



January 20, 2021

National Highway Traffic Safety Administration  
1200 New Jersey Ave, S.E.  
Washington DC, 20590

RE: Applicability of Federal Motor Vehicle Safety Standards Test Procedures to Certifying Manufacturers  
Regulations.gov: NHTSA 2020-0119

The flexibility of how manufacturers self-certify to the performance requirements of applicable Federal Motor Vehicle Safety Standards is well stated and documented in this updated interpretation by NHTSA. NHTSA needs to determine the best course of action for a new vehicle type that does not fit into any of the current NHTSA vehicle classifications. The low-speed electric shuttle that Local Motors designs and manufactures, the Olli, has been deployed in several short-term deployments throughout North America, Europe, and Australia. Local Motors has met with NHTSA on several occasions over the past four years and has worked with NHTSA and State entities to find ways to allow the Olli to operate in approved and well-defined operational design domains.

In the United States some low-speed electric autonomous shuttles that are certified to FMVSS 571.500 Low-Speed Vehicle standard are running on public roads. Heavier low speed shuttles must petition NHTSA for an exemption to operate on public roads. One major difference between these types of low-speed shuttles is the Gross Vehicle Weight Rating (GVWR).

Additionally, it is not possible for the Olli to self-certify with some FMVSS requirements that require a specific speed in excess of low-speed vehicle capabilities.

Temporary exemptions provide short term solutions, but for the long-term success of these types of vehicles that can provide a service to underserved populations, build trust in autonomous vehicles in a safe manner, and serve the public interest, either the definition of Part 571.500 needs to be changed to eliminate the weight portion in the definition or a new vehicle classification needs to be created to accommodate heavier low speed shuttles.

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