



**California Public  
Utilities Commission**

# CPUC Autonomous Vehicle (AV) Drivered and Driverless Pilot and Phase I Deployment Programs

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APPLICATION INSTRUCTIONS AND REQUIREMENTS  
FOR PERMIT HOLDERS

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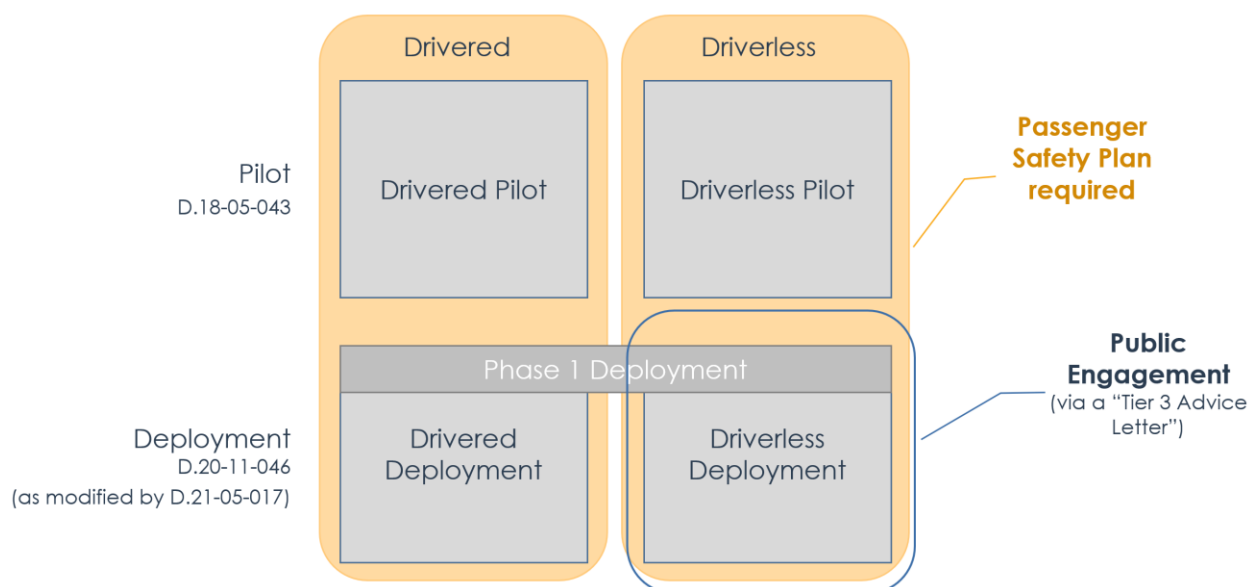
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# 1 INTRODUCTION TO CPUC AV PROGRAMS

The CPUC offers four autonomous vehicle passenger service programs:



AV passenger service may be offered with or without a driver present in the vehicle – “Drivered” or “Driverless” service, respectively.

Further, service may be offered as part of the CPUC’s AV Pilot Program, authorized by Decision 18-05-043 or as part of the CPUC’s AV Phase I Deployment Program, authorized by Decision 20-11-046 (later modified by D.21-05-017). In the Pilot Programs, no fares may be collected from passengers. The Phase I Deployment Programs allow for the collection of fares from passengers.

Application requirements vary across the different programs; please review this guidance document *and* the applicable CPUC General Order(s) and decision(s) that apply to your desired program(s). All programs require the carrier to apply for a Transportation Charter Party (TCP) permit. All driverless programs require the submission of a Passenger Safety Plan. The Phase I Driverless Deployment program requires the submission of a Tier 3 advice letter in addition to the TCP permit application.

## 2 BEFORE YOU APPLY – Frequently Asked Questions

For each frequently asked question, these guidelines specify to which programs the response relates. “All Programs” covers all four of CPUC’s AV programs: Drivered Pilot, Drivered Deployment, Phase I Driverless Pilot, and Phase I Driverless Deployment.

### 2.1 I wish to transport members of the public in an autonomous vehicle. What permit(s) must I obtain?

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*For All Programs:*

If you wish to transport members of the public (i.e., individuals who are not employees, contractors, or designees of the AV manufacturer) in an AV on public roads in California, it is necessary to possess the prerequisite AV Testing (for eligibility in CPUC’s Pilot program) or Deployment (for eligibility in CPUC’s Phase I Deployment program) Permit from DMV; to have completed at least 30 days of operations under such DMV permits; to obtain TCP authority from the CPUC; and to comply with the CPUC’s added requirements contained in Decision 18-05-043 and Decision 20-11-046 (as modified by Decision 21-05-017) authorizing AV passenger service on a pilot and deployment basis, respectively.

### 2.2 Which autonomous vehicle permit should I apply for?

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If you wish to carry passengers in AVs, the table below will help you identify the relevant program for your situation. All AV permits below require you to also hold a TCP authority. A single TCP authority may authorize participation in one or more AV programs.

With drivers	For compensation	CPUC Authority Required
Yes	No	TCP Authority + Drivered Pilot Permit
No	No	TCP Authority + Driverless Pilot Permit
Yes	Yes	TCP Authority + Phase I Drivered Deployment Permit
No	Yes	TCP Authority + Phase I Driverless Deployment Permit

### 2.3 What are Charter-Party Carriers?

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*For All Programs:*

To participate in the AV programs, you must obtain Charter-Party Carrier (TCP) authority. You may obtain a Charter-Party “Class A” Certificate or a Charter-Party “Class P” Permit. These authorities are described in the table below.

“Class A” Certificate	“Class P” Permit
<ul style="list-style-type: none"> <li>• \$1,500 fee for new or refiled certificate</li> <li>• \$100 renewal fee</li> <li>• Chartered service</li> <li>• May operate vehicles of any seating capacity</li> <li>• May operate from any point to any point within California.</li> <li>• May be transferred (fee: \$300)</li> </ul>	<ul style="list-style-type: none"> <li>• \$1,000 fee for new or refiled permit</li> <li>• \$100 renewal fee</li> <li>• Chartered service</li> <li>• May operate only vehicles seating fewer than 16 including the driver</li> <li>• May operate from any point to any point within California.</li> <li>• May not be transferred.</li> </ul>

You may reference Public Utilities Code Sections 5371.1 and 5383 for statutory requirements for the “Class A” Certificate and Section 5384(b) for the “Class P” Permit.

## 2.4 Do I possess the appropriate DMV AV Manufacturer's Permit?

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*For All Programs:*

The DMV’s AV regulations require AV companies to obtain a permit before operating AVs on public roads. As of this writing, the DMV offers three different permits depending on whether you wish to operate drivered or driverless vehicles and whether you will charge for your rides.

The table below should help you identify the DMV Manufacturer’s Permit you must obtain prior to submitting an application with the CPUC. Your DMV permit must be in good standing to be eligible for a CPUC AV permit of any kind.

With safety drivers	For compensation	DMV permit required
Yes	No	Manufacturer’s Testing Permit
No	No	Manufacturer’s Testing Permit – Driverless Vehicles
Yes	Yes	Manufacturer’s Deployment Permit
No	Yes	Manufacturer’s Deployment Permit

## 2.5 Is there a delay between issuance of a DMV AV Manufacturer's Testing or Deployment Permit(s) and when I become eligible for a CPUC Permit?

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*For All Programs:*

Pursuant to CPUC Decisions 18-05-043 and 20-11-046 (as modified by Decision 21-05-017), an entity that wishes to participate in any of the CPUC’s AV programs must submit an attestation along with its TCP permit application that an AV that is representative of the AV fleet and of the technology that the entity plans to use in offering AV Passenger Service has been in actual permitted

operations on public roads in California for a minimum of 30 days following granting of the relevant DMV AV Manufacturer’s Testing Permit or Deployment Permit.

## 2.6 Will I need separate authorities from DMV and CPUC for each AV program?

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*For All Programs:*

Yes. In addition to the requirement to possess the appropriate AV Manufacturer’s Testing or Deployment Permit from DMV for testing with a driver or without a driver in the vehicle, you must apply for a TCP permit to participate in the CPUC’s AV programs. **You may be authorized to participate in one or more CPUC AV programs under a single TCP authority.** For example, a carrier could initially apply for a TCP P Permit authorizing participation in the Drivered Pilot program and in the future apply for further authorization to participate in the Driverless Pilot program. In that case, the second application would require submittal only of the AV-specific documents and not a full TCP application in order to amend the existing TCP permit. More information is available [later in this document](#).

Each vehicle proposed for use in the CPUC’s AV programs must also be authorized for use by the appropriate DMV AV Manufacturer’s Testing or Deployment Permit.

