July 5, 2023

California Public Utilities Commission
Attention: Public Advisor’s Office
505 Van Ness Avenue
San Francisco, CA. 94102

Re: Provisional Authorizations for Autonomous Vehicle Passenger Service

Dear President Reynolds and Commissioners,

I write to you today on behalf of the Peace Officers’ Research Association of California (PORAC), representing 79,000 public safety members and 950 public safety associations. Our organization would like to express a deep concern and opposition to the approval of autonomous vehicles in the state of California. The rush to implement this technology without thorough research and understanding of its implications is not only premature but also potentially dangerous.

Recently, an incident occurred in San Francisco where an autonomous vehicle blocked the path of emergency vehicles responding to an incident in the Mission District. Incidents like this cause unnecessary delays due to the inability of the autonomous vehicle to comprehend the urgency of the situation. The City of San Francisco, along with its Fire Chief, have stated such incidents have become more common since the roll out of autonomous vehicles in June 2022. These incidents are a stark reminder of the potential dangers these vehicles pose to public safety.

While we understand and appreciate the potential benefits of autonomous vehicles, such as reducing human error and potentially improving traffic flow, these benefits should not come at the expense of public safety. The incident in San Francisco is a clear example of how autonomous vehicles can interfere with emergency response times, which in many cases can be a matter of life or death.

We strongly urge the California Public Utilities Commission (CPUC) to reconsider the approval of autonomous vehicles until more comprehensive research is conducted. We need to fully understand the impact these vehicles could have on the safety of not only other vehicles on the road but also pedestrians and emergency response units.

In conclusion, I implore you to not approve the application for autonomous vehicles until more research is done that shows autonomous vehicles do not pose a danger to the public by delaying public safety response times. Let us not be in such a rush to embrace new technology that we forget the human element and the potentially dangerous situations it can create.

Thank you for your time and consideration. I trust that you will make the right decision for the safety of all Californians.

Very truly yours,

BOARD OF DIRECTORS
Peace Officers Research Association of California

[Signature]

Brian R. Marver
President
June 26, 2023

California Public Utilities Commission
Public Advocates Office
505 Van Ness Avenue
San Francisco, CA 94102

RE: Provisional Authorizations for Waymo & Cruise for Driverless Autonomous Vehicles Passenger Service Deployment Program.

Dear President Reynolds and Commissioners:

I am writing to you on behalf of the more than 1,500 members of San Francisco Firefighters Local 798 to urge you to remove items 6 and 7 from your June 29th Consent Agenda and defer approving these applications until further research can be done to understand the significant safety impacts of these vehicles.

Autonomous Vehicles have a demonstrated track record of interrupting response to emergency incidents and of making dangerous situations even worse. From April 2022 through May 2023, San Francisco Firefighters submitted 18 reports concerning instances of robot cars disrupting their efforts. The City and County of San Francisco has included a list of the reported incidents in their protest letter, including times when Autonomous Vehicles interfered with and delayed our apparatus responding to emergencies, blocked apparatus at active incidents, damaged equipment, and ignored emergency responders attempting to stop or move them.

Not included in that list was an incident that took place on June 9, 2023 when an Autonomous Vehicle blocked our emergency response to the mass shooting in San Francisco’s Mission District. The shooting was a tragedy that was compounded by Cruise’s driverless vehicle that impeded emergency apparatus responding to the scene. With serious emergencies, just a few seconds can mean the difference between life and
death. People understand this, and they cooperate with emergency response vehicles. Robot cars do not, and they sit cluelessly in the middle of the street or even worse.

It must be pointed out that your own CPUC agenda for Items 6 and 7 states:

"The positive and negative safety impacts of deployment of Autonomous Vehicles for passenger service are uncertain at this time."

If your own staff conclusion is that the public safety impacts are uncertain, and firefighters, paramedics, EMTs, and police officers are all saying that the Autonomous Vehicles have a NEGATIVE impact on public safety, I do not understand why this matter is up for consideration at this time – let alone on the Consent Agenda.

Local 798 stands with our local elected officials, our public safety partners, and other San Francisco leaders in requesting that the CPUC defer the approval of these applications until more work is done to resolve the significant public safety concerns that these vehicles present for our emergency personnel. We cannot safely perform our service with the current conditions placed on these vehicles.

On behalf of the men and women of the San Francisco Fire Department and IAFF Local 798, I thank you for your very careful consideration of this important issue for our first responders.

