

Zoos, Inc. (Paul Escobar)

Please see attached comments submitted on behalf of Zoos, Inc.

October 31, 2025

TO:

Clean Vehicles Team
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Zook Comments Regarding ZEVergreen State Dialogue Sessions

Dear Washington State Department of Ecology Clean Vehicles Team,

Thank you for the opportunity to submit written comments as part of the Department of Ecology ("Department") ZEVergreen dialogue sessions. As noted in the bulletin for these sessions, Washington has seen significant zero-emission vehicle ("ZEV") adoption, and Zook appreciates the state's continued efforts to advance transportation decarbonization. As the Department and the Legislature consider regulations and legislation to promote ZEV adoption, we encourage consideration of advanced ZEV technologies and fleet operators, such as Zook.

Zook is reinventing personal transportation – building a safer, cleaner, and more enjoyable future on the road. At the core of its vision is a purpose-built robotaxi that offers the world a better way to ride. Through a combination of cutting-edge technology and a focus on the rider experience, Zook is transforming urban mobility with its comprehensive and cohesive autonomous ride-hailing service. Zook assembles the all-electric robotaxis in the U.S., and we own and operate the fleet in a ride-hailing service. Zook vehicles are not available for purchase or operation by individual consumers or unaffiliated entities.

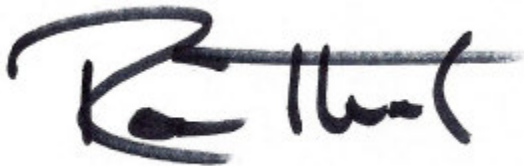
The Zook ride-hailing service has the potential to significantly expand access to zero-emission transportation while also reducing congestion and tailpipe emissions in our cities. We therefore respectfully request that commercial, fleet-based operations like ours be considered as new policies are developed to encourage ZEVs. In particular, we suggest:

- Encouraging manufacturer-owned and -operated ZEV business models;
- Exempting manufacturer-owned and -operated light-duty fleets and associated charging infrastructure from standards and regulations intended to promote and support individual consumer ownership of ZEVs and associated public charging infrastructure; and
- Supporting legislation and regulation that allows for autonomous vehicle deployment in Washington. Given that light-duty AV operators, such as Zook, have broadly committed to utilizing ZEV platforms, AVs represent a unique opportunity to help decarbonize the transportation ecosystem.

By avoiding a “one size fits all” approach that has in mind primarily private ZEV ownership, these actions will encourage a broader range of ZEV deployments and help Washington continue its momentum in meeting the state’s climate goals. ZEV fleets deployed in a ride-hailing service also have the potential to expand access to zero-emission transportation more quickly to the broader public at a lower price point than individual vehicle ownership, making it an important part of decarbonizing the transportation system worthy of encouragement.

Thank you again for your leadership and steadfast support for zero-emission transportation in Washington. We appreciate your consideration of our feedback and look forward to collaborating with you to achieve the state’s vision for a safer, cleaner, and more resilient transportation system.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ron Thaniel", with a stylized flourish extending from the end.

Ron Thaniel
Senior Director, Policy & Regulatory Affairs
Zoox