



November 1, 2023

The Honorable Alice Busching Reynolds
President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Driverless Autonomous Vehicle Passenger Deployment Program in Los Angeles

Dear President Reynolds,

I have serious concerns over the recent California Public Utilities Commission (CPUC) decision to approve a Driverless Autonomous Vehicle (AV) Passenger Deployment Program in the City of Los Angeles.

A decision to allow AVs to operate in the City of Los Angeles without local regulation, and without a well-developed and collaborative deployment plan, will likely have adverse impacts on the residents of Los Angeles. As the Los Angeles Department of Transportation (LADOT) has stated repeatedly in comments to the CPUC, responsible AV deployment demands early collaboration between state agencies, cities, and industry to set clear regulations that maximize the benefits of new transportation technologies for all our communities, while protecting emergency response capability, safety on our roads, and equitable service. To date, local jurisdictions like Los Angeles have had little to no input in AV deployment and are already seeing significant harm and disruption.

In a letter submitted at a recent CPUC hearing, the Chief of the Los Angeles City Fire Department (LAFD) stated her serious concerns about several incidents where AVs prevented emergency vehicles from arriving on scene in San Francisco. San Francisco Fire Department (SFFD) AV incident reports include:

- Ignoring yellow emergency tape and warning signs to enter a street with compromised electrical wires, causing entanglement around the rooftop vehicle sensors;
- Blocking firehouse driveways, requiring more distant resources to be dispatched, and increasing response times
- Sitting motionless on one-way streets, creating traffic and prohibiting emergency vehicles from responding to incidents;
- Pulling up behind a fire truck with emergency lights on which interfered with firefighters unloading ladders; and
- Entering an active fire scene, then parking on top of the fire hose.

Since that letter was sent, an AV blocked an ambulance in San Francisco, which first responders say contributed to the death of the individual being transported because the ambulance was unable to expeditiously make it to the hospital. Earlier this month an AV rolled on top of a pedestrian struck by a human-driven vehicle and dragged them 20 feet at a speed of up to 7 miles per hour when it attempted an emergency maneuver, significantly contributing to life-threatening injuries. That operator's self-reported data did not provide the full incident. Thankfully, the Department of Motor Vehicles' investigation did and they have since pulled that operator's permit, but further deployment must include regulations that require complete and accurate reporting.

AV companies started testing in Los Angeles this month, and our traffic enforcement personnel have already experienced at least one incident where an AV could not properly identify or obey an officer who was directing traffic in an intersection where traffic signals were offline. Accurately detecting and responding to traffic officers, and other road users such as pedestrians and cyclists is a basic requirement for safe AV deployment. Unrestricted deployment before operators demonstrate this basic ability, and without clear requirements to address these concerns, present a serious risk to public safety. More testing is needed to ensure operators can safely expand their service.

These public safety, road safety, and other serious concerns remain unaddressed by the CPUC as it permits commercial AV deployment in a number of cities across the state.

The City of Los Angeles continues to work toward a system where every Angeleno has reliable, safe, and affordable transportation options that serve their needs. We continue to be optimistic about advancements in transportation technology that have the potential to increase mobility options for all, but we cannot meet these goals without direct input or authority over new modes. I am concerned that the CPUC will not consider the clear adverse impacts of unrestricted AV deployment in San Francisco in its decision to further deployment in Los Angeles. In a city that spans 500 square miles, has a population of approximately 4 million people, and contains 7,500 miles of roadways, the risk is exponentially greater.

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The City of Los Angeles is equipped with the tools to effectively regulate AV service within its jurisdiction, and should determine the requirements for future deployment to maximize the benefits of new transportation technologies and mitigate harm across our diverse communities. I look forward to working with the Commission to ensure deployment in Los Angeles meets this goal.

Sincerely,

A handwritten signature in black ink that reads "Karen Bass". The signature is fluid and cursive, with the first letters of "Karen" and "Bass" being capitalized and prominent.

KAREN BASS

Mayor

City of Los Angeles

CC: The Honorable Genevieve Shiroma, Commissioner
The Honorable Darcie L. Houck, Commissioner
The Honorable John Reynolds, Commissioner
The Honorable Karen Douglas, Commissioner