## 2.7 Will I need separate authorities for each AV that I wish to operate?

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*For All Programs:*

No. As a charter-party carrier, you may operate any number of vehicles under one certificate or permit. As part of the application process, charter-party carriers must provide the CPUC’s Licensing Section with a list of all vehicles to be operated, including their license plate numbers, VIN numbers, and seating capacities. Thereafter, carriers must use the CPUC’s Transportation Carrier Portal to report [changes to the vehicle list](#) within 10 days of adding or removing any vehicle from their fleet.

## 2.8 Will I need a commercial vehicle registration for each AV that I wish to operate?

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*For All Programs:*

Yes. Before the Licensing Section will process your request to add a vehicle to your certificate or permit, the vehicle must be registered as “commercial” with the California Department of Motor Vehicles. If your entity is a Corporation, LLC, or LP, the registered owner or lessee of each vehicle must be listed on the Statement of Information (SOI) on-file with the California Secretary of State. In addition, the registered owner or lessee of the vehicle must be one of the following in the table below.

For this type of entity...	the registered owner or lessee must be:
Individual	The individual
General Partnership	One or more of the partners
Corporation	The Corporation or Corporate Officer
LLC	The LLC or Manager Member or Member
LP	The LP or partner

If your vehicles cannot be registered commercially (e.g., prototypes that use manufacturer plates), you may consider seeking an exemption to this requirement. You may find [more information on seeking an exemption](#) later in this document.

## 2.9 Are there special application requirements for Phase I AV Deployment permits?

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Yes.

If you wish to apply for a Phase I Driverless Deployment permit, you must submit an application to CPED in the form of a Tier 3 advice letter with specific content and attachments as described [later in this document](#). This advice letter is *in addition to* applying for TCP authority electronically through the TC Portal if you do not already hold an active TCP authority.

If you wish to apply for a Phase I Drivered Deployment permit and you already hold a Drivered Pilot permit, you may request conversion of your Pilot permit into a Deployment permit [as described in more detail later in this document](#). Your Drivered Pilot permit must be active and in good standing and you must hold an active DMV Deployment permit. If CPED determines you have met all the requirements of the Drivered Deployment program, CPED will issue an amended permit that reflects your participation in the Drivered Deployment program. Because this is a conversion and not the issuance of new permit, once approved, your Drivered Deployment program effectively terminates and replaces your Drivered Pilot program; they do not run simultaneously on the same TCP authority.

If you wish to apply for a Phase I Drivered Deployment permit and you do not currently hold a Drivered Pilot permit, you must hold a DMV Deployment permit and apply for TCP and/or AV authority as described in this document.

## 2.10 How can I contact the CPUC with further questions?

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Should you have questions or concerns in advance of submitting your application, you may contact CPUC AV Programs staff at [AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov). While we are available to answer procedural or ministerial questions as you prepare draft application materials, we are unable to offer substantive feedback outside of the formal application review process that commences once you have submitted your TCP application, Tier 3 advice letter, and/or conversion request.



### 3 APPLICATION SUMMARY & CHECKLIST

Refer to the checklists below as you create and submit your application. Additional information on each of the requirements can be found later in this document.

#### [TCP Application](#)

You will need to create a new application for TCP authority in the [TC Portal](#). The application will walk you through all the required steps, but you may refer to the checklist below to ensure you are prepared with the necessary information. These requirements apply to *all AV programs*.

As noted in the FAQ above, a single TCP authority may authorize participation in one or more AV programs. If you already hold a TCP authority and wish to add an additional AV program authorization, you do not need to re-submit the TCP documents below.

- Carrier basic details, including [DMV EPN Requester code](#)
- Driver/remote operator list
- Terminal address
- [Vehicle list](#)
- Applicant/carrier declarations, including Vehicle Safety Inspection Declaration, others
- [Controlled substances and alcohol testing certification program](#)
- [Profit and loss statement](#)
- [Insurance](#)
- [Payment](#) (Online payments processed immediately, checks must be received and processed before you may submit application)

#### [AV-Specific Documents](#)

AV-specific documents are in addition to the TCP application and must be [uploaded separately](#) to the TC Portal as part of your initial TCP application. If you already hold a TCP authority and wish to apply for an additional AV program, you may submit your AV-specific documents via email [as described below](#).

Use this checklist and review the relevant CPUC decision(s) to ensure you have prepared all necessary documents.

*For the Drivered Pilot Program:*

- DMV AV Manufacturer's Testing Permit
- [DMV AV Operator Permit\(s\)](#)
- [AV Test Driver training course outline and description](#)
- [Attestation of compliance with DMV regulations](#)
- [Attestation of 30 days of California operations under DMV Permit](#)
- [Statement and Map of Operational Design Domain](#)
- [Passenger Notice and Consent Plan](#)

- (optional) [Supplement to Projected Profit or Loss Statement](#)
- (optional) [Request\(s\) for Exemption\(s\) to General Order 157-E](#)

*For the Driverless Pilot Program:*

- DMV Driverless AV Testing Permit
- [DMV Process in the Event of a Collision](#)
- [DMV Law Enforcement Interaction Plan](#)
- [DMV Disclosure to Passengers Regarding Collection and Use of Personal Information](#)
- [AV Remote Operator training course outline and description](#)
- [Attestation of compliance with DMV regulations](#)
- [Attestation of 30 days of California operations under DMV Permit](#)
- [Statement and Map of Operational Design Domain](#)
- [Passenger Notice and Consent Plan](#)
- [Passenger Safety Plan](#)
- (optional) [Supplement to Projected Profit or Loss Statement](#)
- (optional) [Request\(s\) for Exemption\(s\) to General Order 157-E](#)

*For the Phase I Drivered Deployment Program:*

- DMV AV Manufacturer's Deployment Permit
- [DMV Process in the Event of a Collision](#)
- [DMV Law Enforcement Interaction Plan](#)
- [DMV Disclosure to Passengers Regarding Collection and Use of Personal Information](#)
- [AV Driver training course outline and description](#)
- [Attestation of compliance with DMV regulations](#)
- [Attestation of 30 days of California operations under DMV Permit](#)
- [Statement and Map of Operational Design Domain](#)
- [Passenger Notice and Consent Plan](#)
- (optional) [Supplement to Projected Profit or Loss Statement](#)
- (optional) [Request\(s\) for Exemption\(s\) to General Order 157-E](#)

*For the Phase I Driverless Deployment Program:*

- DMV AV Manufacturer's Deployment Permit
- [DMV Process in the Event of a Collision](#)
- [DMV Law Enforcement Interaction Plan](#)
- [DMV Disclosure to Passengers Regarding Collection and Use of Personal Information](#)
- [AV Remote Operator training course outline and description](#)
- [Attestation of compliance with DMV regulations](#)
- [Attestation of 30 days of California operations under DMV Permit](#)
- [Statement and Map of Operational Design Domain](#)
- [Passenger Notice and Consent Plan](#)
- [Passenger Safety Plan](#)

- [Tier 3 Advice Letter](#)
- (optional) [Supplement to Projected Profit or Loss Statement](#)
- (optional) [Request\(s\) for Exemption\(s\) to General Order 157-E](#)

# 4 CREATING YOUR TCP APPLICATION

## 4.1 Eligible Applicants

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*For All Programs:*

Several types of legal entities may apply for an operating authority. If you are applying for charter-party authority, you would do so as a Sole Proprietor (“Individual”), a General Partnership, a Corporation, an LLC (Limited Liability Company) or LP (Limited Partnership). All applicants will indicate the name of the applicant; this is the person(s) or entity to which your permit or certificate will be issued. That name will be your CARRIER NAME. If you apply as a Corporation, LLC or LP, CPUC Transportation Licensing will verify that the legal entity is in good standing with the California Secretary of State.

Keep in mind that the address and phone number you place on your application—even if they are your home address and phone number—are public information, posted on our web site, and available to any member of the public. We will not accept a P.O. Box or mail drop for a physical address. If you apply as an Individual, your name will be part of that public information. If you apply as a General Partnership, the names of all partners are public information. If you wish to request confidential treatment of any information in your application, you must follow the procedures outlined in [General Order 66-D](#).

## 4.2 “Carrier Name” vs “DBA”

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*For All Programs:*

The name under which you apply (Individual, Partnership, Corporation, etc.) will be your “carrier name,” and is the name (the legal entity) to which your permit or certificate will be issued. This is not to be confused with any fictitious business name or Doing Business As (“DBA”) you may choose to use.

