



April 8, 2025

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

Re: Letter of Support for Zoox's Petition for Exemption, Docket No. NHTSA-2025-0523

Dear Administrator Morrison:

Independent Women's Voice respectfully submits our support for Zoox's Petition for Exemption from certain Federal Motor Vehicle Safety Standards (FMVSS), Docket No. NHTSA-2025-0523. We write today because the technology at the heart of Zoox's petition—fully autonomous, purpose-built robotaxi vehicles—holds extraordinary promise for American women as consumers, commuters, and members of communities who deserve safer roads.

Women's Safety on the Road: The Case for Autonomous Vehicles

The statistics surrounding road safety are sobering and demand serious policy attention. While men are statistically more likely to be involved in fatal crashes as drivers, women face distinct and [well-documented risks as passengers](#) and victims of impaired or aggressive drivers. According to federal traffic data, a significant share of women killed or seriously injured in vehicle crashes are passengers—not drivers—meaning their safety is entirely dependent on the behavior and sobriety of drivers behind the wheel. For women who rely on rideshare services, taxis, or rides from acquaintances, the risks extend well beyond the road itself.

Human drivers pose a threat to women that autonomous vehicles cannot. Sexual harassment and assault by rideshare and taxi drivers have been widely documented, [with thousands of incidents reported annually](#). Women frequently make calculated decisions about their personal safety when choosing transportation: avoiding late-night rides, selecting specific routes, sharing their location with friends, or simply declining to travel at all to minimize risk. These are not abstract concerns—they are experienced by millions of American women navigating daily life. Fully autonomous vehicles eliminate the human driver entirely, and with it, the risk of assault or coercion by a person in a position of control over the passenger.

Beyond personal safety from driver misconduct, autonomous vehicle technology offers protection from the most pervasive cause of traffic fatalities: human error. The National Highway Traffic Safety Administration has long recognized that driver error—including distracted driving, impaired driving, speeding, and fatigue—is a factor in the overwhelming majority of serious crashes. Drunk and drugged driving alone claims thousands of lives each year. Women, who are [statistically less likely to drive impaired themselves](#), are nonetheless killed and injured by impaired drivers at alarming rates. Autonomous vehicle systems do not drink. They do not text. They do not speed out of frustration or fatigue. The promise of dramatically reducing human error on our roads is a promise of saving women's lives.

Women as Consumers: Access, Independence, and Mobility

The benefits of autonomous vehicle technology extend beyond physical safety. For many American women, access to reliable, safe transportation is directly tied to economic participation, caregiving responsibilities, and quality of life. Women make up the majority of caregivers for children and elderly family members, and they are more likely than men to make multiple “trip-chaining” stops throughout their day—combining work commutes with school pickups, medical appointments, grocery runs, and other essential errands. Safe, on-demand autonomous transportation could dramatically expand mobility options for women in underserved communities, women without access to personal vehicles, older women who can no longer safely drive, and women with disabilities for whom traditional transportation options remain inadequate.

Women with greater access to safe and reliable transportation have greater access to opportunity. The freedom to move safely, affordably, and on one's own terms is foundational to the independence and self-determination that Independent Women's Voice champions. Autonomous vehicle technology, if permitted to develop and deploy responsibly, represents a significant expansion of that freedom.

Supporting Innovation with Appropriate Oversight

We recognize that NHTSA's FMVSS were designed with human-operated vehicles in mind, and that Zoox's purpose-built autonomous vehicle—with no steering wheel, no gas pedal, and no provision for a human driver—does not neatly fit within that existing regulatory framework. We believe this is precisely a situation when a petition for exemption, evaluated carefully and transparently by the agency, serves the public interest. Rigid application of standards designed for a different technology could unnecessarily delay the safety benefits that autonomous vehicles promise. We urge NHTSA to evaluate Zoox's petition on its merits, taking seriously both the safety case the company has presented and the broader public interest in enabling life-saving innovation to move forward.

Independent Women's Voice is not calling for a regulatory free-for-all. We support thoughtful, evidence-based oversight that ensures vehicles are genuinely safe before they are deployed at scale. We are confident that NHTSA has both the authority and the expertise to make that determination. We ask the agency to approach this petition with an openness to the transformative safety potential of autonomous vehicle technology—particularly for the women and families who stand to benefit most.

Conclusion

Independent Women's Voice strongly supports NHTSA's favorable consideration of Zoox's petition for exemption under Docket No. NHTSA-2025-0523. Autonomous vehicle technology represents a meaningful, concrete opportunity to make American roads safer from impaired and reckless drivers, safer from harassment and assault, and more accessible to the millions of women who deserve transportation that works for their lives. We urge the agency to grant this petition and to continue developing a regulatory environment that allows safety-advancing innovation to flourish.

We appreciate the agency's consideration of these comments and welcome the opportunity to discuss further.

Sincerely,

A handwritten signature in dark ink that reads "Carrie Sheffield". The signature is written in a cursive, flowing style.

Carrie Sheffield
Director, Center for AI & Technology
Independent Women