

ZOOX

ZOOX INC 1149 CHESS DR  
FOSTER CITY, CA 94404

**Confidential Declaration (General Order 66-D)**

**DATE:**

May 1, 2026

**TO:**

Terra Curtis  
Director, Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Declaration of Christopher Nalevanko in Support of Request for Confidential Treatment of Zook Driverless Autonomous Vehicle TCP (TCP 0038380-P) Pilot Passenger Quarterly Data Report (January 1, 2026 to March 31, 2025), Pursuant to General Order 66-D**

I, Christopher Nalevanko, declare and state:

1. I am the General Counsel of Zook, Inc., doing business as Zook Labs, Inc. in California, and an officer of Zook, Inc.
2. I have reviewed and/or am familiar with the confidential information related to Zook's Zook Autonomous Vehicle TCP Pilot Passenger Service Quarterly Data Report Driverless.
3. I have personal knowledge of the facts and representations therein and, if called upon to testify, could and would do so competently, except such facts or representations as are stated to be based upon information and belief, and as to those matters, I believe them to be true.
4. Listed in Attachment A are references to the information or data for which Zook, Inc. is seeking confidentiality protection and the basis for Zook, Inc.'s confidentiality request.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct. Please contact Paul Escobar, Zook's State Policy Lead, should a request for the disclosure of any of the aforementioned confidential information be made.

Executed on May 1, 2026, at Foster City, California.

DocuSigned by:

*Christopher Nalevanko*

10093008A8CC436

Christopher Nalevanko

General Counsel, Vice President & Corporate Secretary, Zook, Inc.

# ATTACHMENT A

DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

ATTACHMENT A

## Attachment A

### Request for Confidential Treatment of Zoox Driverless Autonomous Vehicle TCP (TCP 0038380-P) Pilot Passenger Quarterly Data Report (January 1, 2026 to March 31, 2026), Pursuant to General Order 66-D

Category	Field Name	CPED Staff Field Description	Spread-sheet Column	Basis for Confidentiality Claims
Trip-Level Trip Data	TripStartDate	The time and date the trip was requested	J	<p><b>Trade secret:</b> Gov. Code § 7927.705 exempts “disclosure of records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.” Evidence Code § 1060 provides that “the owner of a trade secret has a privilege to refuse to disclose the secret, and to prevent another from disclosing it, if the allowance of the privilege will not tend to conceal fraud or otherwise work injustice.” Civil Code §3426.1(d) defines trade secret as “information, including a formula, pattern, compilation, program, device, method, technique, or process that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” 5 U.S.C. § 552(b)(4) also exempts trade secrets from disclosure under the Freedom of Information Act.</p> <p>Trip-Level Trip Data, including TripStartDate, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its</p>

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				<p>disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p>
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				<p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700 protects documents "the disclosure of which would constitute an unwarranted invasion of personal privacy." Gov. Code § 7927.705 incorporates protections established by federal and state laws, which includes protections offered by the California and U.S. Constitutions. Gov. Code § 7930.100 expressly incorporates the right of privacy guaranteed by Article 1, Section 1, of the California Constitution. In addition, Gov. Code § 7927.400 exempts from disclosure "records that relate to electronically collected personal information, as defined by Section 11015.5, that is received, collected, or compiled by a state agency." Electronically collected personal information includes "any information that is maintained by an agency that identifies or describes an individual user. . ." Gov. Code § 11015.5.</p> <p>Trip-Level Data reveals information about rides completed on Zoox's platform, including the precise date and time of pick-up and drop-off, and the locations of the requester, pick-up and drop-off, by zip code and census tract, as well as passenger miles travelled. If</p>
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				made public, this detailed Trip-Level Data could be used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual's name, phone number and address are not reported. This data is especially sensitive while service is limited to select riders and ridership is relatively low, making it easier for a third party to identify travel patterns of a particular rider. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.
Trip-Level Trip Data	TripReqRequesterTract	Census Tract Code of Requester (at time of trip request)	K	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including TripReqRequesterTract, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p>

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Trip-Level Trip Data	TripReqRequester Zip	Zip Code of Requester (at time of trip request)	L	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including TripReqRequesterZip, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking</p>

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Trip-Level Trip Data	TripFulfilled	Whether the trip was fulfilled	M	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including TripFulfilled, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas</p>

