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FOSTER CITY, CA 94404

July 17, 2026

TO:
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Zoox Comments on California Air Resources Board ("CARB") Second Public Workshop on Drive Forward Light-Duty Vehicle Program

Dear Board Members and Staff,

Thank you for the opportunity to comment on the June 22, 2026, Second Public Workshop on the Drive Forward Light-Duty Vehicle Program ("Workshop") and for your continued efforts to both ensure that California remains the nation's leader in clean transportation and foster an environment in which innovative transportation technologies can thrive. Zoox strongly supports the goals of the Drive Forward program and shares CARB's commitment to accelerating the replacement of internal-combustion vehicle miles with zero-emission vehicle ("ZEV") miles.

As CARB develops its Drive Forward regulation, it is important that it is structured to achieve these shared objectives without creating unintended barriers for innovative vehicle deployment models that contribute meaningfully to California's clean transportation goals. The rapid evolution of mobility technologies—including autonomous, fleet-owned, and shared transportation services—presents significant opportunities to accelerate ZEV adoption and maximize the environmental benefits of vehicle electrification. A flexible regulatory framework that recognizes these diverse deployment models will better ensure that the Drive Forward program encourages innovation while advancing its core policy objectives.

Based in Foster City, CA, Zoox is reinventing personal transportation—building a safer, cleaner, and more enjoyable future on the road. At the core of its vision is an all-electric, purpose-built robotaxi that offers a better way to ride. Through a combination of cutting-edge technology and a focus on the rider experience, Zoox is transforming urban mobility with its comprehensive and cohesive autonomous ride-hailing service. Zoox assembles the all-electric robotaxis in our 220,000-square-foot facility in Hayward, California, and we own, operate, and maintain the fleet in a ride-hailing service. Zoox's robotaxis are not available for purchase or operation by individual consumers or unaffiliated entities. Every passenger mile traveled in a Zoox robotaxi is an all-electric mile designed to promote shared mobility, and each of those miles advances the goals that Drive Forward is designed to achieve.

A great deal will change in the transportation sector between now and the 2031 model year, when many of the preliminary Drive Forward proposals would take effect. By 2031, fleets like Zoox's—in which the vehicles are never sold, but the all-electric, autonomous service they provide is woven into California's larger transportation ecosystem—will be a growing part of how Californians get around. Governor Gavin Newsom's Executive Order N-27-25 on ZEV acceleration recognizes this trajectory, and autonomous ZEV services like Zoox's have the potential to significantly expand access to zero-emission transportation at a lower price point than traditional vehicle ownership while also reducing congestion and tailpipe emissions in our cities. A regulation written today for the vehicles of 2031 and beyond should be designed to accommodate them.

For these reasons, Zoox respectfully (1) requests that the requirements for new vehicles incorporate deployment models that don't involve vehicle sales to the public, and (2) offers the following feedback on the proposed "ZEV0 Bin Certification Requirements" discussed at the Workshop.[1]

Approach to Applying ZEV0 Bin Requirements

Zoox recognizes that many of the requirements proposed in the Drive Forward program are relevant to all ZEVs. For example, the proposed battery labeling requirements[2] are intended to support the safe handling, disposal, and recyclability of batteries at the end of their life—concerns that apply to all electric vehicles. There is a meaningful distinction between ZEVs designed to be sold to the public and those that are not. Zoox requests that CARB account for this distinction throughout the proposed regulation. More specifically, requirements that serve goals independent of individual consumer needs should apply broadly, while requirements that exist to protect a vehicle purchaser should not attach to vehicles that will not be sold to the public. Accounting for this distinction in the Drive Forward program would help ensure that the regulation achieves its intended objectives while also encouraging a broader range of ZEV deployment models, including autonomous, fleet-owned ride-hailing services like Zoox's.

Range, Durability, and Warranty Requirements

The proposed minimum range, durability, and warranty requirements appear designed with vehicle purchasers in mind—helping assure buyers of a baseline utility, supporting range retention for the secondary market, and providing recourse when components fail. Zoox recognizes that these protections are relevant for vehicle models sold to the public. Applied to a fleet that is designed, owned, and operated by a single entity for its own exclusive use, these requirements would impose significant and unnecessary compliance costs without any of the intended benefits for the consumer (in this case, the fleet owner/operator and its riders).

