February 24, 2022

Department of Motor Vehicles
Autonomous Vehicles Branch
2415 1st Avenue, MS D405
Sacramento, CA 95818

RE: Argo AI LLC’s Application for the Autonomous Vehicle Tester (AVT) Driverless Program

Dear Autonomous Vehicles Branch,

On behalf of Argo AI, LLC, a Delaware limited liability company, ("Argo"), enclosed please find Argo’s application for the AVT Driverless Program.

The application materials submitted herewith contain information pertaining to Argo’s technical information, internal processes, and operational plan, which constitutes or reveals “Trade Secrets” as defined within Civ. Code §3426.1(d), and constitutes or reveals confidential proprietary information. Argo is entitled to notice of a request for these records and an opportunity to respond under the procedure set forth in Cal. Evid. Code §§ 1060 and 1061(a)(1).

If you have any questions or require any additional information please contact [redacted].

Sincerely,

Argo AI, LLC
AUTONOMOUS VEHICLE TESTER (AVT) PROGRAM
APPLICATION FOR MANUFACTURER’S TESTING PERMIT
DRIVERLESS VEHICLES

APPLICATION TYPE:
☒ Original $3,600
☐ Renewal $3,600
☐ Modification $70
☐ Additional Vehicle Permits $50

CHECK THE APPROPRIATE BOX:
☐ Address Change
☒ Vehicles

INSTRUCTIONS:
• Please complete online or print and complete by hand using black or blue ink.
• Submit completed and signed form and fees to: Department of Motor Vehicles, Autonomous Vehicles Branch, 2415 1st Avenue, MS D405, Sacramento, CA 95818

SECTION 1 — AUTONOMOUS VEHICLE TESTER INFORMATION

NAME OF MANUFACTURER
Argo AI, LLC

BUSINESS NAME
Argo AI

BUSINESS NAME LICENSED BY DMV
Argo AI, LLC

STREET ADDRESS
1450 Page Mill Road

CITY
Palo Alto

STATE
CA

ZIP CODE
94304

MAILING ADDRESS (IF DIFFERENT FROM STREET ADDRESS)

CITY
STATE
ZIP CODE

SECTION 2 — DRIVERLESS VEHICLES EQUIPPED FOR TESTING

List all vehicles in fleet.

Number of vehicles in fleet: 7

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<th>PLATE NUMBER</th>
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OL 316 (REV. 7/2020) WWW
1. The autonomous vehicle has been tested under controlled conditions that simulate as closely as practicable, each operational design domain in which the manufacturer intends the vehicle to operate and the manufacturer has reasonably determined that is safe to operate the vehicle in each operational design domain. CCR 227.18(b)

2. Written notification that includes all of the requirements identified in CCR 227.38(a) has been provided to local authorities, as defined in Vehicle Code section 385, within the jurisdiction where the vehicle will be tested.

3. The autonomous test vehicle has a communication link with the remote operator to provide information on the vehicle's location and status, and allow continuous two-way communication between the remote operator and any passengers if the vehicle experiences any failures that would endanger the safety of the vehicle's passengers or other road users or otherwise prevent the vehicle from functioning as intended, while operating without a driver. CCR 227.38(b)(1)(A)

4. There is a process to display or communicate vehicle owner or operator information as specified in Vehicle Code Section 16025 in the event that the vehicle is involved in a collision, or if there is a need to provide that information to a law enforcement officer for any reason. CCR 227.38(b)(2)

5. The autonomous vehicle complies with all relevant Federal Motor Vehicle Safety Standards, Title 49 Code of Federal Regulations, Part 571, and the California Vehicle Code, Division 12 (Equipment of Vehicles), or the manufacturer is exempt from such requirements pursuant to 49 U.S.C. §30112(b)(10), or an exemption has been approved by the National Highway Traffic Safety Administration and provided as an attachment to this application. CCR 227.38(b)(3)

