



Waymo LLC  
1600 Amphitheatre Pkwy  
Mountain View, CA

February 13, 2024

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

**RE: Reply of Waymo LLC in support of Waymo Tier 2 Advice Letter No. 0002**

Dear Director Curtis,

Pursuant to General Order Section 7.4.3, Waymo LLC (“Waymo”) (TCP0038152A) hereby submits its reply to the public stakeholder submissions made to the Commission’s Consumer Protection and Enforcement Division (“CPED”) in connection with Waymo’s Advice Letter 0002, (“Advice Letter 0002”).

On January 19, 2024, Waymo submitted Advice Letter 0002 in accordance with Decision (D.) 20-11-046 (as modified by D.21-05-017) (the “Deployment Decision”), and the *CPUC Autonomous Vehicle (AV) Drivered and Driverless Pilot and Phase I Deployment Programs Application Instructions and Requirements (Version 1.0)* (“Application Instructions”). Pursuant to those authorities and guidance, Advice Letter 0002 seeks CPED review and approval of Waymo’s Passenger Safety Plan, updated in January 2024 (“Updated Passenger Safety Plan”) - a key operational component of Waymo’s existing Phase I Driverless Autonomous Vehicle (“AV”) Deployment Permit. Waymo’s Updated Passenger Safety Plan describes our driverless AV technology and service and provides an overview of the policies and procedures we use to minimize potential risks to passenger safety. The update also reflects Waymo’s expanded operational design domain (“ODD”) for deployment operations, which was approved by the Department of Motor Vehicles (“DMV”) on January 11, 2024. As amended, Waymo’s DMV deployment ODD authorizes Waymo to expand deployment operations in portions of the Los Angeles area and additional portions of the San Francisco Peninsula. Waymo is currently providing free driverless trips in portions of this broader territory pursuant to the CPUC driverless pilot permit that Waymo has held since November 2022.<sup>1</sup>

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<sup>1</sup> Our Waymo One Tour has been providing driverless rides to limited members of the public in our driverless pilot service area and is currently in the Downtown LA neighborhood. For more information about our LA Tour, please see <https://waymo.com/tour/>.

## **SUMMARY OF PUBLIC STAKEHOLDER SUBMISSIONS**

Following Waymo’s submission of Advice Letter 0002, Waymo received service of eighty-one (81) responses expressing support for Waymo’s Updated Passenger Safety Plan and/or the potential for Waymo to extend Waymo One autonomous vehicle passenger carrier service to public riders in its expanded deployment service area. Supportive responses came from a broad and diverse group of stakeholders, including organizations that, like Waymo, work to reduce roadway deaths and injuries, improve the independence of those with disabilities, expand transportation access for the historically underserved, and build community and opportunity through mobility. Waymo also received supportive responses from public officials, academics, business and trade organizations, and non-profit organizations serving Los Angeles and the SF Peninsula, among others.<sup>2</sup> Waymo is grateful for these statements of support for Waymo’s Advice Letter 0002.

In addition to the above, Waymo received five (5) submissions, styled as protests, from the City of South San Francisco (“CSSF”), Los Angeles County Department of Transportation (“LADOT”), San Francisco County Transportation Authority (“SFCTA”), San Mateo County Office of the County Attorney (“San Mateo”), and the San Francisco Taxi Workers Association (“SF Taxi Workers”). These submissions generally oppose the current regulatory framework under which AV

