Subject: Request for Regulatory Action to Ensure Driver Safety by Requiring Drivers be able to Disable One-Pedal-Drive in EVs.

[redacted]

Park City, UT

[redacted]

1/28/2025

INFORMATION REDACTED
PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

To Whom It May Concern:

I am writing to express a serious safety concern regarding one-pedal-driving pedal operation in electric vehicles (EVs), specifically the inability to disable this feature in some modern vehicles.

As the purchaser of a new 2025 Tesla Model X, I am writing to report that this vehicle feels UNSAFE to drive on icy downhill turns because the car does not have the ability to turn off One-Pedal-Drive.

I urge the U.S. Department of Transportation (DOT) to consider requiring automakers to provide drivers with the ability to disable one-pedal driving, particularly for driving in hazardous conditions such as snow and ice.

While one-pedal driving has advantages, and is generally well received by drivers in good traction conditions, this feature has significant drawbacks in specific driving conditions that make it a potential safety risk:

1. **Unsafe in Downhill Icy Turns**: On slippery surfaces, drivers need to make smooth, deliberate adjustments to both acceleration and braking to maintain control, because the vehicle is operating at the edge of traction conditions. In particular, in an icy downhill turn, the driver must assure all traction is available to turning force, by minimizing throttle and brake inputs. In a normal vehicle control scheme, this is easy, as one removes pressure from both pedals and only gently applies brakes as necessary. However, in a one-pedal-drive mode, it is very hard to keep your foot in the "magic" spot between accelerating and braking, while turning, while the car is potentially changing speed on an icy descent. In practice, this means riding the regenerative braking, which in a turn, makes the car feel like it wants to skid out the rear tires and spin.
2. **Drivers should be in Control of the Car**: In earlier Tesla vehicles, drivers could adjust regenerative braking settings or disable one-pedal driving by selecting a "LOW" regenerative braking mode. However, my 2025 Tesla Model X lacks any such disable. Research on the Internet has many winter-drivers complaining about this problem, and suggestions that Tesla has forced all 2020+ S/X models (and perhaps all models) to operate with one-pedal-drive always enabled. This change eliminates the driver's ability to adapt the vehicle's behavior to remain safe in snowy and icy conditions.
3. **Transparency During Sale**: When purchasing our new car, we had no idea there was no way to turn off one-pedal-drive. Why would we ever ask the question "can the car be driven with pedals operating like a normal car?" We had the car in our possession for more than a week before we realized this safety issue, and now we are struggling to figure out how to address what we consider both a safety issue and a deceptive sale issue.

Tesla's owners manual for the Tesla Model Y acknowledges this risk by recommending drivers turn regenerative braking to "LOW" in snowy or icy conditions to maintain vehicle stability. However, this option is absent in my 2025 Model X. (and as far as I know all 2020+ Model S/X models)

[redacted]

Warning

In snowy or icy conditions, Model Y may experience loss of traction during regenerative braking, particularly when in the **Standard** setting and/or not using winter tires. Tesla recommends using the **Low** setting in snowy or icy conditions to help maintain vehicle stability.

Given the growing prevalence of EVs on American roads and the increasing push toward sustainability, it is imperative that safety considerations keep pace with technological advancements. To address this issue, I respectfully request the DOT to consider the following regulatory actions:

1. **Mandate a Disable One-Pedal-Drive Option**: Require all automakers to provide drivers with the ability to disable one-pedal driving or significantly reduce regenerative braking force when necessary. This setting should be easily accessible and clearly labeled in the vehicle's interface as a setting to use very-low or no regenerative braking.
2. **Standardize Safety Guidelines**: Establish standardized guidelines to test one-pedal-drive anti-lock regenerative braking functionality in slippery conditions, in particular in icy descending turns.
3. **Require Sale Transparency**: For any vehicle which is incapable of disabling one-pedal-drive, automakers should be required to have buyers sign an acknowledgement of operating limitations and safety risks in slippery conditions before a purchase transaction can be completed.

The removal of the ability to disable or adjust regenerative braking places drivers at an unnecessary disadvantage in challenging driving conditions, undermining both safety and confidence on the road. While one-pedal driving offers numerous benefits, it must not come at the cost of safety. By mandating that drivers retain the ability to turn this feature off, the DOT can ensure that advancements in vehicle technology are implemented responsibly and inclusively.

I appreciate your attention to this matter and urge the Department of Transportation to take proactive steps to address this critical safety issue. Please feel free to contact me at [your email address] or [your phone number] if further clarification or discussion is needed.

Thank you for your time and consideration.

Sincerely,

LB7XGP3B

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PARK CITY, UT [redacted]

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Subject: Request for Regulatory Action to Ensure Driver Safety by Requiring Drivers be able to Disable One-Pedal-Drive in EVs.

Department of Transportation

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