

VOLUNTARY SAFETY SELF-ASSESSMENT

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1. INTRODUCTION

LETTER FROM EDWIN OLSON, CEO & CO-FOUNDER

JULY 2024



I founded May Mobility in 2017 to help create a more safe, sustainable, accessible world through autonomous vehicles (AVs). We develop AV technology and partner with cities and transit agencies to deploy autonomous, shared microtransit service where it's needed most. This unique approach of deploying AVs to bridge transportation gaps and improve public transit helps our partners rethink how we build and live in cities. By reducing the need for personally owned vehicles, we can begin shifting from communities built around cars to those built around people. These changes will mitigate the negative impacts to quality of life, wasted space, pollution and greenhouse gas emissions, and unequal access to opportunity that society deals with today as a result of how we live and get around.

That bigger mission is what drives our work at May Mobility, but we know we can only achieve it if we create a service that can operate safely in the real world. That's why we've been uniquely focused on putting real transit offerings on the road, moving travelers today, and learning from that experience. But the world is a really complicated place. There's no way that anyone could create a list of every situation in which an AV might find itself. So how do we safely deploy them to help realize a better future?

We've tackled that challenge with a fundamentally different approach to autonomy. Our proprietary Multi-Policy Decision Making (MPDM) system is a flexible technology that can safely react to a wide range of roadway situations—even those it hasn't encountered before. MPDM is not only designed to make decisions that protect occupants and those around our AVs, but that also improve the safety of the entire roadway environment. We are confident that our approach is the most scalable approach to autonomous driving—and the safest.

But it's not enough for us to know our AVs are safe, we have to show our work. May Mobility is proud to be among the first AV companies to commit publicly to conforming our safety program to UL 4600—the first comprehensive safety standard for fully autonomous vehicles. We prioritize safety, comfort and autonomy—in that order, and we are committed to continuous improvement on all fronts. We are working to ensure that our system gets people where they want to go safely, efficiently and equitably. Done correctly, AVs can transform how we get around and create a better future for everyone.



Edwin Olson,
CEO AND CO-FOUNDER, MAY MOBILITY

2. BUILDING A SAFE SYSTEM & SAFETY CULTURE



To realize the benefits of an expanded transit network and achieve our mission of a greener, more accessible future, we must build SAE Level 4 AV technology stacks that are both safe and trusted. In this Safety Report, we offer a detailed look into the system we've built and the processes we follow to accomplish this goal.

It is important to note that May is unique in some ways, and similar to our AV peers in other ways. Where are we unique? We work directly with cities, transit agencies, departments of transportation and businesses—they're our customers—to ensure our services serve their needs and better their communities. We have deliberately chosen to operate in operational design domains that we have collaborated on with our clients and prospects. Decisions such as service hours, pick-up and drop-off points, the inclusion of an autonomous vehicle operator or to go without one, and conducting shared rides are all done with a dual lens focusing on both our stakeholders' needs and a service we can safely achieve with our technology. It is also important to note that we are supplementing and complementing existing transportation networks. This is core to our business model and also the way we view and build a safety culture.

As of June 2024, we've operated in 13 cities across the U.S. and Japan, and are actively working with municipalities, public transit agencies, airports, universities and businesses in urban, rural and suburban areas across the United States who are seeking to bring autonomous technology safely and reliably to their communities.

WE ORGANIZE OUR WORK ON SAFETY AROUND FIVE CORE PILLARS:

BUILD AUTONOMY FOR THE REAL WORLD:

May Mobility was among the first companies to deploy AVs on public streets and from the beginning, we have focused on transporting real riders in settings where we are confident our technology can operate safely. Working with local experts, we lead a service design process to create microtransit services that first and foremost provide a useful mobility option, while also advancing progress toward an autonomous future. By operating our AVs in the real world, we learn a lot about their performance—we invest these on-road learnings into rapidly improving our technology, enabling us to safely serve an ever-widening set of geographies and use cases. Operating in diverse areas and with a variety of use cases from rural Minnesota to a bustling Michigan college town to Higashi-Hiroshima, Japan has also enabled us to bolster our technology with a greater depth of knowledge about different situations, road-user behavior and environmental data. We also prioritize learning about how diverse demographics interact with AVs, which helps with continuous improvements to our featureset, process and community education efforts.

SIMULATE EVERY POSSIBILITY:

We have designed our system to be resilient and flexible even when faced with the unexpected. Our Multi-Policy Decision Making (MPDM) autonomy system can safely navigate the complexity of real-world driving—including situations it has never encountered before. Rather than requiring a playbook for every possible roadway scenario, MPDM is a flexible technology that runs thousands of simulations per second to predict the behaviors of all agents in the AV's environment and how they are likely to interact with one another. It uses these simulations to determine the best course of action based on safety, passenger comfort and predictability for other road users.

SHOW OUR WORK:

We are proud to commit publicly to architecting our safety program around UL 4600, the state-of-the-art safety standard in autonomous driving. We are structuring the entire process by which we design, build, test and operate our AVs according to UL 4600. We document these practices in a safety case—which starts by making a claim and providing an argument backed with specific evidence that shows why our Automated Driving System (ADS) is safe to deploy in designated operating environments—and rely on independent, third-party experts in autonomy safety to assess our claims based on the evidence we have presented. We routinely report and comply with NHTSA's Standing General Order (SGO) on incidents that may arise.

DELIVER SAFETY BEYOND AUTONOMY:

As providers of options for both the public and private sectors, safety includes all aspects of our technology, service and vehicles. We have developed safety-focused daily operations checklists and structured incident protocols for our local site teams to follow. We have first-responder and law-enforcement interaction plans in place that adhere to local regulatory requirements. We offer numerous ways for riders, partners and employees to share feedback and provide swift responsiveness to pressing concerns, including rider interaction and communication options. To ensure every local team has the most up-to-date knowledge about how to operate a safe AV microtransit service, we regularly share on-the-ground learnings across our global deployments.

SHARE THE JOURNEY:

Like our shared public microtransit deployments and strong local partnerships, May Mobility has always been about moving together. We structure our deployments to solve real mobility needs, and we collect input from our riders, pedestrians, cyclists, partners, regulators and transportation and accessibility advocates in order to build a system that everyone can trust. We are highly transparent in our relationships with federal, state and local regulators, and we closely engage with industry groups to stay abreast of industry practice and support policies that improve the entire sector's safety performance.

3. SAFETY ELEMENTS

This section is structured around the National Highway Transportation Safety Administration's (NHTSA) Voluntary Self-Safety Assessment (VSSA) framework. In its guidance, NHTSA outlines 12 substantive areas that companies should address in order to build a safe, trusted ADS. Using NHTSA's guidance as a baseline, we are using this Safety Report to provide a detailed view into how our AVs work and the processes we follow to ensure they are acceptably safe.

1. SYSTEM SAFETY

May Mobility's ADS is the product of teams of specialists across the company working together; each fulfills a specific piece of the overall goal of designing and operating a system that is acceptably safe. These individual and team efforts combine to create a single product that is composed of thousands of interconnected and interdependent elements and is collectively capable of autonomous driving in real-world environments. This interconnectivity between individual and team contributions and the collective end-product means that every May Mobility team member is by necessity responsible for system safety.

OUR SAFETY CULTURE RECOGNIZES THAT SAFETY IS EVERYONE'S RESPONSIBILITY, AND WE SUMMARIZE OUR KEY TENETS AS FOLLOWS:

ENGINEER IT SAFE:

We design, test and build our system for safety. The design of the system addresses all potential safety-critical failures and scenarios in both autonomous and manual operations. We test the system using a variety of methods to verify its safe performance and that it functions as intended. As we build the system, our process includes checks to ensure the system we deploy is identical to the one we have designed and tested.

OPERATE IT SAFE:

Our daily operations practices ingrain safety at every step. We conduct routine safety checks on our fleet and ensure all components are well maintained and in excellent working order. We rigorously train and certify everyone involved in delivering our AV microtransit services. We follow incident reporting channels that help identify root causes and initiate corrective actions to improve the safety of our system.

CONTINUOUSLY MONITOR AND IMPROVE:

We continuously test and monitor to ensure that the systems we build perform safely when deployed in the real world. We employ safety metrics to monitor performance and implement corrective actions where necessary to maintain and improve the overall safety of our system. We follow a gated safety release process to ensure that changes to the system undergo rigorous reviews and testing before deployment.

2. THE SAFETY ORGANIZATION

May Mobility is headquartered in Ann Arbor, Michigan—in the backyard of the American automotive industry. We've built a cross-functional Safety Team that includes veterans of major automakers and Tier 1 automotive suppliers as well as experts in fields including artificial intelligence, software engineering, network security, functional safety, cyber security, operational safety and aviation. Our Safety Team and many others across May Mobility are well versed in classical system safety approaches.

While safety is part of everyone's job, our independent in-house Safety Team is responsible for developing, executing and monitoring our safety program, rigorously analyzing the safety of our entire ADS and building the culture of safety across the company. To guard against organizational silos that could affect system safety, the Safety Team's safety liaisons help facilitate cross-functional collaboration. The Safety Team and broader organization also collaborates with external parties like regulators, deployment partners, standards-setting organizations and industry groups.





The Safety Team covers three main areas: design safety, autonomous safety and operational safety.

DESIGN SAFETY:

The Safety Team's design safety function seeks to reduce the impact of failures related to the design of May Mobility's ADS that could lead to hazardous operating conditions. The design safety function relies on standardized safety analysis to analyze potential failures and develop mitigation measures, as informed by safety standards such as ISO 26262. This team's work focuses on fault models that include microelectronics and hardware, electronics and electrical, mechanical and non-electrical, sensors and software.