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<sup>2</sup> Waymo received responses supportive of Waymo’s Advice Letter 0002 from the following organizations and individuals: 100 Black Men of Los Angeles, 3 Feet Please, Access LA, American Council of the Blind, Assemblymember Vince Fong, AutoNation, Autonomous Vehicle Industry Association, Bahati Foundation, Bay Area Council, Best Buddies CA, Bike LA, Billy Riggs (University of San Francisco), BizFed, Blinded Veterans Association, Boys and Girls Clubs of Silicon Valley, Breathe Southern California, Brotherhood Crusade, Burlingame Chamber, CalBike, CalChamber, California MADD, California Walks, Center For Council, Central City Association, Chamber of Progress, Community Coalition, CORE - CA, DTLA Proud, Easterseals of Southern California, Epilepsy Foundation of Northern California, Goodwill, Greater Los Angeles African American Chamber of Commerce, Harvest Home, Heart of Los Angeles, Hispanic Foundation of Silicon Valley, Homeboy Industries, Hundley Foundation, IBEW Local 617 (San Mateo), Independent Living Resources Center San Francisco, Integrated Community Collaborative, Jobs for the Future, Professor Jiaqi Ma (Director of the Center of Excellence on New Mobility and Automated Vehicles at the University of California, Los Angeles), Karsh Center, LA-Tech, LightHouse for the Blind and Visually Impaired, Los Altos Chamber, Los Angeles Business Council Support, Los Angeles County Economic Development Corporation, Los Angeles Mission, Menlo Park Resident, Miracle Mile Chamber, Mountain View Chamber of Commerce, National Council on Independent Living, National Federation of the Blind, National Federation of the Blind of California, National Multiple Sclerosis Society, National Sleep Foundation, NorCal Spinal Cord Injury Foundation, Palo Alto Chamber, Pico Union Project, Responsibility.org, Safe Kids Worldwide, San Mateo County Chamber, San Mateo County Economic Development Association, Santa Monica Chamber, Santa Monica Families for Safe Streets, Self-Help for the Elderly, She Is Hope LA, Silicon Valley Bike Coalition, Silicon Valley Leadership Group, South LA Teen Tech Center / VSEDC, South Park Neighborhood Association, Southern California Resource Services for Independent Living, Street Racing Kills, Streets Are For Everyone, TEC Leimert, TechNet California, United Cerebral Palsy, Veloz, Vista Center for the Blind and Visually Impaired, Westwood Village Improvement Association.

passenger carrier services are permitted to operate in California. Waymo appreciates the opportunity to respond to each of these submissions.

### **WAYMO'S REPLY TO LETTERS OF OPPOSITION**

By Advice Letter 0002, Waymo seeks to expand AV passenger carrier service provided to the public pursuant to our CPUC Phase I Driverless Autonomous Vehicle Deployment Permit.<sup>3</sup> Pursuant to the requirements for expansion of service under the Commission's Deployment Decision,<sup>4</sup> Waymo has revised our Passenger Safety Plan to reflect our planned expansion and make other updates to the Passenger Safety Plan that reflect operational changes and improvements to the passenger experience. As required by the Deployment Decision, Waymo's Advice Letter 0002 details the updates made to Waymo's currently effective CPUC-approved Passenger Safety Plan.<sup>5</sup> Advice Letter 0002 also includes documentation of the DMV's approval of Waymo's expanded deployment ODD - a necessary predicate to requesting a corresponding approval in connection with CPUC-jurisdictional service. As detailed below, the relief sought in Waymo's Advice Letter request falls squarely within the scope of CPED's authority as provided for in the Deployment Decision.

CSSF, LADOT, SFCTA, San Mateo, and SF Taxi Workers' submittals opposing Waymo's requested relief uniformly constitute impermissible attempts to relitigate issues the Commission has already decided and are not valid grounds on which to protest an advice letter, per General Order 96-B. As such, they should be accorded no weight in considering the merits of Waymo's Advice Letter 0002.

#### **1. CSSF, LADOT, SFCTA, San Mateo, and SF Taxi Workers fail to state a valid basis for protest under GO 96-B.**

The Commission's Deployment Decision describes the driverless deployment program and the process for making changes to a permit holder's passenger safety plan.<sup>6</sup> Per the Deployment

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<sup>3</sup> Waymo received Commission approval to participate in the CPUC's Phase 1 Driverless Autonomous Vehicle Deployment Program on August 10, 2023 (Resolution TL-19144).

<sup>4</sup> The Commission's Deployment Decision specifies that "if an entity authorized to participate in the driverless deployment program intends to change its operations in a way that would materially affect the approaches outlined in its Passenger Safety Plan, that entity should provide the Commission's Director of Consumer Protection and Enforcement Division with an updated Passenger Safety Plan by way of a Tier 2 Advice Letter." (Deployment Decision, Ordering Paragraph 20.) Note too that page 17 of the Application Instructions also refer driverless deployment permit holders to Ordering Paragraph 20 for the "required advice letter filings triggered by substantive changes to your service (e.g., if you were not offering shared rides but would like to)."