- Example 1: John Doe applied as an individual, doing business as “Acme Limousine Service”. In this case, “John Doe” is the carrier name and the permit or certificate holder, and not “Acme Limousine Service”.
- Example 2: Mr. Doe forms a corporation, “Doe Transportation, Inc.” doing business as “Acme Limousine Service”. “Doe Transportation, Inc.” is the carrier name and the permit or certificate holder, and not “Acme Limousine Service”.

If you are a charter-party carrier, before you use any fictitious business name, you must inform CPUC Transportation Licensing in writing of your intent to use it (General Order 157-E Sec. 3.06).

## 4.3 File Number, TCP Number, PSG Number

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*For All Programs:*

The CPUC issues unique identifiers to maintain records of each carrier it regulates. For charter-party carriers, this is referred to interchangeably as the File Number, TCP Number, or PSG Number. After you submit a completed application, your TCP Number will be conveyed to you on the first “Deficiency Letter” from Transportation Licensing in response to the submitted application.

Please reference your TCP number whenever you call, write, or email Transportation Licensing. Ideally, it should be prominently displayed on every page of every document you send us. When your authority is issued, the numbers of your TCP Number will also be the numbers of your permit or certificate such as “TCP 12345.”

## 4.4 Vehicle Registrations

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*For All Programs:*

Each vehicle must have a commercial registration issued by the California Department of Motor Vehicles. More information on requesting an exemption from this and/or other requirements is available [later in this document](#).

## 4.5 Financial Responsibility (Form TL 706 F3)

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*For All Programs:*

Under Public Utilities Code Section 5374(a)(1)(A), in order to receive a permit or certificate, a company must demonstrate that it is “financially and organizationally capable of conducting an operation that complies with the rules and regulations of the Department of the California Highway Patrol governing highway safety.”

One way to meet this requirement is to complete Form TL-706-F3, a Projected Profit and Loss Statement. This one-page form requires you to project (estimate) your revenue and expenses over a stated initial period of operations, which may be 90, 120, 180 days, or one year.

Along with Form TL-706-F3, you may submit a supplemental document explaining how your organization meets the criteria described above.

## 4.6 CPUC-Approved Controlled Substances and Alcohol Testing Third-Party Administrators/Consortia

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*For All Programs:*

You must provide a drug testing program that includes educational materials for drivers, training for supervisors, and specified testing of drivers for use of controlled substances and alcohol in accordance with GO 157-E. In selecting a controlled substances and alcohol testing (CSAT)

administrator to establish a drug and alcohol testing program for your company, you must select a company that has been accepted and approved by the CPUC's Transportation Licensing Section. You will find a list of approved third-party administrators/consortia on our website. At the time of writing, the list of CPUC-approved CSAT administrators is available [here](#).

These requirements apply to drivers and to remote operators capable of performing the dynamic driving task.<sup>1</sup>

## 4.7 Proof of Enrollment in the DMV Employer Pull Notice Program

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*For All Programs:*

You must enroll in the DMV Employer Pull Notice (EPN) Program. The EPN provides transportation carriers and regulatory agencies with a means of promoting driver safety through the ongoing review of driver records. Through EPN, account holders are notified of any of the following on the driving record of any driver: convictions, failures to appear, accidents, driver license suspensions or revocations, and any other actions taken against the driving privilege.

DMV AV regulations separately require entities, as a condition of obtaining an AV Manufacturer's Permit, to enroll in the EPN Program. Since possession of a DMV AV Manufacturer's Permit is also a condition of participating in any of the CPUC AV programs, you must submit a copy of the letter from the DMV confirming that you are enrolled in this program. This may be a digital copy or a scan of the physical copy. Remote operators must be enrolled in the carrier's EPN account.

## 4.8 Insurance Requirements

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You must have both public liability and property damage insurance and workers compensation insurance.

In general, the levels of insurance required are contained in CPUC General Order (GO) 115 Series for charter-party carriers; however, participants in the CPUC's AV programs must hold a \$5 million insurance policy.<sup>2</sup>

Furthermore, consistent with GO 157-E, charter-party carriers must maintain workers' compensation insurance if they have employees.

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<sup>1</sup> See 13 CCR § 227.02(g)

<sup>2</sup> California Vehicle Code § 38750(c)(3)

# 5 AV-SPECIFIC REQUIREMENTS

## 5.1 Remote Operator Training Requirements

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*For All Programs:*

The DMV requires that an AV manufacturer “shall maintain a training program for its remote operators and certify that each remote operator has completed training sufficient to enable him or her to safely execute the duties of a remote operator and possesses the proper class of license for the type of test vehicle being operated. The manufacturer shall provide the department with a course outline and description of the remote operator training program and the date that each remote operator completed the program” (CCR Title 13 Section 227.38(f)). Per DMV regulations, a remote operator is “a natural person who: possesses the proper class of license for the type of test vehicle being operated; is not seated in the driver’s seat of the vehicle; engages and monitors the autonomous vehicle; is able to communicate with occupants in the vehicle through a communication link. A remote operator may also have the ability to perform the dynamic driving task or cause the vehicle to achieve a minimal risk condition” (CCR Title 13 Section 227.02(n)).

You must show proof of compliance with DMV regulations for AV driver training and certification to the CPUC. You must provide a copy of the operator permit issued to each operator and provide a copy of the course outline and training program required by the DMV.

## 5.2 Materials from Application for DMV Testing and Deployment Permits

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*For All Programs:*

Your application must include several documents that you submitted to the DMV as part of your application for a DMV Testing or Deployment Permits. These documents include your:

- Process in the event of a collision (CPUC Deployment and Driverless Pilot only)
- Law enforcement interaction plan (CPUC Deployment and Driverless Pilot only)
- Disclosure to the passenger regarding collection and use of personal information
- Statement and map of Operational Design Domain (ODD)

## 5.3 Attestation of Compliance with DMV Regulations

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*For All Programs:*

Your application must include a signed attestation that your company has complied with all the relevant DMV regulations. The CPUC does not prescribe a specific format or wording for this document.

The CPUC does not provide instructions about how to obtain or complete forms from the DMV. The applicant must contact the DMV directly for this information.

## 5.4 Passenger Notice and Consent Form

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*For All Programs:*

You must submit a plan detailing how you make passengers aware that they are being offered Drivered or Driverless AV Passenger Service (as applicable) and how the passenger will affirmatively consent to or decline the service. This plan must include documents that reflect the content and experience of individuals who participate in the program. For example, documents could include a written document or a screenshot of an app.

The CPUC does not prescribe a specific format or wording for this document. You may choose the wording and format that best suits your program (e.g., written form, electronic form, etc).

Please note that the passenger-facing documents must:

- a) Clearly state that the passengers are about to ride in a drivered or driverless autonomous vehicle (as appropriate);
- b) If applicable, clearly state the ride is taking place as part of a pilot program. Specify the exact name of the pilot program and state that the pilot was authorized by the California Public Utilities Commission in Decision (D.)18-05-043;
- c) Include a photo of the vehicle (this may be a picture of a representative vehicle, rather than the exact vehicle itself); and,
- d) Obtain the passengers' affirmative consent to participate (e.g., require a signature).

## 5.5 Attestation of 30 Days of California Operations

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*For All Programs:*

You must provide an attestation to drivered or driverless (as applicable to your permit) operations for a minimum of 30 days on California public roads following receipt of your DMV AV Testing or Deployment Permit. The attestation must include:

- Start date of actual operations on California roads.
- Geographic location of operations in California.
- Times of day and number of hours per day in operation during the 30-day period.

Your attestation may be for a single vehicle representative of the vehicle and technology to be offered for service.



*For the Phase I Drivered and Driverless Deployment Programs:*

Your attestation must also include a statement that the vehicle's 30 days of operations were conducted in the specific Operational Design Domain in which the applicant intends to pilot them for service.

## 5.6 Statement and Map of Operational Design Domain

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*For All Programs:*

You must provide a statement and map of the Operational Design Domain as certified to the DMV. The description of the Operational Design Domain (ODD) must include the following:

- Map showing the boundaries of the ODD
- Description of the conditions under which the vehicle will operate, including:
  - Time of day
  - Environmental conditions (e.g., weather, lighting)
- Restrictions on operations, including:
  - Speed of travel
  - Roadway type
- Other domain constraints as applicable

You must inform the CPUC within one business day of any update to the ODD map that is approved by the DMV.

## 5.7 Passenger Safety Plan

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*For the Drivered Pilot Program and the Phase I Drivered Deployment Program:*

This requirement does not apply.