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				<p>in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit (and whether the ride was fulfilled or cancelled) allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, the maturity of Zoox's product offering, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary</p>
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Trip-Level Trip Data	ReasonUnfulfilled	Reason the trip was unfulfilled, if applicable	N	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including ReasonUnfulfilled, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit (and why a ride was unfulfilled) allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, the maturity of Zoox's product offering, and other critical aspects of its business that Zoox does not publicly disclose,</p>

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Trip-Level Trip Data	VIN	Full unredacted VIN of vehicle used	O	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including VIN, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p>

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				<p>confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Personal Identifiable Information:</u></b> Government Code section 6254(c) exempts personal identifiable information from disclosure. Zoox VINs constitute personal identifiable information.</p>
Trip-Level Trip Data	TripAcceptDate	The time and date at which the vehicle accepted a ride	S	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including TripAcceptDate, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p>

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				<p>Trip-Level Data reveals information about rides completed on Zoox's platform, including the precise date and time of pick-up and drop-off, and the locations of the requester, pick-up and drop-off, by zip code and census tract, as well as passenger miles travelled. If made public, this detailed Trip-Level Data could be used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual's name, phone number and address are not reported. This data is especially sensitive while service is limited to select riders and ridership is relatively low, making it easier for a third party to identify travel patterns of a particular rider. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>
Trip-Level Trip Data	TripPickupDate	The time and date at which the vehicle picked up the passenger	T	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including TripPickupDate, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking</p>

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				<p>Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
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				<p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Trip-Level Data reveals information about rides completed on Zoox's platform, including the precise date and time of pick-up and drop-off, and the locations of the requester, pick-up and drop-off, by zip code and census tract, as well as passenger miles travelled. If made public, this detailed Trip-Level Data could be used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual's name, phone number and address are not reported. This data is especially sensitive while service is limited to select riders and ridership is relatively low, making it easier for a third party to identify travel patterns of a particular rider. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>
Trip-Level Trip Data	TripDropoff-Date	The time and date at which the vehicle dropped off the passenger	U	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including TripDropoffDate, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas</p>

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				<p>in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their</p>
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				<p>offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Trip-Level Data reveals information about rides completed on Zoox’s platform, including the precise date and time of pick-up and drop-off, and the locations of the requester, pick-up and drop-off, by zip code and census tract, as well as passenger miles travelled. If made public, this detailed Trip-Level Data could be used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual’s name, phone number and address are not reported. This data is especially sensitive while service is limited to select riders and ridership is relatively low, making it easier for a third party to identify travel patterns of a particular rider. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox’s users.</p>
Trip-Level Trip Data	VMTP1	Vehicle miles traveled since the last trip while the vehicle is neither carrying passengers nor en route to picking up a passenger	V	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including VMTP1, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the</p>

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		("Period 1 VMT")		<p>public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit, and specifically Period 1 vehicle miles travelled, allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which</p>
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				describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Trip-Level Trip Data	VMTP2	Vehicle miles traveled between the point where the vehicle was when it accepted a trip to the point where it picked up the passenger ("Period 2 VMT")	W	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including VMTP2, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit, and specifically Period 2 vehicle miles travelled, allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of</p>

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				<p>Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Trip-Level Trip Data	VMTP3	Vehicle miles traveled between the pick-up point and the drop-off point	X	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including VMTP3, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and</p>

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		("Period 3 VMT")		<p>at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit, and specifically Period 3 vehicle miles travelled, allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox</p>
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				stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Trip-Level Trip Data	EVMT	Electric Vehicle Miles Traveled ("eVMT") over entire trip (i.e., aggregate over all periods for Waybill1)	Y	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including EVMT, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p>

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Trip-Level Trip Data	PassengerMiles Traveled	The number of passengers multiplied by the number of miles traveled with those passengers in the car ("Passenger Miles Traveled")	Z	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including PassengerMilesTraveled, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, duration, and miles traveled, of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment</p>
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Trip-Level Trip Data	PickUpTract	The census tract in which the passenger was picked up for Waybill1	AA	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including PickUpTract, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas</p>

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Trip-Level Trip Data	DropOffTract	The census tract in which the passenger was dropped off for Waybill1	AB	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including DropOffTract, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the</p>

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				<p>public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use,</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D



