



POLICE DEPARTMENT
Deputy Commissioner, Legal Matters
One Police Plaza, Room 1406
New York, NY 10038

February 2, 2019

Google LLC
Attn: Legal Department
1600 Amphitheatre Parkway
Mountain View, CA 94043

Re: DWICheckpoints Posted to Waze Mobile Application

Under the Vision Zero initiative, New York City is endeavoring to eliminate traffic fatalities by improving road conditions, creating safe passages for pedestrians and bicyclists, and enforcing laws to encourage responsible driving. Paramount to the success of this initiative is the New York City Police Department's (NYPD) enforcement of the Driving While Impaired (DWI) laws. The NYPD is focusing significant resources to DWI enforcement, including the use of vehicle checkpoints throughout the city.

This letter serves to put you on notice that the NYPD has become aware that the Waze Mobile application, a community-driven GPS navigation application owned by Google LLC, currently permits the public to report DWI checkpoints throughout New York City and map these locations on the application.

Accordingly, we demand that Google LLC, upon receipt of this letter, immediately remove this function from the Waze application. Further, the NYPD requests that Google take every necessary precaution to ensure that GPS data of NYPD DWI checkpoints, or any other substantially similar data, is not uploaded or posted at a future time on the Waze Mobile application, google.com, Google Maps, or any other associated internet/websites, or web portals and platforms under Google LLC's, its partners', sponsors', or affiliates' control.

Individuals who post the locations of DWI checkpoints may be engaging in criminal conduct since such actions could be intentional attempts to prevent and/or impair the administration of the DWI laws and other relevant criminal and traffic laws. The posting of such information for public consumption is irresponsible since it only serves to aid impaired and intoxicated drivers to evade checkpoints and encourage reckless driving. Revealing the location of checkpoints puts those drivers, their passengers, and the general public at risk.

New York City has a zero tolerance policy for motorists who engage in reckless conduct that endangers public safety. The NYPD will pursue all legal remedies to prevent the continued posting of this irresponsible and dangerous information and will enlist the cooperation of our other law enforcement partners and fellow agencies to assist in this effort.

This letter is not intended as an exhaustive statement of our position in this matter and shall not be construed as an acknowledgment of any fact, nor as a waiver of any of the City's legal rights and remedies, all of which are hereby expressly reserved.

Sincerely,

Ann Prunty
Acting Deputy Commissioner
Legal Matters