



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**



June 26, 2026

Alex Tarnow
Avride Inc.
10 State Street
Newburyport, MA 01950

Subject: Information Request ID PE26003-01

Dear Mr. Tarnow,

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is requesting certain information under a Preliminary Evaluation (PE26003). PE26003 was opened to investigate the performance of the Automated Driving System (ADS) manufactured by Avride Inc. (Avride) and equipped on vehicles operated by Avride with respect to certain driving behaviors, conflict avoidance, and general assertiveness while operating on public roadways.

ODI has identified twenty one (21) subject incidents from crash reports submitted by Avride under Standing General Order 2021-01 (SGO) involving ADS-equipped vehicles (AVs). The associated SGO reports are listed below by report ID:

31101-13612, 31101-13616, 31101-13621, 31101-13624, 31101-13625, 31101-14066, 31101-14070, 31101-14148, 31101-14150, 31101-14166, 31101-14200, 31101-14235, 31101-14286, 31101-14328, 31101-14509, 31101-14653, 31101-14818, 31101-14898, 31101-14923, 31101-14925, 31101-15099.

AVs exhibiting such driving behaviors may increase the risk of crash or injury to other road users and occupants. Therefore, ODI is requesting information to assess these risks, contributing factors, and associated actions taken or intended to be taken by Avride to address the potential safety problems.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject Vehicles:** all vehicles that have been equipped with the Avride ADS that have been or are intended to be operated by Avride in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions.
- **Subject System:** the suite of software, hardware, data, and any other related systems on or off the vehicle that contributes to the operation of the ADS of the subject vehicles.

- **Subject Behaviors**: any of the following driving behaviors exhibited by a subject vehicle with the subject system engaged:
 - changing lanes and failing to yield to the right-of-way of other road users traveling in close proximity in an adjacent lane to a subject vehicle;
 - failing to slow for, yield to, or otherwise avoid other road users present in or entering the lane and path ahead of a subject vehicle; or
 - striking or failing to avoid stationary objects obstructing the lane or path ahead.
- **Subject Incidents**: SGO reports identified in this letter and any other incidents in which the subject system exhibited one or more subject behaviors that resulted in a traffic violation or conflict.
- **Conflict**: (adapted from ISO/TR 21974-1 and SAE J3206) any scenario where the trajectory of one or more road users or things (e.g., objects, animals) led to:
 - a crash or road departure;
 - the execution of evasive maneuvers to avoid an imminent crash or road departure; or
 - hazardous proximity (e.g., “close call”).

Conflicts may involve other road users or things that should normally be avoided, including objects and animals, particularly those associated with risk of property damage or injury of a road user during a crash.

- **Operational Design Domain (ODD)**: the operating conditions under which a given driving automation system or feature thereof is specifically designed to function, including, but not limited to, environmental, geographical, and time-of-day restrictions, and/or the requisite presence or absence of certain traffic or roadway characteristics.
- **ADS Supervisors**: any individuals who, either remotely or while occupying a subject vehicle, are intended to monitor the performance of the subject system, respond to unexpected or otherwise inappropriate performance, and to perform driving tasks as needed.
- **Passengers**: occupants of the subject vehicles who are not intended to perform driving tasks or to supervise the subject system.
- **Avride**: Avride Inc., all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Avride (including all business units and persons previously referred to), who are or were involved in any way as of January 1, 2020, with any of the following related to the subject behaviors in the subject vehicles:

- a. Design, engineering, analysis, modification or production (e.g., quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, lawsuits or arbitrations; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Avride, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Avride or not. If a document is not in the English language, provide both the original document and an English translation of the document.
 - **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

In order for my staff to evaluate the subject behaviors, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Avride has previously provided a document to ODI, Avride may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Avride's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. List each city or county and state and any other locality in the United States in which Avride has operated the subject vehicles on public roadways and provide the total number of subject vehicles that are or have been operated within each locality on public roadways.
2. For each locality identified in Request No. 1, describe the current ODD and other operational limitations of the subject system, and identify all ODD or operational modifications on or after October 1, 2024. Describe any distinctions in the ODD, operational limitations, and modifications based on:
 - a. The vehicle's operating location;
 - b. When public ridership is offered;
 - c. When a human supervisor is onboard; and
 - d. When the vehicle is operating for testing purposes only.

