



DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration

[Docket No. NHTSA-2025-0523]

Zoox – Grant of Temporary Exemption from Portions of Various Requirements of the Federal Motor Vehicle Safety Standards for an Automated Driving System-Equipped Vehicle

AGENCY: National Highway Traffic Safety Administration (NHTSA), Department of Transportation (Department or DOT).

ACTION: Notice of grant of application for temporary exemption from portions of eight Federal Motor Vehicle Safety Standards (FMVSS).

SUMMARY: NHTSA is granting an exemption to Zoox, Inc. (Zoox) to allow it to manufacture and deploy commercially a passenger car, which is equipped with an Automated Driving System (ADS), that does not comply with certain requirements in the Federal Motor Vehicle Safety Standards (FMVSS). Specifically, NHTSA grants Zoox an exemption for its Zoox sedan from certain requirements in eight FMVSS: FMVSS No. 103, Windshield defrosting and defogging systems; FMVSS No. 104, Windshield wiping and washing systems; FMVSS No. 108, Lamps, reflective devices, and associated equipment; FMVSS No. 111, Rear visibility; FMVSS No. 135, Light vehicle brake systems; FMVSS No. 201, Occupant protection in interior impact; FMVSS No. 205, Glazing materials; and FMVSS No. 208, Occupant crash protection. NHTSA is granting Zoox's application on the basis that compliance with these requirements would prevent Zoox from selling, or otherwise commercially deploying, a motor vehicle with an overall safety level at least equal to the overall safety level of a vehicle that complies with all applicable FMVSS. NHTSA grants Zoox an exemption subject to certain specified terms and conditions, including the application of an enhanced oversight condition. Under this condition, NHTSA will

issue Operational Authorizations that may update and expand as Zoox’s ADS technology matures.

DATES: NHTSA grants Zoox’s exemption effective from [INSERT DATE OF PUBLICATION IN THE FEDERAL REGISTER] through July 31, 2028.

FOR FURTHER INFORMATION CONTACT: For legal issues: Callie Roach, Office of the Chief Counsel, callie.roach@dot.gov. For technical issues: Emily Shull, Rulemaking Office of Automation Safety, emily.shull@dot.gov. Mailing address: National Highway Traffic Safety Administration, 1200 New Jersey Avenue S.E., Washington, D.C. 20590.

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I. Executive Summary

NHTSA is granting an application submitted by Zoox for an exemption from certain requirements in eight FMVSS for its “Zoox sedan” model (referred to as the “Zoox robotaxi”).

The Zoox robotaxi is a passenger car that is equipped with an ADS¹ and lacks manually operated driving controls. In its application, Zoox stated that the robotaxi was designed specifically for autonomous ride hailing. The vehicle is symmetrical longitudinally, meaning its front and rear are identical. The interior is configured in a carriage-style arrangement with two rows of seating facing each other toward the center of the vehicle. The Zoox robotaxi can be operated with input by a remote assistant.² Such inputs include requests to pull over, contextual scene information, a suggested path, or help with assessing a scenario. It also can be remotely driven,³ if necessary, at low speeds within line of sight using a handheld controller. Zoox stated that it will not sell the robotaxi but will instead maintain ownership and be responsible for daily operations, including fleet management, maintenance and repair, fleet routing and optimization, remote operations support, and customer service.

NHTSA is granting Zoox an exemption on the basis that “compliance with the standard would prevent the manufacturer from selling a motor vehicle with an overall safety level at least equal to the overall safety level of nonexempt vehicles.”⁴ Under this exemption, Zoox is permitted to manufacture vehicles that do not need to comply with portions of: FMVSS No. 103, Windshield defrosting and defogging systems; FMVSS No. 104, Windshield wiping and washing systems; FMVSS No. 108, Lamps, reflective devices, and associated equipment; FMVSS No. 111, Rear visibility; FMVSS No. 135, Light vehicle brake systems; FMVSS No. 201, Occupant protection in interior impact; FMVSS No. 205, Glazing materials; and FMVSS No. 208, Occupant crash protection. Zoox is permitted to manufacture vehicles pursuant to this

¹ For purposes of this Grant Notice, the term Automated Driving System and the abbreviation “ADS” are used as defined in SAE International J3016, “Taxonomy and Definitions for Terms Related to On-Road Motor Vehicle Automated Driving Systems” (April 2021), available at https://www.sae.org/standards/j3016_202104-taxonomy-definitions-terms-related-driving-automation-systems-road-motor-vehicles. This standard is hereafter referred to as “SAE J3016.”

² For purposes of this Grant Notice, the terms “remote assistant” and “remote assistance” are used as defined in SAE J3016.

³ For purposes of this Grant Notice, the term “remote driving” is used as defined in SAE J3016.

⁴ 49 U.S.C. 30113 (b)(3)(B)(iv).

exemption for two years, provided that not more than 2,500 exempted vehicles are introduced into interstate commerce for commercial deployment in any 12-month period.

As discussed below, NHTSA finds that a Zoox robotaxi that does not comply with the FMVSS for which this exemption is being granted would provide an equivalent level of safety to a nonexempt vehicle. Further, NHTSA finds that requiring compliance with those specific requirements would render Zoox unable to deploy commercially a motor vehicle with an overall safety level at least equal to that of a nonexempt vehicle. In view of the terms and conditions discussed in this notice and to which this exemption is subject, NHTSA also finds that granting this exemption is consistent with the Safety Act, which requires a finding that the exemption is in the public interest and that compliance with the standard would prevent the manufacturer from selling a motor vehicle with an overall safety level at least equal to the overall safety level of nonexempt vehicles.

The Zoox robotaxi is the first passenger-carrying ADS-equipped vehicle to be granted an exemption under NHTSA's general exemption authority.⁵ It is also the first exemption to be issued since NHTSA introduced process improvements under the Department's Automated Vehicle (AV) Framework.⁶ These process improvements have been made in accordance with the AV Framework's three core principles: (1) prioritize the safety of ongoing AV operations on public roads; (2) unleash innovation by removing unnecessary regulatory barriers; and (3) enable the commercial deployment of AVs to enhance safety and mobility for the American public.⁷ As described in more detail in Section V, NHTSA's new approach for processing part 555 exemptions for ADS-equipped vehicles enhances the agency's ability to process applications efficiently and exercise appropriate oversight of the exempt vehicles.

⁵ The first exemption under this authority for an ADS-equipped vehicle was granted to Nuro for an occupantless low-speed delivery vehicle. See 85 FR 7826.

⁶ See June 13, 2025 letter to manufacturers at <https://www.nhtsa.gov/sites/nhtsa.gov/files/2025-06/part-555-letter-june-2025.pdf>.

⁷ See U.S. Dept. of Transp., *Trump's Transportation Secretary Sean P. Duffy Unveils New Automated Vehicle Framework as Part of Innovation Agenda* (Apr. 24, 2025), available at <https://www.transportation.gov/briefing-room/trumps-transportation-secretary-sean-p-duffy-unveils-new-automated-vehicle-framework>.

There are currently no requirements under the Safety Act that prohibit the operation of ADS-equipped vehicles on public roads if the vehicle has been self-certified by its manufacturer that it complies with all applicable FMVSS and the system does not present an unreasonable risk to motor vehicle safety. NHTSA's analysis of whether Zoox's vehicle provides an overall safety level at least equal to the overall safety level of a vehicle that complies with all applicable FMVSS compares Zoox's vehicle to a vehicle that would be identical except for compliance with the standards for which Zoox sought exemption. NHTSA finds that requiring compliance with the portions of the standards listed above is unnecessary to achieve an overall level of safety at least equal to that of a nonexempt vehicle because most of those provisions require certain features to be provided to assist a human and do not provide a safety benefit in a vehicle designed never to be driven by a human occupant. The remaining provisions require certain features and performance that are unnecessary or do not accommodate the Zoox robotaxi's novel design.

NHTSA's safety equivalency analysis is limited to the specific requirements under the FMVSS for which Zoox sought an exemption. In processing Zoox's application, NHTSA has not made any conclusions regarding whether the vehicle otherwise complies with all other applicable FMVSS requirements. It remains the manufacturer's responsibility to perform a complete analysis of the vehicle's compliance with FMVSS requirements.

Although NHTSA did not consider Zoox's ADS in its safety equivalency analysis beyond functional performance that may be directly related to a particular exemption, NHTSA has considered the safety and maturity of Zoox's ADS in its determination of whether granting the exemption would be in the public interest and consistent with the objectives of the Safety Act. This consideration informed development of operational oversight conditions for this exemption.

NHTSA is granting this exemption subject to several terms and conditions that provide increased transparency of operations and allow NHTSA to exercise increased oversight, including to ensure that the exempted vehicles do not undermine the public's interest in safe

operations. In its June 13, 2025 letter to manufacturers, NHTSA stated that it was adopting a more dynamic and flexible approach to evaluating and overseeing exemptions for ADS-equipped vehicles.⁸ NHTSA has used this new approach to process Zoox’s application. In granting Zoox’s exemption, NHTSA is establishing a permanent term that subjects the exempted vehicles to continued operational oversight implemented through Operational Authorizations. Operational Authorizations prescribe specific operating conditions for exempted vehicles and may be tailored to different operating environments. The Operational Authorizations offer flexibility because they allow NHTSA to oversee more dynamically the operations of the exempted vehicles by allowing the agency to modify or expand the authorizations as appropriate. The first Operational Authorization is being issued concurrently with this decision notice and is tailored to Zoox, its robotaxi, and the ADS’s existing capabilities. NHTSA is placing a copy of the Operational Authorization in the docket for this notice.