6. The autonomous vehicle is capable of operating without the presence of a driver inside the vehicle and the autonomous technology meets the description of a level 4 or level 5 automated driving system under SAE International’s Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles, standard J3016. CVC 227.38(c)

7. A copy of a law enforcement interaction plan will be submitted to the California Highway Patrol within 10 days of application approval, and the internet web site address where the law enforcement interaction plan may be accessed will be provided to all other law enforcement agencies, first responders, fire department and emergency medical personnel within the vicinity of the operational design domain of the autonomous vehicle. CCR 227.38(e)

8. Remote operators have 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. CCR 227.38(f)

9. Passengers that are not employees, contractors, or designees of the manufacturer will be notified of what personal information, if any, may be collected and how it will be used. CCR 227.38(h)

10. Upon receipt of a Manufacturer’s Testing Permit to conduct the testing on public roads of a vehicle that does not require a driver, data related to the disengagement of the autonomous mode will be retained for the purposes of submitting an annual report to the department. CCR 227.50(a)

11. Any collision originating from the operation of the vehicle on public roads that resulted in the damage of property or in bodily injury or death shall be reported to the department, within 10 days. CCR 227.48

12. Autonomous test vehicles will not be permitted to operate on public roads when members of the public that are not employees, contractors, or designees of the manufacturer are charged a fee or the manufacturer receives compensation for providing a ride to members of the public. CCR 227.26(f)

13. Autonomous test vehicles will not be permitted to operate on public roads when members of the public are charged a fee or the manufacturer receives compensation for transporting property in motortrucks. CCR 227.26(g)
SECTION 4 — ATTACHMENTS

1. Evidence of insurance, Surety Bond (OL 317), or Application for Self-Insurance (OL 319) in the amount of five million dollars ($5,000,000). CCR 227.04(c)

2. Copy of written notification to local authorities, as defined in Vehicle Code section 385, for each jurisdiction where the vehicle will be tested that includes all of the items identified in CCR 227.38(a).

3. Description of how the manufacturer will monitor the communication link. CCR 227.38(b)(1)(B)

4. Explanation of how all of the vehicles tested will be monitored. CCR 227.38(b)(1)(C)

5. Describe/inform the department of the intended operational design domain of the autonomous vehicle. CCR 227.38(d)

6. Copy of law enforcement interaction plan. CCR 227.38(e)

7. Copy of course outline and description of the remote operator training program and the date each remote operator completed the program and includes all of the items identified in CCR 227.38(f).

8. For manufacturers that have publicly disclosed an assessment demonstrating their approach to achieving safety, a copy of that assessment. CCR 227.38(g)

9. If applicable; evidence of an exemption approved by the National Highway Traffic Safety Administration for manufacturers exempt from such requirements pursuant to 49 U.S.C. 30112(b)(10). CCR 227.38(b)(3)

SECTION 5 — CERTIFICATION

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

I further certify that I am the authorized Administrator of the program for the above named employer.

PROGRAM DIRECTOR/AUTHORIZED REPRESENTATIVE PRINTED NAME AND TITLE: 

SIGNATURE:  

DATE SIGNED: 25-Feb-2022

ADDRESS: 

STREET ADDRESS: 1450 Page Mill Road

CITY: Palo Alto

STATE: CA

ZIP CODE: 94304

EMAIL ADDRESS: 

FAX NUMBER: 

TELEPHONE NUMBER: 
CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 08/19/2021

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFER NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
March USA Inc.

CONTACT
NAME
PHONE
[AC, No, Ext]  
FAX
[AC, No]  
EMAIL
ADDRESS

INSURER(S) AFFORDING COVERAGE
20881

NAIC #

INSURED
Argo AI LLC

CERTIFICATE NUMBER: CLE-00871859-12

REVOLUTION NUMBER: 12

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HERIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

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DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 161, Additional Remarks Schedule, may be attached if more space is required)

Evidence of Insurance:

CERTIFICATE HOLDER
California Department of Motor Vehicles
Autonomous Vehicles Branch
2415 1st Avenue, MS D405
Sacramento, CA 95818

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE
of Marsh USA Inc.

