

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Consumer Protection and Enforcement Division
Transportation Licensing and Analysis Branch**

**Resolution TL-19158
June 11, 2026**

R E S O L U T I O N

RESOLUTION TL-19158 – Adopts Limited Exemption from Certain Requirements of General Order (GO) 157-E for Maryland TMS, Inc.’s 2026 FIFA World Cup Operations.

PROPOSED OUTCOME: Adopts Limited Exemptions from GO 157-E’s Vehicle and Recordkeeping Requirements

SAFETY CONSIDERATIONS: Maryland TMS, Inc.’s (TMS) limited, 30-day exemption from certain portions of General Order 157-E effectively mitigates safety considerations because the exemption is limited in scope and duration.

ESTIMATED COST: No costs are approved in this resolution.

SUMMARY

This Resolution grants Maryland TMS, Inc. (TMS) exemptions related to passenger transportation operations for officials and guests for the *Federation Internationale de Football Association* (FIFA) World Cup 2026 from specified provisions in Part 1.06, Part 4, and Part 6.01 of General Order 157-E for a 30-day period, the effectiveness of which is contingent on the approval of TMS’s application to operate as a Transportation Charter-Party Carrier of Passengers (TCP).

BACKGROUND

Transportation of FIFA officials and guests in the metropolitan areas of Los Angeles and the San Francisco Bay Area is necessary to properly operate the FIFA World Cup 2026. TMS seeks a limited, 30-day exemption from certain provisions of General Order 157-E necessary for its transportation operations relating to the FIFA World Cup 2026. Specifically, TMS seeks a 30-day exemption from requirements for vehicles of TCPs in Parts 4.01, 4.02, 4.05, 4.06 and related recordkeeping requirements in Part 6.01. TMS submitted the exemption request pursuant to Part 8.01 of General Order 157-E to the

California Public Utilities Commission (Commission) on May 4, 2026 (exemption request).¹

TMS is a Maryland-based transportation company founded in 1995 specializing in event mobility, ground transportation, logistics, and venue solutions. In California, TMS is registered as Maryland TMS, Inc. (2578385). FIFA has contracted with TMS to supply drivers to transport FIFA officials and guests for the FIFA World Cup 2026 using vehicles supplied by the main sponsors, Hyundai and KIA. Hyundai and KIA will provide new, model year 2025-2027 vehicles to TMS with limited to no mileage and manufacturer license plates. The vehicles are not yet in the United States and are expected to arrive closer to June 12, 2026, when TMS expects to begin using the vehicles. Despite not having ownership of the vehicles, TMS states it has the authority to operate the vehicles during the event and is contracting with California licensed TCPs that will provide the drivers.

The Commission is the agency responsible for the regulation of intrastate passenger carrier operations in California pursuant to Article XII of the California Constitution, by the Public Utilities (Pub. Util.) Code, commencing with Section 1031 et seq. and 5351 et seq. and by General Orders (GO) 115-G and 157-E for TCPs. These statutes and regulations require TCPs, among other things, to maintain adequate proof of public liability insurance and to operate and maintain their vehicles in safe operating conditions.

DISCUSSION

Considering the totality of the circumstances and the need to facilitate safe transportation services starting in June 2026 for the commencement of the FIFA World Cup 2026, the Commission approves a limited, 30-day exemption for TMS from Parts 1.06, 4.02, 4.05, 4.06, and related recordkeeping requirements in Part 6.01. The exemption will be in effect from June 12, 2026 through July 12, 2026.

This request was received only a month in advance of planned operations; this limited advance notice puts a burden on the Commission, its staff, and the public who may have an interest in the issues considered here. However, the request is being made in response to a unique situation, was received subsequent to good faith efforts by the requestor and Commission staff to engage well in advance of the event, and was submitted in time to be considered by the Commission before the event.

¹ Attachment 1, Transportation Management Services, Inc. Request for CPUC Exemption, dated May 4, 2026.

A. Operating Authority

No entity or person may operate as a transportation carrier under Pub. Util. Code Section 5360's definition of charter-party carrier of passengers without obtaining a permit or certificate from the Commission.² The Commission requires TCPs to demonstrate compliance with all permitting requirements, and the Commission maintains permitting records in its transportation carrier database.

