



September 25, 2026

Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: AV Framework Updates and Request for Comments on Interim Guidance (Docket No. NHTSA-2026-15483)

Dear Administrator Morrison:

The Autonomous Vehicle Industry Association (“AVIA”) respectfully submits these comments in response to the National Highway Traffic Safety Administration’s (“NHTSA”) request for comment on “AV Framework Updates and Request for Comments on Interim Guidance,” published in the Federal Register on July 31, 2026.¹ AVIA appreciates the opportunity to provide its perspective on this important initiative and commends NHTSA on its continued focus on updating existing procedures and regulations to build out a clear regulatory framework for autonomous vehicles (“AVs”).

AVIA is the unified voice of the AV industry, representing the world’s leading technology, rideshare, automotive, trucking, and transportation companies working to bring the tremendous safety and mobility benefits of AVs—otherwise known as SAE Levels 4- and 5-capable vehicles—to consumers in a safe, responsible, and expeditious manner.² Collectively, vehicles operated by AVIA members have driven over 360 million autonomous miles on U.S. public roads,³ a distance roughly equivalent to driving around the Earth more than 14,000 times.

AVIA strongly supports the Administration’s continued engagement on AV policy and the overarching objectives of the AV Framework. We have long advocated for a strong federal framework for AV policy, as detailed in our federal policy proposal, *Securing American Leadership in Autonomous Vehicles*.⁴ One element of such a policy framework that AVIA has pushed for is an enhanced pathway to the deployment of AVs whose designs require exemptions from current Federal Motor Vehicle Safety Standards (“FMVSS”), and we appreciate NHTSA’s

¹ AV Framework Updates and Request for Comments on Interim Guidance, 91 Fed. Reg. 48485 (July 31, 2026).

² AVIA members include Amazon, Aon, Aurora, AVRS, Avride, Bot Auto, Discount Tire, Doordash, FedEx, Ford, Gatik, General Motors, Honda, Humble Robotics, International, Isuzu, Kodiak, Moia, Lockton, Lyft, Motional, NGV, Nuro, PlusAI, Stack, Rivian, Tier IV, Torc Robotics, TaskUs, Terawatt, Uber, UPS, U.S. Venture, Volvo Cars, Volvo Autonomous Solutions, Waabi, Waymo, Wayve, Valgo, and Zoox. See About Us, Autonomous Vehicle Indus. Ass’n, <https://www.theavindustry.org/about> (last visited Sept. 25, 2026).

³ Autonomous Vehicle Indus. Ass’n, State of AV (May 20, 2026), <https://www.theavindustry.org/state-of-av>.

⁴ See Autonomous Vehicle Indus. Ass’n, *Securing American Leadership in Autonomous Vehicles* (2025).



work to address exemptions through both the changes to the 49 C.F.R. Part 555 (“Part 555”) process, and the Autonomous Vehicle Exemption Program.

However, AVIA would urge NHTSA to act with restraint when placing conditions on General Exemptions, and to consider further streamlining the information required by the exemption application. Doing so would serve both NHTSA’s stated goal in reducing the burdens on both the agency and applicants, and the agency’s desire to improve the efficiency of the General Exemption process. For both elements of the General Exemption process, NHTSA should focus its efforts on the information needed to establish how the vehicle or equipment for which the exemption is sought demonstrates a level of safety equal to the level of safety provided by the standard, as required by 49 U.S.C. § 30113.⁵ At the application stage, as laid out in the Interim Part 555 Guidance and Enhanced Application Instructions, this would mean focusing the requested information on how the AV meets the equivalent level of safety as the FMVSS it is seeking an exemption from, and limiting questions on how the vehicle will be otherwise used or managed. This ensures the exemption application is focused on the regulations in question, and not on aspects of the vehicle’s operations that are not directly relevant to the AV’s equivalent safety.

As for the conditions placed on General Exemptions issued to AVs, while AVIA appreciates NHTSA’s desire for flexibility, there is also a need for consistency to ensure that equally situated AV developers are being granted similar conditions. Likewise, provided an AV meets the equivalent safety threshold, NHTSA should avoid placing conditions on the commercial use of the AV, allowing developers who have proven the safety of their vehicles to deploy them as they would choose. NHTSA would retain its ability to revoke an exemption or utilize its existing investigatory and enforcement powers without placing unnecessary limits on how a vehicle could be used.

AVIA commends NHTSA for its continued leadership in developing the AV Framework and its ongoing support for the further development and deployment of AVs. Our members look forward to continuing to engage with NHTSA as the Agency moves forward with this important initiative.

Sincerely,

Jeff Farrah
Chief Executive Officer
Autonomous Vehicle Industry Association

⁵ See 49 U.S.C. § 30113(b)(3)(ii) and (iv).