



U.S. Department
of Transportation

**National
Highway
Traffic Safety
Administration**

ODI RESUME

OFFICE OF DEFECTS INVESTIGATION

Investigation: AQ23001

Date Opened: 03/03/2023

Date 08/04/2025

Closed:

Investigator: Neil Dold

Reviewer: Otto Matheke

Approver: Tanya Topka

Subject: Certification

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Zoox, Inc.

Products: All purpose-built vehicles certified by Zoox, Inc. ("Zoox")

Population: 64

Problem Description: Examination of the process and technical data on which Zoox relied when certifying the Zoox vehicle and related issues.

ACTION/SUMMARY INFORMATION

Action: This Audit Query ("AQ") is closed as Zoox has applied for and been granted a demonstration exemption from applicable Federal Motor Vehicle Safety Standards ("FMVSS") for the subject vehicles.

Summary:

In July 2022, Zoox announced that it had certified a self-driving vehicle as being compliant with all applicable FMVSS. Zoox described these "purpose-built" vehicles as bi-directional, equipped with an automated driving system, and lacking traditional driving controls. Zoox was an outlier in the industry, having self-certified these vehicles rather than seeking an available exemption. Publicly available materials depicting Zoox's vehicles suggested that they may not be compliant with certain FMVSS. On September 6, 2022, NHTSA issued a Special Order directing Zoox to answer certain questions and provide information relating to the company's basis for certifying that the vehicle met all applicable FMVSS. Zoox responded to the Special Order on November 7, 2022. Based on Zoox's response and other available information, NHTSA opened this Audit Query (AQ23001) on March 3, 2023, to examine the process and technical data on which Zoox relied when certifying the Zoox vehicle and related issues.

During this investigation, NHTSA continued its evaluation of information provided by Zoox regarding its vehicles and basis of certification. NHTSA additionally conducted an on-site inspection of two Zoox vehicles. In December 2024, NHTSA issued Zoox an inspection report documenting its findings, which included multiple apparent noncompliances with applicable FMVSS.

Following dialogue with the agency during the course of this investigation, Zoox decided to apply for an FMVSS exemption for the subject vehicles. Specifically, in June 2025, Zoox requested an exemption under § 30114(a) for the purposes of demonstration of its purpose-built vehicles. NHTSA carefully evaluated Zoox's exemption request under the agency's Automated Vehicle

Exemption Program. On August 4, 2025, NHTSA granted Zoox an exemption subject to certain conditions, including that Zoox obscure or remove all existing statements that the purpose-built vehicle complies with or conforms to all applicable FMVSS. This exemption covers all Zoox vehicles encompassed by this investigation, apart from certain 2023 model year vehicles, which Zoox has discontinued from public road operation. As a result, all of the purpose-built vehicles manufactured by Zoox that are now operating on public roads in the United States are doing so pursuant to an FMVSS exemption issued by NHTSA.

In view of these actions, NHTSA is closing this investigation. NHTSA will monitor Zoox vehicles under both its Automated Vehicle Exemption Program and other oversight authorities and will take additional action if warranted.