

ZOOX

ZOOX INC 1149 CHESS DR
FOSTER CITY, CA 94404

DATE:

08.14.2025

TO:

Terra Curtis
Director, Consumer Protection and Enforcement Division
California Public Utilities Commission
506 Van Ness Avenue
San Francisco, CA 94102

**Re: Zoox Updated Request for GO 157-E Exemption for CPUC Driverless AV
Passenger Service Pilot Program (Permit Number TCP0038380-P) Pursuant to
NHTSA FMVSS Exemption**

Dear Ms. Curtis:

Background

Zoox, Inc.'s ("Zoox") Charter Party Carrier ("TCP") Autonomous Vehicle Pilot Permits ("Pilot Permits") was renewed by the California Public Utilities Commission ("Commission") on December 21, 2024. Section (16) of the TCP permit granted Zoox's request for an exemption to Parts 4.02, 4.05, and 4.06 of General Order 157-E for the Zoox purpose-built, driverless robotaxi ("robotaxi"). This exemption was granted in response to Zoox's request for the exemption, made on December 19, 2024 ("Exemption Request").

To support its request, Zoox's Exemption Request stated, "The robotaxi is certified to all applicable Federal Motor Vehicle Safety Standards ("FMVSS"), and it complies with California regulations, which do not require certain traditional automotive mechanisms that are designed solely to facilitate human driving." As discussed on August 7, 2025 with Consumer Protection Enforcement Division ("CPED") staff, the National Highway Traffic Safety Administration ("NHTSA") granted Zoox an exemption from FMVSS under the Automated Vehicle Exemption Program on August 4, 2025. NHTSA announced the granting of this exemption to Zoox on August 6, 2025. Zoox therefore submits this updated request for exemption to reflect the change in Zoox's FMVSS certification status.

Request for Exemption

The Zoox robotaxi is purpose-built to operate without a human driver. It is not equipped with any manually operated driving controls (like a steering wheel) or a driver's designated seating position and, therefore, it can only be operated by the on-board autonomous driving system ("ADS"). To support autonomous driving, the Zoox robotaxi is equipped with a combination of

sensors that provide the ADS with the ability to directly “see” its driving environment. Our sensor suite includes multiple cameras, lidar, and radar that create a 360-degree field of view that extends 200 meters in all directions. On August 4, 2025, NHTSA granted Zoox an exemption from FMVSS pursuant to 49 U. S. Code Section 30114(a) and the Automated Vehicle Exemption Program. The robotaxi complies with California regulations, which do not require certain traditional automotive mechanisms that are designed solely to facilitate human driving. The Zoox robotaxi therefore does not have conventional windshield wipers, rear vision mirrors, a front seat adjustment mechanism, an in-steering-wheel horn, or a speedometer; as a fully electric vehicle, the Zoox robotaxi also does not have a muffler or exhaust system.

Safety Requirements Before Operations

Section 4.02 of GO 157-E requires that all vehicles under a TCP permit shall comply with the California Highway Patrol and Motor Carrier Safety Sections of Title 13 of the California Code of Regulations. The California Code of Regulations (“CCR”) Title 13 Section 1215 Subsection (c) requires that each driver shall prepare a report on each vehicle operated that covers certain parts and accessories, including the horn, windshield wipers, and rear vision mirrors. Because the Zoox robotaxi does not have an in-steering wheel horn, windshield wipers, or rear vision mirrors, Zoox seeks an exemption to these inspection and reporting requirements under this CCR. First, autonomous vehicles are excepted from such equipment requirements under California law, so long as the vehicle otherwise complies with applicable federal regulations, which is the case for the Zoox robotaxi. As such, the requirement to inspect such equipment is functionally an “if equipped” requirement; meaning, the inspection requirement only applies if the vehicle is required to, and actually contains, the covered equipment. Furthermore, Zoox conducts extensive manual daily inspections as provided in the Pre-Service Checklist that was submitted as part of Zoox’s renewal application, in addition to our automatic inspections and continual system monitoring. Therefore, there are no safety risks associated with not inspecting the equipment the Zoox robotaxi does not have, and Zoox’s regular inspections and continual monitoring of the ADS are functionally equivalent to the inspections and reports required by the CCR.

