



April 10, 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 American Association of People with Disabilities (AAPD) works to increase the political and economic power of people with disabilities. As a national disability-led and cross-disability rights organization, AAPD advocates for full civil rights for over 70 million Americans with disabilities. We do this by promoting equal opportunity, economic power, independent living, and political participation.

AAPD has long advocated for a purpose-built vehicle that can serve all people with disabilities. As transportation moves away from both traditional vehicle ownership and traditional fixed route public transportation in many American communities, companies providing transportation as a service (TaaS) must be able to accommodate the needs and preferences of people with diverse disabilities. AAPD supports Zoox's petition in Docket No. NHTSA-2025-0523 requesting exemption to FMVSS (Federal Motor Vehicle Safety Standards) requirements that support the comfort and safety of passengers with disabilities.

No system will be perfect in its first iteration, but steps must be taken to adapt safety criteria to allow for flexibility and innovation for automated vehicle design, and Zoox is one of the few commercial services working on evolving a shared ride vehicle platform that does not need human driver-centric safety requirements. The traditional automotive safety regulations must consider flexibility to support both short- and long-term development of accessible autonomous vehicles.

For wheelchair users, NHTSA has long granted exemptions to the FMVSS so they can get in and out of a vehicle, and maintain a balance of independence and safety. FMVSS historically has centered on licensed drivers for interaction and safety standards, which is no longer the case in automated driving services. While the Zoox vehicle has a long journey to go before it can realize that goal and provide barrier-free



transportation, NHTSA should begin granting exemptions that promote automation and self-driving to build the needed roadmap to barrier-free autonomous vehicles. The outcome will lead to innovation in transportation as we rethink the systems designed in the past. AAPD looks forward to engaging with the autonomous vehicle industry as they look to work and engage with people with disabilities to make vehicles more accessible and safer for the population.

Maitreya Shah
Technology Policy Director
American Association of People with Disabilities