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## Comment from PrimeVitas AI

Posted by the **National Highway Traffic Safety Administration** on Mar 27, 2026

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Comment

Submitted on behalf of PURUS VITAS LLC d/b/a PrimeVitas AI, Overland Park, Kansas.

On March 25, 2026, California CPUC Deputy Director Pat Tsen confirmed on record that Tesla is not operating an autonomous vehicle service — it holds a limousine permit, operates a Level 2 system, and is subject to zero safety reporting requirements despite collecting commercial fares and marketing the service as a “Robotaxi.”

This is the reporting gap this rulemaking must close. We urge NHTSA to: (1) extend incident reporting to all commercial Level 2 ADAS operators collecting fares on public roads; (2) mandate independent third-party verification of AI control outputs; (3) prohibit consumer-facing marketing that overstates SAE classification; and (4) require tamper-evident audit ledgers for all AI control decisions.

The Boeing parallel is instructive — 346 people died because companies self-certified their own safety systems. AI companies are doing the same today.  
Full formal comment attached as supporting document.

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Attachments 1

 NHTSA Comment NHTSA-2026-0529 PrimeVitasAI

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