II. Authority and Procedures for General Exemptions

The National Traffic and Motor Vehicle Safety Act (Safety Act), codified at 49 U.S.C. ch. 301, *et seq.*, provides the Secretary of Transportation with broad authority to exempt motor vehicles from an FMVSS or bumper standard on a temporary basis, under specified circumstances, and on terms the Secretary deems appropriate. This authority is set forth at 49 U.S.C. § 30113. The Secretary has delegated the authority for implementing this section to NHTSA.⁹

In exercising this authority, NHTSA must look comprehensively at the request for exemption and find that an exemption would be consistent with the public interest and with the objectives of the Safety Act.¹⁰ In addition, NHTSA must make at least one of the following more-focused findings, which NHTSA commonly refers to as the “basis” for the exemption:

⁸ <https://www.nhtsa.gov/sites/nhtsa.gov/files/2025-06/part-555-letter-june-2025.pdf>

⁹ 49 CFR 1.95.

¹⁰ 49 U.S.C. § 30113(b)(3)(A).

(i) compliance with the standard[s] [from which exemption is sought] would cause substantial economic hardship to a manufacturer that has tried to comply with the standard[s] in good faith;

(ii) the exemption would make easier the development or field evaluation of a new motor vehicle safety feature providing a safety level at least equal to the safety level of the standard;

(iii) the exemption would make the development or field evaluation of a low-emission motor vehicle easier and would not unreasonably lower the safety level of that vehicle; or

(iv) compliance with the standard would prevent the manufacturer from selling a motor vehicle with an overall safety level at least equal to the overall safety level of nonexempt vehicles.¹¹

NHTSA established 49 CFR part 555, *Temporary Exemption from Motor Vehicle Safety and Bumper Standards*, to implement the statutory provisions concerning temporary exemptions. The requirements in 49 CFR § 555.5 state that the applicant must set forth the basis of the application by providing the information required under 49 CFR § 555.6, and the reasons why the exemption would be in the public interest and consistent with the objectives of the Safety Act.

III. Zoox’s Application

On August 22, 2025, Zoox submitted an application for exemption from portions of eight FMVSS for its ADS-equipped robotaxi. Zoox cited two bases for exemption, section 30113(b)(3)(B)(iv) and section 30113(b)(3)(B)(ii), stating that compliance with these FMVSS would prevent Zoox from offering a motor vehicle “with an overall safety level at least equal to the overall safety level of nonexempt vehicles” and that granting the exemption would permit Zoox to introduce new motor vehicle safety features “providing a safety level at least equal to the safety level of the standard.”

¹¹ 49 U.S.C. § 30113(b)(3)(B).

Zoox requested an exemption from portions of the following FMVSS:

- FMVSS No. 103: Windshield defrosting and defogging systems.
- FMVSS No. 104: Windshield wiping and washing systems.
- FMVSS No. 108: Lamps, reflective devices, and associated equipment.
- FMVSS No. 111: Rear visibility.
- FMVSS No. 135: Light vehicle brake systems.
- FMVSS No. 201: Occupant protection in interior impact.
- FMVSS No. 205: Glazing materials.
- FMVSS No. 208: Occupant crash protection.

Zoox's application provided an overview of the robotaxi, a description of each of the specified FMVSS requirements for which Zoox is seeking an exemption, and its arguments supporting the required statutory findings. NHTSA notes that any of the descriptions provided in this section of its application are Zoox's characterizations and do not necessarily reflect the views of NHTSA. The application included Zoox's claims regarding the safety of the Zoox robotaxi compared to nonexempt vehicles and its arguments that granting this exemption would be in the public interest.¹² In addition, Zoox's application stated that it anticipates it will comply with all applicable FMVSS at the end of the exemption period based on future anticipated regulatory changes that account for ADS-equipped vehicles.¹³

Zoox describes the robotaxi as a purpose-built, fully autonomous, all-electric vehicle optimized for ride hailing in cities. It is classified as a passenger car and has a top speed of 75 mph. The vehicle seats a maximum of four passengers and has a gross vehicle weight rating (GVWR) of 3,000 kilograms (6,614 pounds). Zoox states that its ADS is developed entirely in-house and consists of the hardware and software collectively capable of performing the entire dynamic driving task and fallback on a sustained basis within a specified operational design domain (ODD), without any expectation that a passenger will need to intervene. Zoox states that, therefore, their system meets the description of a Level 4 ADS under SAE J3016: Taxonomy and

¹² Redacted versions of Zoox's application and supporting documents are available in the docket (<https://www.regulations.gov/docket/NHTSA-2025-0523>).

¹³ 49 CFR 555.6(d)(3).

Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles (April 2021).

Unlike conventional human-driven cars, the Zoox robotaxi is symmetrical, meaning its front and rear are identical. Rather than forward-facing rows, the Zoox robotaxi's seats are configured in a carriage-style arrangement where seated occupants face the center of the cabin. Zoox states that the primary difference between the Zoox robotaxi and a nonexempt vehicle is that the Zoox robotaxi is not capable of being driven by a human.¹⁴ Instead, the Zoox robotaxi is equipped with lidar, radar, cameras, long-wave infrared cameras, microphones, and other sensors that perceive the environment with custom perception software. This information is then fed into planner and control systems which plan and execute the driving maneuvers autonomously. Zoox explains that, therefore, the Zoox robotaxi is not equipped with:

- Manually operated driving controls as defined by 571.3 (*i.e.*, “system of controls that are used by an occupant for real-time, sustained, manual manipulation of the motor vehicle’s heading (steering) and/or speed (accelerator and brake)”);
- Manually operated “non-driving” controls (*i.e.*, a turn signal operating unit that is capable of “cancellation by a manually operated control,” a headlamp beam switching device that is “designed and located so that it may be operated conveniently by a simple movement of the driver’s hand or foot,” or a parking brake control that “may be either a hand or foot control”); or
- Human driver visibility aids (*i.e.*, windshield wipers and defrosters, sun visors, abrasion-resistant glazing, rearview and side mirrors, or a rearview image display).

Although the Zoox robotaxi lacks manually operated driving controls, Zoox personnel (“the Zoox Support Team”) are capable of limited, manual, low-speed operation of the robotaxi,

¹⁴ In the context of this statement, we understand Zoox to be referring to the vehicle not being able to be driven by a human occupant.

with direct and constant line of sight, through an industrial handheld “remote” control.¹⁵ Zoox also states that other Zoox personnel (“TeleGuidance tacticians”) can provide remote guidance to the ADS, and the ADS then determines when and how it is appropriate to execute that guidance. Zoox states that the tacticians do not have direct control of the motion of the robotaxi.¹⁶

Zoox’s arguments and rationale supporting granting their exemption are discussed in the relevant sections below.

IV. Receipt Notice, Request for Additional Information from Zoox, and Comment

Summary

NHTSA published a Notice of Receipt of Zoox’s application in the *Federal Register* on September 25, 2025.¹⁷ The Notice of Receipt stated that NHTSA had received an application for exemption from Zoox and listed the FMVSS containing the requirements for which Zoox sought an exemption. The notice told the public that NHTSA made a copy of Zoox’s application available in the docket and that it would separately publish a notice seeking public comment on Zoox’s application after determining that the agency had received adequate information to consider the merits of the request.

After conducting an initial evaluation of Zoox’s application and requesting and receiving additional information from Zoox, NHTSA published a notice requesting public comment on March 11, 2026, and noted that copies of Zoox’s application, appendices, and responses to NHTSA’s questions were placed in the docket, with redactions of information for which Zoox sought confidential treatment.¹⁸

NHTSA received 119 public comments in response to the request for comment. NHTSA received one request to extend the 30-day comment period from the Transportation Trades

¹⁵ NHTSA considers operation via the “remote” control to be remote driving as defined in SAE J3016.

¹⁶ NHTSA considers this remote guidance to be remote assistance as defined in SAE J3016 and understands Zoox’s remote assistants can initiate the vehicles to stop, remain stopped, or pull over, as well as provide suggested paths or contextual scene information.

¹⁷ 90 FR 46300.

¹⁸ 91 FR 04730.

Department,¹⁹ which requested a 90-day extension. Before responding to the request, NHTSA received a comment from the Transportation Trades Department submitted via email one day after the comment period closed, which was added to the docket.²⁰ Because Zoox's application was made available in September 2025 and the emailed comment from the Transportation Trades Department did not reference the extension request nor needing additional time for review, NHTSA did not extend or re-open the comment period.

NHTSA received comments both in support and in opposition to granting Zoox's application for exemption. NHTSA identified several recurring themes among the supportive comments, including discussion of transportation infrastructure, accessibility and inclusivity, economic benefit, safety, American technological advancement, data gathering, and overcoming regulatory hurdles. Some commenters expressed support for granting the exemption if subject to certain conditions, such as a variety of safety reporting requirements, limitations on the number of vehicles, and oversight of the operational domain. Some organizations and individuals opposed granting Zoox's application, with comments focused on occupant safety, crashworthiness concerns, vehicle testing, limited transparency, and Zoox's failure to meet statutory requirements. More detailed discussion of specific comments is included in the relevant sections that follow.

V. Framework for Analyzing Zoox's Application

NHTSA's determination of whether to grant a part 555 exemption application relies on two analyses: (1) an analysis of whether at least one of the four statutory bases for an exemption is met; and (2) an analysis of whether granting the exemption would be in the public interest and consistent with the objectives of the Safety Act.

A. Selection of Statutory Basis on which to Analyze Zoox's Application

¹⁹ Transportation Trades Department, Docket No. NHTSA-2025-0523-0064.

²⁰ Transportation Trades Department, Docket No. NHTSA-2025-0523-0130.

