



January 10, 2023

Rachel Peterson, Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

SUBJECT: Comment Letter for AV Confidentiality Draft Resolution CPUC L-619

Director Peterson:

The San Francisco Municipal Transportation Agency ("SFMTA") and San Francisco County Transportation Authority ("SFCTA") submit this comment letter in response to Draft Resolution Number L-619 issued by the California Public Utilities Commission ("CPUC") on December 9, 2022. The Draft Resolution addresses numerous California Public Records Act ("CPRA") requests for the disclosure of autonomous vehicle passenger service ("AVPS") applications and recommends disclosure of these applications subject to four exceptions.

The SFMTA and SFCTA (collectively "San Francisco") agree with the reasoning contained in the Draft Resolution and applaud the CPUC's commitment to disclosure, which, as noted in the Draft Resolution, is favored by the CPRA. San Francisco concurs with CPUC's staff's reasoning and recommendation to only withhold four categories of records: (1) the names, personal telephone numbers, and home addresses of AVPS company employees; (2) Form TL 706-F3 Profit/Loss Statements; (3) Form INF 1105 DMV Pull Notice Agreements; and (4) the contract price in any third-party (private) contracts with the AVPS companies.

As the Commission's Draft Resolution recognizes, there is a strong public interest in favor of disclosure of all materials that inform understanding of AV passenger service delivery and the impacts AVPS have on all road users, including drivers, cyclists, transit riders, and pedestrians as well as overall system safety, equity, accessibility, and environmental outcomes. These strong public interests weigh heavily in favor of disclosure of the permit application materials addressed in Resolution L-619.

Sincerely,

Jeffrey Tumlin  
Director of Transportation  
San Francisco Municipal Transportation Agency

Tilly Chang  
Executive Director  
San Francisco County Transportation Authority