CYBERCABBIE FLEET OPERATIONS LLC

Comments to the National Highway Traffic Safety Administration

Docket No. NHTSA-2026-1552

91 Fed. Reg. 48,485 (July 31, 2026)

AV Framework Updates and Request for Comments on Interim Guidance

September 29, 2026

To the National Highway Traffic Safety Administration:

CyberCabbie Fleet Operations LLC respectfully submits these comments in response to NHTSA's notice at *91 Fed. Reg. 48,485* (July 31, 2026), Docket No. NHTSA-2026-1552. The comment period was extended to September 30, 2026. NHTSA requested comment on its interim guidance for commercial deployment exemptions under 49 U.S.C. § 30113 and 49 C.F.R. Part 555, including how that guidance could better identify the information most useful in a General Exemption application.

CyberCabbie Fleet Operations LLC is a small Georgia family-run company in Walker County, within the Chattanooga metropolitan area. The company is preparing for the potential future operation of fully automated passenger vehicles as an independent local fleet operator. It does not manufacture automated vehicles or develop automated driving systems. Its perspective is that of a potential downstream owner and operator that may acquire vehicles and automated-driving technology developed, manufactured, maintained, and updated by other entities.

CyberCabbie is an independent venture and is not affiliated with Tesla, Inc. Nothing in these comments is submitted on behalf of Tesla or any other vehicle manufacturer, automated-driving-system developer, transportation-network company, or governmental entity.

Our principal recommendation is that NHTSA's Part 555 guidance and evolving automated-vehicle framework expressly recognize that, in future commercial deployments, **the vehicle manufacturer, ADS developer, transportation-network provider, remote-assistance provider, vehicle owner, and local fleet operator may be different legal entities.**

Current commercial exemptions have generally run through the manufacturer as the deploying entity. That structure is understandable at this stage of the market. It may not describe every mature operating model. Clear assignment of safety and operational responsibilities will become more important as automated vehicles move from manufacturer-controlled fleets into broader commercial service.

I. Comments on the Interim Part 555 Guidance

NHTSA asked how the interim Part 555 guidance and enhanced application instructions could be improved so that prospective applicants understand the information most helpful to the agency. CyberCabbie addresses that request directly.

The guidance is written primarily for the manufacturer-applicant. That is the correct starting point under § 30113. If exempted vehicles will be placed into passenger service by someone other than the applicant, however, the application should not be silent about those downstream entities.

CyberCabbie recommends that NHTSA revise the interim guidance to provide that an applicant seeking a General Exemption for commercial passenger deployment of an ADS-equipped vehicle should:

1. Identify each entity expected to own, stage, maintain, remotely assist, or place the exempted vehicle into passenger service during the exemption term;
2. Attach a multi-entity responsibility matrix covering the functions listed in Section III;
3. Identify a continuously reachable operations contact for law enforcement and other first responders;
4. State who will provide remote assistance, the limits of that function, and what occurs if communications fail;
5. Describe how material changes to the Operational Design Domain, operating terms, or exemption conditions will be communicated to downstream operators;
6. Identify the safety-information package that will be available to a fleet operator placing the vehicle into service; and
7. Identify the entity responsible for preserving relevant ADS and vehicle data after an incident and for satisfying applicable federal crash-reporting obligations, including under NHTSA's Standing General Order.

These items can be required as application content and, where appropriate, as conditions of an exemption. They do not require NHTSA to write the private operating agreements among manufacturers, network providers, and local operators, or to assign every function to a single type of company by rule.

NHTSA also invited comment on other aspects of the General Exemption process. The remaining sections explain why the disclosures above would improve the process for applicants, operators, first responders, and the agency.

II. Recognize Independent Fleet Operators as Distinct Participants

Much of the current automated-vehicle discussion understandably focuses on vehicle manufacturers and ADS developers. During early deployments, those entities frequently also own and operate the vehicles. That structure may not represent the complete mature market.

Commercial deployment may include independently owned fleets operating vehicles whose ADS technology, software, data systems, remote-support services, and transportation-network functions are supplied by one or more other companies. Small and regional operators can supply local knowledge, vehicle staging, charging, cleaning and maintenance logistics, passenger support, emergency coordination, and relationships with local transportation and public-safety agencies—functions the manufacturer or ADS developer may not perform on the ground.

NHTSA should therefore recognize, at least in guidance, the role of an automated-vehicle fleet operator distinct from the:

1. vehicle manufacturer;
2. ADS developer;
3. transportation-network or ride-hailing provider;
4. remote-assistance provider; and
5. owner of the underlying ADS intellectual property.