Zoox cited two bases for exemption in its application, section 30113(b)(3)(B)(iv) and section 30113(b)(3)(B)(ii), stating that compliance with the specified FMVSS would prevent Zoox from offering a motor vehicle “with an overall safety level at least equal to the overall safety level of nonexempt vehicles” and that granting the exemption would permit Zoox to introduce new motor vehicle safety features “providing a safety level at least equal to the safety level of the standard.” NHTSA has decided to consider only the first of these bases. Although Zoox’s ADS is a new vehicle feature that may perform functions related to the exemptions sought, NHTSA does not believe they are replacement for those features because almost all those features are provided to assist a human driver performing the driving task.²¹ In the Zoox robotaxi, the ADS is replacing the human driver, not the features designed to assist human drivers. Instead, the ADS renders those features superfluous. In this situation, because the ADS is not performing the same safety function as the features required by the FMVSS for which they are seeking an exemption, NHTSA believes the equivalent overall level of safety (“EOS”) basis is the appropriate standard under which to evaluate Zoox’s application.

To examine the effects of the requested exemptions and make the EOS finding, NHTSA compared the Zoox robotaxi to a nearly identical compliant vehicle. NHTSA believes this is the appropriate comparison for an EOS analysis based on its interpretation of the statute. NHTSA interprets the EOS statutory finding to be narrowed to an analysis of the impact on features and performance directly related to the exemption requested. In this case, NHTSA views the appropriate comparison vehicle to be a hypothetical compliant version of the Zoox robotaxi, which is also designed to be exclusively driven by an ADS during normal operations. Many of the exemptions sought by Zoox pertain to features and performance that assist a human driver in performing the driving task. Because the comparison compliant vehicle would also be driven exclusively by an ADS during normal operations, the absence of those features or that

²¹ Zoox is also seeking exemption from requirements on the basis that the design of the vehicle renders those requirements unnecessary or inapplicable.

performance would not impact safety if the only safety benefit of the requirements is derived from assisting a human driver.

Although not part of its EOS analysis, NHTSA did consider the information provided by Zoox about its ADS's ability to perform the function of a human driver as it relates to each of the requested exemptions as part of the agency's determination of whether granting the exemption is in the public interest. The Agency notes, however, that there are no performance requirements for an ADS that is replacing a human driver performing the dynamic driving task and NHTSA has no authority to require a higher level of safety performance in the context of deciding whether to grant an exemption. As explained above, NHTSA believes the statutory analysis of whether the EOS finding is met should be based on the impacts of the specific exemptions sought. Because a compliant vehicle may be operated on public roads with Zoox's ADS, presuming that it is free from safety-related defects, NHTSA's consideration of the ADS's performance is limited. In light of this, NHTSA believes that the maturity of the Zoox robotaxi's ADS is best considered in the context of an adaptable oversight condition.

B. New Approach to Processing Exemption Applications for ADS-Equipped Vehicles

The Safety Act grants the Secretary, as delegated to NHTSA, discretion to condition the grant of an exemption "on terms [NHTSA] considers appropriate."²² Historically, NHTSA has applied terms and conditions to the grant of a General Exemption infrequently and, when it did so, only established a single set of static terms and conditions that would apply for the lifespan of exempted vehicles. However, the statute does not require the terms issued by NHTSA to be static nor prescribe how those terms must be implemented. Instead, the statute affords NHTSA discretion to apply "appropriate" terms and conditions.

²² 49 U.S.C. 30113(b)(1) (delegation of authority at 49 CFR 1.95).

These terms and conditions are applied on a case-by-case basis and tailored to the particular exempted vehicles. When evaluating the merits of an application, NHTSA may consider whether applying terms and conditions are appropriate to ensure that granting the exemption is in the public interest or to ensure that the statutory basis on which the exemption is granted is met. To enable both better oversight and a quicker assessment of the threshold question of whether to grant an exemption, NHTSA is adopting a more dynamic and flexible approach to applying terms and conditions.

Because ADS-equipped vehicles are capable of changing performance and extending operational design domains over time, NHTSA has found that establishing a single set of static terms and conditions for such vehicles throughout their lifespan is often impractical and inefficient. Static terms also do not always effectively promote motor vehicle safety because they cannot account for the dynamic nature of ADS technologies. Particularly at an early stage in the development of an ADS, capabilities can improve dramatically as the technology improves and operational design domains are updated over the lifespan of a particular vehicle or generation of vehicles.

NHTSA announced process improvements in June 2025, one of which is the adoption of a dynamic approach for evaluating exemptions for ADS-equipped vehicles. This approach includes an improved oversight structure that provides needed flexibility and can be applied when NHTSA believes that such oversight is necessary or appropriate. This oversight structure would be established via a permanent term or condition in the Grant Notice, which subjects the exempted vehicles to continued operational oversight as outlined in operational terms and conditions in permission letters.

NHTSA determined that it would be appropriate to apply the operational oversight structure to Zoox's exemption if granted and evaluated the merits of Zoox's application with this in mind. Zoox's application is the first to be evaluated since NHTSA announced the process improvements in June 2025 and, as predicted, NHTSA has found that the application of the

dynamic oversight structure allows the agency to process and evaluate applications more efficiently and effectively.

Within the oversight structure, Operational Authorizations are tailored to the individual manufacturer and the ADS's existing capabilities. If an exemption is granted, the manufacturer is able to begin manufacturing and/or commercially deploying vehicles immediately consistent with the terms and conditions of the Operational Authorization, which may be modified via subsequent Authorizations, such as after a manufacturer requests a change. This approach gives NHTSA flexibility to change operational terms quickly, such as by expanding the scope of the operational permission as the ADS continues to develop.

This approach also enables NHTSA to process General Exemption applications more quickly by allowing the agency to rely on an adaptable oversight framework. In turn, NHTSA's initial review can focus on the current capabilities of the vehicles, rather than needing to develop specific terms and conditions that anticipate possible future changes. This process improvement also builds on processes that have proven effective for ADS in Special Exemptions issued under NHTSA's Automated Vehicle Exemption Program.

VI. FMVSS-Specific Analysis of Zoox's Application

This section provides a detailed discussion of Zoox's application for exemption from specific portions of eight FMVSS, Zoox's arguments of safety equivalency, relevant public comments, NHTSA's analyses, and NHTSA's determinations regarding safety equivalency for each of the requirements for which an exemption is sought. Seven of the eight FMVSS for which Zoox requested exemptions assume the presence of a human driver and the availability of manually operated driving controls. In each FMVSS-specific section, NHTSA also discusses any related issues that were considered in NHTSA's analysis of whether granting Zoox's exemption is in the public interest and consistent with the objectives of the Safety Act.

A. Analysis of Zoox’s request for exemption from the windshield defrosting and defogging systems requirements in FMVSS No. 103 and the windshield wiping and washing systems requirements in FMVSS No. 104

Zoox sought exemption from the windshield defrosting and defogging systems requirements in FMVSS No. 103 and the windshield wiping and washing systems requirements in FMVSS No. 104. Section 4.1 of FMVSS No. 103 requires each vehicle to have windshield defrosting and defogging systems. Sections 4.1 and 4.2.1 of FMVSS No. 104 require each vehicle to have a power-driven windshield wiping system and a windshield washing system that meets the requirements of SAE Recommended Practice J903a and J942, respectively. The Zoox robotaxi is not equipped with any windshield defrosting, defogging, wiping, or washing system because the vehicle is designed to be operated exclusively by an ADS, which perceives the driving environment through exterior-mounted sensors rather than through a windshield as a human driver would.

NHTSA did not receive any specific comments regarding Zoox’s request for exemption from the requirements in FMVSS Nos. 103 and 104. Consistent with the agency’s position expressed in the Notice of Proposed Rulemaking (NPRM) on modernizing FMVSS Nos. 103 and 104 to accommodate ADS-equipped vehicles, NHTSA finds that granting an exemption from these requirements would not have a substantive adverse safety effect.²³ Therefore, NHTSA finds that the Zoox robotaxi has an overall safety level equivalent to a nonexempt vehicle.

Zoox also provided additional information that is relevant to NHTSA’s determination of whether granting the application is in the public interest and consistent with the objectives of the Safety Act. Zoox states that the vehicle’s exterior-mounted sensors serve as the foundation of the ADS’s visibility and that the vehicle is equipped with sensor cleaning and clearing systems that remove water, debris, and frost from the critical viewing surfaces of the sensors. Zoox asserts

²³ 91 FR 12537 (March 16, 2026).

that the performance requirements for the sensor systems were derived from the performance requirements of FMVSS Nos. 103 and 104 and exceeds these standards, stating that their system must clean or clear the entire critical sensing surface whereas FMVSS Nos. 103 and 104 only require cleaning or clearing of a percentage of the critical area. In assessing the performance of the sensor cleaning and clearing system, Zoox stated that it used the test procedures and conditions specified in FMVSS Nos. 103 and 104 and SAE Recommended Practice J942 (1965) with the only modification being the pass/fail criteria (100% clearance for Zoox). NHTSA reviewed test reports provided by Zoox regarding defogging, defrosting, and cleansing for critical sensor areas and found the performance to be indicative of performance that serves a safety purpose analogous to the safety purpose of requirements in FMVSS Nos. 103 and 104 for which Zoox sought an exemption.

B. Analysis of Zoox's request for exemption from various portions of FMVSS No. 108 that reference turn signal operating units and headlamp beam switching devices

Zoox sought exemption from Section 9.1.1 of FMVSS No. 108, which requires that all vehicles be equipped with a turn signal operating unit that is self-canceling by steering wheel rotation and capable of cancellation by a manually operated control. Zoox states that there is no need for a manually operated (*i.e.*, human operated) turn signal operating unit. Instead, based on the vehicle's location and trajectory, the ADS's planning system sends a command requesting the activation or deactivation of a turn signal. If a command from a remote assistant requires the (de)activation of a turn signal, the ADS will (de)activate the turn signal as appropriate once the ADS has confirmed a path.