© 1988-2016 ACORD CORPORATION. All rights reserved.

ACORD 25 (2016/03)
IMPORTANT — Read instructions before completing this form.

Filing Fee — $20.00

Copy Fees — First page $1.00; each attachment page $0.50; Certification Fee - $5.00 plus copy fees

This Space For Office Use Only

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)
   ARGO AI HOLDINGS, LLC

2. 12-Digit Secretary of State File Number
   [Redacted]

3. State, Foreign Country or Place of Organization (only if formed outside of California)
   DELAWARE

4. Business Addresses
   a. Street Address of Principal Office - Do not list a P.O. Box
      2545 Railroad St, Suite 400
      City (no abbreviations) Portland
      State OR Zip Code 97217
   b. Mailing Address of LLC, if different than Item 4a
      2545 Railroad St, Suite 400
      City (no abbreviations) Portland
      State OR Zip Code 97217
   c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box
      1450 Page Mill Road
      City (no abbreviations) Palo Alto
      State CA Zip Code 94304

5. Manager(s) or Member(s)
   a. First Name, if an individual - Do not complete Item 5b
      [Redacted]
   b. Entity Name - Do not complete Item 5a
      [Redacted]
   c. Address
      [Redacted]

6. Service of Process (Must provide either Individual OR Corporation.)
   INDIVIDUAL – Complete Items 6a and 6b only. Must include agent’s full name and California street address.
   a. California Agent's First Name (if agent is not a corporation)
      [Redacted]
   b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box
      [Redacted]

   CORPORATION – Complete item 6c only. Only include the name of the registered agent Corporation.
   c. California Registered Corporate Agent’s Name (if agent is a corporation) – Do not complete Item 6a or 6b
      C T CORPORATION SYSTEM (C0168406)

7. Type of Business
   a. Describe the type of business or services of the Limited Liability Company
      Holding Company

8. Chief Executive Officer, if elected or appointed
   a. First Name
      [Redacted]
   b. Address
      [Redacted]

9. The Information contained herein, including any attachments, is true and correct.
   05/19/2021

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name: [Redacted]
Company: [Redacted]
Address: [Redacted]
City/State/Zip: [Redacted]
STATEMENT OF FACTS
Complete the appropriate section(s) in full (including vehicle description) and sign Section H.

LICENSE PLATE/OF NUMBER  VEHICLE/VESSEL ID NUMBER  YEAR/MAKE

A. STATEMENT FOR USE TAX EXEMPTION

This transfer is exempt from use tax because it is a:

☐ Family transfer sold between a parent, child, grandparent, grandchild, spouse, domestic partner, or siblings (if both are minors related by blood or adoption).

☐ Addition or deletion of family member (spouse, domestic partner, parent[s], son/daughter, grandparents, grandchildren).

☐ Gift (does not include vehicles traded between individuals, transfer of contracts or other valuable consideration).

☐ Court Order ☐ Inheritance

NOTE: The Use Tax Exemption cannot be claimed if the vehicle/vessel being transferred was purchased from an otherwise qualifying relative who is engaged in the business of selling the same type of vehicle/vessel.

The current market value is: $__________ .

B. STATEMENT FOR SMOG EXEMPTION

The vehicle does not require a smog certification for transfer of ownership because:

☐ The last smog certification was obtained within the last 90 days.

☐ It is powered by: ☐ electricity ☐ diesel ☐ Other ____________________________ .

☐ It is located outside the State of California. (Exception: Nevada and Mexico)

☐ It is being transferred from/between:
  ☐ The parent, grandparent, child, grandchild, brother, sister, spouse, or domestic partner (as defined in Family Code §297) of the transferee.*
  ☐ A sole proprietorship to the proprietor as owner.*
  ☐ Companies whose principal business is leasing vehicles. There is no change in lessee or operator.*
  ☐ Lessor and lessee of vehicle, and no change in the lessee or operator of the vehicle.*
  ☐ Lessor and person who has been lessee's operator of the vehicle for at least one year.*
  ☐ Individual(s) being added as registered owner(s).*

* Does not require smog certification unless Biennial Smog is required.