<sup>5</sup> Approved by Resolution TL-19144 on August 10, 2023.

<sup>6</sup> Deployment Decision, p. 80.

Decision, “GO 96-B provides the procedural vehicle by which an entity seeks a Commission order that the requested relief is consistent with Commission policy and applicable law.”<sup>7</sup> Pursuant to GO 96-B Section 7.4.2, an advice letter may be protested only on specified grounds, and “may not rely on policy objections to an advice letter where the relief requested in the advice letter follows rules or directions established by statute or Commission order applicable to the [company].”<sup>8</sup>

Specifically, GO 96-B’s permissible grounds for protest are as follows:

1. The utility did not properly serve or give notice of the advice letter;
2. The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the advice letter contain material errors or omissions;
4. The relief requested in the advice letter is pending before the Commission in a formal proceeding;
5. The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
6. The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.<sup>9</sup>

Although the submissions made by CSSF, LADOT, SFCTA, San Mateo, and SF Taxi Workers may superficially refer to one (1) or more of the grounds above, the submissions do not establish valid grounds for protest under the Commission’s Deployment Decision and General Order 96-B. The submissions also fail, by and large, to address Waymo’s Passenger Safety Plan, focusing instead on matters of policy regarding how AVs are regulated in California. As such, these submissions fail to qualify as “protests” to a company-specific advice letter within the meaning of GO 96-B and should not be a basis for delaying administrative review or denying the relief requested.<sup>10</sup>

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<sup>7</sup> Id.

<sup>8</sup> Id.

<sup>9</sup> General Order 96-B, Section 7.4.2.

<sup>10</sup> Resolution TL-19144, FoF No. 3 (“The San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, and the Mayor’s Office of Disability jointly protested Waymo’s advice letter on the grounds that the requested permit is unreasonable given the lack of incrementalism, data transparency, and adequate reporting and monitoring. We find this not to be proper grounds for a protest and therefore treat the protest as a response to the advice letter.”)

**a. Demands for a new or different process for reviewing deployment service changes are not a proper basis to deny or condition approval of Waymo's Advice Letter 0002.**

CSSF asserts that approving Waymo's Advice Letter 0002 would be "unreasonable" because the Commission's advice letter process does not provide "adequate and meaningful notice and public participation in light of the substantial expansion" described therein. SFCTA, LADOT, and SFTWA make similar assertions - that Waymo's Advice Letter 0002 should not be decided pursuant to the regulatory framework set forth in the Deployment Decision and General Order 96-B because the Commission's regulations do not provide "an adequate basis for a decision of this consequence."<sup>11</sup> SFCTA describes the Tier 2 advice letter process, which includes service and solicitation of public input, as providing only a "minimal amount of participation."<sup>12</sup>

However, no party claims that Waymo failed to properly serve entities on the applicable service lists, or that members of the public were prevented from providing input in the process. And in fact, the record of the advice letter process to date belies that conclusion, with many dozens of stakeholders, including CSSF, LADOT, SFCTA, San Mateo, and SF Taxi Workers, all taking the opportunity to provide CPED with their views on Waymo's submission.

These objections are entirely policy-based. CSSF, LADOT, SFCTA, San Mateo, and SF Taxi Workers seek to modify or overturn the Commission's existing regulatory framework by opposing a valid and complete advice letter properly submitted in accordance with its terms. The protests fail to identify how Waymo's Advice Letter 0002 conflicts with applicable Commission requirements or is otherwise unlawful. These arguments should be accorded no weight.

**b. Parties do not identify any deficiencies in Waymo's Updated Passenger Safety Plan.**

SF Taxi Workers claim that Waymo's Updated Passenger Safety Plan is deficient and should be rejected, arguing that "the problem with the Waymo Passenger Safety Plan is precisely that: it's a *passenger* safety plan."<sup>13</sup> SF Taxi Workers proceed to criticize the page-length of the sections in Waymo's Updated Passenger Safety Plan addressing law enforcement and first responder interactions relative to the length of the document as a whole.<sup>14</sup> SF Taxi Workers' critique is misplaced and should be rejected. As its framing of the argument makes clear, SF Taxi Workers is again seeking to relitigate issues that were decided in the Deployment Decision. SF Taxi

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<sup>11</sup> SF Taxi Workers Protest of Waymo Advice Letter (0002) ("SF Taxi Workers Letter"), February 8, 2024, at 2.