Zoox also sought exemption from S9.4, which requires each vehicle to have a means of switching between lower and upper beam headlamps designed and located so that it may be operated conveniently by a simple movement of the driver's hand or foot. In supplemental

information submitted by Zoox on May 6, 2026, Zoox explained that it has developed and implemented autonomous beam switching.

NHTSA did not receive any specific comments regarding Zoox's request for exemption from the requirements in FMVSS No. 108.

NHTSA finds that granting an exemption from these requirements would not impact safety because the requirements for manually operated turn signals and manually operated beam switching devices do not provide a safety benefit in a vehicle that would never be driven by a human occupant. Therefore, NHTSA finds that the Zoox robotaxi has an overall safety level equivalent to a nonexempt vehicle.

C. Analysis of Zoox's request for exemption from various portions of FMVSS No.

111 that require interior and exterior mirrors and rearview image display

Zoox sought exemptions from requirements in sections 5.1.1 and 5.2.1 of FMVSS No. 111, which require that all passenger cars be equipped with a unit-magnification inside rearview mirror providing a 20-degree horizontal field of view and a unit-magnification driver's side outside mirror, both of which must utilize a film-based or silvered-glass reflective surface meeting specified reflectance criteria to ensure image clarity and minimize glare.

Zoox also sought exemption from requirements in section 5.5 of FMVSS No. 111 which requires that all passenger cars display a rearview image meeting requirements for field of view, size, response time, linger time, deactivation, default view, and durability.

In its application, Zoox states that the safety problem addressed by FMVSS No. 111 (*i.e.*, that the "driver does not have a clear and reasonably unobstructed view to the rear") does not exist in the Zoox robotaxi. Instead, the Zoox robotaxi is equipped with a sensor suite, including multiple cameras, lidar, and radar, that creates a 360-degree field of view with redundancy that, according to Zoox, exceeds the field of view specified by FMVSS No. 111 Sections 5.1.1, 5.2.1, and 5.5 and provides much better total visibility than a human would have in any vehicle.

The Advocates for Highway and Auto Safety²⁴ (“Advocates”) commented on the lack of evidence in terms of test results or analyses about how the Zoox robotaxi perceives and responds to pedestrians within the target range for a sensor or camera used for compliance with FMVSS No. 111’s rear visibility requirements. The Advocates cited NHTSA’s recognition that in order for the requirement to meet the need for safety the driver needed to both perceive and respond appropriately before impact with the pedestrian.

Although the Advocates are correct that NHTSA established the requirement for a rear-view image based on information about how human drivers would respond to the presence of objects within the field of view, the standard itself does not require a particular response. Although the ADS in the Zoox robotaxi will be performing the dynamic driving task, NHTSA has not regulated that aspect of motor vehicle performance. Accordingly, NHTSA cannot require a higher level of vehicle safety performance in the context of evaluating whether to grant an exemption simply because a vehicle is being operated by an ADS as opposed to a human driver.

NHTSA also received a comment from the American Automobile Association (AAA)²⁵ expressing concern with the lack of outside mirrors, stating that passengers’ exiting the vehicle may have limited visibility of approaching cyclists or vehicles.

In the Nuro, Inc. grant notice, NHTSA identified potential ancillary benefits that mirrors provide, such as providing a warning to vehicle occupants exiting vehicles (or opening doors) about approaching traffic and persons in the vicinity of the vehicle. An example would be a passenger exiting a vehicle without mirrors while also failing to look both ways to avoid an oncoming cyclist. Although the outside mirror can serve a potential ancillary purpose for exiting passengers and oncoming cyclists, FMVSS No. 111 was not designed or drafted with this in mind. NHTSA considers these ancillary benefits important, but notes that other features may also provide these benefits.

²⁴ Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 4.

²⁵ American Automobile Association, Docket No. NHTSA-2025-0523-0121 at 4.

In supplemental information submitted by Zoox on January 28, 2026,²⁶ Zoox stated that it addresses safe passenger loading and unloading by opening only the doors on the side closest to the road edge (*e.g.*, curb). Additionally, an audio prompt reminds occupants to check for traffic once they arrive at their drop-off location. In addition, because the doors pop out slightly and slide along the body of the robotaxi, occupants can look both ways with the doors open before exiting the vehicle.

After considering the information provided by Zoox and the public comments, NHTSA finds that the Zoox robotaxi provides an equivalent level of safety to a vehicle that complies with the rear visibility requirements in sections 5.1.1 and 5.2.1, as well as section 5.5. First, NHTSA finds that mirrors do not address the safety problem of drivers not having a clear and reasonably unobstructed view to the rear in vehicles that will never be driven by a human. Likewise, NHTSA also finds that displaying a rearview image that meets the requirements for size, response time, linger time, deactivation, and default view do not provide a safety benefit for a vehicle that will not be driven by a human occupant. We note that Zoox provided test reports demonstrating that their vehicle's cameras meet certain requirements in sections 5.2.1 and 5.5. However, because Zoox requested exemption from sections 5.2.1 and 5.5 in their entirety, NHTSA evaluated each as such and found that the vehicle's rearview image provides an overall safety level equivalent to a nonexempt vehicle. Further, while not required for an exemption, NHTSA finds that Zoox's approach to ensuring safe passenger unloading, by unloading curb side and providing reminders to passengers can even substitute for the ancillary benefit provided by exterior mirrors.

D. Analysis of Zoox's request for exemption from the manual brake control requirements in FMVSS No. 135

²⁶ <https://www.regulations.gov/document/NHTSA-2025-0523-0004> at 8.

Section 5.3.1 of FMVSS No. 135 requires the service brakes to be activated by means of a foot control. In addition, the control of the parking brake must be independent of the service brake control and may be either a hand or foot control. The Zoox ADS uses control functions, carried out through actuators and their associated control systems, to activate the service and parking brakes. The ADS then uses a series of electronic messages that are relayed to the brake controller to request negative torque, similar to a human driver applying the brake pedal or pressing a parking brake button.

AAA²⁷ expressed concern with the lack of sufficient public details regarding system behavior under cascading failures, performance in degraded environments, and robustness of fallback strategies in dense urban settings. NHTSA notes that FMVSS No. 135 prescribes minimum foundational brake performance requirements. Zoox's application asserts that the Zoox robotaxi has been tested and complies with the equipment, performance, and warning requirements in FMVSS No. 135, specifically the requirements in S5.1, S5.2, S5.4, S5.5, S5.6, and S7.

Consistent with the agency's position expressed in the NPRM on modernizing FMVSS No. 135 to accommodate ADS-equipped vehicles,²⁸ NHTSA finds that requiring manual controls for the activation of the service and parking brakes is unnecessary for operation of a vehicle by ADS. Accordingly, NHTSA finds that a Zoox robotaxi exempt from the manual brake control requirements in FMVSS No. 135 would have an overall safety level equivalent to a nonexempt vehicle.

E. Analysis of Zoox's request for exemption from the sun visor requirements in FMVSS No. 201

Section 5.4 of FMVSS No. 201 requires each front outboard designated seating position to be provided with a sun visor that is constructed of or covered with energy-absorbing material.

²⁷ American Automobile Association, Docket No. NHTSA-2025-0523-0121 at 3.

²⁸ 91 FR 38593 (June 26, 2026).

The sun visors must also be designed and mounted such that they do not present sharp edges or rigid projections that could increase the risk of injury during an occupant's head impact.

In a notice from 1982 that granted an exemption from the requirement to provide sun visors, NHTSA stated that sun visors function as an occupant protection device by providing impact absorbing material in the windshield header area in addition to keeping the sun from interfering with the vision of the operator.²⁹ Zoox's application addresses both of these purposes. Regarding the occupant protection function of sun visors, Zoox states that it believes rationale for the sun visor requirements is to "minimize the risk of injury from contacting the sun visor" and argues that because the Zoox robotaxi is not equipped with sun visors, there is no need to protect the occupants from the sun visors. Regarding the purpose of reducing sun glare for human drivers, Zoox notes that the ADS is not affected by the presence or absence of a sun visor because it does not view the roadway through a windshield.

NHTSA did not receive any public comments regarding Zoox's request for exemption from the sun visor requirement. After consideration, NHTSA believes that the Zoox robotaxi provides an overall level of safety equal to that of a vehicle that is not exempt from the sun visor requirement because of the positioning of the seats in the Zoox robotaxi. Because the seating positions are facing inward, toward the center of the vehicle, the header area in which the sun visors would be installed is behind the passengers' heads and head restraints. Based on the design configuration of the vehicle, NHTSA finds that providing sun visors would not provide an occupant protection benefit. Regarding the secondary function of sun visors, NHTSA finds that there is no safety need to block sun glare for a human driver for a vehicle that will never be driven by a human occupant. Therefore, NHTSA finds that the Zoox robotaxi provides an equivalent level of safety to a vehicle that complies with the sun visor requirement. Inasmuch as the padding on a sun visor may provide additional occupant protection when the sun visor is in

²⁹ 47 FR 34071 (August 5, 1982), Anden Holdings Ltd., Grant of Petition for Temporary Exemption From Federal Motor Vehicle Safety Standards.

certain positions, the level of energy absorption and volume padding in an FMVSS No. 201-compliant sun visor is not defined and will vary with different vehicles, different occupant sizes, the positioning of the sun visor and various other factors. We note that there have been significant improvements in motor vehicle safety since the requirement was first issued, including improvements to FMVSS No. 201 issued in 1995 that established performance requirements for impact area inclusive of the area in which sun visors are stowed, thus reducing any incremental benefit associated with providing energy-absorbing sun visors. Zoox stated that the robotaxi has been tested and complies with all other relevant components required by FMVSS No. 201. For the same reasons, NHTSA believes granting Zoox and exemption from portions of FMVSS No. 201 is in the public interest.