TMS is the entity engaging in the transportation of persons by motor vehicle for compensation and is therefore subject to our regulation. TMS must apply for a TCP authority, and the granted exemption will be incorporated into the process delegated to Commission staff for issuing a TCP authority.

B. General Order 157-E

GO 157-E establishes the rules and regulations governing the operations of charter-party carriers of passengers in areas such as liability insurance, recordkeeping, and maintenance of vehicles.

Standard conditions applied to all TCPs include:

- Provide a preventive maintenance program for all permitted vehicles;
- Enroll in a mandatory controlled substance and alcohol testing (CSAT) program for drivers;
- Maintain the required level of liability and property damage insurance as specified in General Order 115-G;
- Maintain a passenger carrier equipment list with the Commission of all vehicles in use that includes the manufacturer, model, year, vehicle identification number, seating capacity, whether the vehicle is leased or owned, handicap accessible status, and license plate number; and
- Comply with the California Vehicle Code.

TMS asserts that it will comply with Part 1.05 to meet the liability insurance requirements in GO 115-G; this General Order sets forth minimum coverage amounts to ensure adequate protection against liability. Pursuant to Commission Resolution TL-19105 and GO 115-G, evidence of insurance must be filed electronically with the Commission, and compliance will be imposed through the TCP permitting process.

² Pub. Util. Code §§ 5371, 5387(a).

Part 3 contains general requirements for TCPs including that drivers possess waybills as records for the prearrangement of transportation and the barring of passenger service operations at airports without the express authorization of the relevant airport authority. TMS is expected to comply with Part 3.02's mandate when operating at airports. Part 4 covers rules for TCP vehicles. Part 5 governs TCP drivers. Part 6 relates to the records TCPs must keep. Part 10 sets forth the controlled substance and alcohol testing certification program. TMS asserts that it will comply with GO 157-E's Part 1.06 related to compliance with the California Vehicle Code; Part 3's general requirements; Part 5's driver requirements; Part 6's recordkeeping and inspection requirements (with exception to recordkeeping and inspection requirements associated with Parts 4.02, 4.05, and 4.06); and Part 10's CSAT certification program.

TMS also asserts it will engage only California licensed TCPs as subcarriers. By engaging licensed TCPs as subcarriers to supply drivers to operate Hyundai and KIA's vehicles, TMS asserts it will be in compliance with Parts 1.06, 3, 5, and 10. As licensed TCPs in their own right, TMS's subcarriers must separately adhere to the relevant requirements in Parts 1.06, 3, 5, and 10. TMS asserts it has conditioned compliance with Part 5's driver requirements in its agreements with its subcarriers. It will maintain proper oversight of their subcarriers through conducting pre-operations audits to verify compliance and implementing an oversight program that requires subcarriers to submit supporting documentation. TMS asserts a contractual right to audit and to terminate its agreements with subcarriers for non-compliance. We recognize that TMS may meet certain driver-specific GO 157-E requirements by relying on its contractual arrangements, among other measures, with licensed TCPs as subcarriers, who must themselves comply with GO 157-E.

While TMS will not employ its own drivers to operate the vehicles provided by Hyundai and KIA, through the contracts with its subcarriers, TMS is engaging in a service in connection with the safety, comfort, or convenience of the transportation of FIFA officials and guests. In addition, while TMS will not be the legal owner of the vehicles, it attests to being granted authorization by Hyundai and KIA to operate them during the event for specific purposes. The Hyundai and KIA owned vehicles will therefore be listed on the equipment list for TMS and have displayed the TCP number assigned by the Commission on its vehicles pursuant to Part 4.04 of GO 157-E. Through the permitting process, TMS will be required to produce documentation to support its right to possess and operate these vehicles.

Finally, TMS maintains that, except for the portion of Part 6.01 for which TMS seeks an exemption, it will comply with the remaining reporting and inspection requirements in Part 6. TMS will maintain records reflecting all services performed including applicable waybills, subcarrier agreements, driver records, and consumer complaint records in accordance with Part 6.01. As a condition of its subcarrier agreements, drivers will be

required to also maintain records. TMS affirms its cooperation relating to inspections of records and verification of compliance with GO 157-E.

Aside from those requirements from which TMS is granted an exemption, discussed below, all other requirements in GO 157-E apply.