*For the Driverless Pilot Program and the Phase I Driverless Deployment Program:*

### 5.7.1 Background

D.18-05-043 and D.20-11-046 (later modified by D.21-05-017) created respectively the Commission's Driverless Autonomous Vehicle (AV) pilot and deployment programs, which allow for passenger service in autonomous vehicles with approval from DMV to operate without a safety driver in the car. The pilot program is intended for test rides and does not allow for fare collection; carriers may collect fares in the deployment program. Carriers wishing to participate in either the Driverless Pilot or Phase I Driverless Deployment AV passenger service programs must prepare a Passenger Safety Plan (PSP) as part of their application for a driverless permit. In the context of the pilot program, PSPs are submitted to CPED Staff for informational purposes only. In Phase I Deployment, PSPs are submitted as part of a Tier 3 advice letter. CPED Staff must review and synthesize comments and replies on such PSPs and draft a resolution for the Commission to consider approving or denying a permit application.

D.20-11-046 as modified by D.21-05-017 requires the following, per Ordering Paragraph 8: “Transportation Charter-Party Carrier permit-holders that wish to participate in Phase I of the deployment program for Driverless Autonomous Vehicle Passenger Service must transmit a Passenger Safety Plan that describes their policies and procedures to minimize risk for all passengers in their driverless vehicles.

The Passenger Safety Plan must, at minimum, detail how the applicant will:

1. Minimize safety risks to passengers traveling in a ride operated without a driver in the vehicle;
2. Minimize safety risks to passengers traveling in a shared, driverless ride, including prevention and response to assaults and harassments;
3. Respond to unsafe scenarios outside the vehicle such as hostile individuals;
4. Educate and orient passengers about the technology, experience, and safety procedures;
5. Ensure customers can safely identify, enter, and exit the AV they requested;
6. Enable passengers to contact the AV service provider during the ride and ensure the passengers receive a timely and complete response;
7. Collect, respond to, and retain any passenger comments and complaints; and
8. Ensure the safety measures described above are accessible to and apply to all passengers, including those with limited mobility, vision impairments, or other disabilities.”

## 5.7.2 General Guidance

### *Purpose*

The purpose of the PSP is to demonstrate to the Commission and other AV stakeholders that your company has identified the main risks your customers would face and that you have taken active steps to mitigate those risks.

The PSP should be tailored to your business model and operational design domain (ODD). You must identify the issues most pertinent to your company’s specific service – whether these issues are within or beyond what is described in the decision and in this guidance.

### *Level of Detail*

You should aim to provide sufficient detail that a reviewer understands the specific actions your company would take to mitigate certain risks and protect passenger safety. This might involve discussing and illustrating your response to certain scenarios; real-world examples from your testing and pilot passenger service may be helpful to illustrate more tangibly how you have and will address certain issues. Providing detailed information like screenshots, photos, and other information beyond narrative responses is also helpful. At the same time, no list of scenarios will fully represent all the conditions an AV may encounter. For this reason, we are also interested in understanding more generally the principles motivating how you will ensure passenger safety and/or the underlying design and rationale for various systems and approaches you will use to reduce and manage risk. It may be helpful to describe the qualifications and expertise of the various subject-matter experts in your company that contributed to the PSP in order to

demonstrate to reviewers how your company approaches passenger safety across its various functions.

#### *Growth and Scale*

Your PSP should address how the approaches and measures you describe are appropriate for the scale of the service you plan to offer. Consider how fleet size, staffing needs, ODD and its size or contextual/multimodal traffic dynamics, and other factors might impact how you will mitigate risks and ensure passenger safety. You should also discuss, where appropriate, how your approach may change as your service grows or otherwise changes, including any criteria or “triggers” you would use to assess when changes should take place.

Note that these forward-looking discussions are not a substitute for required advice letter filings triggered by substantive changes to your service (e.g., if you were not offering shared rides but would like to). See Ordering Paragraph 20 of D.20-11-046 (as modified by Decision 21-05-017) for further information on these requirements related to substantive changes.

#### *Confidentiality*

As directed in D.20-11-046 (as modified by Decision 21-05-017), should you believe that any information in your PSP is confidential and should not be available for public review, please review the requirements of General Order 66-D to understand the Commission’s requirements around confidentiality claims and submittal of information claimed to be confidential.

#### *Additional Information*

Commission staff may request additional information as needed for review. You must respond to these requests in a timely manner, or otherwise discuss and receive approval for extensions from staff. You may also make minor or major changes to your PSP if needed during the review process. Please see General Order 96-B for further information on responding to staff requests and making minor or major changes to your PSP as part of the advice letter process.

### 5.7.3 Topic-Specific Guidance

The outline below offers additional guidance on the eight required topic areas of the PSP. *This guidance is not intended as a checklist of items you must address (aside from the general topics and specific requirements mandated by D.20-11-046 as modified by Decision 21-05-017 as described above), but rather is intended to provide examples and highlight specific areas that may be of interest.* As AVs are an evolving technology, this guidance may be updated periodically; please check our website to confirm you are using the latest version.

Your PSP should be tailored to your specific service offering and should be written to demonstrate to reviewers that you have identified risks to passenger safety and will be able to mitigate these risks. While following the topic-specific guidance in this section is discretionary, D.20-11-046 as modified by D.21-05-017 nonetheless requires that you detail in some fashion how you will accomplish each of the italicized topics and several other mandatory items.

To the extent possible, please reflect how your DMV testing and/or Commission passenger service pilot informs your driverless deployment PSP.

1. *Minimize safety risks to passengers traveling in a ride operated without a driver in the vehicle;*
  - a. What safety risks have you identified that might arise during your AV service and how do you plan to mitigate those risks?
    - i. For example: collisions, vehicle mechanical or systems failures, safety issues if the vehicle achieves a minimal risk condition and/or needs to be manually removed from the street, intoxicated passengers, assault and harassment, pickup/drop off scenarios, items left in vehicle, situations in which the customer cannot alert your company (e.g., heart attack, cognitive inability)
    - ii. How will you address these risks before they happen (e.g., proactive or deterrent measures, where applicable), respond during the incident, or follow up after the incident?
2. *(For shared ride services only) Minimize safety risks to passengers traveling in a shared, driverless ride, including prevention and response to assaults and harassment;*
  - a. How do you plan to address safety risks specific to shared, driverless AV service?
    - i. For example: Assault, sexual assault, harassment
  - b. How do you plan to minimize safety risks in shared rides for passengers of all backgrounds, ages, and abilities?
  - c. How will you address these risks before they happen (e.g., proactive or deterrent measures, where applicable), respond during the incident, or follow up after the incident?
3. *Respond to unsafe scenarios outside the vehicle such as hostile individuals;*
  - a. What unsafe scenarios outside of the vehicle might arise during your AV service? How will you mitigate those risks?
    - i. For example: Fires, earthquake, someone breaking into or tampering with the car, pickup/drop-off scenarios in which the vehicle and/or passenger must cross or interact with other street users (e.g., transit, bicyclists)
  - b. If applicable, describe how your vehicle would interact with railways (including light rail, heavy rail, and railways without an exclusive right-of-way that share street space with motor vehicles) and dedicated transit lanes.
  - c. How will you ensure passengers exit the vehicle into a safe situation, in both routine and non-routine (e.g., minimal risk condition, collision, passenger requests early drop-off) exits?
  - d. How will your vehicle interact with other road users, especially pedestrians and cyclists? How will your vehicle communicate with other road users, and how will you facilitate the safe interaction of your passengers with other road users?
4. *Educate and orient passengers about the technology, experience, and safety procedures;*
  - a. How will you educate and orient passengers prior to and during their ride?
    - i. For example: ensuring customers of all ages and abilities understand the ride is automated, that they can and how to change the destination, that

- they can and how to direct the vehicle to safely stop and allow them to exit, that they can and how to call for help at any time
      - ii. Describe your approach to providing information to passengers during the ride, in both routine and non-routine situations.
      - iii. Describe how you will ensure your service is available only to be chartered by adults 18 and older.
      - iv. Where applicable, include screenshots, photos, and any other information that demonstrates how the customer will experience the measures you describe.
    - b. Demonstrate how you will notice and receive consent from passengers that they will be receiving driverless autonomous vehicle service.
      - i. Include screenshots, photos, narrative descriptions, and any other information needed to specifically illustrate this process as the customer will experience it.
5. *Ensure customers can safely identify, enter, and exit the AV they requested;*
- a. Illustrate, by providing screenshots, photos, or similar information, how customers of all ages and abilities will be able to identify, navigate to, and enter the AV they requested.
  - b. Describe if and how the process will vary depending on the conditions of traffic, weather, curb space, and for passengers of different ages and abilities.
  - c. How will you ensure the correct person(s) enters the AV? Consider how this might apply, for example, to minors, passengers other than the chartering party, in the context of shared rides (if applicable).
6. *Enable passengers to contact the AV service provider during the ride and ensure the passengers receive a timely and complete response;*
- a. What are the method(s) of contacting the AV service provider? Are there redundancies in case the first method fails (e.g., phone runs out of charge), the customer is unable or unwilling to use certain methods, or someone other than the chartering party needs to contact the AV service provider?
  - b. Who will respond to the request for contact? Is it always the same person? Describe your staffing plans, their training, and organizational structure.
  - c. Will you triage / prioritize calls based on severity of the request, and if so, how?
  - d. Provide your anticipated response time to passenger requests for contact, and if this will vary based on any triaging you describe above.
  - e. Describe how you will ensure timely and complete responses to customer contacts as your service grows or otherwise changes.
7. *Collect, respond to, and retain any passenger comments and complaints;*
- a. How will former, current, or potential future passengers be able to submit comments and complaints? How will other road users and the general public be able to submit comments and complaints?

