

**DECLARATION OF SHELDON QUAN**

**IN SUPPORT OF CRUISE LLC’S REQUEST FOR EXEMPTION**

I am the Interim General Counsel of Cruise LLC (“Cruise”), a Delaware limited liability company, and wholly-owned subsidiary of GM Cruise Holdings LLC (“Cruise Holdings”), a Delaware limited liability company, in each case, headquartered at 1201 Bryant St., San Francisco, California, 94103.

I submit this declaration in support of Cruise’s Request for Exemption under General Order (“G.O.”) 157-E, Part 8.02, transmitted with Cruise’s Autonomous Vehicle (“AV”) Pilot Program (“Pilot”) Charter Party Carrier (“TCP”) application.

1. Cruise uses a third-party vendor to supply personnel to operate Cruise AVs. Cruise plans to continue to use a third-party vendor to supply such personnel for the duration of the pilot, and in the event that those plans change, Cruise would notify the California Public Utilities Commission (“Commission”).

2. Cruise’s current third-party vendor for personnel to operate Cruise AVs has been supplying such personnel since 2016.

3. Cruise contractually requires its current third-party vendor to ensure that all of the employees who may serve as operators of Cruise AVs in the Pilot are contractually required to maintain a drug and alcohol testing program that complies with General Order 157-E. The third party vendor’s drug testing consultant is contractually required to provide drug and alcohol testing results directly to the CPUC if requested. In addition, Cruise contractually requires its current third-party vendor to ensure that the employees who may serve as operators of Cruise AVs in the Pilot are covered by workers’ compensation insurance in accordance with California Labor Code Section 3602(d)(1). In the future, if Cruise retains any new vendors to assist it with finding operators of Cruise AVs in the Pilot, Cruise will ensure such vendors are subject to the same contractual requirements.

4. Cruise has a training program for the operators of Cruise AVs. Operators who will participate in the Pilot will be enrolled in the California Department of Motor Vehicles (“DMV”) pull-notice program through Cruise’s DMV Employer Pull Notice account.

5. Cruise is insured under an auto liability policy that covers the vehicles it intends to use in the pilot as well as the AVTs who will operate the vehicles. The applicable insurance policy meets the standards set by the Commission’s General Orders, decision 18-05-043, and statutory requirements. GM’s Auto Liability policy

1 extends to Cruise’s AVs. In the event of an accident, GM’s Auto Liability policy would respond as it currently does  
2 for GM owned AVs.

3 6. Cruise maintains control over Cruise AVs (even if the vehicles are owned by GM).

4 7. General Motors Company (“GM”), through its wholly-owned subsidiary, General Motors  
5 Holdings LLC, has a controlling interest in Cruise Holdings and subsequently in Cruise. GM, through its wholly-  
6 owned subsidiary, General Motors LLC, is the title holder and registrant for the vehicles that will participate in the  
7 pilot. Cruise will manage all operations and vehicles involved in the Pilot.

8 Dated this 14th day of February, 2020.

DocuSigned by:

*Sheldon Quan*

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Sheldon Quan  
Interim General Counsel  
Cruise LLC

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