C. STATEMENT FOR TRANSFER ONLY OR TITLE ONLY

This vehicle has not been used or parked on a street or highway or off-highway. I am applying for a:

☐ Transfer Only ☐ Title Only

The vehicle is not currently registered. It has not been driven, moved, towed, or left standing on any California public highway to cause registration fees to become due. It was not transported over any California public highway or operated within California to cause off-highway fees to become due. Appropriate registration will be obtained before the vehicle is operated.

D. WINDOW DECAL FOR WHEELCHAIR LIFT OR WHEELCHAIR CARRIER

Enter your Disabled Person License Plate, or Disabled Veteran License Plate, or Permanent Disabled Person Parking Placard number below:

DISABLED PERSON PLATE  DISABLED VETERAN PLATE  PERMANENT DISABLED PERSON PLACARD

The vehicle to which my Window Decal will be affixed is:

LICENSE NUMBER  VEHICLE MAKE  VEHICLE ID NUMBER

Mail to:
NAME

ADDRESS

CITY  STATE  ZIP

REG 256 (REV. 8/2008) WWW
Argo AI - Public
STATEMENT OF FACTS
Complete the appropriate section(s) in full (including vehicle description) and sign Section H.

LICENSE PLATE/CN NUMBER

VEHICLE/VESSLE ID NUMBER

YEAR/MAKE

E. STATEMENT FOR VEHICLE BODY CHANGE (OWNERSHIP CERTIFICATE REQUIRED)

The current market value of the vehicle or vessel is: $__________________

Changes were made at a cost of $__________________ on this date ________________.

This is what I changed: Check all that apply:

☐ Unladen Weight changed because ________________________ (Public Weighmaster Certificate is required. Exception: Trailers)
☐ Motive Power changed from ________________________ to ________________________.
☐ Body Type changed from ________________________ to ________________________.
☐ Number of Axles changed from ________________________ to ________________________.

F. NAME STATEMENT (OWNERSHIP CERTIFICATE REQUIRED)

Please print

☐ I, ___________________________ and ___________________________ are one and the same person.

☐ My name is misspelled. Please correct it to: _________________________________________________________

☐ I am changing my name from ___________________________ to ___________________________.

G. STATEMENT OF FACTS

I, the undersigned, state:

In accordance with CA DMV's Automated Vehicle Testing Guidance, Argo AI ("Argo") intends to begin driverless testing operations in California and wishes to submit an application for the AVT Driverless Program. The Argo self-driving system is an integrated hardware and software system composed of custom-designed, multi-modal sensing technology, including high-resolution cameras, lidar, radar, microphones, and inertial sensors, as well as custom, power-efficient, high-density ruggedized computing hardware. Together, they integrate into Argo's autonomous vehicle platform to achieve Level 4 self-driving capability.

Argo will continuously monitor the status of the vehicle and the communication link between the vehicle and the remote operator while the vehicle is being operated without a driver.

Argo's Employer Pull Notice Number - ________.

A copy of Argo's Emergency Responder Guide & Law Enforcement Interaction Plan will be made available at www.argo.ai.

The application materials submitted herewith contain information pertaining to Argo's technical information, internal processes, and operational plan, which constitutes or reveals "Trade Secrets" as defined within Civ. Code 3426.1(d), and constitutes or reveals confidential proprietary information. Argo is entitled to notice of a request for these records and an opportunity to respond under the procedure set forth in Cal. Evid. Code §§ 1060 and 1061(a)(1).

H. APPLICANT'S SIGNATURE

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

PRINTED LAST NAME

FIRST NAME

MIDDLE NAME

DAYTIME PHONE NUMBER

SIGNATURE

DATE

Argo AI - Public

02/25/2022
Hello Lt. [Redacted]

We would like to share with you an important update for you from the Argo AI (Argo) team.

