Comments of CyberCabbie Fleet Operations LLC

Before the National Highway Traffic Safety Administration
U.S. Department of Transportation
Docket: NHTSA-2026-1519 | **RIN:** 2127-AM70
Subject: Modernization of FMVSS No. 108 To Accommodate ADS-Equipped Vehicles
Date: October 27, 2026
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I. Introduction and Statement of Support

CyberCabbie Fleet Operations LLC appreciates the opportunity to comment on NHTSA's proposed modernization of Federal Motor Vehicle Safety Standard (FMVSS) No. 108, published October 26, 2026. CyberCabbie is a Georgia-based company preparing for potential participation in autonomous passenger transportation in the greater Chattanooga region, including Northwest Georgia and Southeast Tennessee. Our activities focus on prospective fleet infrastructure, charging, staging, local operational readiness, and evaluation of roadway conditions. CyberCabbie supports removing requirements premised on a human driver when an automated driving system (ADS) performs the driving task, while preserving or improving safety outcomes.

II. Manual Lighting Controls

CyberCabbie supports limiting certain manually operated turn-signal, hazard-warning and headlamp-control requirements to vehicles equipped with manual driving controls. Eliminating a manual control must not eliminate its safety function. NHTSA should preserve applicable lighting performance and visibility requirements, permit ADS-controlled operation, maintain an appropriate basis for evaluating continued lighting functionality, and clarify that removal of manual controls does not remove applicable manufacturer certification responsibilities.

III. Optional Cyan ADS Identification Lighting

CyberCabbie supports optional cyan-colored exterior lamps identifying ADS operation without an occupant expected to monitor the roadway. Nationally consistent color, placement, visibility and activation specifications could aid emergency responders and other road users. NHTSA should ensure installed lamps accurately indicate the applicable ADS operating state, avoid confusion with required vehicle or emergency lighting, and evaluate visibility, glare, adverse weather and nighttime performance. Optional introduction is appropriate while evidence of effectiveness develops.

IV. Emergency Responders and Roadside Safety

Driverless vehicles may encounter police-directed traffic, fire scenes, ambulance operations, disabled vehicles and temporary traffic controls. NHTSA should consider predictable exterior lighting during roadside stops, operational failures, and applicable automated fallback or minimal-risk maneuvers. Hazard lamps and required exterior lighting should remain intelligible to other road users. NHTSA should seek input from emergency-response organizations as appropriate. These comments concern vehicle lighting, not a proposal to regulate all emergency interactions through FMVSS No. 108.

V. Multistate Consistency

CyberCabbie's prospective service region includes Georgia and Tennessee, across urban, suburban, rural and tourist travel patterns. Nationally consistent federal vehicle-equipment requirements, including optional ADS identification lighting, can reduce confusion across jurisdictions. State and local registration, passenger transportation and roadway-operation rules remain distinct from federal vehicle-equipment requirements.

VI. Regional Road Readiness

CyberCabbie is developing a GIS-based CyberCabbie Road Readiness System (CRRS) to evaluate roadway geometry, intersections, school zones, railroad grade crossings, passenger loading areas, emergency facilities and changing roadway conditions. These issues extend beyond FMVSS No. 108 but illustrate the importance of predictable turn-signal, hazard-warning and ADS identification lighting at complex locations.

VII. Manufacturer Certification and Implementation

NHTSA should clearly identify the revised provisions applicable to vehicles designed exclusively for ADS operation without manual driving controls. Technology-neutral implementation guidance can assist manufacturers, prospective purchasers, insurers, registration agencies and fleet operators. The proposed amendments do not themselves establish compliance with other FMVSS, grant vehicle-specific exemptions, or authorize commercial driverless operations in a state.

VIII. Conclusion

CyberCabbie supports technology-neutral modernization that removes unnecessary manual-control assumptions while retaining substantive lighting safety functions. We particularly support standardized optional cyan ADS identification lighting, emergency-responder visibility, clear manufacturer compliance guidance and consistent federal vehicle-equipment requirements for multistate operations. We appreciate NHTSA's consideration of these comments.

Respectfully submitted,

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