C. Exemption from Parts 1.06, 4.02, 4.05, 4.06 and 6.01 of GO 157-E

Pursuant to Part 8.01, we grant TMS a limited, 30-day exemption from requirements for vehicles TMS will operate for the FIFA World Cup 2026 in Parts 1.06, 4.02, 4.05, 4.06 and related recordkeeping requirements in Part 6.01. In making this decision, we considered: 1) the new condition, near-zero mileage, and that the Hyundai and KIA vehicles have limited potential to gain mileage; 2) the exemption is limited to a 30 day timeframe; and 3) the necessity of transportation services for FIFA officials and guests starting in June 2026 for the commencement of the FIFA World Cup 2026.

GO 157-E allows a TCP to seek an exemption from the requirements of GO 157-E. Part 8.01 states:

If, in a particular case, exemption from any of these rules and regulations is desired, a written request may be made to the Commission for such exemption. Such a request shall be accompanied by a full statement of the conditions existing and the reasons relied on to justify the exemption. It is to be understood that any exemption so granted shall be limited to the particular case covered by the request.

Rule 8.01 makes clear that “any exemption so granted shall be limited to the particular case covered by the request.”

Pursuant to Part 4.01, every carrier shall maintain a current equipment list, on file with the Commission, of all vehicles (owned or leased) in use under each permit. In implementation of Part 4.01, for an application to obtain or renew a TCP authority, applicants must identify the vehicles they propose to operate. TMS explains that it will provide an equipment list in compliance with Part 4.01 for all vehicles in its use.

Part 1.06 is implicated in TMS’s exemption request. While TMS attributes to Part 4.01 its obligation to obtain commercial vehicle registration for the vehicles from Hyundai and KIA, since this requirement arises from California Vehicle Code § 260, we find that Part 1.06 is the governing provision within GO 157-E for which an exemption would be necessary. Part 1.06 requires every charter-party carrier to comply with the provisions of the California Vehicle Code, encompassing commercial vehicle registration pursuant to California Vehicle Code § 260. TMS explains that “it is not possible to secure commercial motor vehicle registration” for vehicles it does not own and that won’t

arrive in the United States from the manufacturers until shortly before the event. Also, TMS claims that it is not involved in the provisioning or delivery of the vehicles.

Instead of granting an exemption from Part 4.01, which TMS will satisfy when it produces the equipment list in its application, we grant an exemption from Part 1.06 for the limited purpose of enabling TMS to be granted a TCP authority from the Consumer Protection and Enforcement Division to operate vehicles that do not possess commercial registration. Exempting TMS from meeting the specific requirement to possess commercial vehicle registration for these Hyundai and KIA owned vehicles does not relieve it from complying with requirements of California's Vehicle Code that are not imposed through the Commission's TCP permitting process or enforced directly by the Commission.

While we see the position that TMS is in with only one month left until the FIFA World Cup 2026, we also recognize that, with enough advanced planning and willingness from event sponsors such as FIFA, timely vehicle registration would have been possible. However, due to the limited duration of this exemption and given the importance of transportation services necessary for the World Cup 2026, we grant this exemption.

Under Part 4.02, all vehicles of a charter-party carrier must comply with the requirements of the California Highway Patrol (CHP) and the Motor Carrier Safety Sections of Title 13 of the California Code of Regulations. Title 13 of the California Code of Regulations, in relevant part, is limited to vehicles that meet the definition of a "bus" pursuant to California Vehicle Code § 233, referring to vehicles designed for more than 10 persons (including the driver) used for transporting persons for compensation. To the extent that TMS will not operate any such vehicles, it will not be subject to CHP's oversight and related compliance with Part 4.02.

Part 4.05 requires TCPs to undergo a 19-point inspection at a facility licensed by the California Bureau of Automotive Repair prior to initial operation. In this instance, however, the vehicles at issue are new model year 2025 or newer vehicles with manufacturer plates and will have little to no mileage when placed into service. As a result, and considering the limited time in TCP operation, the safety rationale underlying the Part 4.05 inspection carries reduced force here, as the vehicles' new condition, near-zero mileage, and limited potential to gain mileage substantially mitigate the risk of mechanical failure the inspection is intended to prevent.³

Part 4.06 requires TCPs to maintain records of these inspections. TMS explains again that, due to the limited window of time between when the vehicles are delivered and

³ Part 4.05 requires each vehicle to undergo the 19-Point Vehicle Inspection every 12 months or 50,000 miles in addition to before initial operation.

the event itself, inspections of every vehicle pursuant to Parts 4.02 and 4.05 are not possible. In lieu of advanced inspections, TMS says that it will conduct daily walkaround inspections before operating each vehicle and maintain those inspection records in compliance with Part 6.01 for a minimum of three years.