Argo began testing our autonomous vehicles (AVs) in the Palo Alto area in 2019. Since that time, we have been continuously testing our technology to perform safely and reliably in diverse conditions. We have tested extensively on California public roads with our highly-trained and experienced test specialists on board, conducted additional testing on closed courses, and simulated millions of scenarios through testing in a virtual world.

After careful consideration, Argo will be submitting an application to the California DMV’s Autonomous Vehicle Tester Driverless Program, which they will receive on Friday, February 25 (tomorrow). As part of this application, we have expressed our interest in conducting driverless testing operations in the Palo Alto area, including on municipality roads.

Although we are submitting our application to begin driverless testing operations, that does not mean that you will immediately begin to see Argo driverless vehicles in your community. Once the California DMV approves our application, we expect to continue to conduct extensive testing with test specialists in our AVs before launching our driverless testing operations.

We will notify you directly before we put any driverless Argo AVs on municipality roads, and we will keep you apprised of the number of driverless AVs and the days and times that you can expect to see them in operation on public roads.

Please find attached additional information that Argo is submitting to the California DMV, including the operational design domain of our AVs, a map of all public roads where our AVs will be tested, and a copy of Argo’s Safety Report.

Furthermore, we are also including a copy of Argo’s Emergency Responder Guide & Law Enforcement Interaction Protocol, which provides information to local law enforcement, fire departments, and emergency medical personnel professionally trained in emergency responder situations, including traffic incidents. This guide specifically describes certain characteristics and considerations of Argo AVs, should an incident occur.

If you have any questions regarding our application or testing plans, please do not hesitate to reach out to me and I will be able to assist you.

Thank you,

[Redacted]

--

Argo AI - Public
Hello

We would like to share with you an important update for you from the Argo AI (Argo) team.

Argo began testing our autonomous vehicles (AVs) in the Los Altos area in 2019. Since that time, we have been continuously testing our technology to perform safely and reliably in diverse conditions. We have tested extensively on California public roads with our highly-trained and experienced test specialists on board, conducted additional testing on closed courses, and simulated millions of scenarios through testing in a virtual world.

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If you have any questions regarding our application or testing plans, please do not hesitate to reach out to me and I will be able to assist you.

Thank you,

--

Argo AI - Public
Description of how Argo will monitor the communication link.

All Argo autonomous vehicles ("AVs") are equipped with redundant, bi-directional cellular connections that connect Argo AVs to Argo’s support teams. Argo continuously monitors these connections from both the AV and Argo’s cloud monitoring tool. Argo has three distinct support teams that are always available to immediately respond to Argo AVs and passengers: Remote Guidance, Remote Troubleshooting, and Customer Service. Remote Guidance operators are trained to offer instant support to Argo AVs that require clarification about their surroundings to proceed with a trip. Remote Troubleshooting operators can remotely and proactively fix issues that may arise with an Argo AV’s self driving system. Customer Service representatives can be reached by passengers from within the AV by using the touchscreen console or via communication channels within Argo mobile applications to request support during their ride. Each support team completes training on a continuous basis to remain current on any applicable regulatory changes or updates.
Explanation of how all of the vehicles tested will be monitored.

Argo autonomous vehicles ("AVs") pass a series of tests before each deployment to public roads to verify the functionality of the self driving system and the overall safety and roadworthiness of the AV. During both testing and public operations, Argo utilizes two support teams to monitor all Argo AVs: Fleet Monitoring and Remote Troubleshooting. Fleet Monitoring specialists monitor Argo AVs as they operate, and receive instant alerts from Argo AVs if they encounter an issue. Remote Troubleshooting operators can remotely and proactively fix problems that may arise with an Argo AV's self driving system.
Statement of the Operational Design Domain

The Operational Design Domain ("ODD") describes the geographic, environmental, and technical parameters that define the operating range of a self-driving system ("SDS"). Argo's ODD represents the set of road, driving, weather, and environmental attributes that our autonomous vehicles ("AV") are intended to handle without triggering a Minimal Risk Condition (a condition in which the AV is safely brought to a stop). All Argo AVs are equipped with the hardware and software to manage the ODD, outlined in more detail below.