Provide the date, or approximate date, and the reason(s) for each ODD and operational modification or change. Also, provide the above information for any ODD or operational modifications that Avride is aware of which may be incorporated into subject vehicles within the next 120 days.

3. For each subject vehicle operated with the ADS engaged on public roadways in the United States to date by Avride, state the following:
 - a. Vehicle identification number (17-character VIN);
 - b. ADS version equipped on the subject vehicle when first operated on public roadways at a level of specificity to capture software and hardware modifications or updates;
 - c. Date of initial operation on public roadways (MM/DD/YYYY);
 - d. The state(s) and locality(ies) in the United States where the vehicle and system have been operated (postal abbreviation);
 - e. The number of miles driven, number of trips taken, and number of subject incidents on public roadways with the ADS engaged from October 1, 2024 through May 31, 2026, by month, year, and locality:
 - i. in total;
 - ii. with onboard human supervision;
 - iii. without onboard human supervision;
 - iv. while operating in a testing capacity;
 - v. while offering passenger service to the public with passengers onboard; and

vi. while offering passenger service to the public without passengers onboard.

Provide the table in Microsoft Excel, or a compatible format.

4. State the number of each of the following, received by Avride, or of which Avride is otherwise aware, which relate to, or may relate to, a subject incident or one or more subject behaviors in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports;
 - c. Reports involving a crash, injury or fatality;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings, both pending and closed, where Avride is or was a party to the arbitration;
 - f. Lawsuits, both pending and closed, in which Avride is or was a defendant or codefendant;
 - g. Legal claims asserted against Avride before formal proceedings began; and
 - h. Citations and other similar correspondence from local authorities, and law enforcement.

For subparts "a" through "h," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

For items "c" through "h," provide a summary description of the alleged problem, causal and contributing factors, and Avride's assessment of the problem, including the significant underlying facts and evidence.

For items "e" through "g," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

5. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 4, state the following information:
 - a. Avride's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 4 (i.e., consumer complaint, field report, etc.);
 - c. The identification number for any associated report submitted in response to the SGO;
 - d. The title(s) or identifier(s) of any associated actions identified in Request 7 below;
 - e. The date(s) of inclusion in any associated actions identified in Request 7 below;
 - f. The title(s) or identifier(s) of any associated subject system modifications identified in Request 8 below;
 - g. Vehicle's 17-character VIN;
 - h. ADS version equipped at the time of the incident (at a level of specificity to capture software and hardware modifications or updates);
 - i. Incident date (MM/DD/YYYY);
 - j. Report date (MM/DD/YYYY);
 - k. Incident location (city and state);

- l. Incident latitude and longitude;
- m. Whether the subject vehicle or any subject system was operating outside of the specified ODD or other operational limits or in a degraded state;
- n. Description and cause(s) of any operation outside of ODD or operational limits or degraded state(s) ;
- o. Whether the subject vehicle was operating with or without onboard human supervision at the time of the incident;
- p. Whether or not the subject vehicle was offering passenger service to the public at the time of the incident;
- q. Whether the subject vehicle was operating with or without passengers onboard at the time of the incident;
- r. Whether the subject vehicle was equipped with a driver monitoring system (DMS);
- s. Whether a DMS was in use at the time of the incident;
- t. Whether a DMS or the ADS provided any alert(s) to an ADS supervisor prior to a conflict, subject system limitation, degraded state, ODD exit, or other safety-relevant event;
- u. Description of the nature of the alert(s) and method of delivery;
- v. Whether a citation was issued;
- w. Whether a crash is alleged;
- x. Whether a crash was verified;
- y. Whether a crash was detected at the time of the incident and, if so, the manner of detection;
- z. Whether property damage is alleged;
- aa. Number of alleged injuries, if any; and
- ab. Number of alleged fatalities, if any.

Provide this information in Microsoft Excel, or a compatible format.

In addition, produce copies of all documents related to each item. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) as well as by identifier from subpart "a."

Describe in detail the search methods and search criteria used by Avride to identify the responsive items.