AUTONOMOUS SAFETY:

The Safety Team's autonomous safety function identifies potential safety risks posed by the design of our autonomy system and develops corresponding measures to mitigate such risks. The autonomous safety function relies on the safety standard ISO 21448, which governs the safety of the intended functionality (SOTIF). Autonomous safety incorporates fault models related to ADS behavior, sensors, communication, infrastructure and the operational design domain (ODD) situations that we may encounter.

OPERATIONAL SAFETY:

The Safety Team's operational safety function is responsible for mitigating against the hazardous conditions that arise in the operating environment. This team is split between field operations and production. Operational safety focuses on fault models such as field operations, autonomous vehicle operators (AVOs), tele-assist operators (TAOs), training, external interactions and day-to-day procedures like fleet service and maintenance.

SAFETY MANAGEMENT SYSTEM

The Safety Team institutionalizes May Mobility's culture of safety through our Safety Management System (SMS)—a company-wide approach to managing safety risk and assuring the effectiveness of safety risk controls.

The SMS consists of the following four elements:

1. SAFETY POLICY:

We address all known autonomous and non-autonomous hazards that could occur in our ODD.

2. SAFETY RISK MANAGEMENT:

We maintain a hazard log which lists each hazard, its severity and the mitigation measure to reduce the risk to acceptable levels. In our corresponding safety case, we demonstrate how we've addressed each hazard. Every team member is encouraged to report safety concerns, which includes the option to initiate a pause in operations of an active fleet and its crew.

3. SAFETY ASSURANCE:

We define and monitor safety performance indicators (SPIs) to ensure the mitigation measures described in the hazard log and safety lifecycle are working correctly and subject our SPIs to third-party assessment.

4. SAFETY PROMOTION:

We require every employee to complete our safety curriculum, which includes recurring training to keep safety information current and top of mind. In addition, we require personnel who work on safety critical system components to earn safety certifications in industry safety standards including UL 4600 and ISO 26262.

GUIDING SAFETY STANDARDS

May Mobility has chosen to build toward full compliance with UL 4600—the leading standard for safety in autonomous driving—becoming one of the first AV companies to commit to doing so.

Since May Mobility's founding, we have employed a handful of standards adapted from related applications, including ISO 26262[1] and ISO 21448.[2] These standards govern key elements of the ADS but do not themselves guide the entire scope of fully autonomous driving without a human operator present.

With the issuance of UL 4600 in 2020, the AV industry now has its first standard to assess the safety of fully autonomous vehicles. By design, UL 4600 is compatible with ISO 26262 and ISO 21448. Its scope includes anything involved in the lifecycle of an AV, such as the perception system that orients it, the autonomy software that drives it, its interactions with occupants and other road users and the day-to-day operational practices that AV companies follow to operate AV services.

May Mobility has decided to build toward UL 4600 compliance because it combines sound guidance for how to develop a safe system with the flexibility to take on such an enormous engineering challenge without throttling innovation in the process.

[1] ISO 26262 is an industry safety standard that addresses possible hazards caused by malfunctioning behavior of electrical and/or electronic safety-related systems, including interaction of these systems. This standard is primarily geared towards human-driven vehicles, but is also relevant to many, but not all, functional safety elements within AVs. May Mobility's director of product safety was a member of the team that formulated ISO 26262. https://www.iso.org/standard/68383.html

[2] ISO 21448 addresses Safety of the Intended Functionality (SOTIF) of automated driving functionalities, including advanced driver assistance systems (ADAS), and AVs when later revised. SOTIF provides "guidance on the applicable design, verification and validation measures, as well as activities during the operation phase, that are needed to achieve and maintain the SOTIF." While ISO 21448 provides important structure for many aspects of our system, it was not written to guide the development and operation of fully autonomous vehicles. https://www.iso.org/standard/77490.html

IMPLEMENTING UL 4600

UL 4600 Conformance Plan

UL 4600 outlines 13 mandatory topic areas that must be included in the supporting safety case. Within each of the 13 topic areas are a number of clauses, each containing (1) a series of prompts that lay out the specific requirements for the safety case to meet and (2) the details of how to assess whether the safety case is in "conformance" with that clause.

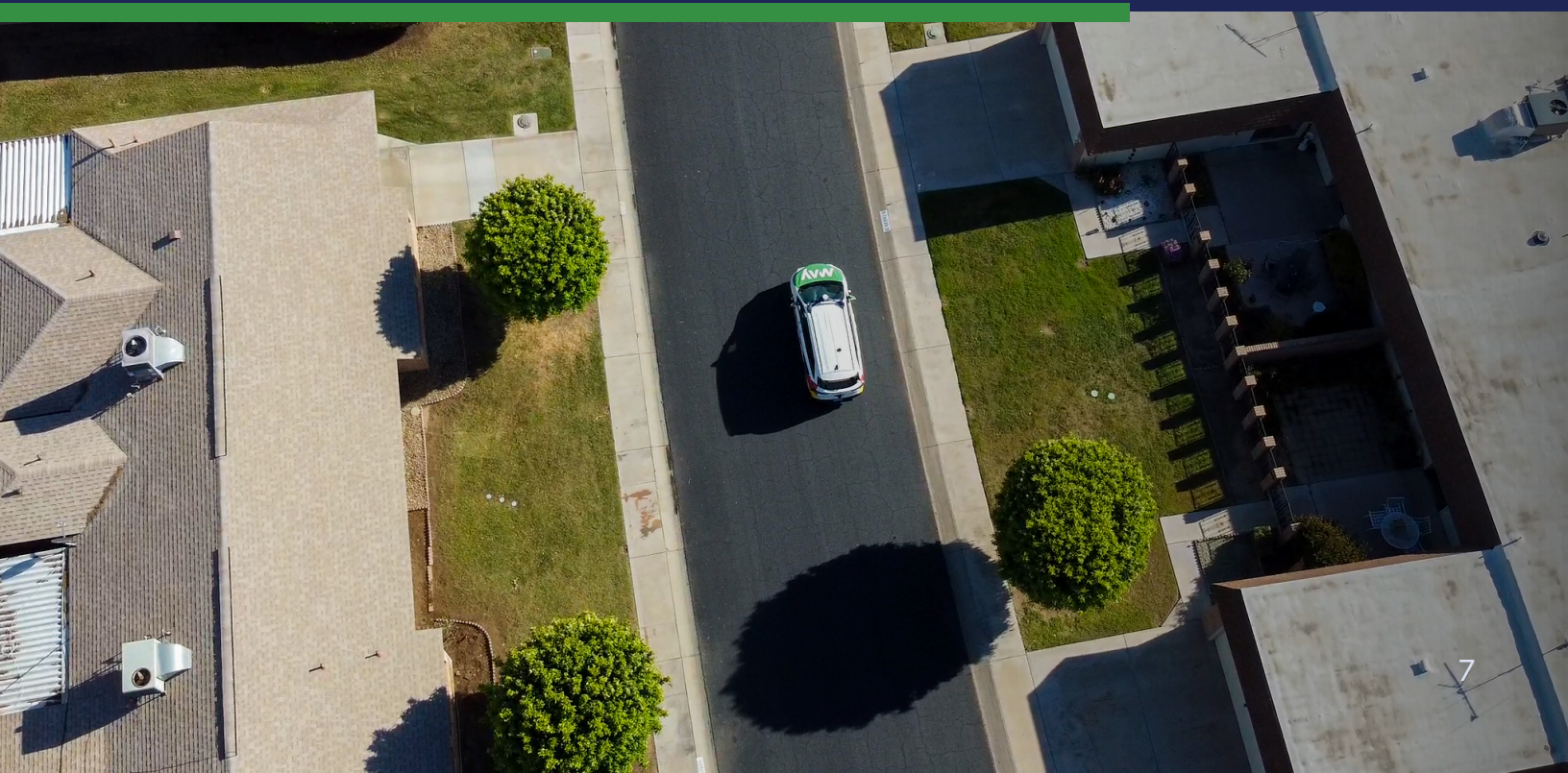
To create a safety case, the first step we perform is to develop a UL 4600 conformance plan. In this plan, we determine which elements of the UL 4600 standard our safety case will cover based on factors such as how our technology works and the characteristics of the ODD in which our AVs will be operating. In other words, the UL 4600 conformance plan defines a tailored set of requirements our safety case must meet.

With these requirements identified, we map each requirement to a specific plan for how we will fulfill it; this includes the means of conformance (e.g., a design element, process, or validation method), a timetable for completion and the responsible team. For some UL 4600 clauses, compliance with other standards like ISO 26262 and ISO 21448 satisfies the requirements of UL 4600. In our UL 4600 conformance plan we identify these areas of overlap and indicate when we are using another standard to satisfy a UL 4600 requirement.

Safety Plan

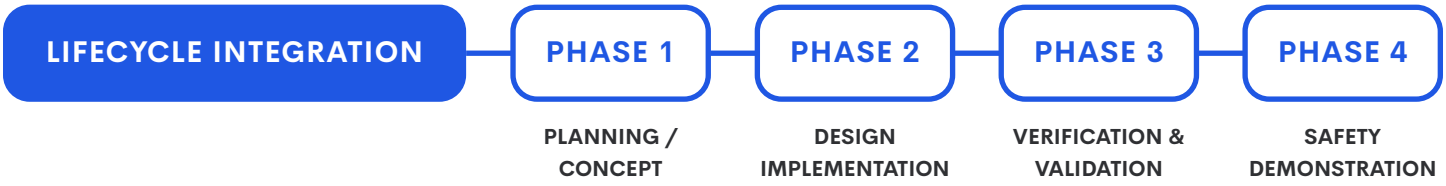
Based on the requirements generated by our UL 4600 conformance plan, we develop a safety plan—a detailed project management plan that breaks safety requirements out into distinct projects and tasks with corresponding safety work products. The safety plan includes a designation of who is responsible, accountable, consulted and informed (RACI) and includes an overall timeline with interim milestones and deadlines.