F. Analysis of Zoox’s request for exemption from the windshield abrasion resistance and deviation and distortion requirements in FMVSS No. 205

Section 5.1 of FMVSS No. 205 requires that glazing materials used in motor vehicles conform to the ANSI/SAE Z26.1-1996 standard, which dictates specific performance and testing criteria based on the glazing’s location and designation as a particular ‘Item’ type. The purpose of FMVSS No. 205 is to reduce injuries (*e.g.*, lacerations) resulting from impact to glazing surfaces, to ensure a necessary degree of transparency in motor vehicle windows for driver visibility, and to minimize the possibility of occupants being thrown through the windows in collisions. Zoox is requesting an exemption from the requirements for their vehicle’s windshields to be AS1 glazing.

Zoox states that none of the glazing in the robotaxi is necessary for driving visibility as there is no driver seat and the ADS views the world through the sensors mounted on the exterior of the vehicle, not through the windows. Zoox states that the glazing at either end of the robotaxi (referred to as “service bays” by Zoox) is marked “AS4” and satisfies the associated requirements for Item 4 glazing. In addition, Zoox states that the glazing was tested and met the occupant safety tests for AS1 glazing. Zoox submitted test reports indicating that the glazing

used in the service bays on the robotaxis meets the requirements for AS4 glazing as well as tests 9, 12, and 26 for AS1 glazing.

NHTSA did not receive any public comments about Zoox's request for exemption from the requirements for windshields to use AS1 glazing.

After considering the information provided by Zoox, NHTSA finds that glazing used for the service bays is not requisite for driving visibility. Accordingly, NHTSA finds that exempting the Zoox robotaxi from the requirements for AS1 glazing that relate to driving visibility would not have an adverse impact on safety. However, because NHTSA believes that the glazing in the service bays should still provide the same level of occupant protection as a compliant windshield, NHTSA is conditioning Zoox's exemption from the requirement that windshields be comprised of AS1 glazing on the glazing meeting AS4 requirements as well as tests 9, 12, and 26 for AS1 glazing. Subject to this condition, NHTSA finds that the Zoox robotaxi would provide an equivalent level of safety to a nonexempt vehicle.

G. Analysis of Zoox's request for exemption from the air bag warning label requirements in FMVSS No. 208

Section 4.5.1 of FMVSS No. 208 requires each vehicle to have a label permanently affixed to either side of the sun visor at each front outboard seating position equipped with an inflatable restraint and the content must conform with the standard. Zoox reasoned that since the robotaxi is not equipped with sun visors, the vehicle cannot comply with the requirements of the standard. Instead, Zoox argued that since an air bag warning label is conspicuously located adjacent to each seating position, the vehicle provides an equivalent level of safety to a nonexempt vehicle. Zoox's approach to the air bag warning label content and pictogram strays slightly from what is required by 4.5.1(b), but Zoox argued that the differences more accurately represent the design of the vehicle. For example, the Zoox air bag warning label references the

Zoox App containing the Rider Manual rather than the owner's manual,³⁰ and the pictogram displays the Zoox bespoke air bag design compared to traditional air bags. NHTSA agrees that Zoox's approach of relocating the air bag warning labels to a location at each seating position, as well as altering the contents of the warning label to represent the unique vehicle design accurately while still conveying safety information to the occupants, adequately addresses the safety need met by S4.5.1(b). Therefore, NHTSA finds that the Zoox robotaxi provides an equivalent level of safety to a vehicle that complies with the sun visor labeling requirements in FMVSS No. 208.

VII. Compliance with the FMVSS from which Zoox Seeks Exemption would Prevent Zoox from Selling the Robotaxis

As noted above, NHTSA evaluated Zoox's application on the statutory basis that the manufacturer would be otherwise unable to sell a motor vehicle with an overall level of safety at least equal to that of a nonexempted vehicle. Although the statutory language for equivalent overall safety states that NHTSA must find that compliance with the FMVSS would prevent Zoox from "selling" the robotaxi, this language does not limit the application of the statutory basis to only vehicles that will be offered for sale (which Zoox states the robotaxi will not). Rather, to grant an exemption under the equivalent overall safety basis, NHTSA must find that compliance with the standard would prevent Zoox from selling the robotaxi *regardless* of whether Zoox actually intends to sell the robotaxi. Section 30113 of the Vehicle Safety Act does not require that a vehicle exempted under the equivalent overall safety basis enter interstate commerce only through a sale, and NHTSA declines to read such a limitation into the statute. Accordingly, we have determined that Zoox may introduce the robotaxi into interstate commerce by means other than selling, even if the vehicle is exempted under this basis.

³⁰ Because Zoox will maintain ownership of its vehicles under this exemption, as stated in Zoox's application and in this Grant Notice, certain information often found in an owner's manual that is relevant to the occupants of the exempted vehicles will be provided in a Rider Manual which is accessible via Zoox's website and app.

Based on its expertise and the information available to it, NHTSA finds that granting Zoox's application for its robotaxi would result in a vehicle that has an overall level of safety equivalent to a nonexempt version of the vehicle. As discussed above, NHTSA has evaluated each of the exemptions sought and has determined that exempting the Zoox robotaxi from those requirements would not decrease safety. Although evaluated individually above, NHTSA also finds that the Zoox robotaxi, as exempt from those requirements, provides an overall equivalent level of safety to an otherwise identical compliant vehicle that is also operated by an ADS. Most of the exemptions sought are for features designed to assist human drivers and therefore are unnecessary for a vehicle that will not be operated by a human occupant, with the remaining exemptions being sought for requirements that are incompatible or unnecessary for the Zoox robotaxi's carriage seating design.

VIII. Analysis of whether Granting Zoox's Application is in the Public Interest and Consistent with the Objectives of the Safety Act

The Safety Act and its implementing regulations provide the Secretary and, by delegation, NHTSA with broad authority and discretion in determining whether granting the application for temporary exemption is consistent with the public interest and objectives of the Safety Act. Here, NHTSA finds that granting Zoox's exemption is consistent with the public interest and 49 U.S.C. Chapter 301 because doing so furthers the Federal Government's interest in facilitating the safe development and deployment of innovative transportation technologies, which is enabled through NHTSA's oversight authority and conditions the agency is placing on Zoox. Given the innovative nature of the Zoox robotaxi and the agency's determination that the exemption will not lower the safety of the robotaxi as compared to a nonexempt version of the vehicle, the agency believes that these reasons are more than sufficient to justify this finding.

A. Zoox's Public Interest Argument

Zoox argued that granting its application for exemption for the robotaxi is consistent with the public interest and the objectives of the Safety Act for several reasons. Zoox stated that

introducing an automated robotaxi that meets or exceeds the performance of a human driver would enhance the overall safety of the transportation system and would directly support the U.S. economy by supporting existing businesses and offering consumers additional transportation mobility. Zoox also argued the exemption would be in the public interest as it would further advance and solidify U.S. standing and leadership in AI and automated vehicle technology, as well as signal to the industry and global competitors this administration's commitment to ensuring American companies can achieve and maintain the lead in automated vehicle innovation. Specific to the Safety Act, Zoox argued that safety is maintained because the robotaxi provides at least an overall level of safety equivalent to nonexempt vehicles. In addition, Zoox asserted that the standards from which it seeks exemptions are predicated on the presence of physical controls and equipment intended for use by a human driver and, therefore, do not improve the safety of a vehicle designed to be operated exclusively by an ADS. Zoox also contended that, notwithstanding the absence of such driver-related equipment, the robotaxi satisfies the underlying performance objectives and safety functions embodied in the standards for which exemptions are sought.

More specifically, allowing for the introduction of the robotaxi as it has been designed by Zoox to optimize its performance as a highly automated passenger car could further the development of new and innovative vehicle automation technologies, which may in turn lead to future benefits for vehicle safety and the economy. Although NHTSA cannot fully predict the extent to which these benefits will materialize in the future and, more specifically, the effect that granting this exemption would have on those benefits, the agency recognizes that development of the ADS technology necessary to make these potential benefits possible is supported by use on vehicles that are designed to be automated.

However, the agency recognizes some of the concerns raised by some commenters about ADS and passenger safety, and has imposed conditions upon this exemption grant to mitigate safety risks and provide enhanced oversight to respond to issues that may arise.

B. Public Interest Issues Raised by Commenters

NHTSA requested comment from the public on the merits of Zoox's application and potential terms and conditions that should be applied to the exemption, if granted.

1) Supportive Comments

An overwhelming majority of the public comments supported NHTSA granting Zoox's exemption, particularly as it relates to public interest, though many commenters did not elaborate on their reasoning for certain supportive comments. Although NHTSA appreciates public participation and takes such comments into consideration, the agency will not respond to non-substantive comments in this notice.

In terms of safety benefits, the Southern Nevada Bicycle Coalition³¹ noted that automated vehicles have the potential to eliminate common causes of crashes (*e.g.*, distraction, speeding) due to advanced sensing, situational awareness, predictive algorithms, and adherence to traffic laws. Transform³² and the California Bicycle Coalition³³ expressed similar sentiments in terms of safety benefits for vulnerable road users.

In addition, some commenters³⁴ agreed that granting Zoox's exemption was in the public interest because of NHTSA's oversight authority, specifically citing that exempting 2,500 vehicles per year for two years allows NHTSA to monitor operations closely while allowing Zoox to run a commercial service.