6. For each unique incident identified within the scope of your response to Request No. 5, provide a composite rendering of the incident showing video of each road user involved in the incident alongside synchronized renderings of the ADS and subject vehicle status, ADS planned path(s), subject vehicle kinematics (including measured velocity and acceleration), ADS control inputs (including commanded acceleration, braking, steering and turn signals), and ADS predicted trajectories of the other involved road users.
7. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to a subject incident or one or more subject behaviors in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Avride. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The title(s) or identifier(s) of any associated actions identified in Request 8;
 - c. The actual or planned start date;
 - d. The actual or expected end date;

- e. The subject and objective of the action;
- f. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
- g. A description of the tools, methods, measures, metrics, criteria and corresponding values, classifications, or other outputs used to perform this action or assess the performance of the subject vehicles and subject system, individually and in aggregate;
- h. A summary of each finding and/or conclusion resulting from the action; and
- i. The list of related documents produced as requested below.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action and, for each action, separate final documents from interim and draft documents.

8. Describe all modifications or changes made by, or on behalf of, Avride in the design, software, function, material composition, manufacture, quality control, supply, or installation of the subject system, from the initial operation on public roadways to date, which relate to, or may relate to, a subject incident or one or more subject behaviors in the subject vehicles. For each such modification or change, provide the following information:
 - a. Action title or identifier;
 - b. The title(s) or identifier(s) of any associated actions identified in Request 7;
 - c. The date or approximate date on which the modification or change was initially introduced;
 - d. A detailed description of the modification, change or update and how it relates to the subject behaviors;
 - e. The reason(s) for the modification, change, or update;
 - f. Avride's assessment regarding the safety implications of the modification, change, or update including supporting evidence and any expected and/or actual reductions in occurrences of subject incidents and the subject behaviors;
 - g. The hardware and software identifier(s) of the original system version;
 - h. The hardware and software identifier(s) of the modified, changed, or updated system version;
 - i. The final date on which the original system version was operated on public roadways; and
 - j. The list of related documents produced as requested below.

Also, provide the above information for any modification or change that Avride is aware of which may be incorporated into subject vehicles within the next 120 days which relate to, or may relate to, the subject incidents and subject behaviors.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action and, for each action, separate final documents from interim and draft documents.

9. Provide documents that describe the subject system theory of operation, design intents, requirements verification and validation, risk management, and associated measures, metrics and thresholds that relate to one or more of the subject behaviors including:

- a. ADS control authority and associated limitations with respect to vehicle acceleration, braking and steering;
 - b. Maintaining predictable and contextually safe vehicle motion control;
 - c. Maintaining a safety envelope;
 - d. Right-of-way determination and assertion in the presence of other road users;
 - e. Detecting and responding to conflicts with other road users and objects;
 - f. Executing maneuvers to achieve a minimum/mitigated risk condition;
 - g. Human factors considerations that facilitate the ability of ADS supervisors to mitigate or otherwise control risks related to the subject behaviors and fallback; and
 - h. Monitoring and responding to the readiness, or lack thereof, of ADS supervisors to perform ADS fallback.
10. Provide documents that describe Avride's organizational and operational policies, practices, processes, procedures, training, or safeguards (collectively, "actions") that are intended to identify, characterize, prioritize, prevent, reduce, or mitigate the safety risks to occupants and other road users associated with risks arising from the subject behaviors. To the extent that any documents were revised from October 1, 2024 to present, explain the revisions. At minimum, include documents pertaining to:
- a. Assessing incident risks and associated contributing factors both individually and in aggregate;
 - b. Implementing operational restrictions and changes to ODD or other operational specifications;
 - c. Implementing subject system modifications in response to identified risks and/or incidents;
 - d. Training and performance monitoring for ADS supervisors to ensure adequate understanding of roles and responsibilities in the safe operation of the subject system and subject system's capabilities and limitations; and
 - e. Conformance of actions to any industry standards or best practices.
11. Furnish Avride's assessment of each subject behavior in the subject vehicles, including:
- a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses; and
 - e. What warnings, if any, an ADS supervisor or other persons both inside and outside the vehicle would have that the subject behavior was occurring, or subject system was malfunctioning.

Legal Authority for This Request

This letter is being sent to Avride pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. It constitutes a new request for information.

Civil Penalties

Avride's failure to respond promptly and fully to this letter could subject Avride to Civil Penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, 49 U.S.C. § 30165(a)(3), provides for Civil Penalties of up to \$27,874 per violation per

day, with a maximum of \$139,356,994 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 C.F.R. § 578.6(a)(3). This includes failing to respond completely, accurately, or in a timely manner to ODI information requests.