By centralizing the tracking of all safety activities, the safety plan allows our team to verify that we have incorporated all necessary safety measures into the development process. The work product captured in the safety plan become evidence we use to substantiate conformance to the applicable UL 4600 clauses in our safety case.



SAFETY AND THE PRODUCT DEVELOPMENT LIFECYCLE

The product development lifecycle is the process that teams across the company follow to conceptualize, design, validate and deploy our ADS. This work brings together the sub-elements of our system including hardware, software and autonomy technology into one cohesive development process. Our product development lifecycle follows the phases of the industry-standard V-cycle outlined in ISO 26262. We integrate safety into the product development lifecycle by mapping the requirements and safety work products from the safety plan to the appropriate lifecycle phase. The Safety Team acts as the gatekeepers of the product development lifecycle, reviewing all safety deliverables generated during each phase of the process before allowing the process to proceed.



SAFETY CASE

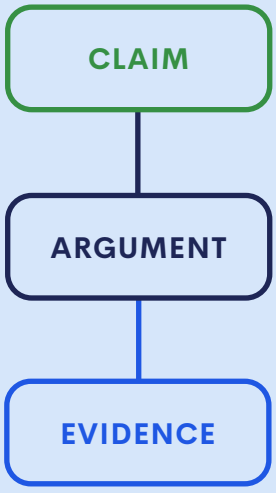
The safety work products that we developed during the lifecycle integration process provide evidence necessary to build out our safety case. Under UL 4600, safety cases should be generally structured into three levels: claims, argument and evidence.[3]

Claims, Arguments, Evidence (CAE) framework is used in safety, security and assurance cases.

Claim: A claim is a true/false statement about a property of a particular object. A claim is just what you might consider it to be from common usage of the term; an idea that someone is trying to convince somebody else is true. An example claim could be made on a train, "The train is safe".

Argument: An argument is a rule that provides the bridge between what we know or are assuming (sub-claims, evidence) and the claim we are investigating. The argument used depends on the type, trustworthiness and extent of available evidence and the nature of the claim. Note that "argument" is an overloaded word and we are using with a specific meaning here.

Evidence: Evidence is an artifact that establishes facts that can be trusted and lead directly to a claim. In projects there can be many sources of information, but what makes this evidence is the support or rebuttal it gives to a claim.



For the safety case to conform to the standard, the claims and arguments that underpin it must be both logically valid and backed by empirical evidence. UL 4600 requires the development and tracking of safety performance indicators (SPIs) to substantiate each claim in the safety case in order to determine whether the AV is performing within specific safety parameters.

[3] 5.2 safety case style and format clause from UL 4600 is met by following the CAE (claims argument evidence) format.





3. OPERATIONAL DESIGN DOMAIN

The defined parameters within which an AV is designated to safely operate in autonomy are referred to as the Operational Design Domain (ODD). The ODD encompasses the types of maneuvers the AV can safely perform—like unprotected right turns, lane changes and navigating traffic circles—and the external factors in which it can operate. These contextual and environmental parameters include different types of road layouts, speed limits, times of day, weather conditions and surrounding physical infrastructure.

When we begin an engagement with a client city, public transit agency, private non-profit or business, for example, we jointly identify the use cases, service model and geographic area that meet local transportation needs and fit within our ODD. This ODD determines where we will run service, the number of vehicles that will operate, service hours and if an autonomous vehicle operator may be needed or not.

When our system detects a situation that would cause the vehicle to exit the boundaries of our designated ODD, like sudden severe inclement weather it prompts the safety redundancy system (SRS) to take control of the vehicle, or the AVO instead if one is present. We test our ability to safely operate in our designated ODD using a combination of simulation, test tracks and on-road testing.

We categorize our ODD according to five primary categories:

EXEMPLARY ODD PARAMETERS		
CATEGORY	**COVERAGE**	**EXEMPLARY ODD PARAMETERS**
PHYSICAL	**What are the physical capabilities of the vehicle platform?**	• Maximum speed • Types of turns • Stopping distance • Passenger pick-up and drop-off • Geofenced service area
BEHAVIORAL	**What behaviors will the vehicle have to execute?**	• Speed limits • Merging & lane changes • Overtaking stopped vehicles • Unprotected turns • U-Turns
ENVIRONMENTAL	**What are the environmental conditions in which the vehicle must operate?**	• Snowfall • Particulates (e.g., rain, ice, sand, dust, smoke, pollution) • Wind • Temperature • Illumination (e.g., day, night, low light, artificial light, cloud cover)
EXTERNAL AGENTS	**What external agents will the vehicles need to interact with?**	• Types of road agents (pedestrians, cars, trucks, cyclists, animals) • Density of road agents (how many agents, and how frequent are interactions?) • Behavior patterns
INFRASTRUCTURE	**What are the features of the built environment where the vehicle will be operating?**	• Intersection types • Fixed road structures (traffic lights, buildings, street furniture, vegetation, urban density) • Special structures (e.g., bridges, raised pedestrian crossings) • Driveable areas (e.g., parking lots) • Roadway types • Road traffic direction (one-way, two-way) • Road dividers (median, paint) • Roadway speed limit • Number of lanes • Lane widths • Drive type (left-hand vs. right-hand drive) • Roadway surface • Road grade (positive or negative) • Land marking quality • Traffic lights • Traffic signs • Lanes (bike lane, bus lanes, emergency lane)

4. OBJECT AND EVENT DETECTION AND RESPONSE

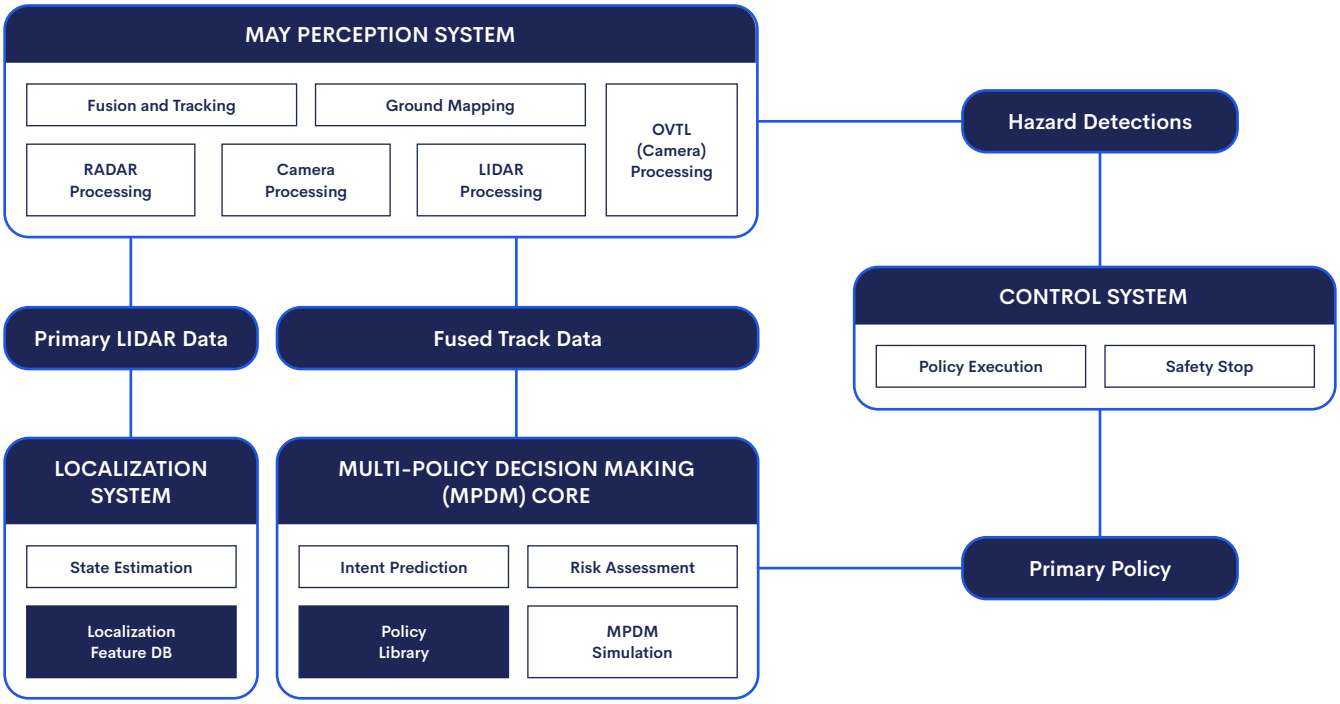
AUTONOMOUS DRIVING KIT (ADK)

May Mobility's ADK includes multiple sensors and an Autonomous Driving Node (ADN)—the on-board computer that runs our MPDM autonomy system. The ADK creates a 360-degree view of the world around the vehicle, giving it the data it needs to make safe driving decisions in its designated operational design domain (ODD).

In AVO attended vehicles, the ADK's sensor suite includes light detection and ranging (LiDAR) sensors, radar units, cameras, inertial measurement units (IMU), On-Vehicle Traffic Light Sensors (OVTL) and wheel rotation sensors (one on each wheel) on current vehicle platforms. In our rider-only application we have two OVTLs as well as additional internal cameras, and an external speaker and microphone. The LiDAR sensors excel at long-range visibility, radar provides blind-spot and cross-traffic perception and the cameras provide the necessary information to detect and identify objects and people. When brought together in the ADK, the sensor suite collectively creates a full understanding of the environment surrounding the vehicle.

