

April 3, 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:

On behalf of the **Corporation for Automated Road Transportation Safety (CARTS)**, I am writing in support of Zoox, Inc.'s petition (Docket No. NHTSA-2025-0523) for a temporary exemption from portions of eight Federal Motor Vehicle Safety Standards under 49 U.S.C. 30113 and 49 CFR Part 555. We have reviewed the publicly available portions of Zoox's application and the Federal Register notice, and we urge the Agency to grant this exemption.

CARTS is a 501(c)(3) research organization based in New York City and Princeton, NJ, with the mission to advance safe and sustainable mobility for all. Our researchers publish white papers and studies on AV deployment readiness, policy gaps, and safety performance, and we work extensively with community organizations nationwide in healthcare, housing, education, public safety, and local business to identify where mobility demand is acute and unmet. Our team also pioneered with the City of Trenton and the NJDOT on what would be the first AV-based urban transit system in the United States (Trenton MOVES). This petition matters to us: we work at the intersection of regulatory and community-acceptance barriers that stand between ADS-equipped vehicles and scalable deployment delivering affordable, high-quality mobility.

The Part 555 exemption framework was designed for a specific regulatory problem: a vehicle whose engineering meets or exceeds the safety intent of the FMVSS but whose physical configuration makes literal compliance with certain standards impossible. The eight standards at issue all share a common assumption: a human driver operating a forward-facing vehicle with conventional controls. FMVSS Nos. 103 and 104 govern windshield systems that serve driver visibility. FMVSS No. 111 addresses rear visibility for a driver monitoring the area behind the vehicle. FMVSS No. 135 requires a service brake pedal for manual stopping. These requirements lose their functional basis in a vehicle where perception, navigation, and braking are handled entirely by the ADS. FMVSS Nos. 201, 205, and 208 specify occupant protection measures calibrated to a forward-facing seating layout and a steering column—neither of which exists in a bidirectional, face-to-face cabin. FMVSS No. 108 defines lamp placement relative to a fixed vehicle front and rear, a distinction that does not apply to a symmetrical platform.

Based on publicly available information and our team's in-person experience with Zoox vehicles in Las Vegas, NV, the vehicle appears designed to achieve these objectives through alternative means, though a full assessment depends on the Agency's review of complete data. This is precisely why a well-structured exemption pathway is important: to enable scaled, real-world deployment and validation of such designs while maintaining appropriate regulatory oversight.

We note that NHTSA’s own rulemaking trajectory supports this conclusion. The Agency also recently published proposed amendments to FMVSS Nos. 103 and 104 that would permanently exempt ADS-equipped vehicles without manual driving controls from those standards¹. The Agency is, in effect, already moving to resolve the regulatory mismatch for at least two of the eight standards at issue here. A temporary exemption under Part 555 is the appropriate bridge for the remaining standards until permanent rulemaking catches up with vehicle designs that the current FMVSS did not anticipate.

The public interest case is evident. The exemption is bounded—2,500 vehicles per year, two years, subject to operational terms NHTSA imposes. That scope is small enough for the Agency to monitor closely and large enough for Zoox to run a real commercial service rather than another open-ended pilot. From CARTS’s perspective, the public benefit goes beyond Zoox. Our work planning AV network in the Northeast has put us in direct contact with the people this technology could serve—hospital shift workers who finish at 2 a.m. and have no safe, affordable way home; patients who miss appointments because paratransit is supply-constrained; residents in neighborhoods where the nearest bus stop is a 30-minute+ walk and the bus runs once an hour. These are not hypothetical use cases. They are the daily reality in communities across the country that existing mobility modes have not been able to serve well. Purpose-built autonomous vehicles are one of the few approaches we have seen that could close those gaps at a per-trip cost communities can financially sustain. But that only happens if manufacturers like Zoox can move past demonstration fleets and into sustained commercial operation, at scale, under federal oversight. This petition is a necessary step in that transition.

We respectfully support this temporary exemption. The petition is well grounded in the statute, the requested scope is reasonable, and the Agency’s own concurrent rulemaking confirms that the regulatory gap Zoox faces is real and already being addressed on a permanent basis. CARTS is available as a resource to NHTSA on this petition and on AV deployment policy more broadly.

Respectfully,

/s/ Jerry He

Executive Director

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¹ National Highway Traffic Safety Administration, *Federal Motor Vehicle Safety Standards; Modernization of FMVSS No. 103 and FMVSS No. 104 To Accommodate ADS-Equipped Vehicles; Incorporation by Reference*, 91 Fed. Reg. 12537 (Mar. 16, 2026).