- b. How will your company review and take action where necessary?
  - c. What is your company's anticipated response time to passenger comments and complaints?
  - d. Describe your recordkeeping process for passenger comments and complaints. Your response should include the taxonomy used to classify comments and complaints and a description of why you chose this taxonomy.
8. *Ensure the safety measures described above are accessible to and apply to all passengers, including those with limited mobility, vision impairments, or other disabilities.*
- a. How will your service accommodate people with disabilities, including people with hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty? How will your service accommodate various types of accessibility and mobility equipment, including service animals?
  - b. How have you engaged with the disability community, disability advocates, and other related organizations to design an accessible service? How and to what extent will you continue these engagements?
  - c. How will your service accommodate minors, even if accompanied by an adult?
  - d. How have you engaged with youth and/or their advocates to design a service that is safe for minors?

## 5.8 Exemption Requests

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*For All Programs:*

[General Order 157-E](#) allows you to seek an exemption from any of the program requirements. You must include the following documents in any exemption request, which can be submitted concurrently with an application or at any time thereafter:

- A cover letter describing the request for exemption
- An attestation that describes your plan to ensure operations will be functionally identical whether the exemption is granted or not
- Supporting documents that demonstrate the functional equivalence described in the attestation.

Your attestation must be signed by an authorized representative of your company as described earlier in this document.

Your exemption documents will be posted alongside your permit on the [CPUC website](#).

You may request an exemption after your permit is issued, so long as your permit is in good standing.

*For the Pilot Programs:*

CPUC staff will review your exemption request, pursuant to Part 8.02 of General Order 157-E.

Per [Resolution TL-19136](#), exemptions granted related to the use of third-party operators in the AV Pilot programs will last for the duration of the relevant pilot permit without requiring renewal.

Otherwise, your exemption will expire after one year or when your permit expires, whichever is sooner. You may request a renewal by submitting an updated exemption request and associated documents. You may only renew your exemptions once.

*For the Phase I Deployment Programs:*

Part 8.01 of General Order 157-E applies to exemption requests made as part of the Phase I Deployment Programs. Unlike Pilot Program exemptions, Part 8.01 requires exemptions to be approved by the Commission rather than by Commission staff. Exemption requests will therefore require a resolution to be considered by the Commission, which is subject to a public review process as described in Public Utilities Code § 311(g). You may submit your exemption request(s) along with the other documents (e.g., the Tier 3 advice letter) required to apply for a Phase I Deployment Permit so that the exemption(s) may be addressed in the same resolution that disposes of your application.

D.20-11-046 (modified by D.21-05-017) specifically authorizes exemptions for the use of third-party contractors as AV operators in Phase I Deployment programs. This type of exemption will last until your permit expires. For other types of exemptions, the duration and other conditions of the exemption will be addressed in the granting resolution.

## 5.9 Drivered Pilot to Deployment Conversion Requests

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Drivered Pilot permittees in good standing with the CPUC that also hold an active DMV Deployment permit may request conversion of their Drivered Pilot permit into a Drivered Deployment permit. To do so, you must demonstrate compliance with Drivered Deployment program requirements set forth in the Ordering Paragraphs of D.20-11-046 (as modified by D.21-05-017). As described in Section 4.23 of the Decision, you must present your active DMV Deployment permit to CPED.

In your conversion request, you must demonstrate compliance with the following requirements of D.20-11-046 (as modified by D.21-05-017):

1. Per Ordering Paragraph 5(b):  
Hold a California Department Motor Vehicles Autonomous Vehicle Deployment Permit and certify that the entity is in compliance with all Department Motor Vehicles regulations;
2. Per Ordering Paragraph 5(g):  
Attest that one of the entity's vehicles that represents the vehicle and technology characterizing the fleet to be offered for the service for a minimum of 30 days on roads in California following the entity's receipt of the Department of Motor Vehicles Autonomous Vehicle Deployment Permit, and include in the attestation:
  - i. The start date of actual operations on California roads,



- ii. The times of day and number of hours per day in operation during the 30-day period,
  - iii. A statement and map of the Operational Design Domain as stated on the entity's Department of Motor Vehicles Autonomous Vehicle Deployment Permit,
  - iv. A statement that the vehicle's 30 days of operations were conducted in the specific Operational Design Domain in which the applicant intends to pilot them for passenger service.
3. Per Ordering Paragraph 5(h):  
Transmit simultaneously to the Commission all reports required by Department of Motor Vehicles regulations, including the process in the event of a collision, law enforcement interaction plan, collision reporting, disclosure to the passenger regarding collection and use of personal information, and annual Autonomous Vehicle disengagement reports;

You should also consider whether any previous submissions as part of your Drivered Pilot Permit application require updating to accurately reflect the latest facts of your intended Drivered Deployment program. You may wish to review Ordering Paragraphs 5(f) and 5(i) of D.20-11-046 (as modified by D.21-05-17) in this regard. However, it is your responsibility to review all program requirements laid out in the Decision and ensure you are fully in compliance.

You may submit your conversion request, including all relevant documents, to the Director of CPED copying [AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov). After receiving these documents, CPED Staff will review and inform you of any deficiencies or other questions before a determination is made.

Note that, if approved, this is a conversion and not the issuance of a new authorization. Your Drivered Deployment authorization therefore effectively terminates and replaces your Drivered Pilot authorization; they do not run simultaneously. This means, among other things, that the data reporting requirements of the Drivered Deployment program will apply from the conversion date going forward.

## 5.10 Tier 3 Advice Letter

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*For the Phase I Driverless Deployment Program ONLY:*

Per D.20-11-046 (modified by D.21-05-017), you must submit a Tier 3 advice letter (AL) as your application for a Phase I Driverless Deployment permit. If you do not already hold a TCP authority, you must also submit a TCP application through the TC Portal.

[General Order 96-B](#) provides the CPUC's rules for ALs, their content, and the process for submittal and review. We provide the guidance below as a summary, but you are responsible for carefully reviewing all requirements and ensuring your application complies.

### 5.10.1 What to Include in Your Advice Letter

The AL is part of your application for a Phase I Driverless Deployment permit. The content of the AL should follow all relevant requirements described in GO 96-B and D.20-11-046 (as



modified by Decision 21-05-017). Keep in mind that ALs must include information justifying the relief sought (in this case, the granting of a permit).

Should you believe that any information in your application is confidential and should not be available for public review, please review the requirements of General Order 96-B, Section 10 to understand the Commission's requirements around advice letter confidentiality claims and submittal of information claimed to be confidential.

Your AL should address the topics below, along with any other requirements stipulated in GO 96-B and D.20-11-046 (as modified by Decision 21-05-017):

- Introduction to your company, your proposed AV service, and other issues as may be pertinent.
- Demonstration of compliance with General Order 157-E.
  - Briefly discuss your plans for compliance with the requirements of GO 157-E, including general requirements and restrictions and those applying to vehicles, drivers, records and inspections, complaints, controlled substance and alcohol testing, and any others that apply.
- Demonstration of compliance with D.20-11-046 (as modified by Decision 21-05-017).
  - Please closely review D.20-11-046 (as modified by Decision 21-05-017) to understand its requirements and discuss how you will meet them. Ordering Paragraph 7 is a helpful summary in this regard.
  - Include an [attestation](#) that a representative vehicle has been in operation on California roads for a minimum of 30 days following receipt of your DMV Deployment permit. There is no prescribed format for this attestation, but it must include all information required by the decision.
  - Include a plan for how you will [provide notice to and receive consent from](#) passengers that they are receiving AV service.
  - Include a [Passenger Safety Plan](#).
- Your DMV Deployment permit.
  - Include your DMV Deployment permit as an attachment to the AL.
  - You must also [certify that you are in compliance with all DMV regulations](#), including insurance regulations. There is no prescribed format for this certification.
- Expanded data reporting plan, per the requirements of D.20-11-046 (as modified by Decision 21-05-017).
- Please include a summary form with your advice letter. A template is available [on the CPUC's website here](#).