				<p>security, and protection of Zoox’s confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Trip-Level Data reveals information about rides completed on Zoox’s platform, including the precise date and time of pick-up and drop-off, and the locations of the requester, pick-up and drop-off, by zip code and census tract, as well as passenger miles travelled. If made public, this detailed Trip-Level Data could be used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual’s name, phone number and address are not reported. This data is especially sensitive while service is limited to select riders and ridership is relatively low, making it easier for a third party to identify travel patterns of a particular rider. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox’s users.</p>
Trip-Level Trip Data	PickUpZip	The zip code in which the passenger was picked up for Waybill1	AC	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including PickUpZip, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p>

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				<p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				<p>confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Trip-Level Data reveals information about rides completed on Zoox's platform, including the precise date and time of pick-up and drop-off, and the locations of the requester, pick-up and drop-off, by zip code and census tract, as well as passenger miles travelled. If made public, this detailed Trip-Level Data could be used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual's name, phone number and address are not reported. This data is especially sensitive while service is limited to select riders and ridership is relatively low, making it easier for a third party to identify travel patterns of a particular rider. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>
Trip-Level Trip Data	DropOffZip	The zip code in which the passenger was dropped off for Waybill1	AD	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Trip-Level Trip Data, including DropOffZip, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and</p>

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				<p>at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Trip-Level Data reveals strategic, targeted service plans under its AV pilot that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Trip-Level Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Trip-Level Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Trip-Level Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the Trip-Level Data on a secure software network protected</p>
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				<p>by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Trip-Level Data reveals information about rides completed on Zoox's platform, including the precise date and time of pick-up and drop-off, and the locations of the requester, pick-up and drop-off, by zip code and census tract, as well as passenger miles travelled. If made public, this detailed Trip-Level Data could be used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual's name, phone number and address are not reported. This data is especially sensitive while service is limited to select riders and ridership is relatively low, making it easier for a third party to identify travel patterns of a particular rider. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>
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Monthly Tract Data	TripsStart; TripsEnd	For each census tract in company's ODD, the total number of trips that began (i.e., picked up a customer, start of Period 3) in that census tract; For each census tract in company's ODD, the total number of trips that ended (i.e., dropped off a customer, end of Period 3) in that census tract.	E, F	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Monthly Tract Data, specifically TripsStart and TripsEnd, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Trip-Level Trip Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Monthly Tract Data provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, distance, and duration of rides completed under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of Monthly Tract Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Monthly Tract Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Trip-Level Data would be</p>
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				<p>exacerbated due to the nascent stage of the AV industry, which makes data concerning trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Monthly Tract Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Monthly Tract Data	Tract	Report each census tract in company's operational design domain (ODD)		<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Monthly Tract Data, including census tract, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Tract Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Monthly Tract Data reveals strategic, targeted service plans under its AV pilot (including Zoox's operational footprint) that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment</p>

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				<p>permits. For example, analysis of census tract data under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities. Census Tract Data is particularly sensitive because it would reveal Zoox's operational footprint, which is not public information.</p> <p>As a result, the compilation of Monthly Tract Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Monthly Tract Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Tract Data would be exacerbated due to the nascent stage of the AV industry, which makes data concerning trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Monthly Tract Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their</p>
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				offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Incidents-Complaints	TimeofIncident	The time and date the incident occurred.	B	<p><b>Trade secret:</b> Gov. Code § 7927.705 exempts “disclosure of records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.” Evidence Code § 1060 provides that “the owner of a trade secret has a privilege to refuse to disclose the secret, and to prevent another from disclosing it, if the allowance of the privilege will not tend to conceal fraud or otherwise work injustice.” Civil Code §3426.1(d) defines trade secret as “information, including a formula, pattern, compilation, program, device, method, technique, or process that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” 5 U.S.C. § 552(b)(4) also exempts trade secrets from disclosure under the Freedom of Information Act.</p> <p>Incidents-Complaints Data, including TimeofIncident, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Incidents-Complaints Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Incidents-Complaints Data provides Zoox with critical insights into the operating environment for its vehicles at various geographic locations and over a particular period of time,</p>