**Domain Abilities**

**Road & Driving Environment**

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Capability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Road Speed</td>
<td>Argo's AVs may operate on roadways with posted speed limits of up to 65 mph.</td>
</tr>
<tr>
<td>Road Types</td>
<td>Argo’s AVs may operate on:</td>
</tr>
<tr>
<td></td>
<td>• Freeways/highways</td>
</tr>
<tr>
<td></td>
<td>• City streets</td>
</tr>
<tr>
<td></td>
<td>• Suburban/rural roads</td>
</tr>
<tr>
<td></td>
<td>• Parking lots/garages</td>
</tr>
</tbody>
</table>

**Weather & Environment**

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Capability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lighting &amp; Hours</td>
<td>Argo’s AVs may conduct 24 hours/day operations for all seasons and lighting conditions.</td>
</tr>
<tr>
<td>Weather</td>
<td>Argo’s AVs may operate in:</td>
</tr>
<tr>
<td></td>
<td>• Light rain</td>
</tr>
</tbody>
</table>
## Domain Constraints

<table>
<thead>
<tr>
<th>Attribute</th>
<th>Capability</th>
</tr>
</thead>
</table>
| Domain Constraints | The following weather conditions are not initially in scope:  
|                   | • Snow  
|                   | • Freezing rain/sleet  
|                   | • Hail  
|                   | • Dense fog  
|                   | • Extreme environmental conditions (including, but not limited to, hurricanes, earthquakes, landslides, etc.)  
|                   | The following road types are not initially in scope:  
|                   | • Autonomous operations off road |

Argo AI - Public
Map of the Operational Design Domain

For our testing and development operations in California, Argo operates its fleet of AVs in the area highlighted below in green, which is in and around Palo Alto, CA. Argo will submit a revised map of the ODD as appropriate and necessary.
Remote Guidance Operator Training Certification

Argo AI - Public
Introduction

Argo AI (“Argo”) is building self-driving technology to make transportation safer, more affordable, and more accessible for all. Argo works with experienced engineers, computer vision experts, machine learning experts, and others to design, test and validate its technology at each stage of innovation. Argo puts its technology through extensive testing on closed courses and public roads to ensure optimum performance of its self-driving system (“SDS”). Argo’s commitment to developing a safe autonomous vehicle (“AV”) begins with its approach to selecting, training, and supporting the ongoing development of its Remote Guidance (“Remote Guidance”) team, including Argo employees who are Remote Guidance Operators (“RGO”).

Commitment To Safety

Argo has a unique Remote Guidance Operator Training Certification (“Training Program”) that engages RGOs in Argo’s mission, empowers them to provide feedback, allows them to play a key role in driverless AV operations, and provides opportunities for career advancement as they develop advanced skills.

Argo adopts a variety of strategies to ensure that RGOs are actively engaged at all times. Candidates are screened prior to working as an RGO at Argo. The pre-employment screenings include, but are not limited to, extensive background checks and comprehensive drug and alcohol screening. Upon hire, all RGOs must complete Argo’s Training Program before they are allowed to sit at a Remote Guidance station and provide remote assistance during AV operations.

Argo’s comprehensive Training Program educates RGOs on the capabilities of remote AV technology, improves Remote Guidance skills, teaches all RGO roles, and refines those skills through testing. The Training Program is designed to be very challenging and requires candidates to pass a series of written and practical tests to advance through each phase of the Training Program.

At all times, Argo demonstrates its commitment to placing safety as its number one core value while pursuing its mission to make getting around cities safe, easy, and enjoyable for all.
Onboarding Day

In order to ensure consistency across all of Argo's operational cities, the onboarding experience includes the same core elements for all newly hired RGOs, regardless of location. Below is an overview of those core elements that are included in the onboarding sessions for RGOs.