<sup>12</sup> SFCTA Protest of Waymo Tier 2 Advice Letter ("SFCTA Letter"), February 8, 2024, at 1.

<sup>13</sup> SF Taxi Workers Letter, at 3 (italics in original).

<sup>14</sup> SF Taxi Workers Letter, at 3.

Workers may want the required scope of the Passenger Safety Plan to be broader or different than it is, but any such change can only be addressed through Rulemaking 12-12-011; rules established in a Commission decision cannot be modified through a company-specific advice letter. More importantly, Waymo's Updated Passenger Safety Plan includes all elements required by the Commission's Deployment Decision and demonstrates Waymo's continuing commitment to passenger and public safety in the provision of AV passenger carrier service.

CSSF, SFCTA, San Mateo, and LADOT do not identify any deficiency or even allege that Waymo's Passenger Safety Plan fails to meet the requirements of the Deployment Decision.

**c. Requests for increased data reporting and real-time operational monitoring are not a proper basis to delay, deny or condition CPED's approval of Waymo's Advice Letter 0002.**

SFCTA asserts that the Commission "must collect additional driverless readiness data and approve expansion incrementally."<sup>15</sup> Similarly, LADOT argues (as it did in previous submissions to the CPUC) that "Waymo and other AV Providers should be required to integrate into a data/notification program with the localities in which it operates."<sup>16</sup> LADOT concludes that "no AV operator has any incentive to do so without CPUC intervention or a rule requiring it of them" and suggests that local municipalities should have the authority to require integration into two-way data sharing platforms as a condition of using the public right-of-way.<sup>17</sup>

Assertions regarding the adequacy of the Commission's data reporting requirements are not a valid basis for protesting Waymo's Advice Letter. Moreover, the Commission is actively considering data reporting requirements in R.12-12-011, after having conducted a workshop and solicited comments from stakeholders last summer. SFCTA and SF Taxi Workers participated in those proceedings (together with Waymo and other parties). As a CPUC-regulated charter party carrier, Waymo will be subject to any new requirements adopted by the Commission pursuant to the rulemaking process. CPED review and consideration of Advice Letter 0002 can and should proceed on its merits in accordance with the Deployment Decision and GO 96-B.

**d. Calls to delay disposition of Waymo's Advice Letter 0002 pending consideration of proposed legislation should be rejected.**

LADOT argues that the CPUC should deny Waymo Advice Letter 0002 and "allow California Senate Bill 915 to be resolved."<sup>18</sup> Similarly San Mateo points to the recent introduction of Senate Bill

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<sup>15</sup> SFCTA Letter, at 2.

<sup>16</sup> LADOT Protest of Waymo's Advice Letter 0002 ("LADOT Letter"), February 8, 2024, at 7.

<sup>17</sup> LADOT Letter, at 7.

<sup>18</sup> LADOT Letter, p. 9.

(SB) 915 in support of its claim that the advice letter process is inappropriate for consideration of driverless deployment expansion. These arguments should be rejected; the mere fact that draft legislation *might* give municipal entities greater control is not a reason for the Commission to defer or decline to carry out its duties under existing law. While SB 915 has been introduced, it is entirely uncertain whether it will ultimately pass and in what form. As with any piece of proposed legislation, the bill will be subject to discussion and amendment over the course of one or more legislative cycles, providing time for thoughtful consideration of its potential impacts. The Commission must process Waymo's Advice Letter based on current law, not stakeholder's speculation about what the law may be in the future.

**e. SFCTA improperly seeks to incorporate legal arguments from a prior separate proceeding.**

SFCTA improperly seeks to "reiterate" arguments previously made from prior filings in different proceedings made by the City and County of San Francisco<sup>19</sup> related to Waymo Advice Letter 0001 and Commission Resolution TL-19144, without articulating or providing sufficient detail to assess and respond to such arguments in the context of Advice Letter 0002.