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				<p>which informs Zoox’s strategic business decisions. As a result, the compilation of Incidents-Complaints Data has actual and potential economic value to third parties. If Zoox’s actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing and strategic decisions regarding Zoox’s services and driving systems, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox’s actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Incidents-Complaints Data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet operational data particularly valuable.</p> <p>Zoox’s efforts to maintain the confidentiality of Incidents-Complaints Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox’s employee handbook, which describes each employee’s obligations regarding technology use, security, and protection of Zoox’s confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
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Incidents-Complaints	IncLat; IncLong; IncidenceTract; IncidenceZip ("Incident-Complaints location data")	Location of incident: Latitude; Location of incident: Longitude; Census Tract Code of incident (at time of trip request); Zip Code of incident (at time of trip request)	C, D, E, F	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Incidents-Complaints location data, including IncLat, IncLong, IncidenceTract and IncidenceZip, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Incidents-Complaints location data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Incidents-Complaints location data provides Zoox with critical insights into the operating environment for its vehicles at various geographic locations and over a particular period of time, which informs Zoox's strategic business decisions. As a result, the compilation of Incidents-Complaints location data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing and strategic decisions regarding Zoox's services and driving systems, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Incidents-Complaints location data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet operational data particularly valuable.</p>
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				<p>Zoox's efforts to maintain the confidentiality of Incidents-Complaints location data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700 protects documents "the disclosure of which would constitute an unwarranted invasion of personal privacy." Gov. Code § 7927.705 incorporates protections established by federal and state laws, which includes protections offered by the California and U.S. Constitutions. Gov. Code § 7930.100 expressly incorporates the right of privacy guaranteed by Article 1, Section 1, of the California Constitution. In addition, Gov. Code § 7927.400 exempts from disclosure "records that relate to electronically collected personal information, as defined by Section 11015.5, that is received, collected, or compiled by a state agency." Electronically collected personal information includes "any information that is maintained by an agency that identifies or describes an individual user. . ." Gov. Code § 11015.5.</p> <p>Incidents-Complaints location data reveals granular location data regarding particular incidents, including incidents where Zoox riders were present. If made public, this detailed data could be</p>
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				used, by itself or in combination with other data, to re-identify specific individuals and track their movements, even though the individual's name, phone number and address are not reported. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.
Incidents-Complaints	VIN	Full unredacted VIN of the AV involved	G	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>The compilation of Incidents-Complaints Data, including VIN, provides Zoox with critical insights into fleet composition and utilization on Zoox's platform. As a result, the compilation of Incidents-Complaints Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding fleet composition, size, and utilization, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Incidents-Complaints Data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet composition and operational data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Incidents-Complaints Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use</p>

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				<p>such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b>Personal Identifiable Information:</b> Government Code section 6254(c) exempts personal identifiable information from disclosure. Zoox VINs constitute personal identifiable information.</p>
Incidents-Complaints	Citation; CitViolation; CitIssuer	If citation issued for the incident; If there was a citation associated with a trip, type of violation including specific code or regulation violated; entity issuing the citation	AB, AC, AD	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Incidents-Complaints Data, including Citation data, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Incidents-Complaints Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Incidents-Complaints Data provides Zoox with critical insights into the operating environment for its vehicles at various geographic locations and over a particular period of time, which informs Zoox's strategic business decisions. As a result, the compilation of Incidents-Complaints Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding Zoox's commercial</p>

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				<p>progress, operating environments, driving systems, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Incidents-Complaints Data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet operational data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Incidents-Complaints Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Investigatory or Security Files:</u></b> Gov. Code § 6254(f) exempts from disclosure "investigatory or security files compiled by any other state or local police agency, or any investigatory or security files compiled by any other state or local agency for correctional, law enforcement, or licensing purposes." Whether a citation was associated with a trip, the type of violation and regulation violated,</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				and the entity issuing the citation, constitutes investigatory or security files compiled by state or local agencies.
Incidents-Complaints	AssaultSexual; AssaultNonsexual; AssaultClaimantPassengerPassenger; AssaultClaimantPassengerDriver; AssaultClaimantDriverPassenger	Type of incident: If sexual assault (Y/N); Type of incident: If non-sexual assault (Y/N); Type of incident: If assault claimant is an AV passenger and alleged perpetrator is another AV passenger (Y/N); Type of incident: If assault claimant is an AV passenger and alleged perpetrator	AE, AF, AG, AH, AI	<p><b>Invasion of Rider Privacy:</b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Incidents-Complaints data related to assault incidents reveals information concerning incidents of a highly personal and sensitive nature, including incidents where Zoox riders were present. If made public, this detailed data could be used, by itself or in combination with other data, to re-identify specific individuals and reveal private and sensitive personal information, even though the individual's name, phone number and address are not reported. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>

