

Comment from Matthew Perin

Mr. Stephen Wood and Mr. Daniel Koblenz
Office of Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Dear Mr. Wood and Mr. Koblenz,

As Americas grocer, The Kroger Co. is proud to employ nearly half a million associates who serve over nine million customers daily through a seamless digital shopping experience and 2,800 retail food stores in 35 states, under a variety of banner names.

We offer customers a variety of ways to buy groceries, including pickup, delivery, and ship-to-home. These services are available to more than 90% of our customers, and our goal is to reach a 100% of our customers with these experiences and ultimately to reach all across America. We offer our customers convenient delivery services both directly and in partnership with a number of companies using traditional vehicles.

Since August 2018, Kroger and Nuro have operated a first-of-its-kind self-driving grocery delivery service in Scottsdale, AZ, servicing a single zip code with an autonomous vehicle fleet. In late 2018, the partnership expanded to include Nuros custom vehicle, R1, marking Americas first fully-unmanned delivery service available to the general public. The pilot proved the companies combined technology and digital expertise can transform the grocery delivery experience. Together through the pilot, Kroger and Nuro have successfully and safely completed thousands of deliveries to customers in Scottsdale.

Our Arizona pilot program confirmed the flexibility and benefits provided by autonomous vehicles and validated that customers are not only open to but delighted by innovative delivery solutions. Customer satisfaction was significantly above the industry average for grocery and delivery services. In their feedback, customers told us they found the service simple, convenient, and fun. For this pilot, we also hired several additional associates in Scottsdale to pick-and-pack groceries for home delivery, who gave consistently positive reviews of their experience working with the vehicles.

Our vision is to expand this initiative to new markets, using world-changing technology to enable a new type of delivery service for our customers. This spring, Kroger and Nuro transferred the autonomous grocery delivery program to Houston for the next phase of the pilot. We believe autonomous delivery will continue to grow in the years ahead, boosting our business and improving customers experiences.

Improving the safety for our customers, associates, and communities is a priority for Kroger, and our partnership with Nuro is an important way we can contribute to safer streets in our neighborhoods. Low-speed vehicles like the R2X, which operate on neighborhood roads and with no humans in the vehicle, are a modest, safe way of testing and evaluating autonomous delivery. Vehicles like these are a lower-risk way to bring convenience and flexibility to more communities and continue to learn about how customers can benefit from this technological innovation. To that end, we encourage NHTSA to allow the numerous safety innovations represented in the R2Xs design and enable continued learning for both Kroger and Nuro in a responsible manner.

We are available to share our experiences with you at any time. Please dont hesitate to reach out if we can be of service to your decision making on this matter or any others related to autonomous vehicle delivery.

Sincerely,

Matthew Perin
Head of Government Relations and Regulatory Affairs
The Kroger Co.