If Avride cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney client, attorney work product, or other privilege, Avride does not submit one or more requested documents or items of information in response to this information request, Avride must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

If Avride's response contains any information that you claim is confidential business information (CBI), you will need to upload a "confidential version" file and a redacted "public version" file of each file for which Avride is requesting confidential treatment to NHTSA's Safety Defect Investigations (SDI) Portal. For each file submitted through the SDI Portal for which Avride is requesting confidential treatment, Avride must check the "Contains CBI" box. Once all Avride's files have been uploaded in the SDI Portal, Avride will need to click on the "Finalize CBI Submission" button in the SDI Portal and then submit its request letter for confidential treatment and Part 512 certification directly to the Office of the Chief Counsel in NHTSA's Confidential Business Information (CBI) Portal.

After Avride submits its request for confidential treatment and certificate in NHTSA's CBI Portal, the CBI Portal will assign a package identification number for your future reference and all "confidential version" and "public version" files submitted as part of the CBI request will be accessible by both NHTSA's Office of the Chief Counsel and NHTSA's Office of Defects Investigation.

Please refer to PE26003-01 in Avride's response to this letter and in any request for confidential treatment that Avride may submit in response to this letter.

Please see enclosure 1 for additional instructions on submitting a request for confidential treatment that is compliant with 49 CFR Part 512 (specifically, a request for confidential treatment must include the required parts that are discussed in enclosure 1).

Due Date

Avride's response to this letter must be submitted to this office by August 7, 2026. If Avride finds that it is unable to provide all of the information requested within the time allotted, Avride must request an extension from me through the Safety Defects Investigation Portal no later than five (5) business days before the response due date. If Avride is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Avride then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please email Thomas Haugh of my staff at thomas.haugh@dot.gov.

Sincerely,

Neil Dold

Neil Dold, Chief
Vehicle Defects Division AETD
Office of Defects Investigation

ENCLOSURE 1 - INFORMATION FOR REQUESTS FOR CONFIDENTIAL TREATMENT

If you believe that your response contains any material that you claim is confidential business information, submit these materials to NHTSA's Office of the Chief Counsel in accordance with 49 C.F.R. Part 512. **All requests for confidential treatment should be submitted directly to the Office of the Chief Counsel via NHTSA's Confidential Business Information (CBI) Portal.** If you do not currently have a user account in the CBI Portal, you may send a registration request to the CBI Portal's Help Desk at cbi-helpdesk@dot.gov.

Prior to directly submitting your request for confidential treatment to the Office of the Chief Counsel in the CBI Portal, you will need to upload all "confidential version" and "public version" files in NHTSA's Safety Defect Investigations (SDI) Portal.

Requests for confidential treatment are governed by Part 512. A current version of this regulation is available on the internet at <http://www.ecfr.gov>, by selecting Title 49 "Transportation," next selecting "Parts 500 - 599," and finally selecting Part 512 "Confidential Business Information."

How to request confidential treatment:

NHTSA is treating electronic submission as an acceptable method for submitting confidential business information to the agency under Part 512. If you claim that any of the information or documents provided in your response constitutes confidential business information within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, you must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with Part 512, to the Office of the Chief Counsel. Requests for confidential treatment should be submitted to the Office of the Chief Counsel in NHTSA's CBI Portal. Do not send a hardcopy of a request for confidential treatment to NHTSA's headquarters.

Your request must include a request letter that contains supporting information, pursuant to Part 512.8. Your request must also include a certificate, pursuant to Part 512.4(b) and Part 512, Appendix A.

You are required to submit one unredacted "confidential version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.6, the words "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS" (as applicable) must appear at the top of each page containing information claimed to be confidential. In the latter situation, where not all information on the page is claimed to be confidential, identify each item of information for which confidentiality is requested within brackets: "[]."

You are also required to submit one redacted "public version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.5(a)(2), the redacted "public version" should include redactions of any information for which you are seeking confidential treatment (i.e., the only information that should be unredacted is information for which you are not seeking confidential treatment).

For questions about a request for confidential treatment, please contact Dan Rabinovitz in the Office of the Chief Counsel at Daniel.Rabinovitz@dot.gov.