That distinction matters for vehicle readiness, software configuration, maintenance, incident response, crash reporting, records retention, interaction with law enforcement, and return-to-service decisions. Where practical, federal requirements should allow safety obligations that only the manufacturer or ADS developer can discharge to be satisfied through standardized manufacturer documentation, rather than requiring every downstream operator to reproduce engineering analyses it does not possess.

III. Require a Responsibility Matrix in Multi-Entity Deployments

CyberCabbie recommends that the Part 555 guidance encourage—and, for commercial passenger deployments involving more than one entity, require the applicant to attach—a documented responsibility matrix.

At a minimum, that matrix should identify the entity responsible for:

- confirming that a vehicle is authorized and appropriately configured for its Operational Design Domain;
- installing, approving, and documenting safety-critical software updates;
- performing vehicle inspection and maintenance;
- responding when an automated vehicle becomes disabled or cannot continue its trip;
- providing remote assistance when necessary;
- communicating with law enforcement, fire, EMS, towing personnel, and other first responders;
- preserving relevant ADS and vehicle data after an incident;

- satisfying applicable federal crash- or incident-reporting requirements, including under the Standing General Order;
- communicating safety-related defects or recalls to the fleet owner or operator;
- determining when a vehicle may safely return to passenger service; and
- maintaining records demonstrating that vehicles continue to satisfy applicable operating conditions.

The purpose is not to assign each responsibility to a particular type of company by regulation. Different commercial arrangements may divide these functions differently. The objective is to ensure that **there is no ambiguity about which entity has each responsibility before the vehicles begin commercial operation.**

NHTSA's recent streamlining of crash reporting, including reducing duplicate reports by multiple entities about the same event, makes this assignment especially important. If several companies touch the same vehicle, the exemption file should state who preserves the data and who files the report.

IV. First-Responder Interaction Should Be Addressed Before Commercial Deployment

CyberCabbie strongly supports NHTSA's emphasis on safe interaction between driverless vehicles and first responders. On July 8, 2026, NHTSA told developers that an automated vehicle that cannot safely interact with first responders is a danger to the general public and directed the industry to treat emergency-scene performance as a core safety function, not an edge case.

See NHTSA, *ADS Developer Letter* (July 8, 2026), https://www.nhtsa.gov/document/ads-developer-letter-july-2026; see also NHTSA press release.

A fully automated vehicle without a human driver presents practical questions that do not arise with conventional vehicles. When a police officer, firefighter, EMS provider, or roadway worker encounters an unoccupied or driverless automated vehicle, that responder should have a reliable method of determining:

- who is responsible for the vehicle;
- how to contact an appropriate operations or remote-support center;
- how the vehicle can be placed into a safe condition;
- whether and how the vehicle may be moved;
- how propulsion and high-voltage systems may be disabled in an emergency;
- what procedures apply during towing or recovery;
- how occupants may be assisted or evacuated;

- how relevant electronic information can be preserved following a serious incident; and
- who has authority to approve the vehicle's subsequent return to service.

These procedures become more important where the local fleet operator is not the ADS developer. NHTSA should encourage standardized, readily accessible first-responder information for ADS-equipped commercial vehicles and should require Part 555 applicants for commercial passenger deployment to designate a continuously reachable operational contact.

V. Distinguish Remote Assistance from Remote Driving

Future federal guidance should clearly distinguish among:

Remote assistance, in which a person provides information or guidance to an ADS while the ADS retains the dynamic driving task;

Remote supervision, in which personnel monitor vehicles or fleet conditions without directly performing the driving task; and

Remote driving, in which a remote human performs some or all of the dynamic driving task.

This distinction is significant for independent fleet operators. A local operator may depend on a manufacturer or ADS provider for remote-assistance functionality without having the technical capability or authority to intervene directly in the ADS. Treating those functions as the same activity would mis-assign responsibility and confuse state and local agencies.

Commercial deployments should document:

- who provides remote assistance;
- under what circumstances the ADS requests it;
- what actions the remote-assistance provider may authorize;
- what communications capability is required;
- what occurs if communications are unavailable;
- what information is recorded about a remote-assistance event; and
- what responsibilities remain with the local fleet operator.

VI. Federal Guidance Should Facilitate Coordination with State and Local Regulators

Automated passenger service implicates both federal motor-vehicle-safety responsibilities and traditional state and local responsibilities relating to vehicle registration, passenger transportation, commercial operations, insurance, traffic enforcement, roadway management, and emergency response. Independent fleet operators will operate at that intersection.