2) Child Ridership

S.D. Thomas LLC³⁵ suggested several reporting requirements, primarily related to child ridership. For example, reporting on the presence of observed children generally and who are

³¹ Southern Nevada Bicycle Coalition, Docket No. NHTSA-2025-0523-0029 at 1.

³² Transform, Docket No. NHTSA-2025-0523-0041 at 1.

³³ California Bicycle Coalition, Docket No. NHTSA-2025-0523-0073 at 1.

³⁴ Robo Shepherd Inc, Docket No. NHTSA-2025-0523-0015 at 1; Corporation for Automated Road Transportation Safety, Docket No. NHTSA-2025-0523-0061 at 2.

³⁵ S.D. Thomas LLC, Docket No. NHTSA-2025-0523-0124 at 8.

incorrectly restrained in a child restraint or booster seat was suggested, as well as requiring Zoox to provide instructions on properly attaching a child restraint to the vehicle and properly restraining a child in a child restraint seat. At the time of granting Zoox's exemption, riders under the age of eight are not permitted. Therefore, NHTSA expects to review relevant materials from Zoox and consider incorporating conditions into Operational Authorizations, should Zoox seek to expand eligible ridership. Although ridership is currently restricted to certain ages, NHTSA acknowledges that the seat belts in the robotaxi may not properly fit all children ages 8 and above. Zoox's Rider Manual states that parents and guardians are responsible for ensuring that children riding with them are safely and properly belted, using a booster seat if necessary.

3) Passenger Egress

Several commenters³⁶ raised concerns about the safety of the Zoox robotaxi. One common theme among safety concerns was passenger egress.³⁷ Specifically, SMART-TD³⁸ and the Transportation Trades Department³⁹ expressed concern over passenger egress since the robotaxi does not have manual door controls. NHTSA notes that, while the emergency door handle (EDH) equipped on the robotaxi is not a traditional handle commonly seen in conventional vehicles, the robotaxi has two methods to open the doors manually. For passengers, a lever is located on either side of the interior that, while pulled, allows passengers to push the door open. If air bags are deployed, the passenger-facing side of the horseshoe air bag provides instructions for locating and using the EDH. For first responders located outside the vehicle, an exterior door button is available. In the event of a severe crash resulting in a non-functioning

³⁶ Cristina Perez Hesano, Docket No. NHTSA-2025-0523-0034 at 1; Donald Slavik, Docket No. NHTSA-2025-0523-0035 at 1; Delaney Howard, Docket No. NHTSA-2025-0523-0052 at 1; Anonymous, Docket No. NHTSA-2025-0523-0083 at 1; Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 3-4; Transport Workers Union of America, Docket No. NHTSA-2025-0523-0105 at 3; SMART-TD, Docket No. NHTSA-2025-0523-0107 at 3; American Automobile Association, Docket No. NHTSA-2025-0523-0121 at 4; Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 2.

³⁷ SMART-TD, Docket No. NHTSA-2025-0523-0107 at 3; American Automobile Association, Docket No. NHTSA-2025-0523-0121 at 4; Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 2.

³⁸ SMART-TD, Docket No. NHTSA-2025-0523-0107 at 3.

³⁹ Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 2.

door button, instructions are shown on the exterior of the horseshoe air bag instructing first responders where to break the glass to access the EDH.

AAA⁴⁰ expressed concern over the lack of side mirrors and the implication on passenger safety during loading and unloading. Although Zoox does not have side mirrors, the vehicle incorporates several precautionary measures to support safe loading and unloading. At a pick-up/drop-off, only the door closest to the road edge will be opened. When a pick-up/drop-off occurs outside a parking spot or parking lane, the hazard warning signal flasher is activated, causing the required turn signals to flash providing a visual indicator to external parties the presence of a vehicular hazard and to use caution. Finally, upon exiting the robotaxi, an auditory prompt reminds passengers to check for traffic.

4) Workforce Requirements

NHTSA received several comments expressing concern over the qualifications and training of remote operators. Particularly, the Advocates⁴¹ and SMART-TD⁴² questioned the sufficiency of remote operator training and qualifications as details were not provided in the public-facing materials. Specifically, both commenters expressed concern over the lack of detail provided on workforce training and certification standards, communication requirements, location, and latency. NHTSA has evaluated Zoox's materials on these matters and has found them to be sufficient. Further, NHTSA has placed certain conditions in the Grant Notice and Operational Authorization for these reasons.

5) Crashworthiness Testing

Another common theme among commenters was Zoox's lack of crashworthiness testing and data. The Consortium for Constituents with Disabilities⁴³ and the American Foundation for

⁴⁰ American Automobile Association, Docket No. NHTSA-2025-0523-0121 at 4.

⁴¹ Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 4.

⁴² SMART-TD, Docket No. NHTSA-2025-0523-0107 at 3-4.

⁴³ Consortium for Constituents with Disabilities, Docket No. NHTSA-2025-0523-0120 at 3.

the Blind⁴⁴ both noted that they would like to see testing for people with disabilities, as both passengers and pedestrians, before the exemption is granted. Although the Americans with Disabilities Act does not require accessibility for passenger vehicles not operating on a fixed route, NHTSA strongly supports the use of automated driving system technologies to expand mobility for people with disabilities. While not included as a condition to this exemption, the agency encourages the development of safety measures designed to enable safe transportation of people with physical and other disabilities, including wheelchair securement mechanisms.

AAA⁴⁵ and the Service Employees International Union⁴⁶ argued that Zoox's safety claims should be supported by scenario-based evaluations and independent validation rather than internal metrics. NHTSA notes that Zoox provided a significant amount of Zoox's crash test data, which were redacted because Zoox claimed those data constitute confidential business information (CBI). Although the specific information cannot be shared with the public, the CBI provided to NHTSA addressed the concerns raised by public commenters in sufficient detail for NHTSA to find equivalent or greater overall safety.

A comment submitted by S.D. Thomas LLC⁴⁷ asked numerous questions concerning Zoox's seating configurations and crash testing. However, most questions were addressed previously in Zoox's materials while others were out of scope in finding equivalent overall safety. The commenter questioned whether Zoox had any additional information on equivalent performance evaluations for several crashworthiness standards. Zoox confirmed in its application that the Zoox robotaxi met all requirements for the remaining applicable FMVSSs. Accordingly, the company is not required to provide additional information related to the requirements for the standards which they did not seek exemptions. The commenter also asked whether the robotaxis

⁴⁴ American Foundation for the Blind, Docket No. NHTSA-2025-0523-0126 at 3.

⁴⁵ American Automobile Association, Docket No. NHTSA-2025-0523-0121 at 3.

⁴⁶ Service Employees International Union, Docket No. NHTSA-2025-0523-0103 at 2.

⁴⁷ S.D. Thomas LLC, Docket No. NHTSA-2025-0523-0124 at 5-7.

meet certain requirements⁴⁸ unrelated to the applicable FMVSS, but such requirements are not relevant to the requisite FMVSS-specific safety equivalence determination.

C. Additional Issues Raised by Commenters

1) Confidential Business Information Claims

Several commenters expressed disagreement with Zoox's CBI claims, commonly stating that an application seeking exemption for noncompliance should be scrutinized by the public, and that the lack of transparency in Zoox's application and supplemental materials prevents such scrutiny. Further, commenters⁴⁹ recommended that NHTSA require full public disclosure as a condition, including remote operations requirements and training, performance tests supporting the equivalent level of safety claims, and incident data.

Zoox has requested that the information in question be treated as CBI. Federal law requires NHTSA to protect CBI, including trade secrets. *See* 49 U.S.C. § 30167(a). *See also* 5 U.S.C. § 552(b)(4); 18 U.S.C. § 1905; *Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356 (2019). NHTSA regulations afford entities like Zoox an opportunity to request that certain material submitted to the agency be afforded CBI status. *See* 49 CFR part 512. These regulations require NHTSA to keep such information confidential until the agency makes a determination regarding its confidentiality. *See* 49 CFR 512.20. Thus far, NHTSA has not reached any determination that the information subject to Zoox's request is not entitled to confidential treatment or otherwise necessary to disclose. *See id.* *See also* 49 U.S.C. § 30167. Thus, the statutes, regulations, and Supreme Court precedent governing the agency prohibit the disclosure of this information. Nevertheless, at various places in this notice, NHTSA has sought to describe confidential information more broadly to help the public understand the general nature of the withheld information.

⁴⁸ DOT HS 813 716; DOT HS 813 755; 2026-01-0578; and 2026-01-0576.

⁴⁹ Ross Templeton, Docket No. NHTSA-2025-0523-0108 at 2-5; S.D. Thomas LLC, Docket No. NHTSA-2025-0523-0124 at 2.

2) Regulatory Structure of Part 555

Several commenters⁵⁰ expressed concern with NHTSA's handling of Zoox's exemption more generally. The most common theme mentioned was that, if granted, Zoox's exemption may be interpreted as a de facto safety standard for future automated vehicles.⁵¹ NHTSA notes that it evaluates all part 555 applicants on a case-by-case basis. Therefore, all vehicles are evaluated against the basis, or bases, chosen by the applicant.

Several commenters⁵² argued that NHTSA should prioritize the development of standards applicable to ADS-equipped vehicles like the Zoox robotaxi instead of considering individual exemptions on a case-by-case basis. NHTSA acknowledges the need to amend its standards to apply to innovative designs and is in the process of modernizing several FMVSSs to account for the lack of manually operated driving controls in such vehicles. The agency notes the Vehicle Safety Act was designed to provide flexibility for manufacturers developing vehicles with advancing technology through exemptions that allow for limited deployments of non-conforming vehicles. Such exemptions are not intended to provide a permanent deployment pathway, which requires rulemaking.

