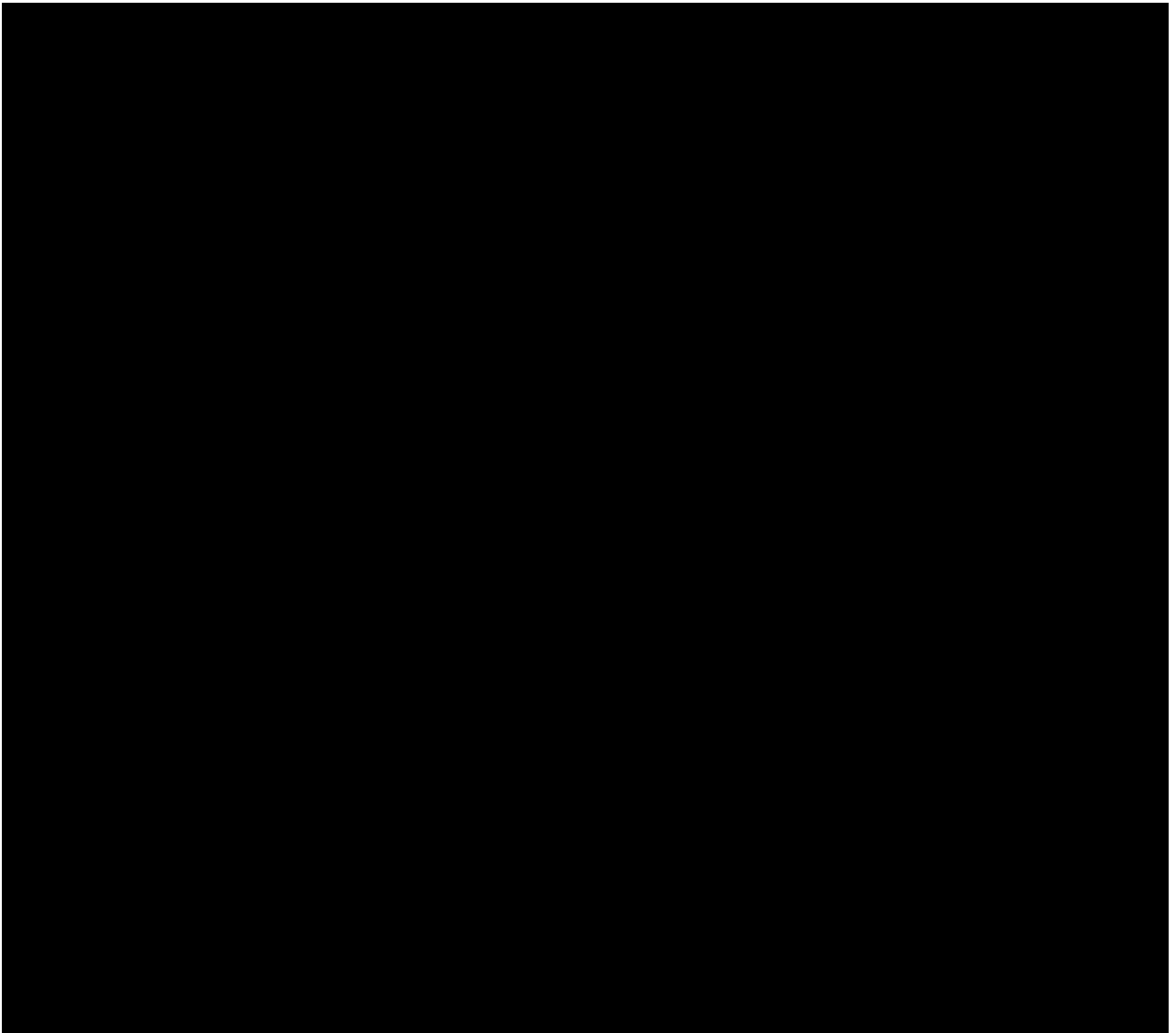
Describe Waymo's approach to safety in school zones, around schools, and in areas with a large population of child VRUs; and how your safety case addresses these areas of operation. Please include in your response a detailed explanation of the role of remote assistance and the criteria for either the 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.

Response 1:

[REDACTED]







Request 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.

Response 2:

Request 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.