CyberCabbie encourages NHTSA to continue coordinating with state and local governments and to identify which aspects of ADS safety NHTSA considers primarily federal and which operational matters remain appropriately addressed by states and local jurisdictions. NHTSA has already identified strengthening coordination across jurisdictions and reducing burdens from overlapping requirements as subjects of recent stakeholder engagement. *91 Fed. Reg. at 48,485*.

A clear federal framework can help prevent a situation in which small fleet operators must interpret incompatible definitions or different technical requirements each time an automated vehicle crosses a jurisdictional boundary. That problem is acute in metropolitan areas that cross state lines. The Chattanooga metropolitan area includes communities in both Tennessee and Georgia. A future automated passenger service may therefore encounter multiple state and local authorities while operating in what residents experience as a single regional transportation market.

VII. Commercial-Deployment Conditions Should Account for Changes Over Time

CyberCabbie supports an adaptable oversight structure for automated vehicles. ADS capabilities, software, Operational Design Domains, and fleet operations can change substantially after initial deployment.

NHTSA's notice and related Part 555 materials recognize that operational terms associated with an exemption can evolve as ADS capabilities develop, including through later requests to modify an authorization, rather than remaining static for the vehicle's entire life. *See 91 Fed. Reg. at 48,485*; NHTSA, Interim Part 555 Guidance and Enhanced Application Instructions.

From a fleet-operator perspective, any material change to the conditions under which a vehicle is federally authorized should be communicated clearly to downstream operators. If an authorization changes the permitted Operational Design Domain, roadway classifications, maximum operating speed, environmental conditions, remote-assistance requirements, passenger-service restrictions, reporting requirements, or required safety mitigations, the fleet operator should have an unambiguous way to determine the current conditions applicable to each vehicle in its fleet.

NHTSA should consider mechanisms by which current operational conditions can be identified by vehicle, exemption, manufacturer, or ADS configuration without requiring a small operator to reconstruct those conditions from multiple historical agency documents.

VIII. Safety Information Should Follow the Vehicle into Downstream Operation

For automated vehicles to move safely from manufacturer-controlled fleets into independently operated commercial fleets, critical safety information must travel with the vehicle. CyberCabbie recommends that the Part 555 guidance identify a minimum safety-information package available to a commercial fleet operator.

Such information might include:

- applicable Operational Design Domain;
- vehicle and ADS configuration;
- applicable exemption or authorization conditions;
- emergency-response procedures;
- maintenance requirements affecting ADS performance;
- minimum sensor inspection and cleaning requirements;
- procedures following collision or sensor damage;
- connectivity dependencies;
- remote-assistance arrangements;
- safety-critical software-update procedures;
- recall and defect-notification processes; and
- criteria for removing and returning a vehicle to passenger service.

This information would allow the entity actually placing the vehicle into daily service to understand the operating limitations established by the manufacturer, ADS developer, and NHTSA. It would also allow small and regional operators to meet their on-the-ground duties without independently reproducing engineering work that only the manufacturer or ADS developer possesses. The objective is an accountable chain of responsibility, not duplicated technical analysis.

IX. Conclusion

CyberCabbie appreciates NHTSA's work to develop a national framework supporting safe commercial deployment of automated vehicles. As automated mobility develops, the company operating an automated vehicle locally may not be the company that manufactured the vehicle, developed the ADS, supplies remote assistance, or operates the underlying transportation network.

CyberCabbie respectfully recommends that NHTSA's Part 555 guidance and evolving framework:

1. require General Exemption applicants for commercial passenger deployment to identify downstream owners and operators;
2. require a clear assignment of responsibilities among manufacturers, ADS developers, fleet operators, transportation-network providers, and remote-assistance providers before service begins;
3. establish clear expectations for first-responder interaction, including a continuously reachable operations contact;

4. distinguish remote assistance from remote supervision and remote driving;
5. promote federal, state, and local coordination, including in multi-state metropolitan areas;
6. ensure that changing federal operating conditions are communicated to downstream fleet operators; and
7. ensure that safety-critical information follows ADS-equipped vehicles into downstream commercial operation.

Resolving these responsibilities before large-scale deployment can provide regulatory clarity to manufacturers, operators, public-safety agencies, state regulators, and the traveling public while preserving flexibility for different commercial operating models.

Thank you for the opportunity to provide comments.

Respectfully submitted,

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