Sincerely,

Floyd K. Rollins II
President
San Francisco Firefighters Local 798

CC:
Fire Chief Jeanine Nicholson
California Professional Firefighters
San Francisco Fire Commission
June 22, 2023

California Public Utilities Commission
Public Advisor's Office
505 Van Ness Avenue
San Francisco, CA 94102

RE: Provisional Authorizations for Waymo & Cruise for Autonomous Vehicle Passenger Service

President Reynolds and Commissioners,

I am writing to you on behalf of the men and women of the San Francisco Police Department and the San Francisco Police Officers Association, to reconsider the agenda items on your June 29th consent agenda. The items I am specifically referring to are items 6 & 7 that have to do with the application for autonomous vehicles. I, as well as the members I represent believe strongly that the application should not be approved until further research is done to help understand the impact these vehicles have to the safety of not only other vehicles on the roadway but pedestrians as well.

Look no further then the recent mass shooting that occurred in San Francisco, in the Mission District, when emergency vehicles were trying to respond to the scene to render aid to multiple victims. An autonomous vehicle was blocking the avenue of approach for emergency vehicles trying to get to the scene. This impacts our police response times, as well as those of the fire department and emergency medical services.

While we all applaud the advancements in technology, we must not be in such a rush that we forget the human element and the effects such technology unchecked can create dangerous situations. Delays of even seconds in our line of work can be a matter of life or death. The time that it takes for an officer or any other public safety employee, to try and interact with an autonomous vehicle is frustrating in the best-case scenario but when they can not comprehend our demands to move to the side of the roadway and are stopped in the middle of the roadway blocking emergency response units, then it rises to another level of danger, and that is unacceptable.

So today I, along with many other public safety employees, as well as local city leaders and local government leaders ask you to not approve the application for autonomous vehicles until more research is done that shows autonomous vehicles do not pose a danger to the public by delaying our response times.

Thank you,

Tracy Mccray
SFPOA President
June 23, 2023

Via Electronic Mail
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Waymo and Cruise Robotaxis with Emergency Services, June 29th Agenda items 6 & 7

Dear Commissioners,

I am writing on behalf of the San Francisco Deputy Sheriffs' Association to express our deep concerns regarding the ongoing interference of Waymo and Cruise robotaxis with the crucial work of our city's fire and law enforcement departments. The safety and effectiveness of emergency response operations are being compromised, necessitating immediate attention to address these critical issues.

Recent incidents in San Francisco have highlighted the alarming encounters between robotaxis and first responders, resulting in potential dangers to the lives of both emergency personnel and the public they serve. Incidents have been reported where robotaxis have been observed driving into active emergency scenes and even parking on fire hoses, hindering the proper functioning of essential firefighting equipment. Such interference not only delays emergency response efforts but also poses a significant risk to the safety and well-being of all those involved.

In light of these concerns, we join the San Francisco fire chief and other city officials in urging the California Public Utilities Commission to take immediate action. Specifically, we request that the commission postpones any further consideration or approval of expanded operations for Waymo, Cruise, and other robotaxi companies until adequate measures are put in place to address the interference with emergency services.

Public safety should always be the top priority when introducing innovative transportation technologies like autonomous vehicles. While we acknowledge the potential benefits and advancements in mobility that robotaxis may offer, it is crucial to ensure that their integration into our city's transportation ecosystem does not impede or endanger the critical work performed by our fire and law enforcement departments.
We propose a collaborative approach involving the California Public Utilities Commission, city officials, robotaxi companies, and representatives from emergency response departments. This approach would facilitate the development of comprehensive regulations, protocols, and safety measures that effectively address the challenges posed by robotaxis, thus minimizing their interference with emergency services.

By delaying the approval of expanded operations for Waymo, Cruise, and other robotaxi companies, we can collectively work towards finding practical solutions that prioritize public safety and enable the seamless coexistence of autonomous vehicles and emergency services. This period of evaluation and dialogue will ensure that the necessary safeguards are in place before further deployments are authorized.

The San Francisco Deputy Sheriffs' Association firmly believes that a thorough examination of these concerns and the implementation of appropriate safety measures will not only enhance emergency response capabilities but also safeguard the well-being of our community.

We appreciate your attention to this matter and look forward to working together to address the challenges posed by Waymo, Cruise, and other robotaxis. Your commitment to public safety and your willingness to consider the concerns of emergency service providers is crucial as we strive for a safer and more efficient transportation landscape in our city.

Thank you for your time and consideration.