The Advocates⁵³ raised concern over Zoox's lack of compliance in the past, citing Zoox's claims of self-certification and NHTSA's Special Order and Audit Query. NHTSA notes that a

⁵⁰ Cristina Perez Hesano, Docket No. NHTSA-2025-0523-0034; Donald Slavik, Docket No. NHTSA-2025-0523-0035; Delaney Howard, Docket No. NHTSA-2025-0523-0052 at 1; Anonymous, Docket No. NHTSA-2025-0523-0083 at 1; Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 2; Transport Workers Union of America, Docket No. NHTSA-2025-0523-0105 at 2; SMART-TD, Docket No. NHTSA-2025-0523-0107 at 2-3; Ross Templeton, Docket No. NHTSA-2025-0523-0108 at 1; S.D. Thomas LLC, Docket No. NHTSA-2025-0523-0124 at 2; Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 2.

⁵¹ Cristina Perez Hesano, Docket No. NHTSA-2025-0523-0034 at 1; Transport Workers Union of America, Docket No. NHTSA-2025-0523-0105 at 2; SMART-TD, Docket No. NHTSA-2025-0523-0107 at 2-3; Ross Templeton, Docket No. NHTSA-2025-0523-0108 at 1; S.D. Thomas LLC, Docket No. NHTSA-2025-0523-0124 at 2; Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 2.

⁵² Transport Workers Union of America, Docket No. NHTSA-2025-0523-0105 at 1; SMART-TD, Docket No. NHTSA-2025-0523-0107 at 3; Ross Templeton, Docket No. NHTSA-2025-0523-0108 at 1; Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 2.

⁵³ Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 2.

part 555 exemption allows NHTSA to maintain enhanced oversight over the exempted vehicles and operations.

D. Discussion of Conditions

NHTSA grants this exemption subject to a number of terms, violation of which enables the agency to take appropriate action, up to and including a determination that the exemption is no longer in the public interest, which is a ground for the agency to terminate the exemption under 49 CFR 555.8(d). NHTSA may also take appropriate enforcement action under its broad defect authorities. Further, NHTSA may—and has—established terms that continue to apply to the vehicles throughout their service life where it determines such continued application is necessary, considering the public interest and the objectives of the Safety Act.

1) Number of Vehicles

The Safety Act limits exemptions granted under the equivalent level of safety basis to a maximum of 2,500 vehicles to be sold in any 12-month period.⁵⁴ Consistent with this statutory provision, NHTSA is granting Zoox an exemption to manufacture and introduce into interstate commerce for commercial deployment up to 2,500 vehicles. However, the total number of exempted vehicles that may be simultaneously operated is limited to the maximum number of vehicles permitted in the initial Operational Authorization, which may be modified in subsequent Authorizations.

2) Oversight Condition

The terms of this exemption are designed in consideration of the public interest and include both grant and operational conditions. The grant conditions are considered fixed conditions because they contributed to NHTSA's overall safety finding and therefore cannot be

⁵⁴ 49 U.S.C. 30113(d).

changed without a modification to this exemption. Zoox must comply with the grant conditions for the life of the exempted vehicles. They are detailed in Section X of this Grant Notice.

In addition, NHTSA anticipates that Zoox's operations, ODD, and use case will change over time. Therefore, NHTSA believes the public interest is best served through a condition that requires continuing NHTSA oversight of the operation of the exempted vehicles. This oversight is most consistent with the public interest when exercised through a set of operational conditions that can be updated over time to remain relevant to Zoox's evolving technology and operational use case. These conditions are set forth in an Operational Authorization. The operational conditions are intended to be adaptable to the changing ADS and operations and therefore, may be modified, added, or removed throughout the lifecycle of the vehicle. The operational conditions must be followed by Zoox and all parties involved.

NHTSA notes that many of the terms the agency has involved in this Grant Notice and the Operational Authorization are similar to those NHTSA has previously imposed on the importation of noncompliant ADS vehicles under 49 CFR part 591, though, consistent with the differing requirements of part 591, Zoox's exemption will allow for commercial deployment, rather than only testing and demonstration.

3) Labeling

Under 49 CFR 555.9(b), a manufacturer of an exempted vehicle must securely affix to the windshield or side window of each exempted vehicle a label containing a statement that the vehicle meets all applicable FMVSS in effect on the date of manufacture "except for Standard Nos. [Listing the standards by number and title for which an exemption has been granted] exempted pursuant to NHTSA Exemption No. ____." This label is intended to notify prospective purchasers about the exemption and its subject. Under § 555.9(c)(2), this information must also be included on the vehicle's certification label.

The text of § 555.9 does not expressly indicate how the required statement on the two labels should read in situations in which an exemption covers a portion of an FMVSS. In this

case, NHTSA believes that a blanket statement that the vehicle has been exempted from each of the standards in its entirety, without an indication that the exemption is limited to specific provisions, could lead to confusion about the nature of Zoox's exemption.

Accordingly, with regard to the requirement in 49 CFR 555.9(c), NHTSA is adding a condition that Zoox must affix to each exempt Zoox robotaxi a label that meets all applicable requirements of 49 CFR part 567 and that ends with the phrase "except for specific requirements within Standard No. 103—Windshield defrosting and defogging systems; Standard No. 104—Windshield wiping and washing systems; Standard No. 108—Lamps, reflective devices, and associated equipment; Standard No. 111—Rear visibility; Standard No. 135—Light vehicle brake systems; Standard No. 201—Occupant protection in interior impact; Standard No. 205—Glazing materials; and Standard No. 208—Occupant crash protection, exempted pursuant to NHTSA Exemption No. 2026-01."

Further, because the Zoox robotaxi will not be sold to consumers but will instead be operated by Zoox for ride hailing services, NHTSA is adding a condition that would require Zoox to provide language about Zoox's exemption in its Rider Manual in lieu of affixing a temporary label to the windshield or side window as specified in § 555.9(b). The purpose of the requirement to affix a label to the window or side window is to inform prospective purchasers about a vehicle's exemption. Because the Zoox robotaxi will not be sold to consumers, NHTSA finds that it would be in the public interest to provide information to consumers via alternative means. Zoox suggested the inclusion of language in their Rider Manual and NHTSA agrees that would be appropriate and would better fulfill the purpose of the requirement in § 555.9(b). Accordingly, NHTSA is establishing a condition that would require Zoox to provide the required language in its Rider Manual and include brief, plain language descriptions of the requirements from which the Zoox robotaxi is exempt. NHTSA is also requiring Zoox to provide sample language for its Rider Manual within 30 days of publication of this Grant Notice.

4) Conditions Suggested by Commenters

Several commenters⁵⁵ recommended conditions that NHTSA should put in place before granting Zoox's part 555 exemption. NHTSA incorporated a number of commenters' suggestions into Zoox's initial set of conditions. However, NHTSA also determined many of the commenters' suggestions to be out of scope for the purpose of this exemption or already addressed in Zoox's application and supplemental materials.

The Advocates,⁵⁶ SMART-TD,⁵⁷ and the Transportation Trades Department⁵⁸ suggested NHTSA require full public disclosure of various aspects of Zoox's operation, including incident data and workforce management. Although NHTSA has determined it unnecessary for Zoox to disclose all aspects of its operations, Zoox has said it intends to disclose aspects of its safety clearance process in the future.

The Advocates⁵⁹ recommended NHTSA require Zoox to coordinate with State and local authorities and communicate effectively with the public in all localities where Zoox operates. NHTSA agrees with the value of public disclosure and has included Condition X.J in this Grant Notice to require disclosure of Zoox's operating areas. In addition, NHTSA expects to request Zoox's coordination plans prior to expansion to new operational areas. The Advocates⁶⁰ also suggested NHTSA condition Zoox's exemption on making all exempted vehicles readily and individually identifiable. However, NHTSA has determined this condition to be unnecessary as the robotaxis are currently labeled clearly with Zoox markings, license plates, and VINs on either end of the vehicle.

⁵⁵ Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 4-5; Transport Workers Union of America, Docket No. NHTSA-2025-0523-0105 at 4-5; SMART-TD, Docket No. NHTSA-2025-0523-0107 at 4-5; Ross Templeton, Docket No. NHTSA-2025-0523-0108 at 2-5; S.D. Thomas LLC, Docket No. NHTSA-2025-0523-0124 at 8-9; Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 3.

⁵⁶ Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 5.

⁵⁷ SMART-TD, Docket No. NHTSA-2025-0523-0107 at 4.

⁵⁸ Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 3.

⁵⁹ Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 5.

⁶⁰ Advocates for Highway and Auto Safety, Docket No. NHTSA-2025-0523-0104 at 5.

Several commenters also suggested that NHTSA implement certain reporting requirements. The Transport Workers Union of America,⁶¹ SMART-TD,⁶² and Ross Templeton⁶³ suggested Zoox be required to report on the number of personnel employed, both by Zoox and contractors, including the location of workers, relevant qualifications, and total hours spent performing duties. Certain aspects of this request are incorporated into Zoox’s reporting requirements at the time of granting (see Condition X.I), while other aspects like total hours spent performing duties are unnecessary for compliance with other conditions relevant to safety performance which are included in the initial Operational Authorization (*e.g.*, remote assistance performance, fleet operations personnel roles and responsibilities). Additional suggested reporting requirements included the number of “floaters” who may be reassigned or called upon to do remote operations duties, the total number of exempted vehicles removed from service due to safety-related maintenance issues, median hourly compensation and employee benefits, and the annualized turnover rate. NHTSA does not believe details like these are necessary for the agency’s safety-focused operational oversight at the time of granting this exemption. In the future, reporting requirements may be added should NHTSA deem them necessary.

