

March 23, 2026

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, West Building
Washington, DC 20590

RE: Support for Zoox's petition, Docket No. NHTSA-2025-0523

Dear Administrator Morrison:

The Southern Nevada Bicycle Coalition advocates for safer roadways, improved cycling infrastructure, and increased biking opportunities in Southern Nevada. On behalf of the organization, I'm writing to express our strong support for Zoox's petition, Docket No. NHTSA-2025-0523, requesting an exemption to enable commercial deployment of their automated vehicles under strict federal safety monitoring.

As advocates for safer streets and equitable mobility, we view the responsible deployment of autonomous vehicle technology as an important opportunity to reduce traffic crashes, improve predictability, and enhance the safety of people biking, walking, and using mobility devices.

Every year, tens of thousands are killed or seriously injured on our roads. Achieving Vision Zero, the goal of eliminating all traffic deaths, requires innovative solutions that complement safe street design and strong public policy. When developed and deployed responsibly, autonomous vehicle technology can be part of that solution.

With advanced sensing and situational awareness, predictive algorithms, consistent adherence to traffic laws, and continuous data feedback, Zoox autonomous vehicles are engineered to detect and respond to cyclists and pedestrians in ways that exceed human capability. Purpose-built systems with 360-degree sensor coverage can provide constant vigilance, helping to eliminate common causes of crashes such as distraction, speeding, or poor visibility.

When properly designed, tested, and monitored, autonomous vehicles can help create a transportation ecosystem that prioritizes vulnerable road users, making streets safer for everyone. Companies like Zoox, whose commitment to safety, transparency, and community collaboration demonstrates how new technologies can advance public good, encourage us.

We support the continued partnership we've established with Zoox to ensure these technologies are implemented in ways that protect people biking and walking, reduce crashes, and build public trust. With the right safeguards and collaboration, autonomous mobility can help move us closer to a future where every road user arrives safely.

For these reasons, we support Zoox's petition, Docket No. NHTSA-2025-0523, to enable the safe, supervised commercial deployment of its autonomous vehicles under NHTSA's continuing oversight.

Sincerely,
The Southern Nevada Bicycle Coalition

Additional Background:

All vehicles in the U.S. must comply with traditional safety standards set by the National Highway Traffic Safety Administration (NHTSA). NHTSA is currently modernizing its approval and oversight process to include driverless vehicles while ensuring public safety, however, these standards currently assume a human driver and require features like steering wheels, pedals, and rearview mirrors. Zoox's autonomous vehicles are intentionally designed without these components, as they are never intended to be driven by, and in fact *cannot* be driven by a human. Instead, they rely on advanced sensors and computer systems for self-driving operation.

Zoox currently holds a demonstration exemption that allows public road operation for testing and demonstrations. This exemption does *not* permit commercial use, and they have applied to NHTSA for a temporary exemption to commercially operate their vehicle. The request is essentially a waiver saying Zoox meets all safety goals, just not in the traditional way.

If the exemption is approved, Zoox will be allowed to operate its driverless vehicles commercially in designated areas. This operation would remain subject to applicable federal and state government regulations.