Sincerely,

Ken Lomba
SFDSA President
Office: (415) 696-2428
president@sanfranciscodsa.com
To whom it may concern,

My name is Carlos Tapia, and I am the President of the Deputy Sheriff’s Association for San Mateo County. At the DSA, we stand in solidarity with the San Francisco Sheriffs Office, San Francisco Fire Department Chief Nicholson, the San Francisco Deputy Sheriff’s Association, the San Francisco Police Officers’ Association and other city officials in urging the California Public Utilities Commission to take prompt action on concerns with public safety regarding automated vehicles.

As a Deputy Sheriff and lifetime resident of the Bay Area, I would be remiss to not share my growing concerns of autonomous vehicles and their dire impact on community safety in the San Francisco. While the promise of tech forward transportation can provide an intriguing look to the future, Waymo and Cruise robotaxis have already caused massive interference of emergency response services in cities like San Francisco, which puts residents and visitors at great risk.

We ask anyone considering the use of autonomous vehicles in San Francisco to acknowledge the impact it currently has on community safety. We must develop and create proper safety measures to ensure these autonomous vehicles do not obstruct the essential work that our fire and law enforcement departments perform everyday. On behalf of the DSA, I urge all of us to stand with our brothers and sisters in San Francisco to promote safety and efficiency as transportation technology progresses. Thank you for your time and dedication to our residents and visitors.

Best,

Carlos Tapia
SMCDSA President

Carlos Tapia
To: California Public Utilities Commission

Re: Automated Vehicle Concerns with Public Safety (June 29th Agenda items 6 & 7)

Dear Commissioners,

I am writing on behalf of the Alameda City Firefighters Local 689 to express our deep concerns regarding the ongoing interference of the Waymo and Cruise robotaxis with the crucial work of the city’s public safety departments. The safety and effectiveness of emergency response operations are being compromised, necessitating immediate attention to address these critical issues.

As a public safety entity, it concerns me that our brothers and sisters of the San Francisco Firefighters are constantly having longer response times due to the negligent behavior of these autonomous vehicles. As stated by Chief Nicholson in the Los Angeles Times article, “A fire can double in size in a minute,” and every minor delay caused by these robotaxis could mean the difference between life and death. Incidents have been reported where robotaxis have been observed driving into active emergency scenes and even parked on the fire hoses, hindering the proper functioning of essential firefighting equipment. Such interference not only delays emergency response efforts but also poses a significant risk to the safety and well-being of all those involved.

In the light of these concerns, we join our public safety brothers and sisters, along with the Teamsters, to take immediate action in addressing these issues with robotaxis with the California Public Utilities Commission. Specifically, we request the commission to postpone any further consideration or approval of expanded operations for Waymo and Cruise, until adequate measures are put in place to address interference with emergency services.

The Alameda City Firefighters Local 689 appreciates your attention to this matter and propose a collaborative approach to help facilitate the development of comprehensive regulations, protocols, and safety measures that effectively address the challenges posed by robotaxis, as these newer technologies will eventually make their way to Alameda.

We are all in it together to address these challenges and your willingness to collaborate is crucial for a safer and more efficient transportation landscape everywhere.

Thank you for your time and consideration,

Respectfully,

Ben Kim
Alameda City Firefighters, President
July 3, 2023

California Public Utilities Commission  
Attention: Public Advisor’s Office  
505 Van Ness Avenue,  
San Francisco, CA. 94102

Re: Provisional Authorizations for Autonomous Vehicle Passenger Service

Dear President Reynolds and Commissioners,

On behalf of the members of the Oakland Police Officers’ Association (OPOA), encompassing every sworn member of the Oakland Police Department, I am writing to ask you to reconsider the approval of agenda items around the application of autonomous vehicles. The leadership of the OPOA and the police officers we represent strongly believe that this application should not be approved until further research is done to help understand the impact these vehicles have on the safety of not only other vehicles on the roadway but also pedestrians.

Confused autonomous vehicles shutting down and blocking streets may seem benign, but it becomes dangerous when as we saw in the San Francisco Mission District recently autonomous vehicles blocked emergency vehicles from responding to the scene of a mass shooting.

Advancements in technology can benefit our lives but technological advancement cannot be allowed to do more harm than good. Delays of even seconds in our line of work can be a matter of life or death. The time that it takes for an police officer to try and interact with an autonomous vehicle is frustrating in the best-case scenario but when they cannot comprehend our demands to move to the side of the roadway and are stopped in the middle of the roadway blocking emergency response units, then it rises to another level of danger, and that is unacceptable.

Therefore, we ask you to not approve the application for autonomous vehicles until more research is done that shows autonomous vehicles do not pose a danger to the public by delaying our response times.

