

February 14, 2025

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

**Re: Zook, Inc. Request for Exemption to Requirement for Commercial Registration of Its Driverless Pilot Vehicles**

Dear Ms. Curtis,

Pursuant to Part 8 of the California Public Utilities Commission (CPUC or Commission) General Order (GO) 157-E, Zook, Inc. (Zook) requests an exemption from the Commission guidance that its autonomous vehicles be registered as "commercial" with the California Department of Motor Vehicles (DMV). This request is consistent with the Commission's purpose for the pilot program and, if granted, Zook's service will be functionally equivalent to the operations otherwise required by GO 157-E.

On July 19, 2023, Zook applied for its autonomous vehicle driverless pilot permit with the Commission. On February 16, 2024, Zook submitted a request for exemption to the requirement for commercial registration of its driverless pilot vehicles (February 2024 Exemption Request). On February 21, 2024, the CPUC granted Zook's autonomous vehicle driverless pilot permit, which included approval of Zook's exemption request. On December 21, 2024, the CPUC granted a renewal of Zook's charter party carrier (TCP) permit.

General Order 157-E Part 4.01 states that charter-party carriers, which include autonomous vehicle companies, shall maintain with the Commission an equipment list of all vehicles in use under each certificate or permit. The Commission's equipment list form (Form PL-664) and California Vehicle Code Section 260 require commercial vehicle registration for vehicles that are used for the transportation of persons for hire. Zook requests that the Commission grant an exemption from this commercial registration requirement to allow Zook to operate under a driverless pilot permit.

Zook will continue to use the plates provided by Zook's Manufacturer's License ("m-plates") through the DMV's Occupational Licensing Division for its 2025 robotaxi operations under the CPUC driverless AV pilot permit.<sup>1</sup> M-plates allow Zook to, as a manufacturer, operate the vehicle on public roads without a traditional registration.

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<sup>1</sup> Zook had indicated in its February 2024 exemption request that Zook robotaxis will be registered as commercial vehicles with the DMV starting with the 2024 model year. Until we begin registering the Zook robotaxi, planned for later in 2025, however, they will continue to operate under m-plates.

The pilot programs set forth in D.18-05-043 were created “to allow the introduction of AVs into passenger service to the public on a pilot basis, while providing for the safety and consumer protection of passengers, consistent with the Commission’s regulation of private passenger-carrying transportation entities subject to its jurisdiction.”<sup>2</sup> Importantly, the Decision goes on to state that the pilot programs are “designed to work in tandem with the DMV’s jurisdiction over regulations addressing the safe operation of AVs themselves . . .”<sup>3</sup> Zoot presently has a driverless testing permit from the DMV that allows its driverless autonomous vehicles with m-plates to operate on public roads. Zoot’s passenger service to the public under the CPUC pilot testing permit would be consistent with the purpose of the pilot program, as it does not hinder the safety and consumer protection of passengers. Furthermore, it is consistent with the DMV’s regulations and CPUC precedent because Zoot is already operating its robotaxis with m-plates under its DMV permit and CPUC AV driverless pilot permit.

Zoot’s service will also be functionally equivalent to operations required by GO 157-E because the m-plates do not impact its operations.

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

Sincerely,

DocuSigned by:  
  
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Christopher Nalevanko  
General Counsel  
Zoot

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<sup>2</sup> D.18-05-043, Page 2.

<sup>3</sup> *Id.*