<table>
<thead>
<tr>
<th>Onboarding Day</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Overview</strong></td>
</tr>
<tr>
<td>People Operations onboards newly hired RGOs and reviews all documents required for their employment with Argo.</td>
</tr>
<tr>
<td><strong>Specifics</strong></td>
</tr>
</tbody>
</table>
| ● Welcome Introduction  
   ● Account setup  
   ● Introduction to Argo  
   ● Company culture and expectations  
   ● Introduction to Mission Control  
   ● Introduction to Remote Guidance |

Training Overview

The RGO Training Program takes place during the first several weeks of an RGO's employment at Argo. The training consists of three different phases: Phase 1 - Remote Guidance Fundamentals; Phase 2 - Remote Guidance Practical Application; and Phase 3 - Remote Guidance Independent Production and Evaluation. The concept of the Training Program is to implement an incremental learning approach where each successive phase builds upon what is trained in the phase(s) prior. A trainee must pass a designated phase of training within that phase or they will not move on. Training is pass/fail, and an inability to pass assessments or evaluations can lead to dismissal of the trainee from the Training Program.
### Training and Certification Timeline

<table>
<thead>
<tr>
<th>Phase 1</th>
<th>Remote Guidance Fundamentals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 2</td>
<td>Remote Guidance Practical Application</td>
</tr>
<tr>
<td>Phase 3</td>
<td>Remote Guidance Independent Production and Evaluation</td>
</tr>
</tbody>
</table>

### Phase 1: Remote Guidance Fundamentals

#### Overview
RGOs trainees receive a complete introduction to Remote Guidance. Training focuses on gaining familiarity with all aspects of the Remote Guidance station and the scope of RGO responsibilities.

#### Objectives
- Demonstrate a working knowledge of all Remote Guidance policies, procedures, protocols, and other applicable materials.
- Gain full understanding of the Remote Guidance Graphical User Interface tooling.
- Perform Remote Guidance session scoring based on AV behavior, Remote Guidance station reliability, and AV situational encounters during a Remote Guidance session.
- Demonstrate understanding of the full Remote Guidance scope of responsibilities.
- Complete Remote Guidance session reverse shadowing of experienced RGOs.

#### Assessment/Evaluation
- Launching the Remote Guidance station.
- Gaining Situational Awareness.
  - Understanding AV Intent.
  - Comprehending the Graphical Layer Window.
  - Understanding mover decision module (MDM) states.
  - Evaluating prediction lines.
  - Understanding prediction objects.
- Session Scoring.
  - Demonstrate proper application of the scoring categories.
  - Properly identify AV behavior.
  - Properly identify camera stream performance.
- Interactive Training Courses.
  - Practice acceptance reaction time.
  - Practice proper session scoring.
- Daily observations of the RGO trainees are made and graded against a rubric. If a trainee does not meet Argo standards, they may be removed from the Training Program.
  - This applies even in the event that the trainee passes all written and practical exams/assessments.

<table>
<thead>
<tr>
<th>Phase 2: Remote Guidance Practical Application</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Overview</strong></td>
</tr>
<tr>
<td>RGO trainees spend this phase shadowing and reverse shadowing experienced RGOs. All phase one topics are reevaluated, including, suggestion guidance and situational awareness, support response times, and the use of the appropriate session scoring.</td>
</tr>
<tr>
<td><strong>Objectives</strong></td>
</tr>
<tr>
<td>- Successfully complete shadowing and reverse shadowing through both trainee observation of experienced RGOs and trainee demonstration to the trainer.</td>
</tr>
<tr>
<td>- Demonstrate knowledge of session scoring and annotations.</td>
</tr>
<tr>
<td>- Provide RGO trainees with the opportunity to practice all skills under direct supervision.</td>
</tr>
<tr>
<td>Assessment/Evaluation</td>
</tr>
<tr>
<td>------------------------</td>
</tr>
<tr>
<td>• Learn processes and procedures to respond to emergencies, including how to respond to emergency situations and hazardous driving scenarios that could be experienced by the AV or the AV's occupants.</td>
</tr>
</tbody>
</table>
| • RGO trainees must successfully perform a Remote Guidance session evaluated by a trainer.  
  o The trainee must demonstrate proficiency in all skills developed during the first two phases, graded against a performance rubric.  
  • RGO trainees must also pass a written final evaluation exam focusing on the fundamentals, skills, and practices of the RGO.  
    o Failure of the exam will result in the RGO trainee being taken back through phase 1 of the Training Program. |