Response 3:

Request 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:

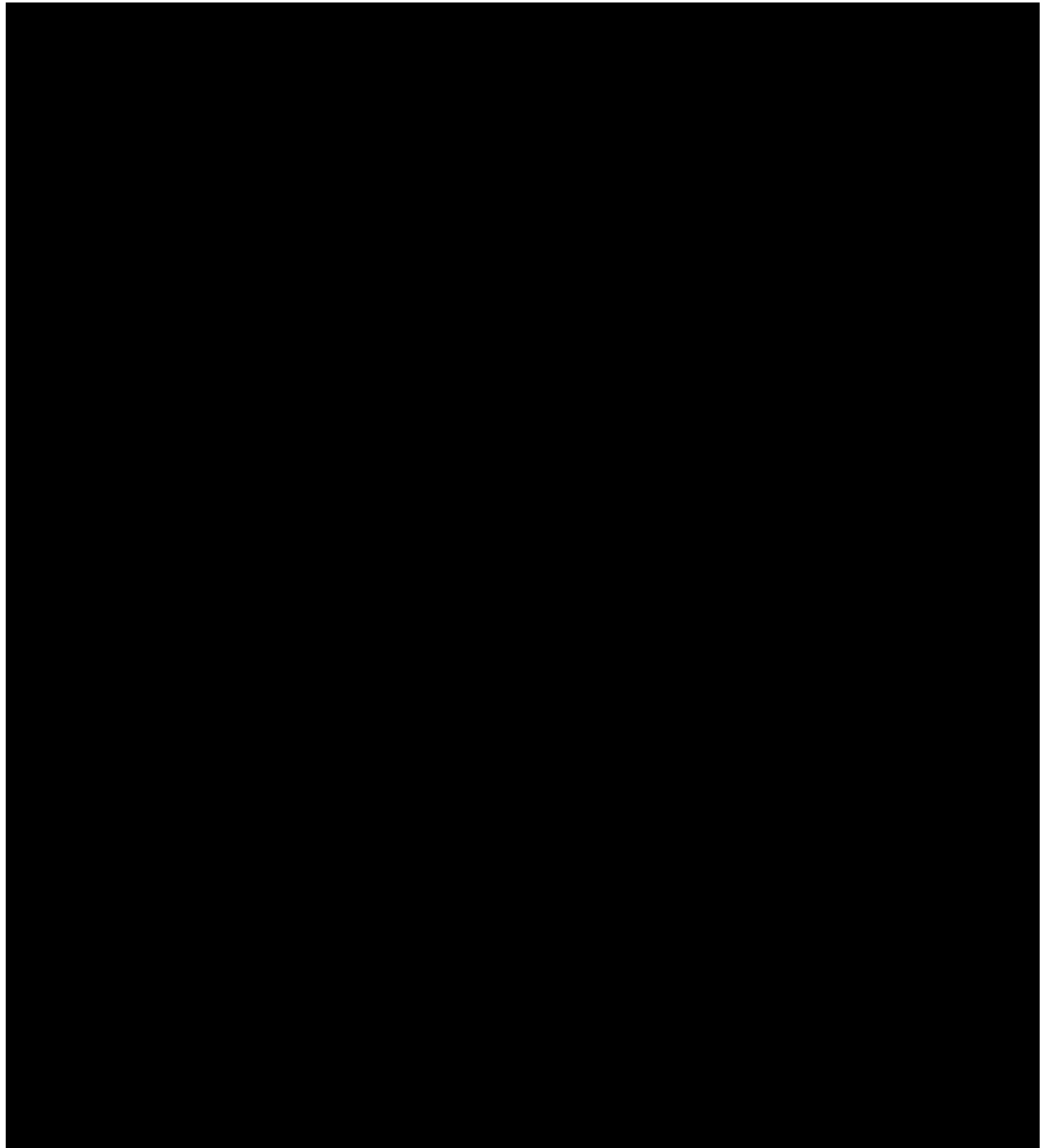
- a. Consumer complaints;
- b. Witness/ bystander complaints;
- c. Fleet operator complaints or reports;
- d. Field reports;
- e. Reports involving a crash, injury or fatality;
- f. Property damage claims;
- g. Third-party arbitration proceedings or mediation, both pending and closed, where Waymo is 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;
- 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).