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		is the safety driver (Y/N); Type of incident: If assault claimant is the safety driver and alleged perpetrator is an AV passenger (Y/N).		
Incidents-Complaints	HarassmentSexual	Type of incident: If sexual harassment incident (Y/N).	AJ	<p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Incidents-Complaints data related to harassment incidents reveals information concerning incidents of a highly personal and sensitive nature, including incidents where Zoox riders were present. If made public, this detailed data could be used, by itself or in combination with other data, to re-identify specific individuals and reveal private and sensitive personal information, even though the individual's name, phone number and address are not reported. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>

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Incidents-Complaints	Harassment Nonsexual	Type of incident: If non-sexual harassment incident (Y/N).	AK	<p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Incidents-Complaints data related to harassment incidents reveals information concerning incidents of a highly personal and sensitive nature, including incidents where Zoox riders were present. If made public, this detailed data could be used, by itself or in combination with other data, to re-identify specific individuals and reveal private and sensitive personal information, even though the individual's name, phone number and address are not reported. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>
Incidents-Complaints	HarassmentClaimant PassengerPassenger	Type of incident: If harassment incident claimant is an AV passenger and alleged perpetrator is another AV passenger (Y/N).	AL	<p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Incidents-Complaints data related to harassment incidents reveals information concerning incidents of a highly personal and sensitive nature, including incidents where Zoox riders were present. If made public, this detailed data could be used, by itself or in combination with other data, to re-identify specific individuals and reveal private and sensitive personal information, even though the individual's name, phone number and address are not reported. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.</p>
Incidents-Complaints	HarassmentClaimant Passenger-Driver	Type of incident: If harassment incident claimant is	AM	<p><b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.</p> <p>Incidents-Complaints data related to harassment incidents reveals information concerning incidents of a highly personal and sensitive</p>

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		an AV passenger and alleged perpetrator is the safety driver (Y/N).		nature, including incidents where Zoox riders were present. If made public, this detailed data could be used, by itself or in combination with other data, to re-identify specific individuals and reveal private and sensitive personal information, even though the individual's name, phone number and address are not reported. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.
Incidents-Complaints	Harassment Claimant Driver-Passenger	Type of incident: If harassment incident claimant is the safety driver and alleged perpetrator is an AV passenger (Y/N).	AN	<b><u>Invasion of Rider Privacy:</u></b> Gov. Code § 7927.700; Gov. Code § 7927.705; Gov. Code § 7930.100; Cal. Const. art. I, § 1; Gov. Code § 7927.400; Gov. Code § 11015.5.  Incidents-Complaints data related to harassment incidents reveals information concerning incidents of a highly personal and sensitive nature, including incidents where Zoox riders were present. If made public, this detailed data could be used, by itself or in combination with other data, to re-identify specific individuals and reveal private and sensitive personal information, even though the individual's name, phone number and address are not reported. Disclosure of such information implicates the constitutionally-protected privacy interests of Zoox's users.
Incidents-Complaints; Incidents-Location	PUDOTravelLane ("PUDO-related Data")	Type of Incident: If pick-up and dropoff event where the AV is stopped more than 18 inches from the curb ("double	Incidents-Complaints: AO; Incidents-Location: G	<b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code § 3426.1(d); 5 U.S.C. § 552(b)(4).  Zoox considers PUDO-related Data as part of the compilation of Trip-Level Data. Trip-Level Trip Data, including PUDOTravelLane, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures PUDO-related Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.

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		parking"); For each census tract of operations, count of all pickup and drop-off events where the AV is stopped more than 18 inches from the curb ("double-parking").		<p>The compilation of PUDO-related Data provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of the number, times and locations of customer pick-up and drop-offs provides strategic insights into rider demand and expectations that will allow Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities.</p> <p>As a result, the compilation of PUDO-related Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's PUDO-related Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such PUDO-related Data would be exacerbated due to the nascent stage of the AV industry, which makes data concerning trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of PUDO-related Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Incidents- Complaint s	PayoutsTotal	Total payouts to parties involved in incidents, if known (dollars)	AV	<p>Government Code § 7922.00 allows for an agency to withhold information where "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." Evidence Code section 1152 provides that evidence that a person has, in compromise or from humanitarian motives, furnished, offered, or promised to furnish money to a claimant is inadmissible to prove liability or damage. Similarly, Evidence Code section 1154 provides that evidence that a person has accepted money to satisfy a claim is inadmissible to prove the invalidity of the claim.</p> <p>The public interest served by not disclosing information concerning payouts far outweighs the public interest served by disclosure. Disclosure of amounts paid to settle claims would have a chilling effect on operators' willingness to enter into settlements to satisfy claims. The public interest in disclosure, by contrast, is minimal. The decision to settle, and amounts paid to settle, are based on the facts and circumstances unique to a particular case. The Commission has determined that information concerning amounts paid to resolve complaints against Transportation Network Companies can be treated as confidential in required annual reports. See, e.g., R.12-12-011 <i>Ruling on Uber Technologies, Inc.'s and Lyft's Motion for Confidential Treatment of Certain Information in Their 2020 Annual Reports</i> (12/12/2020), pp. 10-11 and Appendix A.</p>