Finally, three commenters⁶⁴ suggested NHTSA place a condition on Zoox’s exemption prohibiting any use that would require additional exemptions from Federal agencies and from marketing for use by public transportation agencies, though they did not specify the reasons for such conditions. NHTSA has included a term requiring compliance with all Federal, State and Local laws (see Condition X.E) and determined additional conditions unnecessary as the other agencies have authority to administer their respective exemptions.

⁶¹ Transport Workers Union of America, Docket No. NHTSA-2025-0523-0105 at 4-5.

⁶² SMART-TD, Docket No. NHTSA-2025-0523-0107 at 2-5.

⁶³ Ross Templeton, Docket No. NHTSA-2025-0523-0108 at 2-5.

⁶⁴ Transport Workers Union of America, Docket No. NHTSA-2025-0523-0105 at 4; SMART-TD, Docket No. NHTSA-2025-0523-0107 at 5; Transportation Trades Department, Docket No. NHTSA-2025-0523-0130 at 3.

E. Conclusion that Granting Zoox an Exemption is in the Public Interest and Consistent with the Objectives of the Safety Act

Based upon the Federal government's interest in facilitating the safe deployment of innovative transportation technologies, and public interest arguments raised by Zoox and commenters, NHTSA has determined that granting Zoox a temporary exemption, subject to the terms and conditions established in this notice (Section X) and the Operational Authorization letter, is in the public interest. Although Zoox and public commenters offer a variety of reasons for why granting Zoox's exemption is in the public interest, NHTSA's analyses primarily turn on questions of motor vehicle safety.

NHTSA believes that ADS technology has the potential to improve safety and mobility in the transportation of both people and goods. While these benefits are still largely aspirational and unquantifiable, they provide reasons to grant the exemption, especially after finding that exempt Zoox robotaxis have an equivalent or greater level of motor vehicle safety compared to an otherwise identical FMVSS-compliant vehicle. NHTSA also notes that ADS technology is being deployed on public roads and the agency does not believe that exempt Zoox robotaxis would pose additional risks to motor vehicle safety compared to a compliant vehicle using the same ADS. The difference in safety, however, between granting or denying Zoox's application is that with this grant, as NHTSA has formulated it, NHTSA has more direct and tailored oversight. With this increased oversight, NHTSA finds that granting the exemption would be net positive for safety. Accordingly, because of the other benefits associated with facilitating Zoox's deployment of a vehicle with a novel design with requiring unnecessary features, NHTSA also finds that, overall, granting Zoox's exemption is consistent with the public interest and the objectives of the Safety Act.

IX. Conclusion

Pursuant to 49 U.S.C. 30113(b)(3)(B)(iv), NHTSA is granting Temporary Exemption No. 2026-01 to Zoox for the production of its "Zoox sedan" model vehicle from paragraph S4.1 of

FMVSS No. 103; paragraphs S4.1 and S4.2.1 of FMVSS No. 104; paragraphs S9.1.1 and S9.4 of FMVSS No. 108; paragraphs S5.1, S5.2.1, and S5.5 of FMVSS No. 111; paragraph S5.3.1 of FMVSS No. 135; paragraph S5.4 of FMVSS No. 201; the requirement of FMVSS No. 205 that windshields be comprised of AS1 glazing; and paragraph S4.5.1 of FMVSS No. 208, subject to the condition provided that Zoox complies with the terms described in Section X. The exemption shall be effective from [INSERT DATE OF PUBLICATION IN THE FEDERAL REGISTER] through July 31, 2028.

X. Terms and Conditions

The terms set out in this grant notice are specific to Zoox's "Zoox sedan" model, a robotaxi vehicle, based on information provided by Zoox in its application and supplemental information provided to NHTSA. These terms include an Operational Authorization, which governs the public road operation of the exempted vehicles. In general, the Operational Authorization describes processes for reporting changes to vehicle operations and capabilities and requesting to operate under changed conditions. If NHTSA finds that a change to the vehicle affects the overall equivalent level of safety finding by which this exemption was granted, NHTSA may require Zoox to request a modification to the exemption, which would require notice and public comment and would be processed under 49 CFR § 555.8. Violation of any of the terms included in this notice or the associated Operational Authorization are grounds for NHTSA action, up to and including termination of the exemption.

A. Operational Authorization

Zoox must comply with all terms and conditions in the applicable Operational Authorization(s). The Operational Authorization will govern the operation of the exempted vehicles on public roads and may be modified by NHTSA as appropriate or necessary. NHTSA may issue additional Operational Authorizations that contain specific conditions on an operation-to-operation basis, and therefore, multiple Authorizations may exist concurrently depending on operating areas, locations, or routes. Zoox must be able to access and provide vehicle, ADS, and

other data to NHTSA as required by the reporting conditions specified in the Authorization. The Operational Authorizations will be made publicly available in the docket for this exemption notice (NHTSA-2025-0523).

B. Vehicles permitted under the current exemption

The current exemption applies exclusively to the Zoox sedan model vehicle described in Zoox's application and supplemental documentation.

C. Labeling

In accordance with 49 CFR § 555.9(c), Zoox must affix to each exempt Zoox sedan vehicle a label that meets all applicable requirements of 49 CFR part 567 and that ends with the phrase "except for specific requirements within Standard No. 103—Windshield defrosting and defogging systems; Standard No. 104—Windshield wiping and washing systems; Standard No. 108—Lamps, reflective devices, and associated equipment; Standard No. 111—Rear visibility; Standard No. 135—Light vehicle brake systems; Standard No. 201— Occupant protection in interior impact; Standard No. 205— Glazing materials; and Standard No. 208—Occupant crash protection, exempted pursuant to NHTSA Exemption No. 2026-01."

In lieu of affixing securely to the windshield or side window of each exempted vehicle a label in the English language containing the statement required by 49 CFR § 567.4(g)(5) and including the language specified above in accordance with § 555.9(c), Zoox may instead provide the required language in its Rider Manual and include brief, plain language descriptions of the requirements from which the Zoox sedan is exempt. Zoox must provide sample language for its Rider Manual within 30 days of publication of this Grant Notice.

D. Equipment Requirement for the Vehicles

The glazing in the Zoox robotaxi's "service bays" must meet all requirements for AS4 glazing as well as tests 9, 12, and 26 for AS1 glazing.

E. Compliance with Federal, State, and Local Laws

Zoox, the robotaxis, and their operation must comply with all Federal, State, and local laws and requirements. Each vehicle must be duly permitted, if applicable, and authorized to operate upon all roadways traversed in the manner and conditions described in the associated Operational Authorization. Zoox remains responsible for communicating, cooperating, and coordinating with law enforcement personnel as may be necessary in the deployment regions. This exemption does not supplant or affect any recall or reporting obligations that may arise under the Safety Act for the subject vehicles.

F. Inspection

The Zoox robotaxis must be made available for inspection by NHTSA upon request.

G. Sale and Transfer of Possession

Zoox must maintain operational control of all vehicles under this exemption for the entire life of the vehicles. Zoox shall not sell, or transfer possession of, or title to, any vehicle, and shall not license it for use, or operate it on the public roads, except under such terms and conditions authorized by NHTSA.

H. Modification, suspension, or revocation of an exemption

NHTSA may modify, suspend, or revoke an exemption, in its discretion and as appropriate, including upon determining that:

- a. The exemption is no longer consistent with the public interest and the objectives of the Act, for example if NHTSA determines that the robotaxi(s) or its operation(s) presents an unreasonable risk to safety, which may include if the robotaxi contains safety-related defects that NHTSA determines cannot be satisfactorily remedied or otherwise mitigated;
or
- b. The exemption was granted on the basis of false, fraudulent, or misleading representation or information.

I. Location of personnel involved in safety-critical tasks

Zoox shall ensure that all personnel involved in safety-critical tasks (*e.g.*, remote assistants) are located in jurisdictions within the Continental United States such that the location of remote personnel does not degrade system safety, data integrity, or regulatory accountability. To mitigate the risks associated with signal degradation, Zoox must ensure that these locations provide a communication environment where geographic distance does not introduce prohibitive latency or jitter. Performance for these operations must be validated against Zoox's safety clearance process to ensure that the vehicle remains within a safe, controllable state at all times, with the burden on Zoox to ensure that the chosen remote architecture maintains a level of safety according to its process.

Beyond technical performance, the location of remote personnel must allow the chain of accountability to remain intact regardless of physical jurisdiction. All remote assistants must comply with Zoox's training requirements and procedures. Zoox must verify that the chosen geographic distribution ensures all remote personnel remain reachable and legally accountable to U.S. law enforcement and regulatory bodies.

J. Disclosure of operating areas

To ensure transparency regarding where exempted vehicles are operating on public roads, Zoox must publish maps of current operating areas indicating where the vehicles operate on public roads in each city, county, or State. The maps must be made available to the public on Zoox's website and must be updated no later than 14 days after any substantive change in the operating area.

K. Reporting Manufactured Vehicles

Zoox must submit an Annual Report to NHTSA identifying the VINs of all vehicles manufactured under the exemption. The report should identify, by VIN, whether each vehicle is continuing to operate on public roads. If none of the vehicles have operated on public roads for more than two (2) consecutive years, you are no longer required to submit an Annual Report until operation resumes, if applicable. In addition, the Annual Report should include a list of the

geographic locations of all remote assistance centers involved in operation of the vehicles on public roads.

Authority: 49 U.S.C. 30113 and 49 U.S.C. 30166; delegations of authority at 49 CFR 1.95 and 49 CFR 501.5.

Issued on July 28, 2026 under authority delegated in 49 CFR 1.95 and 501.5.

Jonathan Morrison,
Administrator.

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