



100 Northern Avenue  
Suite 200  
Boston, MA 02210

## Motional Request for Exemption

March 21, 2022

California Public Utilities Commission  
Consumer Protection & Enforcement Division  
Transportation License Section  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Request for Exemption

To Whom It May Concern:

Pursuant to General Order ("G.O.") 157-E, Part 8.01 and Part 8.02, Motional AD Inc. ("Motional") submits this request for a narrow exemption from the charter-party carrier ("TCP") regulations applicable to participants of the California Public Utilities Commission's ("Commission) Drivered Autonomous Vehicle ("AV") Pilot Program. This request is submitted in support of Motional's application, filed concurrently with this request. As further discussed below, the Commission's grant of Motional's request will be consistent with the purpose of the Drivered AV Pilot Program and will allow Motional to operate in a manner that is functionally equivalent to the obligations of G.O. 157-E.

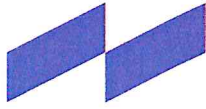
Under G.O. 157-E, Part 4.01, "every [TCP]...shall maintain, on file with the Commission, an equipment list of all vehicles...in use under each certificate and permit." The Commission's form for providing the equipment list also requires a copy of the current commercial vehicle registration.<sup>1</sup> Thus, Motional seeks a narrow exemption from this requirement to allow Motional to operate with AVs that are registered as non-commercial.

Motional maintains control over its fleet of AVs, including those that are not registered as commercial vehicles. The vehicles Motional would use in the AV Pilot Program are prototypes that are not eligible to be registered as commercial vehicles. Apart from the ineligibility of these prototype vehicles to be registered commercially, Motional will operate all vehicles used in the AV Pilot Program in accordance with all DMV regulations and Commission requirements applicable to commercial vehicles.

Regardless of whether Motional's AV Pilot Program vehicles are registered as commercial vehicles, Motional's operations are functionally equivalent to the operations otherwise required

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<sup>1</sup> See Passenger Carrier Equipment Statement Instructions (Form PL-664).



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by G.O. 157-E. Further, Motional believes that the foregoing shall have no impact on the Commission's goals or purposes in authorizing Motional's application for the Drivered AV Pilot Program.

For these reasons, Motional respectfully requests that the CPUC grant this exemption request.

Sincerely,

Peter Simshauser  
General Counsel  
Motional AD Inc.

Enclosure: Attestation of P. Simshauser