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Incidents-Complaints	CitationPD	Type of incident: If citation issued for the pickup or drop off (Y/N).	AW	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Incidents-Complaints Data, including CitationPD, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Incidents-Complaints Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Incidents-Complaints Data provides Zoox with critical insights into the operating environment for its vehicles at various geographic locations and over a particular period of time, which informs Zoox's strategic business decisions. As a result, the compilation of Incidents-Complaints Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing and strategic decisions regarding Zoox's services and driving systems, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Incidents-Complaints Data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet operational data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Incidents-Complaints Data are reasonable under the circumstances</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				<p>to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Investigatory or Security Files:</u></b> Gov. Code § 6254(f).</p> <p>Whether a citation was issued for the pickup or drop off constitutes investigatory or security files compiled by state or local agencies.</p>
Incidents-Complaints	CitlIssuerPD	If there was a citation associated with the pickup or drop off, specific entity issuing the citation	AX	<p><b><u>Trade secret:</u></b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Incidents-Complaints Data, including CitlIssuerPD, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Incidents-Complaints Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Incidents-Complaints Data provides Zoox with critical insights into the operating environment for its vehicles at various geographic locations and over a particular period of time,</p>

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				<p>which informs Zoox’s strategic business decisions. As a result, the compilation of Incidents-Complaints Data has actual and potential economic value to third parties. If Zoox’s actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing and strategic decisions regarding Zoox’s services and driving systems, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox’s actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Incidents-Complaints Data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet operational data particularly valuable.</p> <p>Zoox’s efforts to maintain the confidentiality of Incidents-Complaints Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox’s employee handbook, which describes each employee’s obligations regarding technology use, security, and protection of Zoox’s confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p> <p><b><u>Investigatory or Security Files:</u></b> Gov. Code § 6254(f).</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D



				Whether a citation was issued for the pickup or drop off, and the specific entity issuing the citation, constitutes investigatory or security files compiled by state or local agencies.
Incidents-Location	Tract	Report each census tract in company's operational design domain (ODD)		<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Incidents-Location Data, including census tract, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Incidents-Location Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Incidents-Location Data reveals strategic, targeted service plans under its AV pilot (including Zoox's operational footprint) that are not yet available to the public and provides Zoox with critical insights into the effectiveness and improvements of its services, including the areas in which to expand its AV Pilot offerings, and the areas to prioritize for seeking AV Deployment permits. For example, analysis of census tract data under Zoox's Pilot Permit allows Zoox to gauge how to prioritize seeking Deployment Permits, and where to locate parking, maintenance, and electric vehicle charging facilities. Census Tract Data is particularly sensitive because it would reveal Zoox's operational footprint, which is not public information.</p> <p>As a result, the compilation of Incidents-Location Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Incidents-Location Data, they could analyze the data to gain</p>

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				<p>valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Tract Data would be exacerbated due to the nascent stage of the AV industry, which makes data concerning trip and rider data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Incidents-Location Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Chargers	ChargerID	Unique numeric or alphanumeric identifier for each charger used by one of	D	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Chargers Data, including ChargerID, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Chargers Data using data collection, analysis</p>

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		the company's battery electric or plug-in hybrid electric vehicles.		<p>and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Chargers Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number and location of charging stations and charging duration for Zoox's fleet allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Chargers Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Chargers Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Chargers Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Chargers Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Chargers	ChargerTract	The charger's location, by census tract.	E	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Chargers Data, including ChargerTract, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Chargers Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Chargers Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number and location of charging stations and charging duration for Zoox's fleet allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Chargers Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Chargers Data, they could analyze the data to gain valuable insights into the size of</p>

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				<p>Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Chargers Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Chargers Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Chargers	ChargerPower	The rated power level of the charger in kilowatts.	F	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Chargers Data, including ChargerPower, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Chargers Data using data collection, analysis and reporting processes developed by Zoox over time and at great</p>