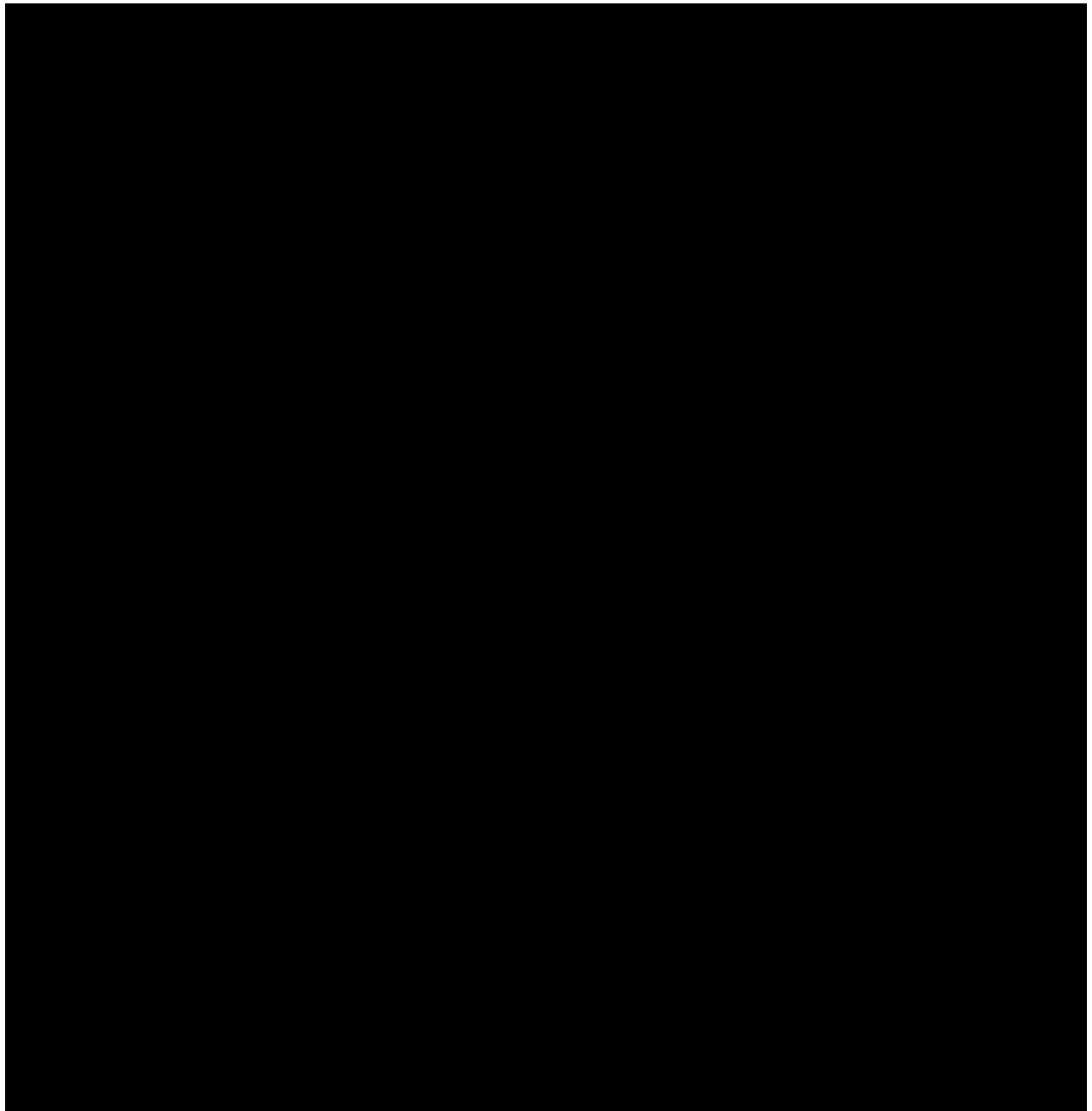
For items “g” through “i,” identify the parties to the action, and where applicable, identify the caption, court or arbitral forum, docket number, and date on which the complaint or other document initiating the action was filed.

Response 4:



[REDACTED]

[REDACTED]



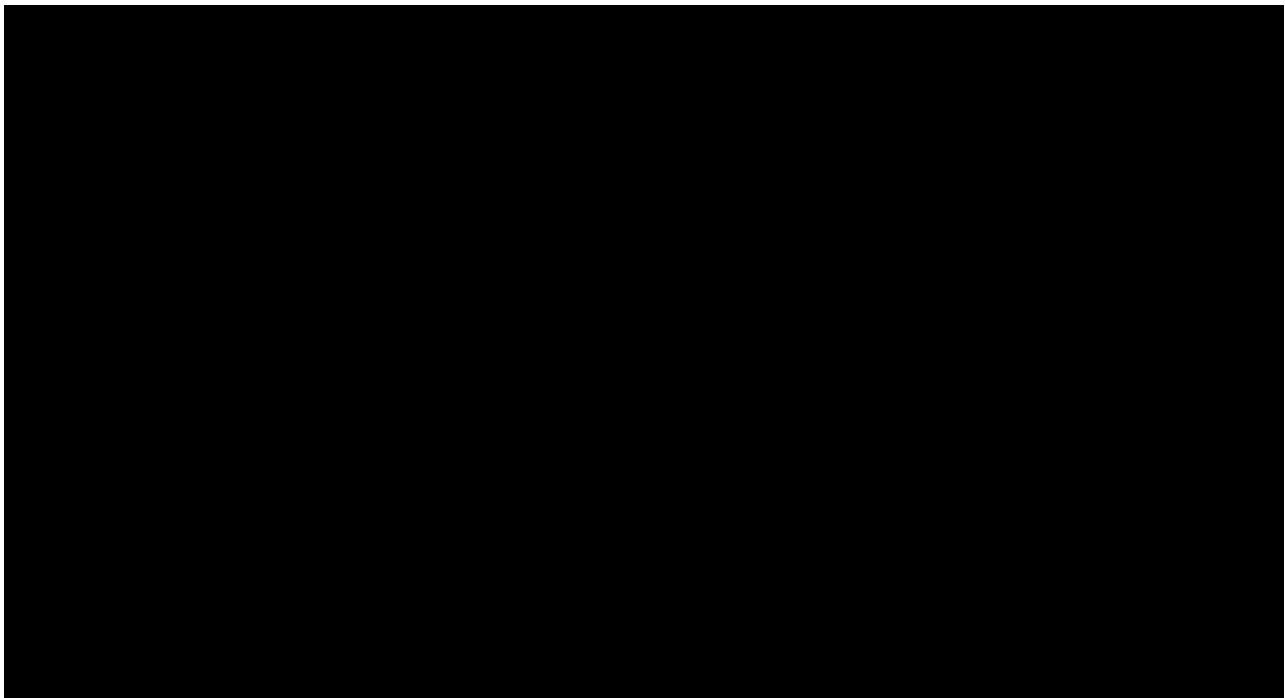
Request 5:

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.

Response 5:



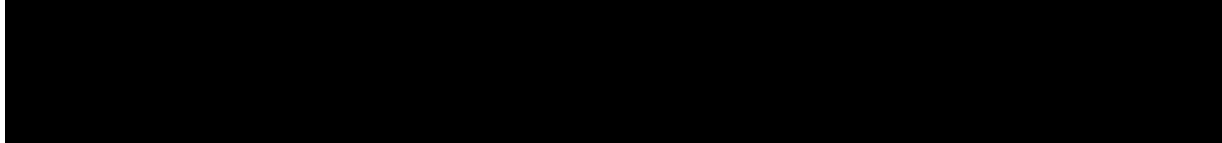
Request 6:

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.

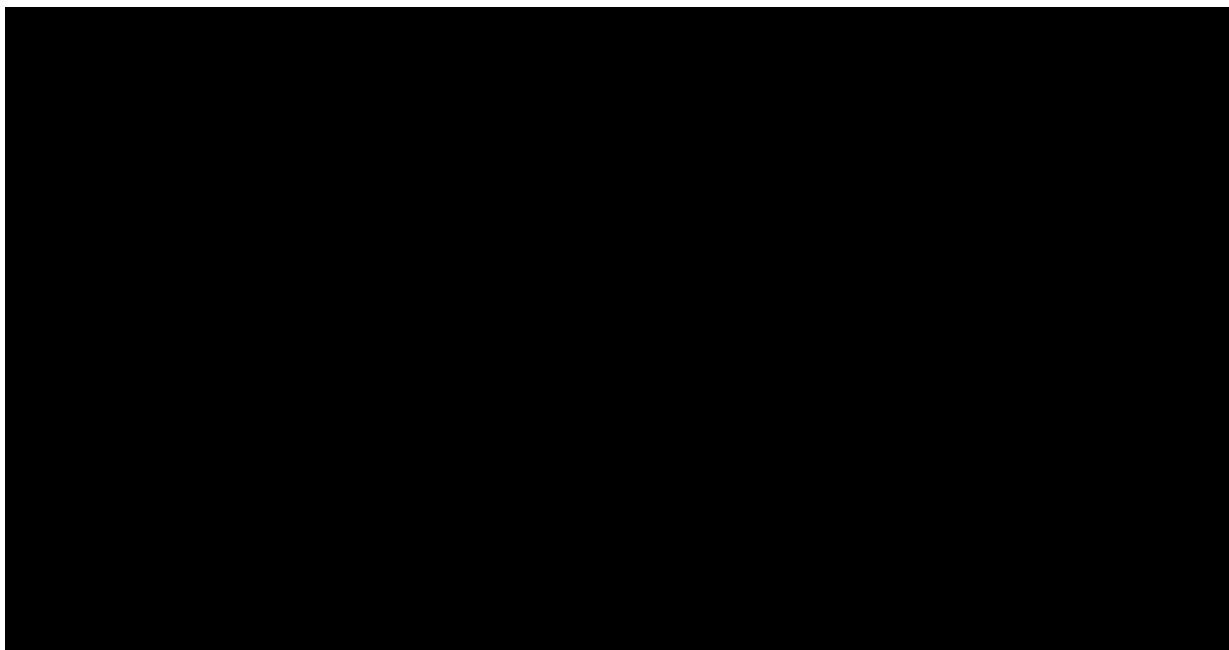
Response 6:



Request 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.

Response 7:



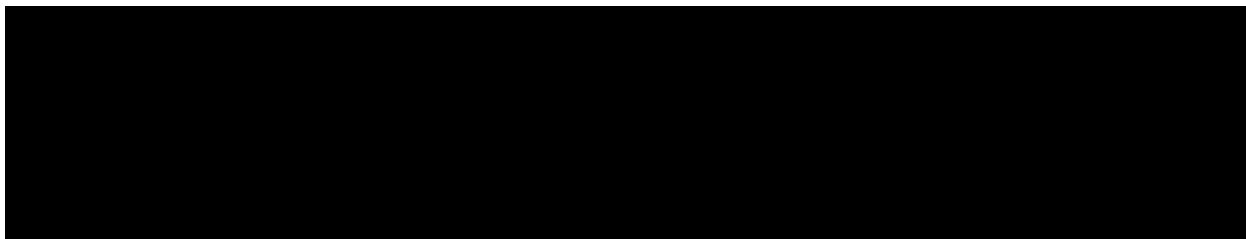
Request 8:

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.

