ZOOX INC 1149 CHESS DR
FOSTER CITY, CA 94404

November 21, 2025

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

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

Dear Board Members and Staff,

Thank you for the opportunity to comment on the October 21, 2025, 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 revolutionary transportation technologies can thrive. In response to the concepts outlined at the Workshop, Zoox's feedback is to avoid a "one size fits all" approach to encourage a broader range of zero-emission vehicle ("ZEV") deployments.

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 the world 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 210,000-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.

As CARB begins to develop the next generation of California's light-duty vehicle emissions rules, it has a unique opportunity to approach the light-duty vehicle sector more holistically by considering deployment models beyond the purchase of individually owned, conventional ZEVs. In line with the goals of Governor Gavin Newsom's recent Executive Order (N-27-25), the Zoox autonomous ride-hailing service has the potential to significantly expand access to zero-emission transportation while also reducing congestion and tailpipe emissions in our cities. As such, autonomous ZEVs should be both considered and encouraged as CARB designs the future of clean transportation in California.

It is with this in mind that Zoox respectfully requests that operations like ours be considered as the Drive Forward rules are developed. In particular, we suggest that CARB:

- Recognize the emission-reduction benefits of manufacturer-owned autonomous ZEV fleets: In the Workshop, CARB sought input on "additional technology and innovative

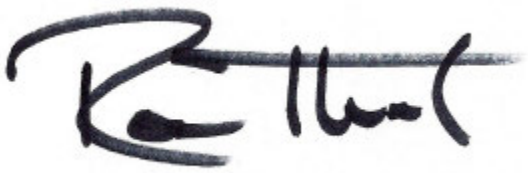
GHG reduction mechanisms."[1] Zoox encourages CARB to promote ZEV models where the vehicles are not offered for sale in its policy and incentive programs. Such deployment models can help expand access to ZEVs more rapidly at a lower cost to consumers than individual ZEV ownership.

- Ensure a clear pathway to CARB certification for autonomous ZEVs that are not offered for sale: In the Workshop, CARB sought input on "Additional actions we should explore" regarding ZEV certification and referenced "the need to ensure ZEVs are equally reliable and repairable."[2] As part of Zoox's autonomous, manufacturer-owned model, it is Zoox's responsibility and in its business interest to manage the reliability and maintenance of its fleet. ZEVs that are not and will not be offered for sale should not be subject to consumer-facing certification requirements.

These actions would promote ZEV adoption beyond individual ownership and would encourage a broader range of ZEV deployments – like Zoox's autonomous ride-hailing service. Avoiding a "one size fits all" framework will also ensure that California remains at the forefront of new, zero-emission transportation technologies and services.

Thank you again for your leadership and steadfast support for zero-emission transportation in California. We appreciate your consideration of our feedback and look forward to working 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

[1] CARB, *Drive Forward Light-Duty Vehicle Program: First Public Workshop*, October 23, 2025, Presentation, Slide 23.
[2] *Ibid*. Slide 40.