While SFCTA generally indicates that such arguments relate to data collection requirements, the use of the advice letter process, consideration of public safety impacts, and its claim that CEQA review is required, it does not specifically articulate its arguments or claims on these issues or their relevance to this proceeding in its submission opposing Waymo's Advice Letter 0002. The Commission has previously rejected similar attempts to "incorporate by reference" legal arguments raised by a party in prior, distinct proceedings. As the Commission has explained in an analogous case,<sup>20</sup> it "is not sufficient for a party to just identify broad legal principles, or make general statements or arguments." The Commission further explained that "citing to past pleadings in the same or different proceeding as a substitute for presenting thoroughly articulated factual and legal arguments . . . inappropriately shifts the burden to the Commission to determine what exact arguments the rehearing applicant intended to make."<sup>21</sup> While SFCTA's arguments here are raised in response to an advice letter, not an application for rehearing, the same principle applies.

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<sup>19</sup> Notably, the prior filings referenced by SFCTA were submitted jointly by multiple San Francisco departments, including San Francisco Municipal Transportation Agency, the Mayor's Office of Disability, the San Francisco Planning Department, and SFCTA. Aside from SFCTA, these departments have not submitted or joined letters of opposition to Advice Letter 0002.

<sup>20</sup> A.17-01-004, *Application of Charter Communications, Inc. for Rehearing of Resolution T-17514*, D.17-08-015) (The Commission rejected one party's attempt to incorporate by reference arguments raised by the party in a prior application for rehearing.)

<sup>21</sup> *Id.*

Indeed, General Order 96-B requires that any protest must specify “the grounds for the protest” including “supporting factual information or legal argument.”<sup>22</sup> Here, however, SFCTA has simply referenced arguments previously made by San Francisco in an earlier separate proceeding with a distinct factual, procedural, and legal context. The Commission is not and cannot be expected to discern whether and how those prior arguments might be applied in the context of the Advice Letter at issue here. Accordingly, the Commission should reject SFCTA’s attempt to incorporate arguments previously raised on the grounds that it fails to meet the standard for protests under GO-96-B.

**f. Requests for evidentiary hearings fail to identify any disputed issue of material fact and should be denied.**

LADOT, CSSF, San Mateo, and SF Taxi Workers request that the Commission hold evidentiary hearings.<sup>23</sup> Per Section 4.7 of General Order 96-B, “[a] person wishing to request an evidentiary hearing must submit and serve a timely protest to the advice letter. The protestant must expressly request and explain the need for an evidentiary hearing. The explanation must identify material disputed facts and explain why a hearing must be held.”

First, as noted above, the statements of opposition cannot be considered “protests” under GO 96-B because they merely seek to relitigate policy issues that the Commission has either already considered and addressed in the rulemaking proceeding or which are otherwise inappropriate grounds for protest of an advice letter. None of the entities that requested evidentiary hearings explained the need for evidentiary hearings nor did they identify any material disputed facts that would necessitate such hearings. Accordingly, requests for evidentiary hearings should be denied.

**g. SF Taxi Workers’ claim that Waymo’s Advice Letter 0002 should be rejected for not including a “cover sheet” is without merit.**

SF Taxi Workers assert that by not including a cover sheet, Waymo failed to properly serve or give notice of its advice letter.<sup>24</sup> This claim elevates form over substance. Waymo’s Advice Letter 0002 includes the pertinent information specified in Section 4.6, including, for example, the requested effective date, description of existing service, proposed change to the existing service, and the name and email of the Waymo point of contact; other elements specified in Section 4.6 are inapplicable.<sup>25</sup> Notably, Waymo Advice Letter 0001, which was accepted as submitted and

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<sup>22</sup> GO 96-B, Section 3.11.

<sup>23</sup> LADOT Letter, at 10; CSSF Submission of Protest related to Waymo’s Advice Letter 0002 (Tier 2) (“CSSF Letter”), February 8, 2024, at 2; County of San Mateo Protest of Waymo Advice Letter 0002 (Tier 2), (“San Mateo Letter”), February 8, 2024, at 3; SF Taxi Workers Letter, at 3.

<sup>24</sup> SF Taxi Workers Letter, p. 4.