### 5.10.2 What to Expect in the Advice Letter Process

After you have prepared your AL, you must submit it to CPED and serve it to interested parties. Your AL should be emailed to:

- The Director of CPED and [AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov)

- All TNC and/or AV-related service lists, specifically R.12-12-011 and any successors to this proceeding

See Rule 1.10 of the CPUC's Rules of Practice and Procedure for specific requirements regarding electronic service of documents. No hard copy service is necessary. You must submit a summary form with your advice letter. A template is [available here](#).

After you have served your AL, CPED Staff and stakeholder review will begin. GO 96-B provides for an initial review period of 30 days. At this point, CPED Staff may suspend the advice letter to allow for continued review, notifying you and any protestants. Disposition of the AL must occur within 300 days of this suspension.

Note that ALs are commonly suspended for additional review by staff. The suspension deadline is the maximum time allotted and staff may issue a disposition or resolution at any time before the deadline. A suspension does not impact a carrier's existing CPUC authorities to operate.

CPED may inform you of missing components of your application and request any additional information it needs to understand your application. You must respond to these requests *within 5 business days*, unless CPED agrees to a later response.

Anyone may submit a protest or response to your AL within 20 days of service. You *must* reply to protests *within 5 business days* of the end of the protest period. You *may* reply to responses. There are no further replies from protestants or respondents.

You can make changes to your application after submittal, if needed. Substitute sheets or supplemental ALs should be served as described above. CPED may (or may not) opt to reopen the protest period in the event of any AL changes.

CPED staff will review your application, any protests or responses, and any replies. Tier 3 advice letters require disposition via CPUC resolution. As such, CPED staff will prepare a draft resolution with a recommended outcome. The draft resolution will be available for public comment for 20 days and will be considered by the Commission no earlier than 30 days after its release.

If you do not already hold a TCP authority, you must also submit a TCP application through the TC Portal. You should prepare your TCP permit application as described earlier in this document. It should be submitted in parallel with your AL as described below.

## 6 SUBMITTAL INSTRUCTIONS

### 6.1 Do Not Begin Operations Until You Have Received a Permit

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Do not begin passenger service operations before you receive a permit. You may not operate until the CPUC has issued you a permit to participate in an AV program. Submitting an application and getting a file number does not give you authority to operate. Only “active” authority allows you to operate. You may operate when you receive a signed permit or certificate from the Licensing Section, and not until then. Public Utilities Code § 5411 -5450 describes the fines and penalties (including imprisonment, impounding of vehicles) for violating Commission rules, including operating without a permit.

### 6.2 Submitting the TCP Application

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These requirements apply to the applicant and any entities that submit documents directly to the CPUC as part of the application process (e.g., a drug and alcohol testing consultant).

The [Transportation Carrier Portal](#) (TC Portal) is the CPUC’s online platform for applying to and managing your TCP permit. You may submit your TCP application and additional documents required of AV program applicants directly through the Portal. Paper applications are no longer required or available.

The TC Portal includes [FAQ pages](#) that address the most common tasks. You may want to review the following as you create your account and application:

- [Creating a Transportation Carrier account](#)
- [How to apply for TCP authority](#)

If you already have a TC Portal account, you may submit an application for a TCP authority using that account. There is no need to create a new account.

If you hold an existing TCP authority and wish to participate in an additional AV program, please see [section 6.9 below](#) for instructions on how to submit your application. *You do not need to apply for an additional TCP authority.*

### 6.3 Filing Fee

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Participation in CPUC’s AV Passenger Service programs requires authority from CPUC to operate as a charter-party carrier of passengers (TCP) providing for-hire passenger transportation services. The application filing fees for TCP authorities are shown in the table below. No application will be accepted or processed without the correct filing fee. **APPLICATION FILING FEES ARE NOT REFUNDABLE.**

Payment information will be collected through the TC Portal as part of your TCP application. Payment may be made electronically by credit card or automated clearinghouse (ACH). There is a 2.65% fee for electronic payments. You may also pay by check; however, please note that you will not be able to submit your application until your payment has been received and processed.

If you *already hold a TCP authority* and wish to apply for an additional AV program, there is no additional filing fee required.

### FILING FEES

	New / Refile	Renewal
Charter-party “A” Certificate	\$1,500	\$100
Charter-party “P” Permit	\$1,000	\$100

## 6.4 Uploading Supplemental Documents

AV permit applications require several additional documents (see “AV-Specific Documents” below) beyond what you will submit directly through the TCP application process. You will need to upload these documents to your application after the initial submittal of the application through the Portal.

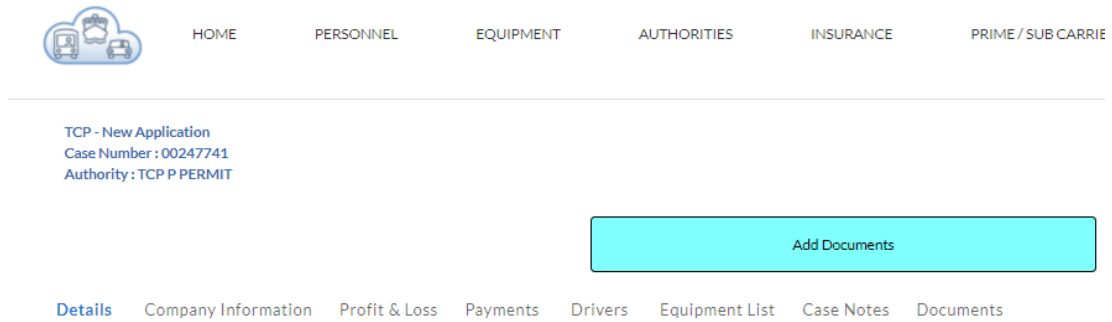
How to upload AV-specific documents to the Portal:

1. After you have submitted your application using the Portal, click the “Case Number” of your application.

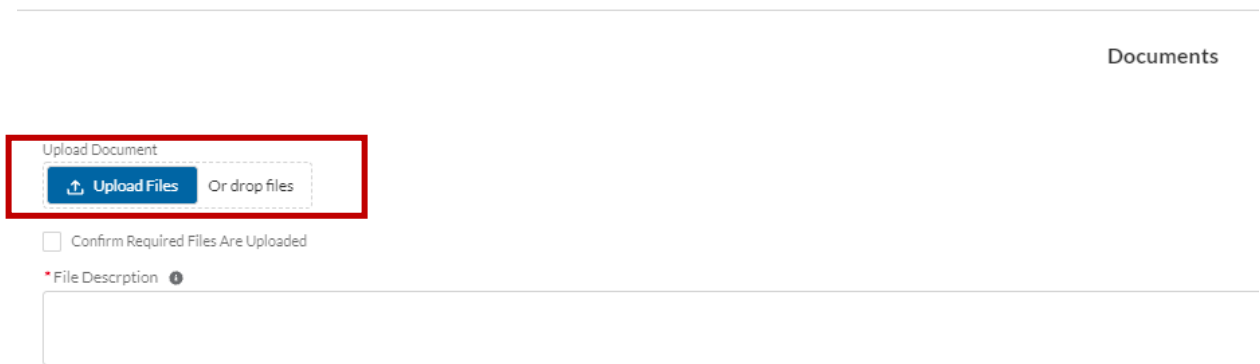
The screenshot shows the TC Portal interface. At the top, there are navigation tabs: HOME, PERSONNEL, EQUIPMENT, AUTHORITIES, INSURANCE, and PRIME / SUB CARRI. Below the tabs are three main action buttons: "Apply / Renew / Transfer", "PUCTRA Fees", and "Others". Underneath these buttons is a "Cases" section titled "My Open Cases" with a dropdown arrow and a refresh icon. Below this title, it says "40 items • Sorted by Subject • Filtered by All cases - Closed, My Cases, My Cases(PSC & VCC) • Updated a few seconds ago". The main content is a table with the following columns: Case Number, Case Record Type, Subject, and Status.