May Mobility's sensors provide the necessary redundancy to ensure that our AVs will behave safely even in degraded operating conditions—in the event that a sensor becomes damaged or obscured while driving, data from the other sensors fills the gaps. For example, if snow or mud temporarily obscures the front camera, radar and LiDAR will provide sufficient information about the AV's surroundings to enable it to continue to make safe driving decisions. In the event of a sensor fault, the ADK, our AVOs or TAO's will safely bring the vehicle to a stop.





The ADN is the on-board computer that collects and processes perception data and runs our Multi-Policy Decision Making (MPDM) autonomy system. By combining data from our sensor suite, the ADN enables our AVs to accurately detect and track vehicles, people, animals, traffic lights, static structures (e.g., buildings) and any other objects the AV encounters in a variety of environmental conditions. The ADN feeds this data into our MPDM algorithm, which processes it to determine the vehicle's driving decisions.



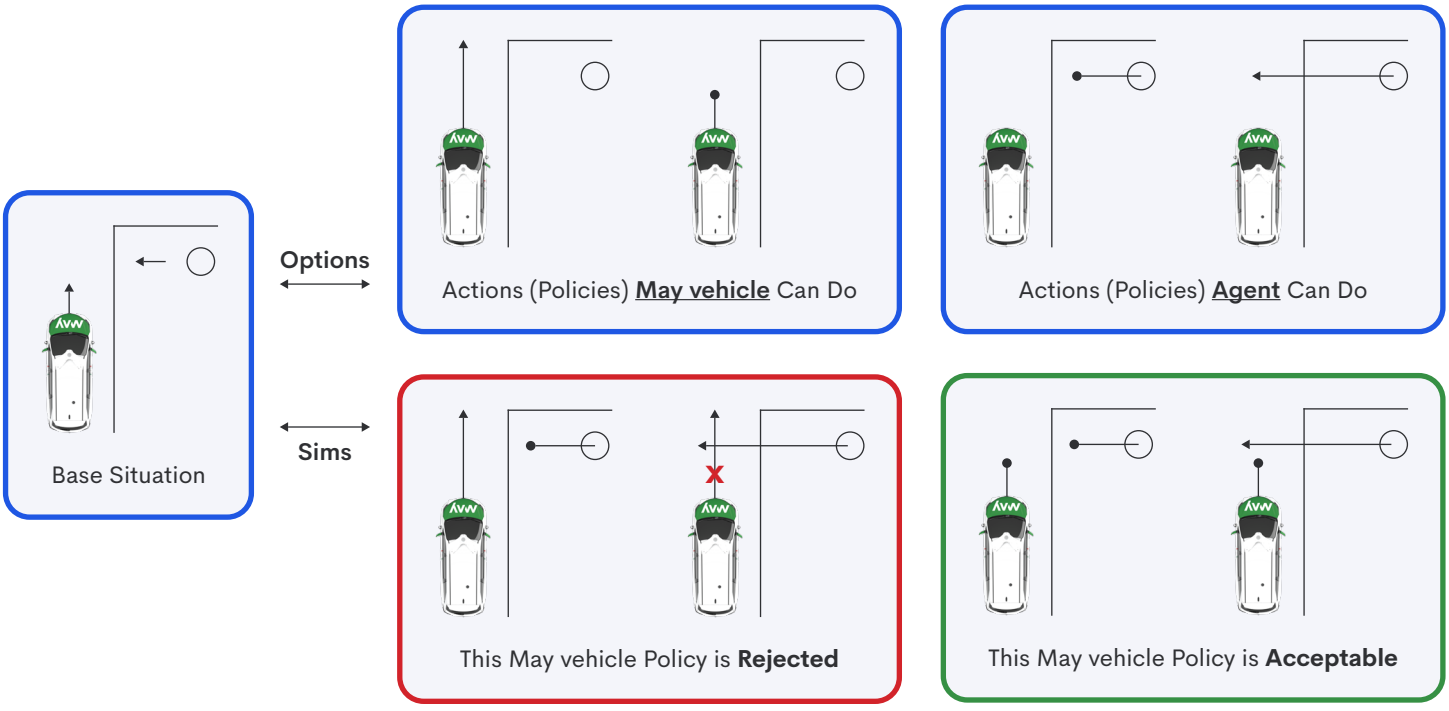
EMERGENCY VEHICLE DETECTION AND RESPONSE

When an emergency vehicle is encountered, an AVO or a TAO is available to verify that it is safe to pull the vehicle over while ensuring that the path is cleared for said emergency vehicle to the extent the vehicle is unable to automatically determine the appropriate safe response.[4] This process prioritizes immediate and safe responses to emergency scenarios.

HOW MULTI-POLICY DECISION MAKING (MPDM) WORKS

MPDM takes in the data that the perception system provides—the positions and velocities (over the past several seconds) for every agent (e.g., cars, people and cyclists) in the scene. For each of these agents, MPDM generates a set of plausible actions the agent could take. Here *plausible* means that an action is physically possible given the environmental constraints and consistent with the movement patterns observed in the past few seconds. These actions are not always likely, which is important because sometimes high-risk actions are not probable, but must still be considered.

MPDM identifies plausible actions based on behavioral models we create for each type of road user, or agent. This includes, e.g., other vehicles on the roadway like cars, trucks and vans and vulnerable road users like pedestrians, cyclists, motorcyclists and animals. We build these behavioral models through hundreds of thousands of miles of real-world driving and millions more in simulation, and we constantly refine them based on our AVs' on-road experience. With the plausible actions of other roadway agents in mind, MPDM selects a set of potentially useful actions—called policies—for the May Mobility AV. None of these actions are selected specifically to fit the scenario, they are general behaviors that might be useful in a wide range of situations. For example, actions include "go the speed limit while following a lead vehicle," "brake for the pedestrian in front," "brake before the intersection," "go a little slower" or "shift a little to the left." MPDM then simulates the future that would occur if these objects all behaved using the selected actions. The system cannot be certain that the future it simulated will really happen, so it picks another, different set of actions, simulates those and repeats this process hundreds of times.



[4] This protocol may be automated in future, more mature versions of our ADS.

With each election cycle, MPDM simulates hundreds of futures, creating a range of outcomes, none of which is certain, but all of which are plausible. Effectively, the vehicle is virtually driving through that specific scene hundreds of times, sometimes making mistakes, sometimes succeeding and learning the best way to get through it in real time. The AV executes its selected policies using a controller—a device that makes small adjustments to the vehicle's steering, braking and acceleration multiple times per second. In this way, the system remains responsive to rapid changes in the environment, including sudden encroachment of obstacles into the vehicle's path, while gathering information required to make another election. MPDM repeats this closed-loop election cycle process repeatedly every second. Thus, as the world changes (e.g., a new obstacle is detected or a vehicle changes its direction or speed), MPDM immediately responds with the best policy for that updated situation. MPDM is able to determine safe actions for the AV to take even when there is uncertainty in the environment.

MAP-BUILDING PROCESS

During the first phase of the map-building process, we create the localization map—a digital model of the local environment as it appears to our vehicle's perception system. The localization map depicts static objects including building faces and road infrastructure, which our AVs use for orientation. During autonomous driving, our AVs use the localization map to precisely estimate their location (within a few centimeters) as they move through their environment.

We create our base localization map by manually driving one of our AVs on the roads where we operate a given microtransit service while collecting location data through our sensor suite. We compress the data from the localization map into a version that is easy to store and efficient for our system to process during autonomous operation.

After creating the localization map, we create a route network that contains semantic information about the environment. By detailing not just what objects look like, but what they represent, the route network provides our AVs with information about the rules and expectations for its environment, which our MPDM algorithm uses to determine safe driving decisions. The route network encompasses information such as lane boundaries, curb locations, crosswalk locations, traffic light locations and sign locations and types.

We build the route network by combining point-cloud data collected from our LiDAR sensors with other visual data sources like satellite and street-view imagery. Once created, we test the route network's accuracy on the route using test drivers, adjust it as necessary (e.g., make slight modifications to object locations) and finally upload it to each vehicle in our local fleet.

USING THE MAP TO ORIENT OUR AVs

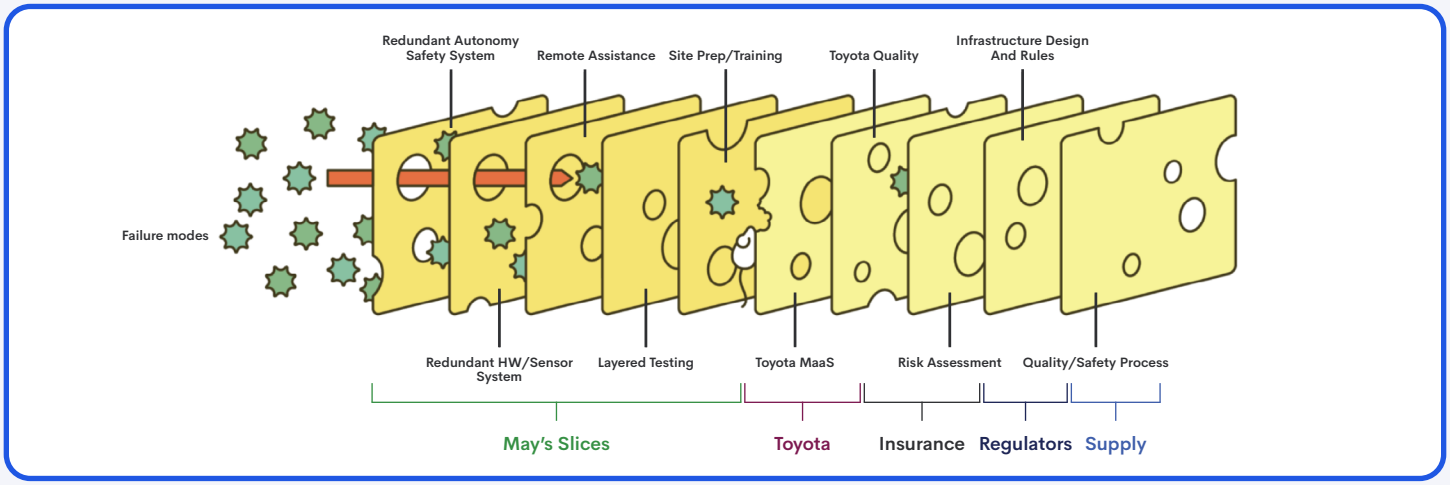
Our AVs use the localization map and route network to perceive and understand their surroundings in order to make safe driving decisions.

