ALLIANCE FOR AUTOMOTIVE INNOVATION

April 10, 2026

Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
US Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: DOCKET No. NHTSA-2025-0523

Dear Administrator Morrison,

The Alliance for Automotive Innovation ("Auto Innovators") appreciates the opportunity to provide input on Zoox's petition for temporary exemptions from certain requirements in eight Federal Motor Vehicle Safety Standards (FMVSS).

Auto Innovators represents the full automotive industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive automotive industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving almost $1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.[1]

Auto Innovators supports the AV Framework laid out by the Department of Transportation and the commitment from the agency to facilitate the deployment and commercialization of ADS equipped vehicles.[2] Streamlining the exemption process is a way to remove unnecessary regulatory barriers and is one of the most important regulatory tools available to advance the safe deployment of autonomous vehicles, because it allows the agency to engage substantively with novel vehicle designs on a case-by-case basis and gather real-world data.

Auto Innovators also supports NHTSA granting Zoox the exemptions that it seeks in this petition because they are consistent with the recent NPRMs addressing modernizing FMVSS 102, 103 and 104.[3]

[1] Zoox Inc. is a member of Auto Innovators.
[2] https://www.transportation.gov/briefing-room/trumps-transportation-secretary-sean-p-duffy-unveils-new-automated-vehicle-framework
[3] Docket Nos. NHTSA 2026-0628 and NHTSA 2026-0629

We remain enthusiastically supportive of a transparent, efficient, and useable exemptions process. A functioning, well-supervised exemption pathway is a crucial component of the regulatory framework. Auto Innovators has advocated for a revised and updated exemptions process for some time. We encourage the agency to complete the review in an expedited manner.

As the industry sees significant technological change, the exemption process will continue to be an important component of ensuring that OEMs can deploy ADS equipped vehicles whose safety is equivalent to FMVSS compliant vehicles. The Zoox petition is a crucial first step as the United States seeks to lead the world in the development and deployment of ADS equipped vehicles.

Sincerely,

Sarah Puro
Vice President, Safety and Technology Policy