Because TMS will not be able to comply with Parts 4.02 and 4.05 related to vehicle inspections and correspondingly with Part 4.06 related to records of such inspections, it will be unable to maintain records demonstrating compliance with these provisions pursuant to Part 6.01.

We do not find time constraints a persuasive justification for exempting GO 157-E requirements. In the future, event sponsors such as FIFA, in coordination with their event organizers, TCPs, or other transportation carriers regulated by the Commission, are expected to begin coordinating internally and with CPUC staff regarding sponsor-provided vehicles sufficiently in advance to avoid the need for exemptions from GO 157-E. Nevertheless, we do see it necessary to grant TMS's exemption so that it can engage⁴ in transportation services starting in June 2026 for the commencement of the FIFA World Cup 2026 and recognize that the vehicles TMS has authority to operate are in new condition, near-zero mileage, and have limited potential to gain mileage. The exemption is also limited to a 30-day timeframe necessary to transport FIFA officials and guests. This request is unique in that the statutory and regulatory scheme for TCPs does not contemplate vehicles provided on a value in-kind basis for use during a limited time for large scale events such as the World Cup, as is the case here with the vehicles provided by Hyundai and KIA. Considering the totality of the circumstances, we grant TMS's exemption request with the caution that exemptions are limited to the particular case covered by the request.

COMMENTS

Public Utilities Code section 311(g)(1) generally requires that draft resolutions be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. As this Resolution is issued outside of a formal Commission proceeding, interested stakeholders do not need party status in order to submit comments. Comments are due 20 days from the mailing date of this Resolution. Replies will not be accepted.

This draft Resolution will be e-mailed to all active and suspended Transportation Charter-Party Carriers and Passenger Stage Corporations as well as served on the service lists of R.12-12-011, R.21-11-014, and R.25-08-013.

⁴ To operate, TMS must obtain a permit or certificate from the Commission.

FINDINGS AND CONCLUSIONS

1. Maryland TMS, Inc. (TMS) must apply for and be granted an operating authority by the Commission to serve as a Transportation Charter-party Carrier of passengers (TCP).
2. General Order (GO) 157-E imposes specific requirements upon TCPs, which are designed to promote safe and legal operations.
3. Transportation is needed for a limited number of FIFA officials and guests for the 2026 FIFA World Cup being held in Los Angeles and the San Francisco Bay Area.
4. TMS states it has the authority to operate vehicles provided by Hyundai and KIA, the event's main sponsors.
5. TMS will contract with licensed TCPs to provide the drivers of the vehicles provided by Hyundai and KIA.
6. While TMS will not employ its own drivers to operate the vehicles provided by Hyundai and KIA, through its contracts with licensed subcarriers, TMS is engaging in a service in connection with the safety, comfort, or convenience of the transportation of FIFA officials and guests.
7. TMS must comply otherwise with the rules and regulations required of charter-party carriers in GO 157-E except for those requirements from which an exemption is granted.
8. The statutory and regulatory scheme for TCPs does not contemplate vehicles provided on a value in-kind basis for use during a limited time for large scale events such as the World Cup, as is the case here with the vehicles provided by Hyundai and KIA.
9. TMS explains that it is not possible to secure commercial vehicle registration for the Hyundai and KIA sponsor provided vehicles because TMS is not involved in the provisioning or delivery of the vehicles.
10. Commercial vehicle registration of the Hyundai and KIA sponsored vehicles is required by California Vehicle Code Section 260.
11. TMS will not be able to comply fully with Part 1.06 of GO 157-E, which requires compliance with the California Vehicle Code.
12. To enable TMS to be granted a TCP authority by the Commission's Consumer Protection and Enforcement Division to operate vehicles that do not possess commercial registration, compliance with Part 1.06 is waived for this limited purpose.
13. Exempting TMS from meeting the specific requirement to possess commercial vehicle registration for the Hyundai and KIA owned vehicles does not relieve it from complying with the requirements of California's Vehicle Code which are not

imposed through the Commission's TCP permitting process or enforced directly by the Commission.