19-Point Inspection

Section 4.05 of GO 157-E requires all TCPs to ensure every vehicle undergoes a 19-point vehicle inspection prior to initial operation and every 12 months or 50,000 miles thereafter. This inspection requirement includes windshield wipers, rear view mirrors, front seat adjustment mechanism, horn, speedometer, muffler and exhaust system. Zoox seeks an exemption to the inspection requirement for this equipment under Section 4.05. As stated above, the Zoox ADS and sensor suite make the need for these specific manual controls and equipment unnecessary, and they are not required by California or federal regulation. Furthermore, Zoox conducts extensive manual daily inspections as provided in the Pre-Service

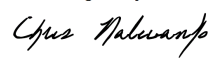
Checklist that was submitted as part of Zoox's renewal application, in addition to our automatic inspections and continual system monitoring. Therefore, there are no safety risks associated with not inspecting the equipment the Zoox robotaxi does not have, and Zoox's regular inspections and continual monitoring of the ADS are functionally equivalent to the inspections and reports required by the 19-point inspection.

Maintenance of Vehicle Inspection Records

Section 4.06 of GO 157-E requires that all TCPs maintain records that their vehicles comply with the 19-point inspection requirement for a period of three years. Zoox requests an exception for this record keeping requirement for the items in the 19-point inspection with which the Zoox robotaxi is not equipped, as described above.

For the reasons above, and in order to fulfill the true intent of our pilot operations, Zoox respectfully requests an exemption from portions of General Order 157-E, Sections 4.02, 4.05, and 4.06 regarding inspection of the Zoox purpose-built robotaxi pursuant to AV TCP Drivered Passenger Pilot permit TCP0038380-P.

Sincerely,

DocuSigned by:

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Christopher Nalevanko
General Counsel, Vice President & Corporate Secretary
Zoox, Inc.

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FOSTER CITY, CA 94404

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TO:

Terra Curtis
Director, Consumer Protection and Enforcement Division
California Public Utilities Commission
506 Van Ness Avenue
San Francisco, CA 94102

RE: Attestation of Christopher Nalevanko Regarding Zoox, Inc.'s Request for GO 157-E Exemption

On behalf of Zoox, Inc. ("Zoox"), I, Christopher Nalevanko, General Counsel, attest to the following:

1. Zoox is responsible for compliance with the California Public Utility Commission ("Commission") General Order (GO) 157-E, including Sections 4.02, 4.05, and 4.06 regarding vehicle inspections.
2. As evidenced by the vehicle inspection forms provided in our TCP renewal application submitted on September 22, 2024, Zoox inspects the equipment listed under the 19-point inspection checklist provided in GO 157-E and the California Code of Regulations ("CCR") in Title 13 Section 1215 Subsection (c) - with the exception of the windshield wipers, rear vision/view mirrors, front seat adjustment mechanism, horn, speedometer, muffler, and exhaust system - on an annual basis or every 50,000 miles, whichever occurs earlier.
3. On August 4, 2025, the National Highway Traffic Safety Administration granted Zoox an exemption from FMVSS pursuant to 49 U. S. Code Section 30114(a) and the Automated Vehicle Exemption Program.
4. The robotaxi complies with California regulations, which do not require certain traditional automotive mechanisms that are designed solely to facilitate human driving. The Zoox robotaxi is therefore not equipped with conventional windshield wipers, rear vision/view mirrors, front seat adjustment mechanism, an in-steering-wheel horn, or speedometer.
5. As a fully electric vehicle, the robotaxi does not have a muffler or exhaust system.
6. As evidenced by the daily inspection list provided in our TCP renewal application submitted on September 22, 2024, Zoox conducts robust manual and automatic


inspections of the robotaxi daily.

7. As described in Zoox's Passenger Safety Plan submitted to the Commission, Zoox continually monitors vehicle equipment performance and diagnostics throughout robotaxi operations.
8. As described in Zoox's Passenger Safety Plan submitted to the Commission, the Zoox robotaxi is equipped with a combination of sensors that provide the autonomous driving system ("ADS") with the ability to directly "see" its driving environment. Our sensor suite includes multiple cameras, lidar, and radar that create a 360-degree field of view in all directions. The ADS enables the vehicle to be operated without manual driving controls that would allow a human to perform the dynamic driving task.
9. The manual and automatic inspections that Zoox performs at daily, annual, and mileage intervals, the continual monitoring, and the ADS described herein ensure safe operation of Zoox's robotaxis for passenger service. There are no safety risks associated with not inspecting the equipment the Zoox robotaxi does not have. The inspections, monitoring, and ADS performance ensure that Zoox's passenger service operations are functionally equivalent to the operations otherwise required by General Order 157-E Sections 4.02, 4.05, and 4.06.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 14, 2025, in Foster City, California.

Signed

DocuSigned by:

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Christopher Nalevanko
General Counsel, Vice President & Corporate Secretary
Zoox, Inc.