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				<p>effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Chargers Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number and location of charging stations charging duration, and charging power for Zoox's fleet allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Chargers Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Chargers Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Chargers Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Chargers Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Chargers	ChargerType	The type of charger (privately owned by company, residential, workplace, public, etc)	G	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Chargers Data, including ChargerType, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Chargers Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Chargers Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number and location of charging stations, charging duration, and types of chargers available, for Zoox's fleet allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Chargers Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Chargers Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular</p>

DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				<p>routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Chargers Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Chargers Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Chargers	ChargerLSE	Load serving entity (i.e., utility) serving the charger and its electric rate	H	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Chargers Data, including ChargerLSE, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Chargers Data using data collection, analysis and reporting processes developed by Zoox over time and at great</p>

DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D



				<p>effort and expense. Zoot uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Chargers Data provides Zoot with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number and location of charging stations, charging duration, and utility rates paid for charging, for Zoot's fleet allows Zoot to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Chargers Data has actual and potential economic value to third parties. If Zoot's actual or potential competitors obtained access to Zoot's Chargers Data, they could analyze the data to gain valuable insights into the size of Zoot's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoot does not publicly disclose, causing Zoot irreparable harm. Other entities, including Zoot's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoot has. The potential harm caused by the disclosure of such Chargers Data would be exacerbated due to the nascent stage of the AV industry, which makes data concerning trip and charging infrastructure data particularly valuable.</p> <p>Zoot's efforts to maintain the confidentiality of Chargers Data are reasonable under the circumstances to maintain their secrecy. Zoot stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOTO DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Chargers	ChargerRate	Load serving entity (i.e., utility) serving the charger and its electric rate	I	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Chargers Data, including ChargerRate, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Chargers Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Chargers Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number and location of charging stations, charging duration, and utility rates paid for charging, for Zoox's fleet allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Chargers Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Chargers Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular</p>

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				<p>routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Chargers Data would be exacerbated due to the nascent stage of the AV industry, which makes data concerning trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Chargers Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Charging-Sessions	ChargerID	Unique numeric or alphanumeric identifier for each charger used by one of the company's	D	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Charging-Sessions Data, including ChargerID, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Charging-Sessions Data using data collection, analysis and reporting processes developed by</p>

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		battery electric or plug-in hybrid electric vehicles.		<p>Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Charging-Sessions Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number, location, capability and source of available electric vehicle charging stations allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Charging-Sessions Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Charging-Sessions Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Charging-Sessions Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Charging-Sessions Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				<p>their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Charging-Sessions	SessionID	Unique numeric or alphanumeric identifier for each charging session.	E	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Charging-Sessions Data, including SessionID, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Charging-Sessions Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Charging-Sessions Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number, location, capability and source of available electric vehicle charging stations, and the precise date and time of charging sessions, allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Charging-Sessions Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Charging-Sessions Data, they could analyze the data to gain valuable insights into the</p>

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				<p>size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Charging-Sessions Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Charging-Sessions Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Charging-Sessions	SessionDatetime	Charging session data including time, day	F	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Charging-Sessions Data, including SessionDateTime, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Charging-Sessions Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox</p>

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				<p>uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Charging-Sessions Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number, location, capability and source of available electric vehicle charging stations, and the precise date and time of charging sessions, allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Charging-Sessions Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to Zoox's Charging-Sessions Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Charging-Sessions Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Charging-Sessions Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.
Charging-Sessions	Session-Duration	Charging session duration of charge	G	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Charging-Sessions Data, including SessionDuration, is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Charging-Sessions Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Charging-Sessions Data provides Zoox with critical insights into the effectiveness and improvements of its services, including where and how to invest resources to improve and expand its service offerings. For example, analysis of the number, location, capability and source of available electric vehicle charging stations, charging duration, and the precise date and time of charging sessions, allows Zoox to gauge how to prioritize service expansions, and where to locate parking, maintenance, and additional electric vehicle charging facilities.</p> <p>As a result, the compilation of Charging-Sessions Data has actual and potential economic value to third parties. If Zoox's actual or</p>