14. TMS states that it will comply with Part 4.01's requirement to provide an equipment list of all vehicles in use.
15. The 19-Point Vehicle Inspection prior to operation as required by GO 157-E, Part 4.05 and referenced in Part 4.02 and Part 4.06, of every vehicle at a licensed facility is not possible in this case.
16. In lieu of advanced inspections, walkaround inspections before operating each morning will be conducted consistent with Parts 4.02 and 4.05, and TMS will maintain those inspection records as required by Parts 4.06 and 6.01.
17. TMS states that it will utilize only drivers employed by California licensed charter-party subcarriers in contract with TMS.
18. The statutory and regulatory scheme for TCPs does not contemplate vehicles provided on a value in-kind basis for use during a limited time for large scale events such as the World Cup, as is the case here with the vehicles provided by Hyundai and KIA.
19. TMS may meet certain driver-specific GO 157-E requirements by relying on its contractual arrangements, among other measures, with licensed TCPs as subcarriers, who must themselves comply with GO 157-E.
20. The Hyundai and KIA owned vehicles will be listed on TMS's equipment list and display the TCP number assigned by the Commission on its vehicles pursuant to Part 4.04 of GO 157-E.
21. TMS will maintain records reflecting all services performed including applicable waybills, subcarrier agreements, driver records, and consumer complaint records in accordance with Part 6.01.
22. The exemption requested is of limited duration, lasting only 30 days.
23. TMS's transportation services for FIFA officials and guests are necessary for implementation of the FIFA World Cup 2026.
24. To the extent that TMS will not operate vehicles subject to Title 13 of the California Code of Regulations, it will not be subject to CHP's oversight and related compliance with Part 4.02. Considering the limited time of TMS's operation, the safety rationale underlying the Part 4.05 inspection carries reduced force here, as the vehicles' new condition, near-zero mileage, and limited potential to gain mileage substantially mitigate the risk of mechanical failure the inspection is intended to prevent.
25. We expect TCPs to begin coordinating with event sponsors and staff regarding sponsor-provided vehicles sufficiently in advance to avoid the need for exemptions from GO 157-E going forward.

26. The exemption herein shall be limited to the particular case covered by TMS's request.

THEREFORE, IT IS ORDERED that:

1. Pursuant to General Order 157-E, Part 8.01, the Commission grants an exemption to Maryland TMS, Inc., allowing a temporary deviation from the requirements of General Order 157-E, Parts 1.06, 4.02, 4.05, 4.06, and 6.01 as discussed herein.
2. The exemption to Maryland TMS, Inc. will be in effect from June 12, 2026 to July 12, 2026.
3. Maryland TMS, Inc. will comply with all other requirements of General Orders 115-G and 157-E.
4. The effectiveness of this exemption is contingent on Maryland TMS, Inc. completing and receiving a Transportation Charter-party authority from the Commission before June 12, 2026.

This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on June 11, 2026 and the following Commissioners voting favorably thereon:

/s/

Leuwam Tesfai
Executive Director

ATTACHMENT 1

Transportation Management Services, Inc.
Request for CPUC Exemption,
dated May 4, 2026



May 4th, 2026

Ms. Leuwam Tesfai
Executive Director of the California Public Utilities Commission
California Public Utilities Commission

Via email: leuwam.tesfai@cpuc.ca.gov

Re: Request for CPUC Exemption

Ms. Tesfai,

Pursuant to Part 8.01 of General Order (GO) 157-E of the California Public Utilities Commission (“CPUC” or “Commission”), Transportation Management Services, Inc.¹ (“TMS”) as a facilitator for *Federation Internationale de Football Association* (“FIFA”) and the 2026 World Cup, respectfully submits this request for a limited, 30-day exemption from four Part 4 provisions (and associated recordkeeping requirements under Part 6) in General Order 157-E for certain operations surrounding transportation needs for the FIFA World Cup events being held in Los Angeles and the San Francisco Bay area. Pursuant to Part 8.01, TMS provides a “full statement of the conditions existing” and the “reasons relied on to justify the exemption.”