<sup>25</sup> See *e.g.* General Order 96-B, Section 4.6 subsections (4), (6), and (7).



deemed complete by CPED, was submitted in the same format as the instant request.<sup>26</sup>

SF Taxi Workers' complaint that the lack of a cover sheet resulted in inadequate notice and service is undermined by the fact that SF Taxi Workers submitted its letter by the required deadline and in accordance with the process outlined in Waymo's Advice Letter. As such, even assuming, arguendo, that a cover sheet was impermissibly omitted, such omission did not result in any prejudice to SF Taxi Workers.

#### **h. Waymo's outreach efforts with the County of San Mateo**

San Mateo's initial letter, submitted on February 8, 2024, incorrectly asserted that Waymo had not conducted any outreach to San Mateo County officials. In fact, Waymo has conducted extensive outreach with County officials in advance of Advice Letter 0002. Waymo notified San Mateo's County Manager and County Attorney of the error on the same day, and San Mateo submitted a correction to its initial letter.<sup>27</sup>

Waymo appreciates the timely correction and is pleased that the apparent misunderstanding has afforded Waymo and San Mateo's County Attorney the opportunity for further engagement in the future. However, San Mateo's correction did not fully capture the extent of Waymo's dedicated and ongoing outreach in the region. For completeness, Waymo has spoken or met with the following San Mateo County offices, departments, and officials:

- San Mateo County Executive Officer, Mike Callagy
- San Mateo County District 3 Supervisor, Ray Mueller
- San Mateo County District 4 Supervisor, Warren Slocum
- San Mateo County District 5 Supervisor, David Canepa
- San Mateo City/ County Association of Governments (Chairperson and Executive Director)
- San Mateo County Sheriff's Office
- North San Mateo County Fire Authority (Brisbane, Daly City & Pacifica)
- South San Mateo County Fire (Menlo Park, Redwood City & Woodside)

Waymo also reached out to representatives from all cities within San Mateo County and spoke or met with the officials from the following cities: Brisbane, Burlingame, Daly City, Foster City,

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<sup>26</sup> Resolution TL-19144, FoF 8 ("Waymo's application is complete per the requirements of Ordering Paragraph 7 of Decision (D.)20-11-046, as modified by D.21-05-017 (Deployment Decision).")

<sup>27</sup> County of San Mateo electronic mail correspondence, RE: Correspondence re Waymo LLC Advice Letter 0002 (Tier 2), February 8, 2024, available at: <https://www.cpuc.ca.gov/regulatory-services/licensing/transportation-licensing-and-analysis-branch/autonomous-vehicle-programs/phase-i-driverless-autonomous-vehicle-deployment-program-advice-letter-status>.

Hillsborough, Menlo Park, Redwood City, Menlo Park, San Bruno, San Carlos, and San Mateo.

In addition to the above outreach, Waymo has completed twelve (12) training sessions for the North San Mateo County Fire Authority, four (4) training sessions for the Menlo Park Police Department, two (2) training sessions for the South San Francisco Fire Department, one (1) training session for the San Bruno Police Department, and one (1) training session for the Colma Police Department. Training sessions with South San Mateo County Fire, South San Francisco Fire Department, South San Francisco Police Department, San Mateo Police Department, and East Palo Alto Police Department have been scheduled.

As evidenced by the summary above, Waymo deeply values and prioritizes engagement with California local officials, first responders, and other road safety and mobility stakeholders. Waymo will continue its outreach efforts in San Mateo County and throughout the expanded deployment ODD as we plan for deployment of our Waymo One service.

**CONCLUSION**

Waymo recognizes the profound responsibility that transportation carriers have to prioritize the safety of their riders and the public. Waymo is committed to providing safe, accessible, and comfortable transport to riders in bustling city centers and in quiet suburbs, and at every pick-up and dropoff spot in between. We believe Waymo’s Updated Passenger Safety Plan demonstrates that focused and steadfast commitment and that no party has identified a valid grounds for protest. Therefore, and for the reasons detailed above, Waymo respectfully requests that CPED timely approve Waymo’s Advice Letter 0002.

Respectfully,

DocuSigned by:

*Mari Davidson*

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