As an AV drives in autonomy, the perception system provides the positions and velocities (over the past several seconds) for every agent in its environment. Operating multiple times per second, our ADK delivers a detailed picture of an AV's operating environment, including static objects like road infrastructure, and dynamic objects like other vehicles, pedestrians, cyclists and animals.

As the vehicle drives, it uses the LiDAR data it gathers to create a real-time version of the localization map that depicts the AV's immediate surroundings. The ADS determines the location coordinates of the vehicle by comparing this real-time localization map to the stored localization map. This approach is robust because it is both fast—recomputed at 10 Hz at present—and accurate—our test results have consistently demonstrated that our system detects the location of our vehicles within three centimeters of the actual location. Once the AV has detected its precise location using the localization map, it relies on information from the route network to provide it with the traffic rules the vehicle must obey when driving, such as staying inside its lane, stopping at stop signs and obeying traffic signals.

5. FALLBACK (MINIMAL RISK CONDITION)

May Mobility's fallback system is called the Safety Redundancy System (SRS). MPDM is the *primary mechanism* by which our AVs make driving decisions, while SRS is the *backup system* that takes control of the vehicle when critical hardware fails, when the vehicle encounters a safety-critical situation or when the vehicle is operating outside of its designated ODD. SRS is an autonomous technology that requires no intervention from an AVO, or communication with any external party like a TAO.



May Mobility's system is designed based on the "swiss cheese model of error" (see figure above) developed with several layers of safety to ensure safe operations even when things go wrong. Under May Mobility's layers in normal mode MPDM controls the vehicle. When it encounters elements outside of the ODD, such as obstruction caused by construction or another object, tele-assist can provide a suggested path to clear the obstruction. Note that MPDM still does the risk assessment during the pursuit of the tele-assist provided path to prevent issues due to human errors. The system includes a reactive stop that is designed for situations which MPDM cannot avoid, like objects suddenly appearing in front of the vehicle. The system is also designed with a fallback system which can continue operation in a degraded state or stop in-lane, depending on the type and criticality of the failure. If a sensor fails, the fallback system takes appropriate action. Additionally, the system includes a safety controller that can maintain a safe state if the main computer fails. The system has backup safety features built into the vehicle platform to address any scenario where multiple failures lead to loss of communication with the ADK that falls under the platform layer. There are other layers that we work with including regulations, insurance and supply to make sure the error propagation is limited.

AUTONOMOUS VEHICLE OPERATORS

As a bridge to a fully autonomous future, May Mobility has staffed our AVs with Autonomous Vehicle Operators (AVOs). The primary responsibility of our AVOs is to take control of the vehicle when the AV encounters operating conditions that are outside of the designated ODD, or in response to any conditions the AV detects that could prevent it from being able to safely remain in autonomous operation. AVOs sit in the driver's seat of the vehicle, with their hands hovering near the steering wheel and right foot close to the accelerator and brake pedals. From this position, they remain engaged and are ready at all times to take manual control of the vehicle.

At the start of each shift, AVOs complete a safety checklist and conduct a visual inspection of the vehicle to make sure all the basic driving functions are working properly. This includes visual assessment of the vehicle's tires for air pressure or damage, wiping down and inspecting sensors for damage or debris, inspecting the interior for any loose items, ensuring that the safety kit is complete, verifying that the fire extinguisher is charged and checking that the emergency backup phone is working, charged and has its ringer volume up.

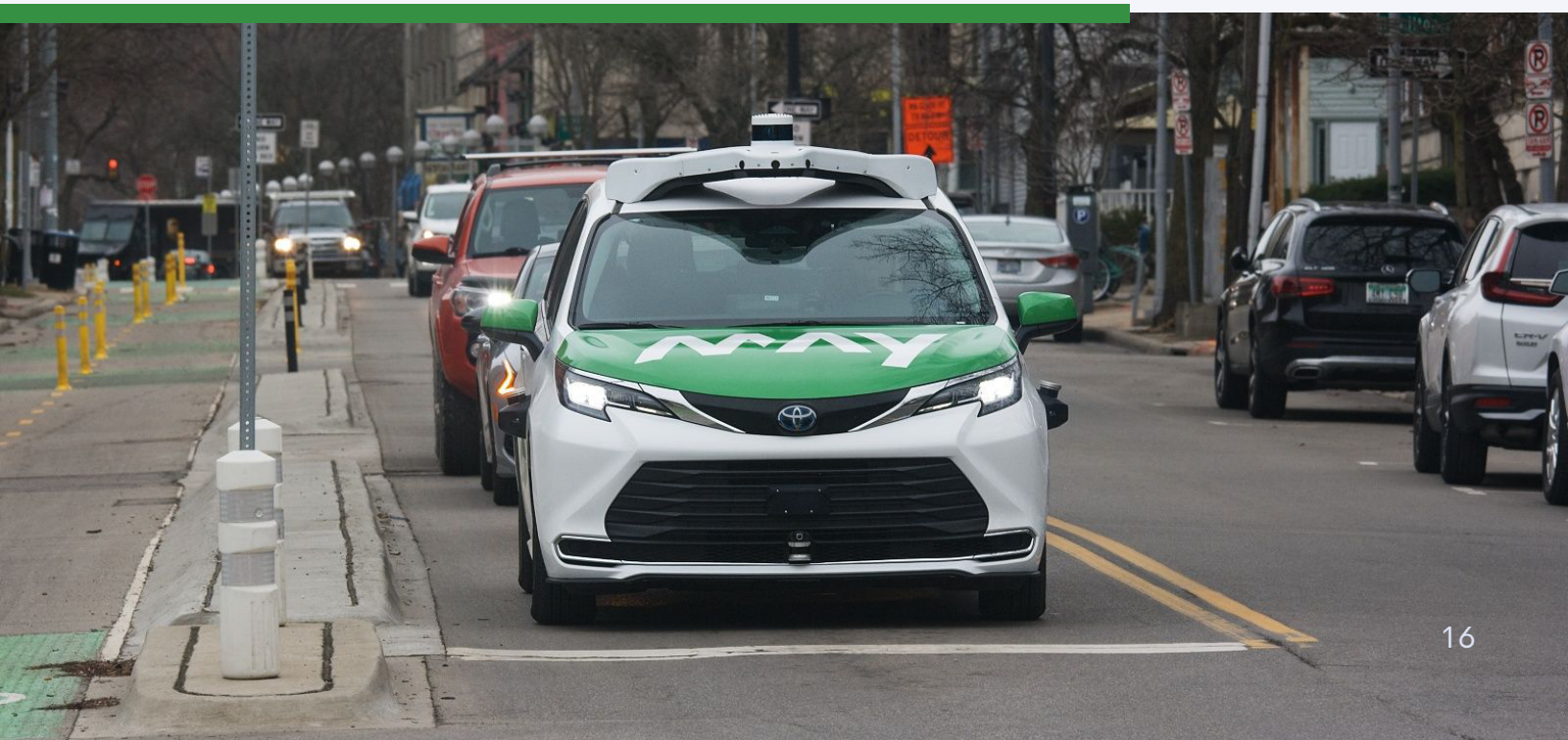
We train our AVOs to prioritize safety, rider experience and then autonomy in that order. This prioritization framework gives them the context they need to make sound judgment calls on when to take manual control of the vehicle, engage with passengers or communicate with the base station. AVOs press a button to log a report related to vehicle behavior, and in response, the AV automatically generates a timestamped ticket for our engineers to review. After logging a vehicle behavior report, our AVOs communicate with staff at the base station to add relevant details about why they created a report and on any interventions they took in response. The site team adds this context and information to the corresponding report ticket.

Our local operations team maintains constant two-way audio communication with AVOs to confirm they are focused, alert and ready to assume control of the vehicle at a moment's notice. We audit driver attentiveness and performance through site staff ride-alongs, reviews of video footage from driver-facing internal cameras, and drive log analysis to identify instances where an AVO may have failed to intervene. We also monitor AVO performance through Safety Performance Indicators (SPIs) and passenger feedback. AVOs are also subject to random drug tests. If at any time an AVO's behavior is deemed unsafe, our site leadership intervenes as appropriate—which could include retraining or termination if warranted.