[1] CARB, Drive Forward Light-Duty Vehicle Program: Second Public Workshop, June 22, 2026, Presentation, Slides 32–35.
[2] Ibid., Slides 40-42.

Zoox's service is designed for maximum uptime; every hour a robotaxi spends charging or in repair is an hour it is not serving riders. While individual consumers may reasonably need a certain range to support diverse travel patterns, Zoox's robotaxis are optimized for ride-hail duty cycles in which vehicles often travel shorter distances and recharge at centralized depots—meaning an individual consumer-market range threshold does not account for Zoox's operational model nor does it provide any benefit to Zoox customers.

For the same reason, Zoox designs its vehicles to minimize costly replacement expenditures, such as the replacement of a large-format battery. Durability and useful life are managed as core business functions, and the vehicle is optimized for its specific duty cycle rather than for a comparison shopping decision that will never occur.

The proposed warranty requirement illustrates the mismatch most clearly. A warranty is a contract between a vehicle purchaser and a seller; where there is no sales transaction, it serves no purpose. It is not logical for Zoox to provide itself a warranty for these components, and the regulation should not require it to.

ZEV Charging Requirements

Similarly, with regard to ZEV charging, individual consumers may expect a ZEV to charge overnight at home and to fast-charge on longer trips. In this context, requirements like the proposed dual-amperage (Level 1/Level 2) convenience cord[3] may provide value to individual consumers. By contrast, charging Zoox's robotaxis is a business operations function and the fleet is charged exclusively using Zoox-designated equipment. Moreover, because the business prioritizes maximizing uptime, that charging architecture is built entirely on this goal. Requiring lower-level charging capability or adherence to Plug & Charge standardization would add significant cost to every vehicle—a cost that produces no benefit for the traveling public and increases the burden on Zoox, thereby diverting resources from expanding zero-emission service. Such requirements also serve to stifle innovation in charging methods and novel concepts to optimize for overall uptime.

Data Standardization and Service Information Requirements

The proposed data standardization and service information requirements assume a vehicle will be serviced by parties other than the entity responsible for the vehicle design. Zoox is responsible for the maintenance of its own robotaxi fleet, and it has designed its test and diagnostic methodology to match the bespoke Zoox robotaxi. Zoox's own technicians are equipped with the specific tools and communications protocols needed to maintain and repair the fleet. A diagnostics port standardized for traditional vehicles would add unnecessary design and production costs with no additional benefit to our company or our riders. Worse, it could risk the cybersecurity of the Zoox robotaxi by creating an attack surface that could be exploited by bad actors. CARB should not require these access points for vehicles not sold to

[3] Ibid., Slide 34.

the public. They would not provide the intended benefit and unnecessarily increase the regulatory burden for these deployment models.

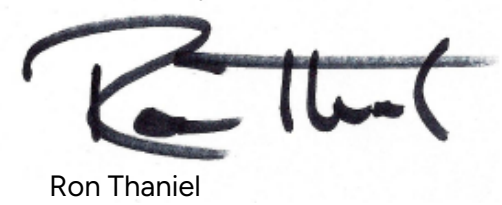
Autonomous Vehicle Test Procedures

Zoox also notes a practical dimension to the Drive Forward proposals that CARB should resolve regardless of how it defines applicability: an autonomous vehicle cannot readily run a test cycle designed for human operation. As CARB considers adopting the 2026 version of SAE J1634 for battery-electric vehicle range testing,[4] Zoox requests that CARB build in flexibilities or the option for alternative test procedures for vehicles designed to operate exclusively by an autonomous driving system. Without such provisions, the test procedures themselves could become an unintended barrier to certifying precisely the kinds of advanced ZEVs the state aims to encourage.

Conclusion

Thank you again for your leadership and support for zero-emission transportation in California. A technology- and deployment-neutral framework will make Drive Forward more durable as vehicle platforms and technology continue to evolve, positioning California to retain its leadership in both clean transportation and mobility innovation. We appreciate your consideration of our feedback and look forward to continuing to work together over the course of the Drive Forward rulemaking to realize the state's vision for a safer, cleaner, and more resilient transportation ecosystem.

Respectfully submitted,



Ron Thaniel
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Zoox

[4] Ibid., Slide 35.