Case Number	Case Record Type	Subject	Status
1 00236952	TCP - New Application	<a href="#">TCP Z PERMIT</a>	<i>i</i> Draft
2 00237524	PUCTRA	<a href="#">TCP PUCTRA Quarterly Fee</a>	✔ Submitted
3 00240371	PUCTRA	<a href="#">TCP PUCTRA Annual Fee - Amended</a>	⌚ Pending For Info
4 00243958	PUCTRA	<a href="#">TCP PUCTRA Annual Fee</a>	<i>i</i> Draft
5 00247741	TCP - New Application	<a href="#">TCP P PERMIT</a>	✔ Submitted

2. In the submitted application, click the “Add Documents” button.



3. After clicking the “Add Documents” button, follow the prompts in the pop-up box to upload your documents.



## 6.5 AV-Specific Documents Required in Your Submittal

Refer to the tables below to ensure you have uploaded the appropriate supplemental documents for the specific AV permit you are applying for.

Required Document(s)	Pilot		Phase I Deployment	
	Drivered	Driverless	Drivered	Driverless
<u>Tier 3 Advice Letter</u>				✓
<u>Attestation of compliance with relevant DMV regulations</u>	✓	✓	✓	✓
DMV AV Testing Permit	✓			
DMV AV Testing Permit, Driverless Vehicles		✓		
DMV AV Deployment Permit			✓	✓
<u>DMV driver/remote operator documents</u>				
<ul style="list-style-type: none"> <li>DMV permits issued to drivers/remote operators</li> <li>Remote operator/driver training documents</li> </ul>	✓	✓	✓	✓
<u>Attestation of 30 days of operation on CA roads post receipt of DMV permit</u>	✓	✓	✓	✓
<u>Statement and map of Operational Design Domain</u>	✓	✓	✓	✓
<u>DMV-required documents</u>				
<ul style="list-style-type: none"> <li>Process in the event of a collision</li> <li>Law enforcement interaction plan</li> <li>Disclosure to passengers regarding collection and use of personal information</li> </ul>		✓	✓	✓
<u>Passenger Notice and Consent Plan</u>	✓	✓	✓	✓
<u>Passenger Safety Plan</u>		✓		✓
<u>Supplement to Projected Profit or Loss Statement</u> (optional)	✓	✓	✓	✓
<u>Request(s) for exemption(s) to General Order 157-E</u> (optional)	✓	✓	✓	✓

No specific file naming convention is required, but please use descriptive titles to the extent possible.

## 6.6 E-Filing for Insurance

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Insurance providers must electronically file (“E-File”) evidence of public liability and property damage (PL&PD insurance) and workers’ compensation insurance, on behalf of the transportation carriers they are serving, to the CPUC.

The TC Portal must be used for insurance filings. Submittal instructions can be reviewed [here](#).

E-filing is a process by which insurance providers (insurance companies or insurance brokers authorized to file on their behalf) submit to the CPUC an ongoing attestation that your company has an active policy at the required insurance level. This e-filing requirement applies to both the umbrella insurance document and the workers’ compensation insurance document. Do not send the CPUC copies of your insurance policies and/or signed copies of the policies’ declaration pages. We do not accept these documents.

## 6.7 Signature Requirements and Signing Authority

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CPUC Rules of Practice and Procedure, Rule 1.1 dictates that all applicants, by doing business with the CPUC, are representing that they are authorized to do so and that they are not being misleading or untruthful. Therefore, anyone your company represents is authorized to act on its behalf may sign your application and any attachments.

Unless stated otherwise, any documents requiring a signature may be signed with a pen or via e-signature. Unless stated otherwise you do not need to notarize these signatures.

## 6.8 Requesting Confidential Treatment of Your Application

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If you would like to request confidential treatment of your application (or any subsequent documents sent to us), you must submit a request at the same time you provide the document along with a justification for that request. [General Order 66-D](#) details these requirements. You may attach your request to your application as a supplemental document as described above.

Procedurally correct confidentiality claims will meet the requirements below. We provide this as general guidance; you are responsible for carefully reviewing General Order 66-D to ensure you are following the proper procedures.

- Claimant designates pages, sections, fields, or portions thereof, as confidential
- Claimant specifies basis for confidential treatment with citation to an applicable provision of the CPRA
  - Note that a general marking of confidentiality such as “GO-66” or “Public Utilities Code Section 583” does not satisfy this section
- Claimant provides a name and email address of the person for the Commission to contact regarding potential release of information
- Claimant provides a declaration in support of the legal authority cited signed by an officer, or employee or agent designated by an officer

If we receive a Public Records Act request related to your application, CPUC's Legal Division will review your justification and determine the confidentiality of the document.

## 6.9 Applying for an Additional AV Program Authorization Under Existing TCP Authority

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A single TCP authority may authorize participation in one or more CPUC AV programs. If you already hold an active TCP authority and wish to participate in an additional AV program, you do not need to apply for an additional TCP authority.

To apply to participate in an additional AV program, compile the required AV-specific documents and submit via email to the AV Programs team at [AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov). Driverless Deployment applicants should also follow the advice letter procedures described [earlier in this document](#).



## 7 CPUC REVIEW OF APPLICATIONS

*For the Drivered and Driverless Pilot Programs and the Phase I Drivered Deployment Program:*

CPUC Staff will review your application. Staff will determine if any information or documents are lacking or incomplete. You may receive a request from staff for clarification, additional information, or documentation. If your application is incomplete, you will receive a letter via email telling you what you need to do before your authority can be issued. Thirty days later, if those items have not been completed, you will receive a second letter by e-mail informing you what remains to be done. Thirty days after that, you will receive a “Final Notice,” advising you that if the remaining items are not completed within 20 days, the CPUC may deny your application. We will wait at least those 20 days before denying your application; we appreciate applicants’ responsiveness and a demonstration of a good faith effort to complete the application in a timely manner. Filing fees are not refundable, so if your application is denied, you must refile and pay the application fee again.

*For the Phase I Driverless Deployment Program:*

If you are applying both for a new TCP authority and for the Driverless Deployment program, the CPUC’s review period described above occurs in parallel to the Tier 3 Advice Letter process associated with your Passenger Safety Plan. Issuance of a Phase I Driverless Deployment permit is contingent upon both Staff approval of the TCP permit and disposition of the Tier 3 Advice Letter. General Order 96-B provides for a maximum Advice Letter review period, as described above.

# 8 AFTER PERMIT HAS BEEN ISSUED

## 8.1 Tracking Compliance Obligations

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It is your responsibility to track and comply with all operating requirements. This applies to the conditions listed on your permit and in any supporting documents (e.g., submitting proper paperwork, paying fees, collecting, and submitting appropriate data).

It is your responsibility to ensure fees, documents, and any other materials are submitted to the proper person or department and in the proper format.

Any reminders the CPUC provides are as a courtesy. The CPUC may send paper or email reminders to notify you when a deadline is approaching or when you have missed a deadline, but does not guarantee such reminders will be issued, nor does your responsibility change if such reminders are not issued.

If you have questions or concerns, contact the CPUC well in advance of deadlines. Not understanding the regulations does not justify tardy or incomplete documents.

## 8.2 Maintaining Up-To-Date Contact Information

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You must maintain up-to-date contact information for your company. This includes a physical address and an individual point of contact including a phone number and email address. You must submit this information at the time of application.

You may update your contact information directly in the [TC Portal](#). Please review [this FAQ page](#) for additional information.

## 8.3 Notices of Suspended, Revoked, Expired, or Reinstated Authority

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We will notify you by e-mail at the addresses on-file for your TC Portal account any time your authority is suspended, revoked, expired, or reinstated. Please keep your contact information up to date.

If you have any doubts about your authority status, you may verify it on the [TC Portal](#), which is updated several times daily, or contact CPUC Transportation Licensing ([licensing@cpuc.ca.gov](mailto:licensing@cpuc.ca.gov)). If your authority is suspended, revoked, or expired you may not operate. Only “active” authority allows you to operate. Public Utilities Code § 5411 -5450 describes the fines and penalties (including imprisonment, impounding of vehicles) for violating Commission rules, including operating without an active permit.

## 8.4 Adding Vehicles to the List of Active Vehicles

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*For All Programs:*

If you wish to add vehicles to your equipment statement, you may do so through the [TC Portal](#). Please visit [this FAQ page](#) for additional information.

You must submit an update through the TC Portal within ten days of putting vehicles into service.

## 8.5 Removing Vehicles from the List of Active Vehicles

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*For All Programs:*

If you wish to remove vehicles from your equipment statement, you may do so through the [TC Portal](#). Please visit [this FAQ page](#) for additional information.