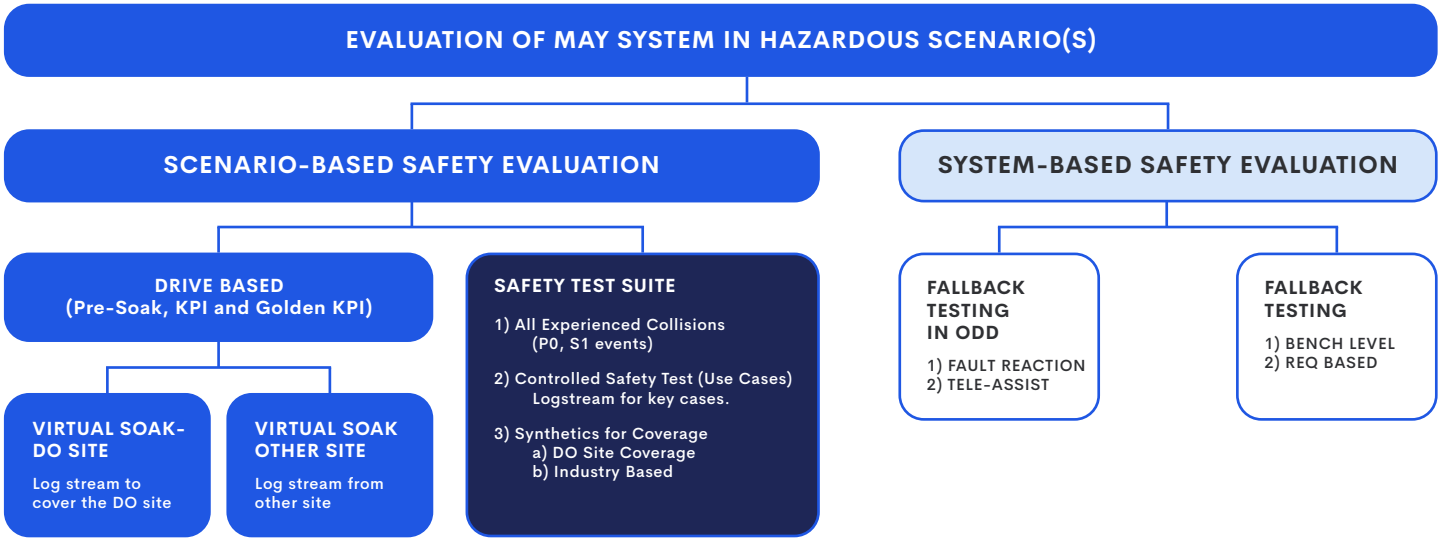


As we move toward our goal of operating in in autonomy in any ODD, May Mobility will gradually transition away from staffing AVOs in our public deployments. As we make this transition toward driver-out vehicles, we will rely on tele-assist operators (TAOs). Recently, May deployed without an AVO in Arizona. We will continue to launch new deployments both with and without AVOs, depending on our clients' requests, our safety case and our available ODD. We also see value in having an AVO in the case of wheelchair accessible vehicles where AVOs can assist with passenger boarding, securement and alighting on our vehicles with ADA-compliant wheelchair accessible ramps.

In the place of AVOs, our Safety Redundancy System (SRS) will provide fallback support, and we will provide passenger support remotely. We will also utilize tele-assist operators when needed. In the event of an incident or unexpected road scenario, the vehicle will come to a stop if it is not already stopped. Then the tele-assist operator will select the best maneuver for the situation so that the vehicle can continue autonomous operations.



6. TESTING AND VALIDATION METHODS

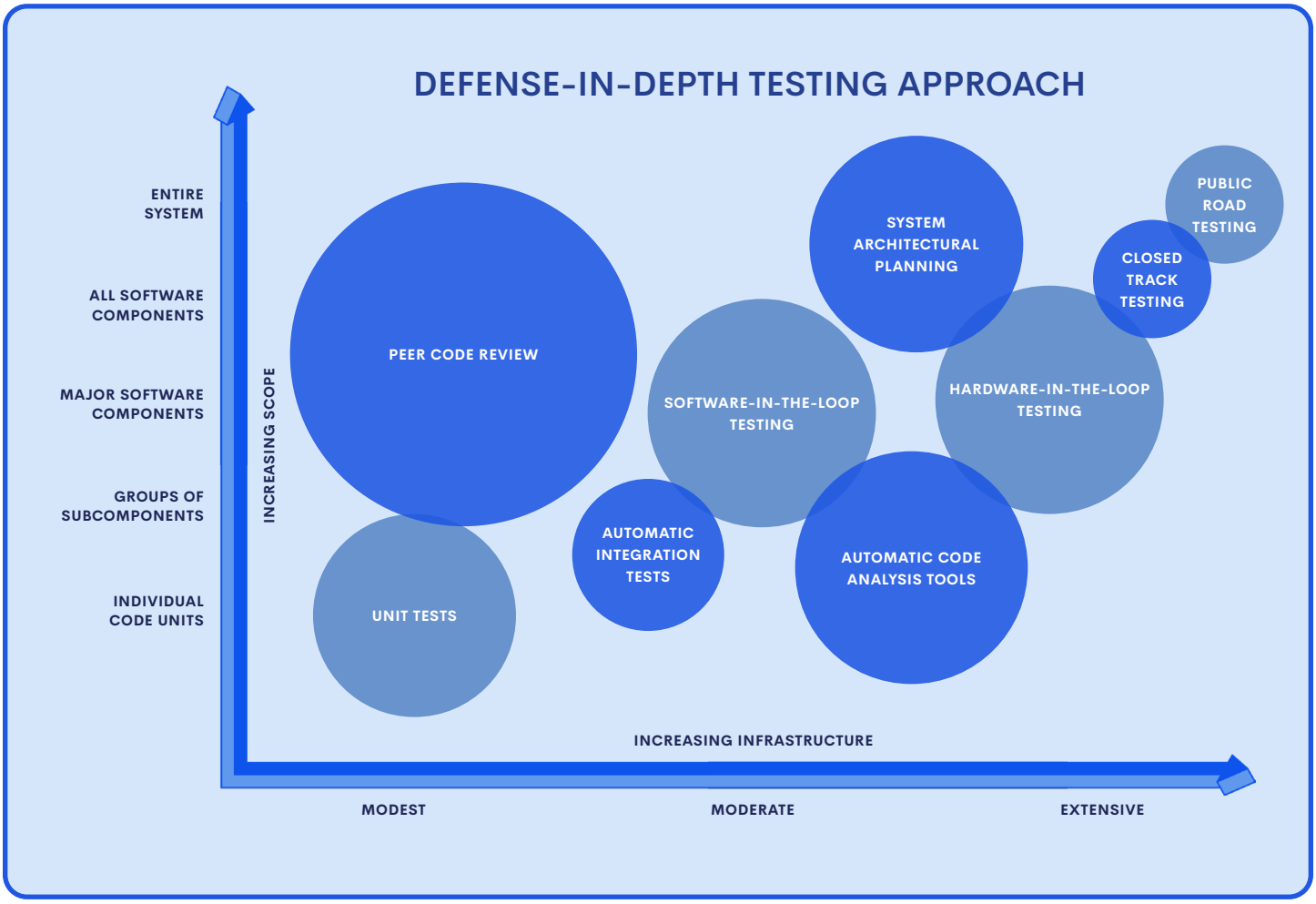


May's validation phase is multifaceted. Members of May's Safety Team assess the system to determine whether it satisfies all safety requirements. We assess whether we have designed and built the system properly by conducting a combination of bench/unit testing, fault insertion testing, use-case testing and requirements-based testing. If those tests are successful, we next assess whether the ADS performs safely and as expected while in use by testing it extensively both on-road and using simulation.

SOFTWARE TESTING

May performs extensive testing to identify bugs and defects. Every software test has limitations—an individual test may be good at identifying a particular group of issues but not another. To expose the many hurdles to safe autonomous driving, May Mobility follows a Defense-in-Depth testing strategy for software testing. We conduct dozens of individual tests, each of which is a different permutation of three test variables: (1) test method, (2) test scopes and (3) test infrastructure. This methodology allows us to evaluate our system from different angles and with different tools to expose the many hurdles to safe autonomous driving.





TEST METHOD:

Test methods covered include unit tests, peer code review, automatic integration tests, software-in-the-loop (SIL) testing, simulation testing, system architectural planning, automatic code analysis tools, hardware-in-the-loop (HIL) testing, closed track testing and public road testing.

TEST SCOPE:

Defense-in-Depth applies testing at multiple levels of our system, from individual code units, to groups of software units, to major software units, to all software components. Ultimately, we test the full ADS before deploying it to public use.

TEST INFRASTRUCTURE:

Different testing methods use different amounts of infrastructure to achieve their ends. For the unit test, peer code review and automated integration tests, May Mobility uses industry standard continuous integration systems provided by an external provider and hosted in the cloud. For software in the loop testing system, May Mobility maintains a full hardware reproduction of the vehicle sensors and compute components. This system performs daily and on demand testing of the full hardware and software using recorded data from representative drive at a customer site. Final testing on a vehicle requires a test vehicle configured identically to a commercial vehicle. These are maintained at the May Mobility HQ office for both development testing and integrated level testing.

SIMULATION

As part of our Defense-in-Depth strategy, May Mobility employs third-party simulation software in order to assess how new code performs in a controlled digital environment and catch issues before we move to live-in-vehicle testing. Simulation testing seeks to address two main questions: whether our AV's perception suite is collecting the data it is supposed to, and whether the AV's control system is reacting to and making the right decisions based on the data the perception system collects. In simulation, we can test scenarios that would be too time consuming, too dangerous or too expensive to test responsibly in real life.