I. TMS and Exemption Request Background

TMS is an established Maryland transportation company founded in 1995 with operations across the United States and world. As a global leader in event mobility, ground transportation, logistics, and venue solutions, TMS delivers best-in-class services for the world’s most complex events. More information about TMS is available at our website: <https://www.tms.com/>. If granted, this exemption would allow transportation surrounding the 2026 World Cup to operate properly, helping to ensure Californians, businesses, and fans enjoy this exciting and unique event.

The exemption request is critical to the success of FIFA’s transportation plans. FIFA has contracted with TMS to provide certain transportation services for the event, including as relevant here drivers for vehicles. Hyundai and KIA, the main sponsors of FIFA World Cup 2026, will provide those vehicles across North America. Some of those vehicles have been allocated to operations in Los Angeles and San Francisco. The vehicles are new, model year 2025-2027, have limited or no mileage, only have room for 10 or fewer passengers, and have MFG plates. They would arrive in the United States shortly before the event begins and be used for approximately thirty days from June 12th, 2026, to July 12th, 2026. Hyundai and KIA would remain the legal owners of the vehicles, though TMS would have the authority to operate the vehicles during the event for specific purposes. The vehicles would be operated by drivers of charter-party sub-carriers that TMS contracts, in accordance with Part 5.03, and provide transportation to a limited group of FIFA officials and guests FIFA has accredited. Before operation each morning, there would be a walkaround inspection of each vehicle.

Concurrent with its application for a TCP A certificate, TMS respectfully requests the Commission exempt the above event operations, significantly limited in duration, geography, ridership, and purpose, from certain parts of the following requirements: Parts 4.1, 4.2, 4.5, 4.6, and Part 6.01.

¹ In California, Transportation Management Services, Inc. is registered as Maryland TMS, Inc. (2578385).



TMS fully supports the purpose of GO 157-E generally, Part 4 specifically, and the Commission's overarching commitment to passenger safety. This request seeks to harmonize the regulations with this unique operational situation while proposing alternative actions that preserve safety and accountability.

Please find an explanation of and justification for the requested exemptions below.

II. Part 4.01 – Commercial Motor Vehicle Registration

Under Part 4.01, TCPs 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 person for hire. TMS is not involved with managing the provisioning or delivery of the vehicles. Due to the limited window between vehicle delivery and the event, logistics of securing registration, and that TMS is not the owner of the vehicles, it is not possible to secure commercial motor vehicle registration for those vehicles.

TMS will comply with the remainder of Part 4.01, including providing an equipment list of all vehicles in use under its certificate. As a result, the CPUC will have information about these vehicles, including each make, model, year, and VIN. The CPUC will therefore understand which vehicles will operate as well as whether there are any known issues with the vehicles. Since TMS will comply with the remainder of Part 4.01, the MFG plates will not affect its operations, and thus operation under the exemption will be functionally equivalent to standard operations.²

III. Parts 4.02, 4.05, 4.06 – Inspections and Records Thereof

Under Part 4.02, "[a]ll vehicles shall comply with the requirements of the California Highway Patrol and the Motor Carrier Safety Sections of Title 13 of the [CCR]." Moreover, "each carrier must inspect all vehicles and maintain proper documentation of such inspections." Under Part 4.05, TCPs must ensure a 19-point inspection at a facility licensed by the California Bureau of Automotive Repair prior to initial operation. Under Part 4.06, TCPs must maintain records of these inspections.

Due to the limited window between vehicle delivery and the event, the logistics of securing inspection, and that TMS is not the owner of the vehicles, full inspections of every vehicle is not possible. As mentioned above, these vehicles are considered new, in model years 2025-2027, have no or limited mileage, and are not owned by TMS. Before operation each morning, there will be a walkaround inspection of each vehicle. TMS will maintain records of this inspection. The vehicles will also be operated for only approximately 30 days and then physically returned to the manufacturer.

