



April 10, 2026

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

Re: NHTSA 2026-04730

Dear Administrator Morrison:

The U.S. Chamber of Commerce (“Chamber”) strongly supports Zoox, Inc’s (Zoox) application for a temporary exemption.¹ If approved, this exemption will allow Zoox to operate a fully autonomous, all-electric robotaxi with new and innovative safety features. Furthermore, this robotaxi will help accelerate the widespread deployment of safe automated vehicle technology and advance the public’s interest to maintain the United States’ leadership in automated driving system (ADS) technologies.

Autonomous vehicles present tremendous opportunities for consumers, businesses, and the U.S. economy by enhancing road safety. A recent study by the U.S. Chamber found that the widespread and safe deployment of passenger AVs could prevent 1,442,000 accidents and 12,000 fatalities annually, resulting in \$94 billion in savings.² Additionally, AVs would significantly improve mobility for persons with disabilities, elderly Americans, and nondrivers, providing them with better access to jobs, income, and medical care.³

¹ Zoox-Receipt of Application for Temporary Exemption From Various Requirements of the Federal Motor Vehicle Safety Standards for an Automative Driving System-Equipped Vehicle, Request for Comment, 91 Fed. Reg. 12042, Docket No. NHTSA-2026-04730 (rel. March 11, 2026).

² Robert Shapiro & Isaac Yoder, Innovation Highway: Unlocking the Social and Economic Benefits of Autonomous Vehicles 5 (2023), https://www.uschamber.com/assets/documents/CTEC_InnovationHighwayReport_July23.pdf.

³ *Id.*

The National Highway Traffic Safety Administration (“NHTSA”) may issue a temporary exemption to the Federal Motor Vehicle Safety Standards (“FMVSSs”), if the agency determines the exemption is consistent with the public interest and the objectives of the National Traffic and Motor Vehicle Safety Act.⁴ In Zoox’s case, the need for a temporary exemption is warranted. Zoox’s robotaxi will not make use of certain features designed for human drivers that are required under the FMVSSs, and failing to provide an exemption could lead to the interference of the ADS, potentially undermining the safety benefits of the robotaxi.

While the agency will make its own evaluation, we are confident that Zoox’s application demonstrates that its robotaxi meets (or exceeds) the performance requirements associated with the existing FMVSSs. Furthermore, we agree that Zoox’s application includes extensive information and data on its motor vehicle design to justify its argument.

NHTSA’s stated mission is to save lives and to prevent injuries. By encouraging new innovations like automated vehicles, it can achieve those objectives. Presuming Zoox’s petition meets the agency’s safety requirements, the Chamber respectfully requests NHTSA to favorably grant the petition. Moreover, NHTSA should fully account for the significant benefits of automated vehicle technologies when considering the petition and evaluate the petition in a timely manner to ensure regulatory certainty for the petitioner. Granting companies like Zoox the tools they need, such as exemptions, to safely deploy automated vehicles commercially across the United States is clearly in the public interest. In addition, a successful exemption request will create high quality jobs, incentivize continued research and development, and generate significant investment in the United States.

Furthermore, once the safety questions are addressed, NHTSA should consider the public interest in this application. The United States risks losing its crucial technological leadership in the automated vehicle industry unless it effectively leverages existing regulatory tools and enacts new ambitious policies to protect its leadership in the development, manufacture, and deployment of automated vehicles amid growing competition from the People’s Republic of China. While U.S. companies are making notable advancements, China currently leads in key metrics such as vehicle miles traveled, cumulative rides, cumulative truckloads, and the number of AVs in operation.⁵ Supporting applications like the one submitted by Zoox will go a long way to maintain our nation’s leadership in this important – and growing – industry.

⁴ [49 U.S.C. 30113\(b\)\(3\)\(A\)](#).

⁵ Egil Juliussen, AV Status: U.S. vs. China vs. Europe, EE TIMES EUROPE (Oct. 22, 2024), <https://www.eetimes.eu/avstatus-u-s-vs-china-vs-europe/>.

Thank you for your attention to this matter, and please reach out to Michael Blanco at mblanco@uschamber.com if you have any questions.

Sincerely,

Jordan Crenshaw
Senior Vice President
Chamber Technology Engagement Center
U.S. Chamber of Commerce