Response 8:



Request 9:

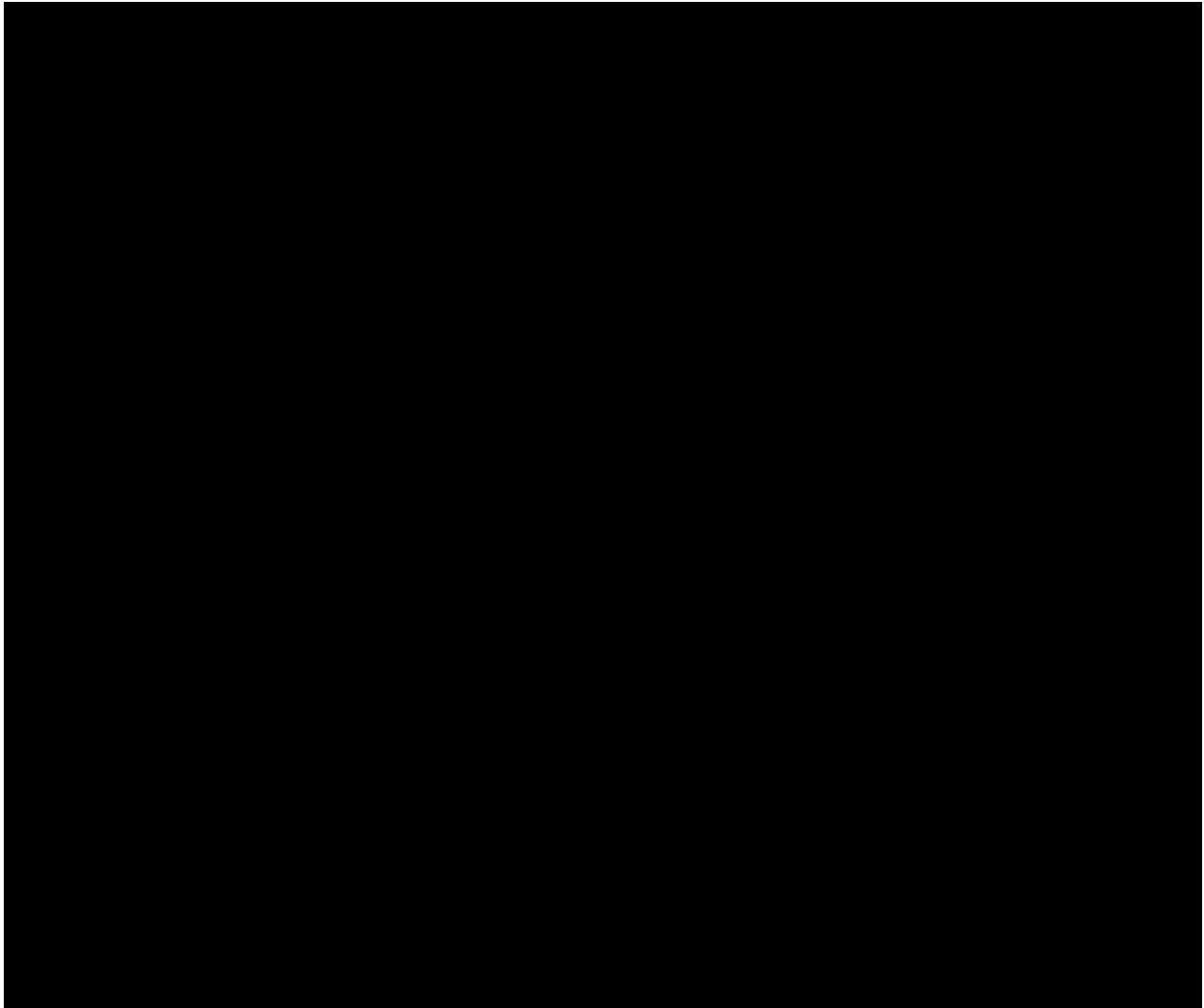
Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the subject incidents or subject behaviors that have been conducted, are being conducted, are planned, or are 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

Response 9:



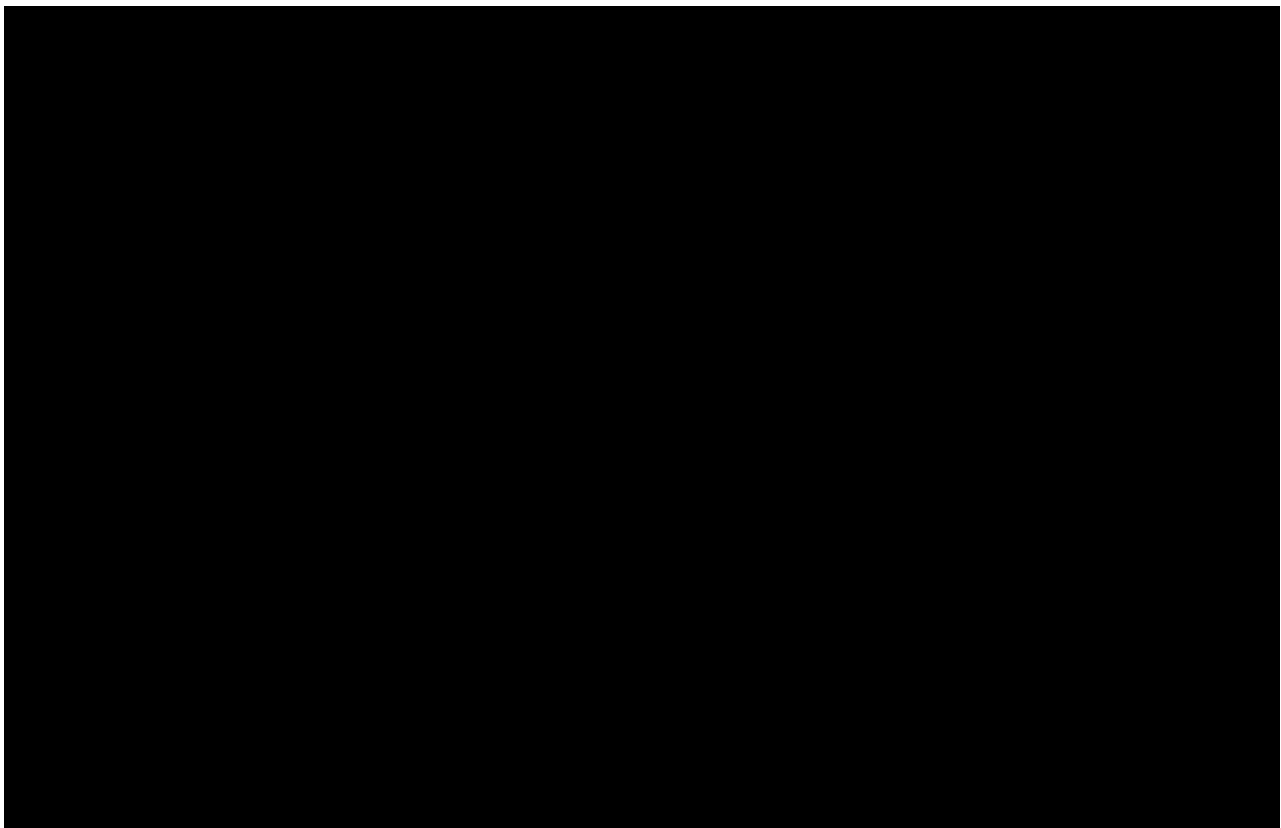
Request 10:

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.

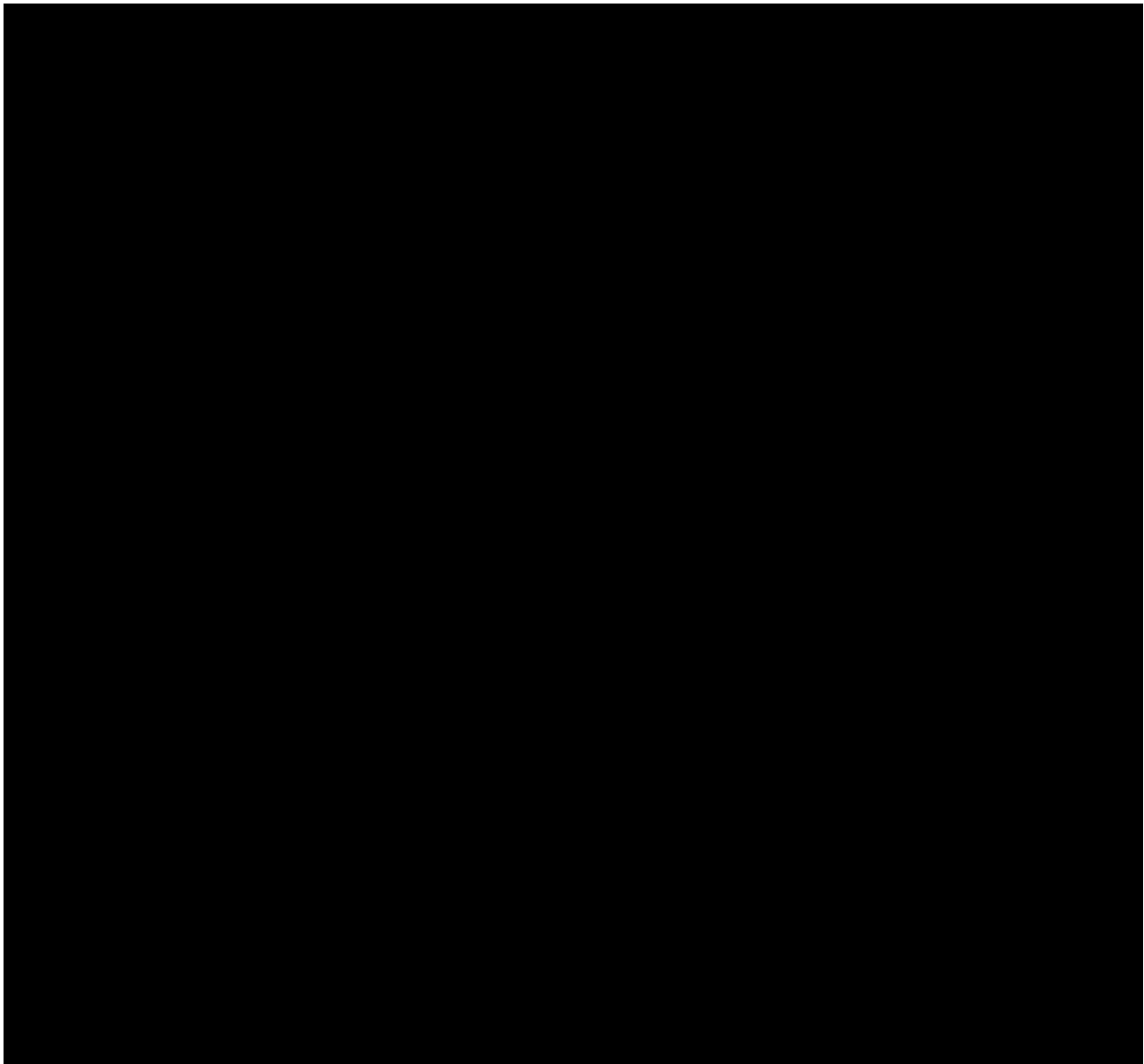
Response 10:



Request 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.

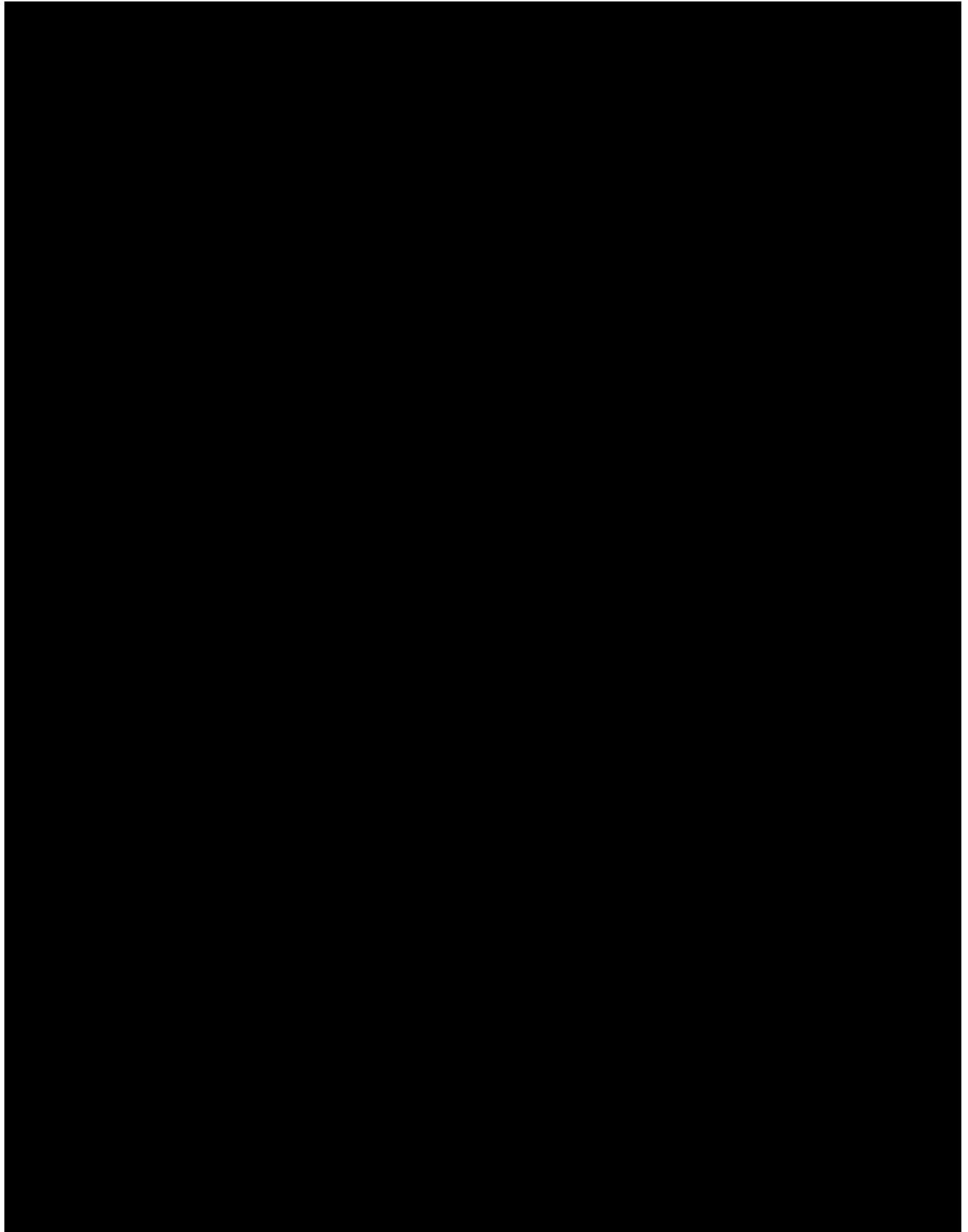
Response 11:

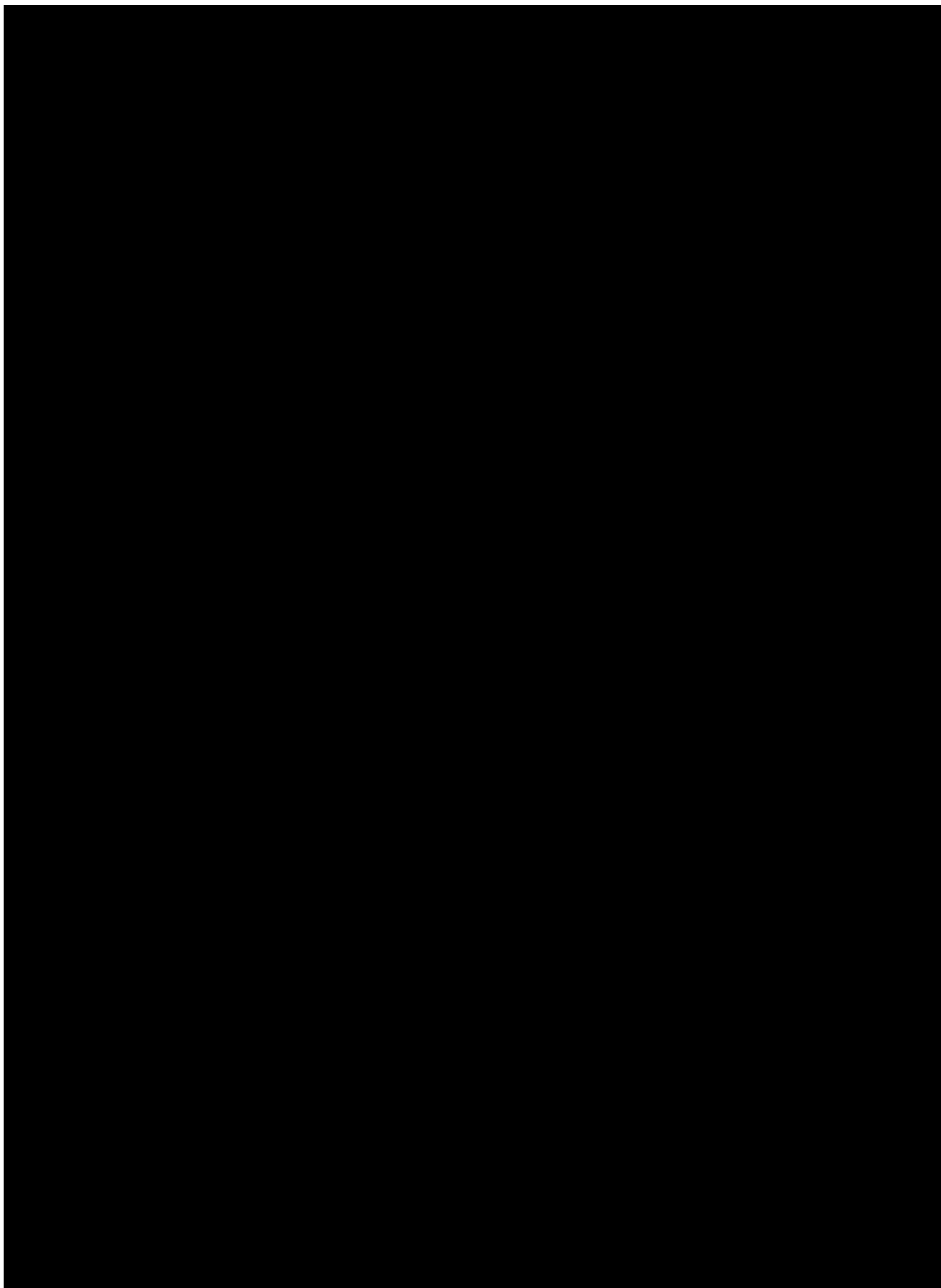
Request 12:

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.

Response 12:





Conclusion

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

Sincerely,



Matthew Schwall
Senior Director, Safety