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				<p>potential competitors obtained access to Zoox's Charging-Sessions Data, they could analyze the data to gain valuable insights into the size of Zoox's fleet, fleet utilization rate, peak periods of ridership, popular routes, future marketing strategies and promotions, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such Charging-Sessions Data would be exacerbated due to the nascent stage of the AV industry, which makes trip and charging infrastructure data particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Charging-Sessions Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Stoppage -Incident	All fields in Stoppage-Inciden t tab (including data fields related to stoppage	All fields in Stoppage-In cident tab		<p><b>Trade secret:</b> Gov. Code § 7927.705 exempts "disclosure of records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege." Evidence Code § 1060 provides that "the owner of a trade secret has a privilege to refuse to disclose the secret, and to prevent another from disclosing it, if</p>

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	location, presence of passengers, stoppage resolution and all other fields in this tab including the number of rows which if disclosed would reveal the number of stoppage events)		<p>the allowance of the privilege will not tend to conceal fraud or otherwise work injustice.” Civil Code §3426.1(d) defines trade secret as “information, including a formula, pattern, compilation, program, device, method, technique, or process that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” 5 U.S.C. § 552(b)(4) also exempts trade secrets from disclosure under the Freedom of Information Act.</p> <p>All fields in the Stoppage-Incident tab represent a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Stoppage-Incident Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Stoppage-Incident Data provides Zoox with critical insights into the operating environment for its vehicles at various geographic locations and over a particular period of time, which informs Zoox’s strategic business decisions. As a result, the compilation of Stoppage-Incident Data has actual and potential economic value to third parties. If Zoox’s actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing and strategic decisions regarding Zoox’s services and driving systems, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox’s actual or potential competitors, could use such information for their own business purposes, without making</p>
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DECLARATION OF CHRISTOPHER NALEVANKO IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT OF ZOOX DRIVERLESS AUTONOMOUS VEHICLE TCP (TCP 0038380-P) PILOT PASSENGER SERVICE QUARTERLY DATA REPORT (JANUARY 1, 2026, to MARCH 31, 2026), PURSUANT TO GENERAL ORDER 66-D

				<p>the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet performance and routing particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Stoppage-Incident Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
Stoppage - Fleet	ManualCount; Manual-Relaunch ; ManualRespon-s eTime; ManualResolut-i onTime; ResolutionAve-ra ge; ResolutionMed-i an; PctManual	For all stoppage events requiring manual in-person assistance, count of manual removals, count of relaunches,	D, E, F, G, H, I, J	<p><b>Trade secret:</b> Gov. Code § 7927.705; Evidence Code § 1060; Civil Code §3426.1(d); 5 U.S.C. § 552(b)(4).</p> <p>Stoppage-Fleet Data is a compilation of data that derives independent economic value from not being generally known to others who can obtain economic value from its disclosure or use. Zoox captures Stoppage-Fleet Data using data collection, analysis and reporting processes developed by Zoox over time and at great effort and expense. Zoox uses the data for both regulatory reporting and business analytics purposes.</p> <p>The compilation of Stoppage-Fleet Data provides Zoox with critical insights into the operating environment for its vehicles at various</p>

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		average response time, and average resolution time; For all stoppage events of 30 seconds or more, average resolution time, median resolution time, and percent of these events requiring manual removal.		<p>geographic locations and over a particular period of time, which informs Zoox's strategic business decisions. As a result, the compilation of Stoppage-Fleet Data has actual and potential economic value to third parties. If Zoox's actual or potential competitors obtained access to this data, they could analyze the data to gain valuable insights regarding Zoox's commercial progress, fleet utilization, operating environments, driving systems, and other critical aspects of its business that Zoox does not publicly disclose, causing Zoox irreparable harm. Other entities, including Zoox's actual or potential competitors, could use such information for their own business purposes, without making the substantial investment to compile the data that Zoox has. The potential harm caused by the disclosure of such data would be exacerbated due to the nascent stage of the AV industry, which makes information concerning fleet performance and routing particularly valuable.</p> <p>Zoox's efforts to maintain the confidentiality of Incidents-Complaints Data are reasonable under the circumstances to maintain their secrecy. Zoox stores the data on a secure software network protected by appropriate computer security controls, and access is provided to approved employees to use such information to fulfill their job functions. Zoox also requires that new employees sign a confidentiality agreement and Zoox's employee handbook, which describes each employee's obligations regarding technology use, security, and protection of Zoox's confidential and proprietary information. Zoox also requires members of the public visiting their offices to read and sign a non-disclosure agreement before proceeding to any areas that could reveal confidential information.</p>
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2026), PURSUANT TO GENERAL ORDER 66-D

ATTACHMENT A

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