

ZOOX

ZOOX INC 1149 CHESS DR
FOSTER CITY, CA 94404

DATE:

12.18.2024

TO:

Terra Curtis

Director, Consumer Protection and Enforcement Division

California Public Utilities Commission

506 Van Ness Avenue

San Francisco, CA 94102

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

Dear Ms. Curtis:

On September 22, 2024, Zoox, Inc. ("Zoox") submitted an application to renew its Charter Party Carrier ("TCP") Autonomous Vehicle Pilot Permits ("Pilot Permits") with the California Public Utilities Commission ("Commission"). On Monday, December 16, 2024, the Commission's Consumer Protection and Enforcement Division ("CPED") staff informed Zoox that it must pursue an exemption from certain sections of General Order ("GO") 157-E to renew its Driverless AV Pilot Permit. Pursuant to GO 157-E Section 8.02, Zoox hereby respectfully submits this request for an exemption from portions of GO 157-E Sections 4.02, 4.05, and 4.06 for the Zoox purpose-built, driverless robotaxi ("robotaxi").

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. 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. 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 4.02 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, in-steering-wheel horn, speedometer, muffler and exhaust system. Zoox seeks an exemption to the inspection requirement for this equipment under Section 4.02. 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,

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Christopher Nalevanko
General Counsel, Zoox