



Argo AI, LLC

2545 Railroad St, Suite 400  
Pittsburgh, PA 15222

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February 12, 2021

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

Re: Request for Exemption

Dear Consumer Protection and Enforcement Division,

Pursuant to General Order (“G.O.”) 157-E, Part 8.02,, Argo AI, LLC (“Argo”) 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 (“Pilot”). This request is submitted in support of Argo’s TCP Application, filed simultaneously with this request. As detailed below, the granting of this exemption will be consistent with the purpose of the Drivered Autonomous Vehicle Pilot Program and will allow Argo to operate in a manner that is functionally equivalent to the operations established by G.O. 157-E.

Under G.O. 157-E, “every charter-party carrier, shall maintain, on file with the Commission, an equipment list of all vehicles in use under each certificate and permit.” The equipment list (Form PL-664-AV) stipulates that: (1) a copy of the current commercial vehicle registration must accompany the form; and (2) the applicant or permit holder must be shown on the registration as either the registered owner or the lessee. Argo seeks a narrow exemption from this requirement to allow Argo to operate with AVs that are owned by Ford Motor Company (“Ford”) and registered as non-commercial. Argo maintains control over its fleet of AVs, including those vehicles which are owned and registered by Ford. The AVs that Argo intends to use in the Pilot are Ford prototype vehicles which are ineligible to be registered as a commercial vehicle or have their registration transferred from Ford. Argo will operate all AVs used in the Pilot in accordance with all DMV regulations and Commission requirements applicable to commercial vehicles.

Further, Argo’s operations are functionally equivalent to the operations otherwise required by G.O. 157-E, regardless of whether Argo’s AVs are registered commercial and with Argo listed as the owner or lessee. In addition, we believe that the foregoing shall have no impact on the



**Argo AI, LLC**

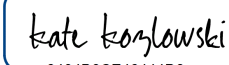
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Commission's goal or purposes in authorizing Argo's application for the Drivered Autonomous Vehicle Pilot Program.

For the reasons above, Argo respectfully requests that the Commission grants Argo's request for a narrow exemption that allows Argo to operate Ford-owned AVs which are registered as non-commercial in the State of Michigan.

Sincerely,

DocuSigned by:  
  
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Kathleen Kozlowski  
EVP General Counsel, Chief Compliance Officer, and Secretary  
Argo AI, LLC

**DECLARATION OF KATHLEEN KOZLOWSKI  
IN SUPPORT OF ARGO AI, LLC'S REQUEST FOR EXEMPTION**

I am the EVP General Counsel, Chief Compliance Officer, and Secretary of Argo AI, LLC ("Argo"), a Delaware limited liability company, which is headquartered at 2545 Railroad Street, Pittsburgh, Pennsylvania, 15222.

I submit this declaration in furtherance of Argo's Request for Exemption transmitted with Argo's Autonomous Vehicle ("AV") Pilot Program ("Pilot") Charter Party Carrier ("TCP") application. Argo's Request for Exemption is submitted pursuant to General Order ("G.O.") 157-E, Part 8.02, which requires that the applicant demonstrate that "if the exemption is granted, the carrier's operation will be functionally equivalent to the operations required by this General Order."

Argo's Request for Exemption seeks a limited exemption allowing Argo to operate Ford owned AV's which are registered in the State of Michigan.

I, KATHLEEN KOZLOWSKI, DECLARE AS FOLLOWS:

1. Ford Motor Company ("Ford"), through its wholly owned subsidiary, Ford Holdings LLC, has an interest in Argo. Ford is the title holder and registrant for the vehicles which will be used in the Pilot. Argo will be responsible for all vehicles and operations conducted under the Pilot.

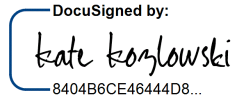
2. Argo maintains control over its fleet of Argo AVs, including those AVs that are owned and registered by Ford.

3. Argo is insured under an Auto Liability Policy that covers the AVs it intends to use in the Pilot. Argo's Auto Liability Policy also covers all employees of Argo who will operate the AVs. The applicable insurance policy adequately meets the statutory requirements and standards set forth under Commission's General Orders, Decision 18-05-043. In the event of an accident, Argo's Auto Liability Policy would respond.

4. The AVs intended for the Pilot are registered by Ford in the State of Michigan. Argo's Autonomous Vehicle Testing Permit granted by the California DMV allowed for Argo to operate

31 with Michigan Manufacturer License Plates pursuant to the reciprocity granted under Vehicle  
32 Industry Registration Procedures Manual Sections 12.145 and 12.150.

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34 Dated this 12th day of February, 2021.

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38 Kathleen Kozlowski  
39 EVP General Counsel, Chief Compliance Officer, and Secretary  
40 Argo AI, LLC  
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