

Public Comments on Resolution TL-19158 From May 22, 2026 to June 1, 2026

| # | Commenter Name | Organization / Affiliation |
|---|----------------|--------------------------------------|
| 1 | Armando Flores | PSG 33603 – Royal Lines Charters LLC |

From: [George Flores](#)
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Subject: [EXTERNAL] FIFA/TMS Exemption Proposal Response
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Attachments: [image001.png](#)
[FIFA TMS Exemption Resolution Response.pdf](#)

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Good afternoon,

Attached is our response to the current proposal regarding TMS exemption. We hope this is strongly considered while making a decision. Thank you.

*Best Regards,
George Flores
Accounting*



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Dear Commissioners:

We respectfully submit these comments regarding Draft Resolution TL-19158, which would grant Maryland TMS, Inc. (“TMS”) a temporary exemption from several requirements of General Order 157-E in connection with transportation services for the 2026 FIFA World Cup.

I support the successful operation of the FIFA World Cup and recognize the importance of providing reliable transportation for FIFA officials and guests. However, we are concerned that the proposed exemptions unnecessarily weaken established safety standards and create an uneven playing field for California transportation companies that fully comply with all Commission requirements throughout the year.

Firstly, we are extremely concerned about the economic impact on California transportation providers. Many charter bus and transportation companies invest heavily in their own fleets, vehicle wraps, logos, and professional branding. Major international events such as FIFA World Cup offer valuable opportunities to showcase these vehicles and services to high-profile guests and potential future customers. Under this arrangement, local transportation companies may be reduced to supplying drivers while sponsor-provided Hyundai and Kia vehicles receive all of the public visibility and branding exposure. This shifts much of the promotional and economic value away from California transportation businesses and toward multinational vehicle manufacturers. Local operators bear the burden of staffing and compliance but lose the opportunity to market their own companies and brands during one of the world’s most visible events.

Secondly, the draft resolution would exempt TMS from the requirement to obtain commercial vehicle registration for the vehicles being used. California carriers are required to ensure their vehicles are properly registered for commercial passenger service. Granting an exemption from this requirement undermines regulatory consistency and provides unfair preferential treatment to an out-of-state operator.

Thirdly, the draft resolution would exempt TMS from the required vehicle inspections under Part 4.05 of General Order 157-E. While the vehicles may be new, new vehicles are not immune from shipping damage, mechanical defects, recalls, or manufacturing issues. The required inspections are an important safeguard and should not be waived simply because the vehicles have low mileage.



Fourthly, the proposal to substitute daily walkaround inspections is not equivalent to the formal 19-point inspection required of California carriers. Visual inspections cannot adequately evaluate brakes, steering, suspension, tires, and other critical safety systems.

Fifthly, TMS submitted its request only one month before planned operations. The draft resolution itself acknowledges that time constraints are not a persuasive justification for exemptions, yet the Commission proposes to grant the request anyway. This sends the wrong message and may encourage future applicants to seek last-minute relief rather than plan ahead.

Lastly, the resolution does not disclose the number of vehicles involved or identify the California subcarriers that will provide drivers. This limits public transparency and prevents stakeholders from assessing the scope and potential impact of the exemption.

For these reasons, we strongly urge the Commission to deny the proposed exemptions while enforcing strong safeguards to ensure fair treatment of California transportation companies and the public's safety.

Thank you for considering these comments.

Respectfully submitted,

Armando Flores

CEO