TMS requests exemption from the inspection requirements under Part 4.02 as well as Parts 4.05 and 4.06. TMS would otherwise comply with Part 4.02. As has been recognized, "[m]ost failures in the automotive systems depend on age and accumulated usage."³ The newness of these vehicles, their limited or no mileage, and their short window of operations,

² Part 8.01 does not identify a standard to assess exemption requests but mere "justif[ication]." Exemptions under Part 8.02 require a "functionally equivalent" showing. Though we explain how operations under these limited exemptions will be functionally equivalent, we do not take a position on the appropriate standard and do not believe the Commission need do so as we have justified the exemption request and shown operations will be functionally equivalent to standard operations.

³ Vineet Khare, Pulak Bandyopadhyay & Mary Waldo, *Automotive Field Failure Analysis Based on Mileage—Feasibility & Benefits*, in Proceedings of the IEEE Conference on Prognostics and Health Management (2012), <https://ieeexplore.ieee.org/document/6299513>.



combined with the daily inspection that TMS will cause to be performed, as well as maintain records thereof, should help to ensure vehicle safety in a manner commensurate with the exempted inspection and recordkeeping requirements. As a result, operations under the exemption should be functionally equivalent to standard operations.

TMS also commits to engaging, if necessary, with the appropriate California entities to determine whether they can provide a sufficient alternate inspection after delivery.

IV. Part 6.01 – Charter-Party Records

Allowing those exemptions under Parts 4.01, 4.02, 4.05, and 4.06 would mean that TMS could not maintain records pursuant to Part 6.01 demonstrating compliance with the four provisions. TMS would maintain other records required under Part 6.01. As it would be impossible to maintain nonexistent records and those records have no information about actual operations, exempting those limited Part 6.01 recordkeeping requirements would be functionally equivalent to standard operations.

V. General Compliance

TMS would otherwise comply with the requirements of GO 157-E. This includes complying with the liability insurance requirements of Part 1.05, applicable provisions of the California Vehicle Code pursuant to Part 1.06, Part 3 (general requirements), Part 5 (driver requirements), and Part 6 (records and inspections).

Part 10.01 (“Who Must Comply”) requires TCP applicants “who propose to employ any driver [of certain vehicles]” to “provide for a mandatory controlled substance and alcohol testing certification program for those drivers.” The remainder of Part 10 establishes requirements related to that testing. As described above, TMS is not employing any drivers, but contracting with licensed sub-carriers who will provide drivers. Those sub-carriers are subject to Part 10 and subject to TMS’s oversight.

VI. Compliance Officer Designation

TMS will designate a compliance officer as the primary point of contact for Commission regulatory matters. The compliance officer will remain in contact with the CPUC staff and keep them informed about operations.

* * *

Transportation Management Services respectfully requests that the Commission consider the limited exemption from Parts 4.01, 4.02, 4.05, 4.06, and 6.01 described above. The exemption is significantly limited in duration, geography, ridership, and purpose. Granting this exemption would allow transportation surrounding the 2026 FIFA World Cup to operate properly, thereby supporting California’s hospitality and events economy and helping to ensure Californians, businesses, and fans enjoy this exciting and unique event—all while maintaining safety and accountability.

We are grateful to the Commission staff who have provided continued support regarding this matter, and we are committed to continuing this collaboration to ensure all services are delivered in a manner consistent with regulatory expectations and public safety priorities.

We appreciate your time and consideration and are available to provide any additional information the Commission or its staff may require.



Thank you,

Michael Moulton

Michael Moulton
President
Transportation Management Services, Inc.
571-233-2608
mmoulton@tms.com

May 4, 2026

Ms. Leuwam Tesfai
Executive Director of the California Public Utilities Commission
California Public Utilities Commission

Via email: leuwam.tesfai@cpuc.ca.gov

Re: Attestation of Michael Moulton Regarding Transportation Management Services, Inc.'s Request for Exemption

On behalf of Transportation Management Services, Inc. ("TMS"), registered in California as Maryland TMS, Inc. (2578385), I, Michael Moulton, President, attest to the following:

1. Transportation charter-party carriers ("TCP"), including TMS if the California Public Utilities Commission ("CPUC") approves its concurrent TCP application, are responsible for compliance with CPUC General Order (GO) 157-E.
2. Commission staff have requested attestations related to certain parts of GO 157-E.
3. Part 1.05 requires all TCPs to comply with GO 115-G, including by holding insurance policies with coverage greater than or equal to the limits under (1). TMS has protection against liability for the payment of damages for personal bodily injury (including death resulting therefrom) and for damage to or destruction of property in an amount greater than or equal to the coverage limits set forth in (1).
4. Part 1.06 requires TCPs and their drivers to comply with the provisions of the California Vehicle Code ("CVC"). TMS will comply with these provisions by requiring all sub-carriers to contractually certify CVC compliance, conducting pre-operations audit to verify compliance, and implementing a multi-layered oversight program that requires sub-carriers to submit supporting documentation and remain subject to TMS's right to audit and terminate for non-compliance. For transportation related to the 2026 *Federation Internationale de Football Association* ("FIFA") World Cup, described in greater in TMS's exemption request, TMS contracts with licensed sub-carriers for all drivers. As a result, those sub-carriers are subject to Part 1.06 and subject to TMS's oversight.
5. Part 3 establishes a series of general requirements for TCPs. TMS will comply with all applicable provisions of Part 3. TMS will ensure such compliance, including by maintaining proper waybills, ensuring all sub-carriers hold Commission authority as charter-party carriers, and adhering to all other applicable requirements outlined herein.
6. Part 5 establishes requirements for drivers. TMS will comply with all applicable provisions of Part 5. As TMS does not employ any of its own drivers, all drivers utilized during the 2026 FIFA World Cup operations are drivers of licensed TCP sub-carriers. TMS requires that all sub-carriers ensure their drivers are properly licensed in accordance with the California Vehicle Code and comply with the Motor Carrier Safety Sections of Title 13 of the California Code of Regulations. TMS further requires that all sub-carriers are enrolled in the DMV's Pull Notice Program and that no driver with a presumed negligent operator status under Vehicle Code Section 12810.5 is permitted to operate any vehicle related to this event. Additionally, TMS requires all sub-carriers to enforce strict drug and alcohol prohibitions consistent with Code of Federal Regulations Title 49, Parts 392.4 and 392.5, ensuring no driver is under the influence of any drug or alcoholic beverage while on duty. Compliance with these requirements is a condition of all sub-carrier agreements, and TMS maintains the right to audit and terminate any sub-carrier found to be in violation. As described, licensed sub-carriers will provide drivers and will thus be subject to Part 5 and will be subject to TMS's oversight.
7. Part 6 establishes recordkeeping requirements and inspection rights. Except the portion of Part 6.01 for which TMS seeks exemption (as described in TMS's exemption request), TMS will comply with these provisions. TMS will institute and maintain a complete set of records reflecting all services performed during the 2026 FIFA World Cup operations, including applicable waybills and/or assigned driver movements, sub-carrier agreements, driver records, and consumer

complaint records, in accordance with Section 6.01. All such records will be retained for a minimum of three years and may be maintained in electronic format consistent with Section 2.12. TMS will further ensure that all sub-carriers maintain their own records in compliance with Part 6 as a condition of their sub-carrier agreements. TMS and its sub-carriers will cooperate with any duly authorized representatives of the Commission, affording all reasonable access to vehicles, facilities, and electronic devices for the purpose of inspection and verification of compliance with General Order 157-E.

8. Part 10 establishes requirements for a controlled substance and alcohol testing certification program. Part 10.01 requires TCP applicants “who propose to employ any driver [of certain vehicles]” to “provide for a mandatory controlled substance and alcohol testing certification program for those drivers.” The remainder of Part 10 establishes requirements related to that testing. For transportation related to the 2026 FIFA World Cup, TMS is not employing drivers, but instead contracting with licensed sub-carriers who will provide drivers. Those carriers are subject to Part 10 and subject to TMS’s oversight. TMS has verified these sub-carriers have a controlled substance and alcohol testing program.
9. Consistent with TMS’s exemption request, TMS will perform daily walkaround inspections of each vehicle and retain records regarding this inspection.
10. Consistent with TMS’s exemption request, TMS will, if necessary, engage with the appropriate California entities to determine whether they can provide a sufficient alternative inspection after the vehicles are delivered.
11. TMS will designate a compliance officer as the primary point of contact for Commission regulatory matters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 4, 2026 in Frederick, Maryland

Signed

Michael Moulton

President
Transportation Management Services, Inc.
571-233-2608
mmoulton@tms.com