Sincerely,

[Signature]

Harry Donelan  
President  
Oakland Police Officers Association

Cc: Brian Marvel, President, Peace Officer Research Association of California
June 27, 2023
Reference: US 2023-085

To: California Public Utilities Commission

From: Sheriff Paul Miyamoto

Re: Automated Vehicle Concerns with Public Safety (June 29th Agenda items 6 & 7)

Dear Commissioners,

I am writing on behalf of the San Francisco Sheriff’s Office to express our deep concerns regarding the ongoing interference of Waymo and Cruise robotaxis with the crucial work of our city’s fire and law enforcement departments. The safety and effectiveness of emergency response operations are being compromised, necessitating immediate attention to address these critical issues.

As a public safety partner, it concerns me that the San Francisco Fire Department is constantly having life-saving response times increased due to the negligent behavior of these autonomous vehicles. As stated by Chief Nicholson in the Los Angeles Times article, “A fire can double in size in a minute,” and every minor delay caused by these robotaxis could mean the difference between life and death. Incidents have been reported where robotaxis have been observed driving into active emergency scenes and even parking on fire hoses, hindering the proper functioning of essential firefighting equipment. Such interference not only delays emergency response efforts but also poses a significant risk to the safety and well-being of all those involved.

In light of these concerns, we join the San Francisco Fire Department Chief Nicholson, the San Francisco Deputy Sheriff’s Association, the San Francisco Police Officers’ Association and other city officials in urging the California Public Utilities Commission to take immediate action. Specifically, we request that the commission postpone any further consideration or approval of expanded operations for Waymo, Cruise, and other robotaxi companies until adequate measures are put in place to address interference with emergency services.

Public safety should always be the top priority when introducing innovative transportation technologies like autonomous vehicles. While we acknowledge the potential benefits and advancements in mobility that robotaxis may offer, it is crucial to ensure that their integration...
into our city's transportation ecosystem does not impede or endanger the critical work performed by our fire and law enforcement departments.

We propose a collaborative approach involving the California Public Utilities Commission, city officials, robotaxi companies, and representatives from emergency response departments. This approach would facilitate the development of comprehensive regulations, protocols, and safety measures that effectively address the challenges posed by robotaxis, thus minimizing their interference with emergency services.

The San Francisco Sheriff's Office appreciates your attention to this matter and looks forward to working together to address the challenges posed by Waymo, Cruise, and other robotaxis. Your commitment to public safety and your willingness to consider the concerns of emergency service providers is crucial as we strive for a safer and more efficient transportation landscape in our city.

Thank you for your time and consideration.

Sincerely,

[Signature]

Paul Miyamoto
Sheriff
June 29, 2023

CALIFORNIA PUBLIC UTILITIES COMMISSION
PUBLIC ADVISOR'S OFFICE
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

RE: Provisional Authorizations for Waymo & Cruise for Autonomous Vehicle Passenger Service

President Reynolds and Commissioners,

I am writing to you on behalf of the men and women of the Santa Ana Police Officers Association, to reconsider the agenda items on your July 13th consent agenda. The items I am specifically referring to are items 6 & 7 that have to do with the application for autonomous vehicles. I, as well as the members I represent believe strongly that the application should not be approved until further research is done to help understand the impact these vehicles have to the safety of not only other vehicles on the roadway but pedestrians as well.

Look no further than the recent mass shooting that occurred in San Francisco, in the Mission District, when emergency vehicles were trying to respond to the scene to render aid to multiple victims. An autonomous vehicle was blocking the avenue of approach for emergency vehicles trying to get to the scene. This impacts our police response times, as well as those of the fire department and emergency medical services.

While we all applaud the advancements in technology, we must not be in such a rush that we forget the human element and the effects such technology unchecked can create dangerous situations. Delays of even seconds in our line of work can be a matter of life or death. The time that it takes for an officer or any other public safety employee, to try and interact with an autonomous vehicle is frustrating in the best-case scenario but when they cannot comprehend our demands to move to the side of the roadway and are stopped in the middle of the roadway blocking emergency response units, then it rises to another level of danger, and that is unacceptable.

So today I, along with many other public safety employees, as well as local city leaders and local government leaders ask you to not approve the application for autonomous vehicles until more research is done that shows autonomous vehicles do not pose a danger to the public by delaying our response times.

Respectfully,

GERRY SERRANO
PRESIDENT
SANTA ANA POLICE OFFICERS ASSOCIATION

GS/rr
SAPOA PAC - Support Letter AB 316