In simulation, we employ a set of available *observers* which look for behavior patterns we are trying to avoid. For example, a particular observer might trigger if the May Mobility AV accelerates too aggressively or comes too close to another vehicle. These observers allow us to know when the vehicle is performing incorrectly in simulation. Simulation tests pass if all of the relevant observers report that no negative behavior was observed.



CLOSED TRACK ODD TESTING

May is able to test in both a fully closed and controlled operational design domain on a track as well as a limited ODD on a semi-public road within an office park. Both of these test areas provide May an opportunity to validate current and new technology enhancements prior to operating on public roads.



REAL-WORLD TESTING

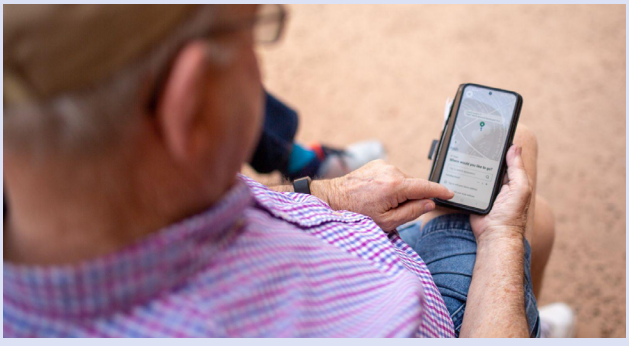
Once the vehicle has passed testing in a controlled environment, it is tested extensively in real-world traffic using strict safety protocols. Our safety protocol includes trained test drivers at the wheel at all times with the ability to take control of the vehicle at any moment. Additionally, we have "yellow" and "red" button policies to abort testing if safety ever feels compromised. Software issues discovered during this phase are documented and reported to our development team to quickly create fixes. These fixes are then re-tested in a controlled environment first before real-world traffic. This agile iterative process allows us to quickly develop a high functioning self-driving vehicle that operates safely and smoothly.

7. INTERACTION BETWEEN HUMANS AND VEHICLES WITH AUTOMATED TECHNOLOGY

For the vast majority of our riders, their initial experience with AVs is during their first ride in a May Mobility AV. We strive to make all riders feel welcome and safe in our AVs and to help educate them on autonomy technology while getting them where they need to go.

These are the values that guide every May Mobility ride:

MAY MOBILITY'S RIDER EXPERIENCE PILLARS	
BE SAFE AND FEEL SAFE	To gain wide acceptance, AVs must demonstrate they are objectively safe, based on safety metrics and also *feel* safe from the perspective of riders and other road users. From acceleration, to turns to making room for other road users, our MPDM system drives in a way that enables people to gain comfort in autonomy technology.
PROVIDE CLEAR INFORMATION	We understand that traveling in an AV may seem unsettling at first, especially when there is no AVO present. We give riders insight into what is happening behind the scenes by providing clear, real-time information about their AV and their trip in order to create a more predictable experience.
BE PREPARED	May Mobility is ready for anything that comes our way and we stay in constant communication with vehicle occupants. Our local site team is always at hand for rapid incident response and to interface with first responders.
COLLECT FEEDBACK	Every trip is a chance to learn from riders where there are opportunities to improve our service. We collect feedback in the vehicle, through our app and through regular in-person engagement with the community.



TAKING A RIDE

Riders can hail a May Mobility AV through an on-demand app, which we localize for each deployment. This app is provided by one of our ride booking partners or by our client. Riders request a trip by indicating their origin, destination and the number of travelers in their party. Users who do not wish to use the app can call the local base station to book a ride in certain deployments.

Through our collaboration with partners that provide ride hailing apps, our dispatch technology dynamically groups riders heading in similar directions without the need for fixed routes. After a rider books a trip, we identify the vehicle in our fleet that is best positioned to service that ride based on the routing algorithm—while also taking into account whether the rider requires a wheelchair-accessible vehicle—and then route the AV to a pickup location that minimizes vehicle diversion. Pickup points are usually a nearby street corner or building entrance where we know there is space for an AV to stop safely. The rider app provides walking instructions to this pickup point and gives a real-time vehicle ETA estimates.

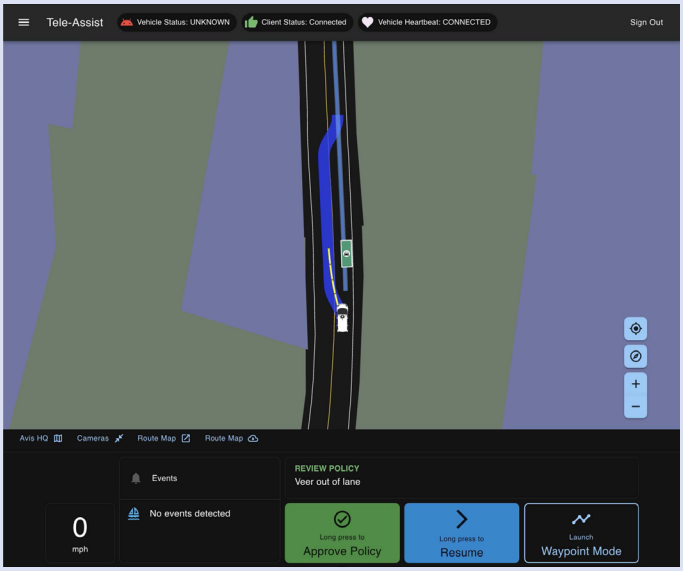
Once the AV arrives at the pickup point, the AV instructs riders to board through the curb-facing rear door. Once onboard, the AV prompts riders to confirm that they are inside the vehicle with their seatbelts fastened before it will begin the trip. During the trip, riders can track their ride's progress through the May Mobility app or by using the rear-facing rider screen. This rider display provides trip information including current position and planned path, upcoming stops and the estimated time of arrival for each party. Our AVs also employ audio notifications like chimes to indicate when doors open or close and spoken announcements to indicate upcoming stops, arrivals and departures.

As with pickups, our AVs drop off riders at a pre-designated stop. This could be a street corner or building entrance in order to minimize diversions for other riders who are onboard or waiting to be picked up and to limit overall vehicle miles traveled (VMT). When dropping off a rider, the AV's rider screen reminds the departing rider to take any belongings as they exit the vehicle. Before resuming the trip, the AV ensures that the departing rider has closed the door and cleared away from the vehicle. Following that, the May Mobility app prompts the rider to rate their trip and provide feedback on their experience.

IN-RIDE SUPPORT AND MONITORING

In most deployments, AVOs currently perform most in-ride support and cabin monitoring, like verifying that passengers have fastened their seatbelts and have safely boarded or alighted before authorizing the AV to proceed.

May Mobility has added remote monitoring channels as we launch our next generation of AVO-free deployments. Instead of monitoring passengers and providing support from the vehicle, we will do so via the rider screen and two-way live audio support provided by the site team from the local base station. Riders can initiate a two-way audio connection with base station staff by pressing a call button in the passenger cabin, within reach of all passenger seats. The rider screen and audio alerts notify riders when the two-way audio support feature is enabled, which indicates that they are in communication with base station staff.





8. VEHICLE CYBERSECURITY

May Mobility manages cybersecurity risk at two levels—the vehicle level, to ensure that our AVs can operate free from any interference with their behavior, and the enterprise level, which protects our IT systems, code base and physical premises from unauthorized access and interference.

VEHICLE SECURITY

To prevent unauthorized remote access to and control of our vehicles, we have designed our platform so that each May Mobility AV is a "walled garden." That means that each vehicle is a closed ecosystem equipped with everything necessary to determine and execute driving maneuvers, without the need for external connections or data. Because the AV determines and executes safe decisions using information and systems embedded in the vehicle, and cannot be commanded by a remote operator, it is insulated against interference from remote malicious actors.

From a safety perspective, a walled-garden approach allows our AVs to operate without relying on infrastructure external to the AV such as vehicle-to-everything (V2X) technologies or 5G cellular networks, which are not yet reliable enough to depend on for safety-critical decisions. This more conservative approach increases the reliability of our AVs, as they are not dependent on the performance of external technology that does not have 100 percent uptime.

Our system is designed so that the vehicles initiate only outbound connections to remote services, for instance to support remote monitoring of our fleet by our Operations Team. We also work with our partners OEMs on specific implementations and add measures that will detect corruption and prevent control functions from being compromised. We are working to illustrate our compliance with **U.N. Regulation 155e** to illustrate that our vehicles meet internationally recognized cybersecurity system standards.

ENTERPRISE SECURITY

Enterprise cybersecurity encompasses the methods we use to keep our information, IT systems, networks and end users safe from cybersecurity threats. These methods include software, hardware and the processes that collectively ensure that we can identify and mitigate threats and vulnerabilities on a timely basis.

Our system security model primarily protects against remote attack vectors on computer systems, such as Internet/Internet Protocol (IP) based attacks. All of May Mobility's operational software is stored in a repository that can only be accessed using company credentials and multi-factor authentication (MFA), via a secure single-sign on (SSO) platform. We employ encryption and authentication along with firewalling, and use a network address translation (NAT) firewall that works by only allowing internet traffic to pass through the gateway if a device on the private network requested it. We use advanced Distributed Denial of Service (DDoS) protection at our network edge to ensure our internet gateway is available. We also employ an IP firewall that uses a set of rules to accept or discard packets. Our physical premises are secured such that only authorized members have access to May Mobility's AVs and computer systems.

Since May Mobility owns all components of the AV environment (e.g., autonomy software, vehicles and local operations), we are able to mandate security updates across the enterprise, ensure software compatibility with our vehicles and otherwise tailor our cybersecurity and information security practices to fulfill our specific needs.

