

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE, West Building
Washington, D.C. 20590

Re: Support for Zoox's Petition, Docket No. NHTSA-2025-0523

Dear Administrator Morrison,

The American Consumer Institute Center for Citizen Research (ACI) is a nonprofit 501(c)(3) educational and research institute with the mission to identify, analyze, and protect the interests of consumers in legislative and rulemaking proceedings.

Zoox's Petition in Docket No. NHTSA-2025-0523, which would allow Zoox to safely offer ride services in an emerging and competitive marketplace, furthers these long-held principles and should be viewed by regulators as an overdue exemption that expands consumer choice and agency. The decades-old rules that currently govern vehicle deployment were not designed with autonomous vehicles in mind. Unlike the automobile designs of the past, safe autonomous cars need not include brake pedals, steering wheels, windshield wipers, or sun visors to safely transport willing consumers to desired destinations. These rules were designed for human drivers but are useless—if not counterproductive—for autonomous vehicles that operate more safely than cars operated by human drivers.¹ If consumer safety is the goal, the status-quo makes little sense and will likely cause harm by discouraging safer and more affordable transportation options.

Consumers Deserve a Competitive Autonomous Vehicle Market

Economic research anticipates the cost of purpose-built autonomous vehicles will fall by more than half—from \$120 thousand to \$50 thousand per vehicle—by 2030.² As autonomous vehicles become more affordable to build, assemble, and deploy on a global scale, consumers will benefit from an increasingly competitive automotive marketplace that will drive down transportation costs, especially for ridesharing services. Transportation expenses trail only housing costs as the second largest consumer budget item, and the cost of traditional vehicle ownership has not fallen over time.³

¹ Jonathan Slotkin, "The Data on Self-Driving Cars is Clear. We Have to Change Course," *New York Times*, December 2, 2025, <https://www.nytimes.com/2025/12/02/opinion/self-driving-cars.html>.

² Jackson Lester, "15 Charts That Explain the Autonomous Vehicle Industry," *The Driverless Digest*, January 14, 2026, <https://www.thedriverlessdigest.com/p/15-charts-that-explain-the-autonomous>.

³ Bureau of Labor Statistics News Release, *Consumer Expenditures—2024*, December 19, 2025, <https://www.bls.gov/news.release/pdf/cesan.pdf>; and ArkInvest, "Big Ideas 2025," February 4, 2025, https://research.ark-invest.com/hubfs/1_Download_Files_ARK-Invest/Big_Ideas/ARK%20Invest%20Big%20Ideas%202025.pdf.

With the price of autonomous vehicles falling but traditional vehicle ownership still expensive, consumers have an incentive to turn to ridesharing services, which adds a new and long overdue dimension of competition to the traditional automobile marketplaces. Autonomous vehicles and robotaxis can meaningfully contribute to more affordable transportation services and a more reasonable cost of living. But that will only happen if the rules of road do not favor specific companies or crowd out competition. That is why the Zoox waiver levels the playing field for consumers.

Needed: Strong American Competitors in a Global Marketplace

The autonomous vehicle market is increasingly global. In the United States, Zoox competes for ridership with Waymo and Tesla. American companies like Waymo are beginning to test their mettle abroad, where they must compete against China's "Robotaxi Trio": Baidu (Apollo), Pony.ai, and WeRide.⁴ Chinese companies have historically relied on American hardware to build-out their autonomous vehicle fleets, but their real advantage comes from their ability to cheaply produce vehicles at scale.⁵ For national security reasons, the United States and China largely operate in separate autonomous vehicle ecosystems, with build-out shifted to third-party markets, where businesses first scale at home before expanding into foreign markets.⁶

Granting Zoox a temporary, domestic-only exemption will allow the company to scale a stronger robotaxi fleet in the United States. Just like how Chinese firms grew their competitive edge in domestic markets before expanding abroad, the United States must do the same.⁷ It must first build the foundation of a strong domestic autonomous vehicle industry that can compete—and win—in the global markets of the future. The United States should not concede its leadership in autonomous vehicles to China. To increase competition and resilience, the National Highway Traffic Safety Administration (NHTSA) should grant Zoox its waiver request and modernize the outmoded regulations that made this exemption necessary in the first place.⁸

⁴ Tony Peng, "Chinese Robotaxis are Gunning for Global Domination," July 15, 2025, <https://spectrum.ieee.org/tesla-robotaxi-chinese-competitors>.

⁵ Ibid.

⁶ Michael McGrath, "An Autonomous Vehicle Investment Roadmap," Seeking Alpha, April 7, 2026, <https://seekingalpha.com/article/4888982-an-autonomous-vehicle-investment-roadmap>.

⁷ Daniel Abreau Marques, "Waymo Goes London. China's Fleets Go Global," The AV Market Strategist, September 29, 2025, <https://avmarketstrategist.substack.com/p/waymo-goes-london-chinas-fleets-go>; Linda Lew, "Chinese Robotaxi Companies Outnumber Waymo in Global Push," *Los Angeles Times*, October 27, 2025, <https://www.latimes.com/business/story/2025-10-27/chinese-robotaxis-race-waymo-to-take-driverless-cars-global>; and Divsha Bhat, "China Steers the Gulf's Driverless Future as U.S. Rivals Stay Home," Rest of World, January 2026, <https://restofworld.org/2026/robotaxis-gulf-china/>.

⁸ "Trump's Transportation Secretary Sean P. Duffy Advances AV Framework with Plans to Modernize Safety Standards," National Highway Traffic Safety Administration, September 4, 2025, <https://www.nhtsa.gov/press-releases/av-framework-plan-modernize-safety-standards>.

Conclusion

The Zoox petition is a commonsense waiver that will allow the company to fill market needs and safely reach new consumers. It will add much-needed competition and strengthen America's autonomous vehicle fleet. Meanwhile, the existing, outmoded regulatory environment continues to throw sand in the gears of America's competitive engine. The American Consumer Institute urges the NHTSA to grant Zoox their waiver request, and update the current rules, so consumers can choose for themselves which cars work for them in the budding autonomous vehicle marketplace.

Respectfully,

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