**Independent Operating**

Independent Operating ("IO") serves many purposes. First and foremost, it is a critical element in ensuring that all RGOs can effectively respond within acceptable parameters to an AV request for assistance, deliver appropriate suggestion guidance, and resolve or triage issues. IO is designed to enhance the RGO trainee’s confidence and ability to react within the required timeframe to an AV request for support, gain situational awareness, and satisfy the request. IO is also used as an assessment tool to ensure that only the most skilled and competent RGOs support Argo AVs on public roadways. This phase focuses on the practical application of the entire scope of Remote Guidance and how RGOs contribute to its core mission. At all times during the IO evaluation period, trainers will continue to actively monitor the RGO’s performance to ensure safety. Failure to demonstrate the appropriate situational awareness, speed and accuracy in initiating suggestion guidance, and any other non-compliant Remote Guidance behaviors will lead to a failure and dismissal from the program.
### Phase 3: Remote Guidance Independent Operation and Evaluation

#### Overview
- The RGO trainees learn how to safely and successfully perform Remote Guidance to the AV without trainer support.
- The trainer will only intervene if the RGO demonstrates an inability to function without supervision.

#### Objectives
- Demonstrate the ability to complete IO Remote Guidance sessions first with minimal trainer intervention, and then progressing to IO with no trainer intervention during the phase.
- Demonstrate comprehensive practical application of all training phases with trainer observation only.

#### Assessment/Evaluation
- Daily observation of the trainee is made and graded against a rubric.
  - If the trainee does not meet Argo standards, they may be removed from the Training Program.
- Successfully passing this portion of training certifies that the RGO trainee has the ability to safely perform Remote Guidance to our AVs on public roadways.

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**Continued Training**

The foundation of Argo's approach to AV operations is the conviction that training and learning never end. As Argo's SDS matures, those who are responsible for maintaining safe operations must mature their knowledge and learning as well. The RGOs attend daily teamwide briefings, pre-shift and post-shift, in order to gain a thorough
understanding of new software releases, pertinent information about the operational area (i.e., new construction, situations or constructs to closely monitor while assisting an AV, etc.), relevant safety topics, and relevant protocols, such as key incident response and critical event procedures.

Software engineers and developers engage with RGOs frequently to ensure they gain a deeper understanding of the SDS and its capabilities. Remote Guidance leads continue to have a presence in ongoing training – as observers and coaches – to ensure all are performing at the high standard consistent with their training. Feedback is regularly solicited and encouraged to ensure that Argo’s operations are continually improved. Argo emphasizes teamwork, pride and professionalism, to inspire and invest RGOs in their day-to-day work.
## Argo Remote Guidance Operators Training Certification Record

<table>
<thead>
<tr>
<th>Remote Guidance Operator (initials)</th>
<th>Training Start Date</th>
<th>Certification Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5/18/2020</td>
<td>6/1/2020</td>
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<tr>
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<tr>
<td></td>
<td>9/10/2021</td>
<td>9/27/2021</td>
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<td>10/25/2021</td>
<td>11/8/2021</td>
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<tr>
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<td>4/5/2021</td>
<td>4/19/2021</td>
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<tr>
<td></td>
<td>8/16/2021</td>
<td>8/30/2021</td>
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<td>8/16/2021</td>
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<td>4/5/2021</td>
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<td>11/15/2021</td>
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