We have implemented advanced vulnerability and threat detection systems that will allow us to find and remediate vulnerabilities in our cloud and network estate. In addition, we have implemented a Threat Analysis and Risk Assessment (TARA) framework based on the ISO/SAE 21434 Cybersecurity Engineering for Road Vehicles standard. This assessment identifies potential threat scenarios to vehicle cybersecurity and tracks remediation of those threats. All operating systems are patched on an industry-standard cadence, and software vulnerabilities are identified and remediated to ensure that potential exploits are driven out to reduce potential attack surface area.

9. CRASHWORTHINESS

Our current fleet consists of Toyota Sienna Autono-MaaS (S-AM) vehicles. These vehicles are FMVSS compliant, feature state-of-the-art automotive safety and redundancy features and were an Insurance Institute for Highway Safety (IIHS) Top Safety Pick in 2021, 2022, 2023 and 2024. When converting a base vehicle into an AV or seeking out new types of models to add our AV stack to, we work with the OEM to ensure that our additions do not inhibit its built-in safety features. We also verify that all of our added equipment inside and outside the vehicle are validated for crash load so that, in the event of a crash or incident, they do not become loose and injure either riders or vulnerable road users surrounding the vehicle.

10. POST-CRASH ADS BEHAVIOR

DETECTING INCIDENTS

Time is critical when responding to a roadway incident. May Mobility uses the following channels to quickly ascertain whether one of our AVs has been involved in an incident:

INCIDENT NOTIFICATION CHANNELS	
AUTOMATED ALERTS	Our AVs automatically monitor for incidents like impacts and hard stops through the perception suite. When these indicators exceed certain levels, the AV sends an automated alert to the site team.
SITE TEAM MONITORING	The local site team constantly monitors video feeds, GPS data and other real-time information from our local base station and is in constant audio communication with the AVO and/or vehicle occupants. The site team uses these data and communication channels to detect incidents. In further generations of our ADS, we plan to add additional cabin sensors that will automate many of these monitoring activities.
RIDER NOTIFICATIONS	For deployments that are not staffed by AVOs, passengers can establish an audio connection to the site team and alert them to an incident by pushing one of three help buttons in the passenger cabin.
AVOs	If an AVO is present, they alert our local site management team and first responders of an incident through their audio headset or by phone. In the event of a severe incident, AVOs are trained to call 911 immediately and communicate directly with emergency responders.

RESPONDING TO INCIDENTS

Once detected, May Mobility follows these protocols to respond to an incident:

RETURN VEHICLE TO A SAFE STATE:

To reduce the potential for any additional incidents, our immediate goal is to return AVs involved in an incident to a *safe state,* such as being pulled over outside of the travel lane. For AVs staffed by AVOs, AVOs are trained to assume immediate manual control of the vehicle following an incident and move it to a safe nearby location if the situation allows.

ASSIST PASSENGERS AND OTHER ROAD USERS:

We work quickly to assist riders and any other road users involved in the incident. If a vehicle without an AVO present is involved in an incident, the site team at the base station uses remote monitoring tools and video feeds to determine the severity of the incident and the appropriate next steps. The site team communicates with riders and other road users in the immediate vicinity of the vehicle by using the microphone and speakers inside and outside of the vehicle. They convey safety instructions to riders, such as whether or not to remain in the vehicle, and depending on the severity of the situation, will dispatch another vehicle to pick up the riders and get them to their destinations. For AVs staffed by AVOs, the AVO facilitates passenger assistance directly, aided by audio guidance from the local site team.

CONTACT EMERGENCY SERVICES (AS APPLICABLE):

If no AVO is present and the incident is serious enough to require the support of emergency services, site staff will call 911 immediately upon detecting or learning of an incident to relay the AV's location and the nature of the incident. If an AVO is present, after returning the vehicle to a safe state—if the situation allows—AVOs call 911 using a designated emergency cellphone they carry with them at all times.

DEPLOY INCIDENT RESPONSE TEAM:

Next, May Mobility will deploy members of our incident response team to the scene—this team is composed of senior members of the on-duty site team at the base station. The incident response team brings with them safety triangles, high-visibility safety vests, phones and a camera. This equipment allows our incident team to keep the situation as safe as possible, to divert traffic around the May Mobility vehicle if it is still in the roadway and to collect the data, evidence and photos they need to create an incident report. Upon arrival, the team collaborates with anyone involved in the incident and response process, including emergency services personnel. If emergency services are not on the scene because it is a low-severity incident, members of the incident response team will generally go to the police station to file a report once all on-site incident response has concluded.

SHARE INFORMATION AND LIAISE WITH LOCAL PARTNERS:

As the response unfolds, the incident response team details information about the incident to the site's customer success team, who may also report to the scene directly. The customer service team or other May personnel will contact May Mobility's local partners immediately to provide a brief overview of the incident and provide a timeline for follow up with complete information. They also relay incident information to company leadership at headquarters.

MOVE THE VEHICLE BACK TO BASE STATION:

Once all data collection and on-site response is complete, May Mobility's incident response team will facilitate the movement of the impacted AV back to the local base station, coordinating with local law enforcement as necessary. They pilot the vehicle strictly in manual (non-autonomous) mode, or via tow truck if necessary.

ASSESS THE VEHICLE AND RETURN IT TO SERVICE WHEN APPROPRIATE:

Before an AV can be brought back into service, it must pass a number of protocols, which are defined based on the level of severity of the incident. We document these protocols in our Repair and Service Manual. For minor incidents that have not impacted vehicle function, the site team can conduct this process at the site of the incident and return the vehicle to service if it passes all required operational checks.

11. DATA RECORDING

Our AVs ingest substantial quantities of data when in operation. The vehicle logs and data we collect and store include perception, vehicle behavior and other system data from every moment in which our AVs are in operation. Our engineers analyze this information to reconstruct the AV's environment and investigate events and incidents of all types, retaining data of interest where warranted. This helps us ensure the safety and integrity of each ride we offer and make continuous improvements to our technology. The data in our logs are used to generate additional testing simulations. Engineers look not only at incident data but also standard ride data to learn more about vehicle performance and model scenarios that could potentially lead to incidents.

12. CONSUMER EDUCATION AND TRAINING

Our site teams engage closely with local communities as we plan, launch and operate our AV microtransit deployments, and we focus on safety as the primary topic.

PUBLIC SAFETY, FIRST RESPONDERS, AND CITY PERSONNEL:

When launching a new service, we invite public safety and emergency services personnel to our local base station for a safety presentation, which covers information about the service, our vehicles and autonomy technology and the protocols we follow for different kinds of potential safety incidents. During these workshops, we also encourage visiting officials to sit in and take a ride in our AVs in order to gain more hands-on familiarity with our service. Our customer success teams also convene these stakeholders for tabletop exercises, which include a run through of both everyday and emergency scenarios to ensure that all stakeholders are aligned in their response plans.

THE COMMUNITY:

Leading up to launch, May Mobility hosts demo rides that allow community members to get familiar with our AVs and our service. Our local operations team is on hand to answer questions and explain May Mobility's autonomy technology and approach to safety. We also host in-person and virtual AV town halls, often in conjunction with existing community events or neighborhood association meetings. At an AV town hall, we provide an overview of our AV technology, describe how it keeps riders and other road users safe, explain how to use the May Mobility app and how a ride works, describe the planned service and answer questions from citizens attending. We have also found these meetings along with educational workshops to be helpful in educating disabilities groups and transportation advocates. In addition, we bring vehicle and ride demonstrations across the country so the general public can take rides and gain a better understanding of how autonomy works and safety protocols that May adheres to. We have done this in conjunction with different organizations and conferences, including Partners for Automated Vehicle Education (PAVE), Community Transportation Association of America (CTAA), the Autonomous Vehicle Industry Association (AVIA), the America Public Transportation Association (APTA) and the National League of Cities (NLC).



13. FEDERAL, STATE AND LOCAL LAWS

We catalog the laws and rules of the road that our vehicles must follow and program the associated constraints into our autonomy software. For example, we restrict our vehicles from exceeding a posted speed limit. Of course, most driving situations require more judgment, such as whether to proceed through a yellow light or how much buffer to provide the nearby vehicles. Our MPDM autonomy system generates prudent and lawful driving decisions by weighing the possible outcomes of taking a particular option, even in complex scenarios that our ADS has not previously observed.

FEDERAL LAWS:

We track and comply with USDOT, NHTSA and FTA rulemaking and guidance. Following NHTSA's issuance of the Standing General Order on incident reporting requirements, we quickly incorporated the new rule into our incident reporting process. The Sienna-AM vehicles comply with Federal Motor Vehicle Safety Standards (FMVSS).

May Mobility has voluntarily participated in NHTSA's Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) initiative. Through AV TEST, information about certain of our testing sites and public routes is made available in an online database of AV testing and deployments.

STATE LAWS:

We understand that states and local municipalities have different regulations to test and operate autonomous vehicles with or without an AVO. State and local regulatory requirements also impact reporting, acquiring permits, creation of emergency vehicle and law enforcement interaction plans and other requirements or recommendations. Each state has a different approach to AV permitting processes and compliance. Some states, such as California have various processes dependent on the phase of development, while others like Arizona have a self-certification process and some states have no defined process. We follow state guidance closely and on a case-by-case basis.

LOCAL LAWS:

Similar to state-level laws, cities and regions have different approaches to AVs. We work closely with city officials, transportation planners, public safety and other local stakeholders to fulfill existing requirements like operating permits. If the city or community does not have an existing framework for AVs, we'll work together as the city builds out a permit program, or wishes to test out certain requirements collaboratively.

