January 25, 2023

Douglas Ito, Director
California Public Utilities Commission
Consumer Protection and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3214
douglas.ito@cpuc.ca.gov

**RE: Cruise LLC Advice Letter 0002**

Director Ito:

On behalf of the California Transit Association, I submit the following letter in protest to Cruise LLC's Advice Letter 0002. This advice letter seeks to expand driverless autonomous vehicle passenger service from a limited geography and restricted hours of operation with a fleet of up to 30 vehicles, to all of San Francisco, 24 hours a day, 7 days a week. This advice letter calls for an initial fleet of 100 vehicles with no stated maximum fleet size. The Association is a non-profit trade organization, representing 220 member organizations from across the public transit industry, including 85 transit and rail agencies in the State of California.

We urge the Commission to limit the scale at which Cruise is permitted to operate autonomous vehicle passenger service due to documented incidents where driverless AVs have blocked light rail vehicles and buses, encroached upon transit only lanes, impacting hundreds of transit riders in San Francisco. This is particularly concerning as public transit provides robust services to people with disabilities, while the Commission has not yet required AV passenger service providers to provide service with wheelchair accessible vehicles or meet any minimum standards for disability access.

Since the time the first permit was issued by Commission through the Phase 1 Driverless Deployment Program in June 2022, there have been a number of incidents that have impacted transit operations, both bus and light rail, in San Francisco. In one example from September 2022, a Cruise AV stopped in a position that blocked the San Francisco Municipal Transportation Agency's (SFMTA) N-Judah light rails tracks in both directions for about 7 minutes. This impacted the travel of about 140 transit riders. This

incident occurred at 10:05 pm. If this type of incident were to occur during peak travel times the number of riders impacted would be much greater. The incidents impeding transit operations have ranged from 5 to 20 minutes in duration. The longer it takes to clear a disabled vehicle from the roadway, the more transit passenger will be impacted. It should be noted that in addition to SFMTA, Golden Gate Bridge, Highway and Transportation District, San Mateo County Transit District, and the Alameda-Contra Costa Transit District provide transit services on San Francisco streets.

Given that the technology is still developing, and in light of these recent incidents, the CPUC should provide for incremental approvals with regards to the geographic area, hours of operation, and fleet size. To assess the readiness to expand service for any of these factors, the CPUC should require new data be reported by the permit holder to document the number of minimal risk condition and vehicle retrieval incidents that obstruct travel lanes. This information should be shared with the public.

While the expansion of automated technologies may provide benefits in some applications, the industry should not be allowed to expand in ways that interfere with transit operations on public streets. This result would not be consistent with California climate, congestion, and equity goals.

If you have any questions about this letter, please feel free to contact me at (916)-446-4656 or michael@caltransit.org.

Sincerely,

Michael Pimentel
Executive Director

cc: Prashanthi Raman, Cruise LLC
Aichi Daniel, Cruise LLC