You must submit an update through the TC Portal within ten days of removing vehicles from service.

## 8.6 Adding Drivers to the List of Active Drivers

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*For All Programs:*

If you wish to add drivers or remove drivers from operating under your permit, you may do so through the [TC Portal](#). Press the “Others” button on your account home page and select “Add/Edit Drivers” from the drop-down list.

For Pilot Programs, you must include copies of valid Autonomous Vehicle Testing Program Test Vehicle Operator Permits from the DMV for each driver you request to add.

You do not need to wait until you have received confirmation from the CPUC before using those drivers for service.

## 8.7 Removing Drivers from the List of Active Drivers

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*For All Programs:*

You must notify the CPUC when you remove a driver from the list of active drivers. You may do so through the [TC Portal](#). Press the “Others” button on your account home page and select “Add/Edit Drivers” from the drop-down list.

You do not need to wait until you have received confirmation from the CPUC before removing those drivers from service.

## 8.8 Display of TCP Numbers

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Per Part 4.04 of GO 157-E, Carriers must prominently display their TCP number. Specific instructions are available in the General Order itself.

## 8.9 Submittal of DMV-Required Reports

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Pursuant to CPUC Decisions 18-05-043 and 20-11-046 (as modified by Decision 21-05-017), you must submit to CPUC all reports required to be submitted to DMV under its AV regulations. For Pilot Program participants holding DMV Testing permits, these reports include collision reports sent to CPUC simultaneously with DMV and the annual AV disengagement reports. CPUC regulations require that *all* reports submitted to the DMV must also be submitted to the CPUC; e.g., collision reports should be submitted to the CPUC regardless of whether the AV was operating in passenger service at the time of the incident.

## 8.10 Submittal of Quarterly Data Reports

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*For the Drivered and Driverless Pilot Programs:*

Pursuant to CPUC Decisions 18-05-043 and 20-11-046 (as modified by Decision 21-05-017), you must submit Quarterly Data Reports that include information about individual trips, including the trips' accessibility and environmental impact. Further detail and templates are [available online](#).

Quarterly Data reports are due on the following dates: January 1, April 1, July 1, and October 1. The reporting period for each of these submissions will be September 1 to November 30, December 1 to February 28 (February 29 in leap years), March 1 to May 31, and June 1 to August 31, respectively.

If any reporting deadline falls on a weekend or holiday, the reports are due on the next business day.

*For the Phase I Drivered Deployment Program and the Phase I Driverless Deployment Program:*

Pursuant to CPUC Decision 20-11-046 (as modified by Decision 21-05-017), you must submit Quarterly Data Reports that include information about individual trips, the company's operations in aggregate, and the company's plan to improve accessibility, equity, and environmental footprint of their operations. [Appendix A](#) to Decision 20-11-046 outlines the specific numerical data and narrative responses that must be reported each quarter. Further detail and reporting templates are available [on our website](#).

Quarterly Data reports are due on the following dates: January 1, April 1, July 1, and October 1. The reporting period for each of these submissions will be September 1 to November 30, December 1 to February 28 (February 29 in leap years), March 1 to May 31, and June 1 to August 31, respectively.

If any reporting deadline falls on a weekend or holiday, the reports are due on the next business day.

*For all programs:*

Confidentiality claims for quarterly data reports are governed by General Order 66-D. If your data reports contain information for which you would like to claim confidentiality, you must simultaneously submit redacted reports for public posting.

CPUC's Legal Division reviews all confidentiality claims. Depending on Legal Division's conclusions, you may be asked to prepare updated redactions for public posting.

## 8.11 Renewal of TCP Permit and Exemption Authorizations

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You must renew your TCP permit every three years. To avoid any lapse of your operating authority, any renewal application must be submitted ninety days in advance of the expiration date.

For the Pilot Programs, per GO 157-E Part 8.02, exemptions are granted for 12 months or for the duration of the pilot program, whichever is shorter, and can be requested for one additional renewal period of 12 months. However, per Resolution TL-19136, exemptions allowing the use of third-party operators in the Pilot Programs will last for the duration of the relevant Pilot Permit. To avoid any lapse of your operating authority, any renewal application should be submitted ninety days in advance of the expiration date.

## 8.12 Public Utilities Commission Transportation Reimbursement Account (PUCTRA) Fees

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Generally, charter-party carriers are required to file either annual or quarterly revenue reports (depending on revenues) and to pay a \$25 annual or \$10 quarterly administrative fee plus a percentage of their gross operating revenues. Per [Resolution M-4869](#) adopted December 14, 2023, the annual fee for charter-party carriers is 0.003 (0.3 percent) of gross intrastate revenue plus a minimum \$10 quarterly fee or \$25 annual fee.

Reports may be filed and fees paid using the TC Portal. [This help page](#) contains instructions. Carriers reporting revenues of \$0 must still submit the required reports and pay the minimum fee.

PUCTRA fees may change periodically. It is your responsibility to track if PUCTRA fees have changed.

Failure to file these reports will result in penalties and/or suspension and revocation of authorities.

## 8.13 Prohibition of Transporting Unaccompanied Minors

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*For All Programs:*

You must ensure that your service is available only to be chartered by adults 18 years and older. Minors must be accompanied by an adult traveling in the vehicle.

## 8.14 Restriction of Trips to, from, or within Airports without the Specific Authorization

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*For All Programs:*

Pursuant to CPUC Decisions 18-05-043 and 20-11-046 (as modified by Decision 21-05-017), entities participating in the Driverless AV Passenger Service Pilot and Phase I Deployment programs are prohibited from providing passenger service to, from, or within airports unless the airport involved has granted the entity express authority to do so.

If you have received the relevant airport authorization(s) and wish to begin operations at an airport, you must inform CPED staff before doing so.

## 8.15 Updates to AV Operations

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*For All Programs:*

CPED strongly encourages ongoing, proactive engagement from carriers on topics such as impending changes to operations (e.g., expansions within the authorized ODD when the carrier has not been operating to the full extent of the authorized ODD), notable safety incidents, or modifications to protocols or policies. You may contact us at [AVPrograms@cpuc.ca.gov](mailto:AVPrograms@cpuc.ca.gov) or reach out directly to the relevant CPED staff.

*For the Drivered and Driverless Pilot Programs:*

CPUC Decision 18-05-043 requires that you inform the Commission within 1 business day of an update to the Operational Design Domain that is approved by the DMV.

*For the Phase I Driverless Deployment Program:*

Per CPUC Decision 20-11-046 (as modified by Decision 21-05-017), participants in the Driverless Deployment program that subsequently wish to offer shared rides must request such authorization in the form of a Tier 3 Advice Letter revising the carrier's Passenger Safety Plan to include the required content related to shared rides. The Tier 3 Advice Letter will be reviewed by staff and disposed of by Commission resolution as described earlier in this document.

Additionally, participants in the Driverless Deployment program that intend to make changes to their operations in a way that would materially impact the approaches outlined in their Passenger Safety Plan should submit an updated Passenger Safety Plan as a Tier 2 Advice Letter. Modifications to a carrier's Operational Design Domain are considered material and would therefore require

submission of an updated Passenger Safety Plan. Please contact CPED staff if you would like to discuss other potential changes to your operations.

Tier 2 Advice Letters are typically disposed of by CPED staff, but may be elevated for the Commission to consider via resolution if the issues at hand exceed CPED's ministerial authority.

Please refer to [section 5.10.2](#) above and General Order 96-B for more information on the submission, review, and disposition of advice letters.

# 9 APPENDIX

## 9.1 Acronyms and Terms

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AV – Autonomous Vehicle

AV Deployment Programs – Collectively refers to the Phase I Drivered Deployment Program and Phase I Driverless Deployment Program

AV Pilot Programs – Collectively refers to the Drivered Pilot Program and Driverless Pilot Program

AV Programs – Collectively refers to the Drivered and Driverless Pilot Programs and the Phase I Drivered and Driverless Deployment Programs.

CPED – Consumer Protection and Enforcement Division

CPUC – California Public Utilities Commission. Also abbreviated “Commission.”

DBA – Doing Business As, or a fictitious business name distinct from a carrier’s legal name

DMV – California Department of Motor Vehicles

GO – General Order, full list available [here](#)

PSG – Each carrier is assigned a unique PSG number for internal CPUC recordkeeping

PSP – Passenger Safety Plan

TCP – Transportation Charter Party or Charter-Party Carriers are carriers that perform charter service, roundtrip sightseeing, or passenger service under Commission authority. AV carriers must obtain TCP authority to provide passenger service.

TC Portal – [Transportation Carrier Portal](#)