

CEVA Members:

April 14, 2021

Amazon	Administrator Michael Regan
American Airlines Group, Inc.	U.S. Environmental Protection Agency
AT&T, Inc.	1200 Pennsylvania Avenue, N.W.
Best Buy Co, Inc.	Washington, D.C. 20460
CBRE	
Centrica Business Solutions	
Clif Bar & Company	Acting Administrator Steve Cliff
Consumers Energy	National Highway Traffic Safety Administration
DHL	1200 New Jersey Avenue, SE
Edison International	Washington DC, 20590
Exelon Corporation	
Genentech, Inc.	
Hertz Global Holdings, Inc.	<u>Re.</u> Light Duty Vehicle Standards
IKEA USA	
JLL	Dear Administrator Regan and Acting Administrator Cliff,
LeasePlan	
Lime	
Lyft	As companies that represent over \$1 trillion in annual revenue ¹ and
National Grid	collectively own, lease, or operate nearly one million fleet or networked
Siemens	vehicles in the United States, we are writing to express our support for
T-Mobile	strong light duty vehicle standards. We share a common goal of electrifying
ThyssenKrupp Elevator	our fleets and networks, as well as reducing our transportation carbon
Uber	footprint, but recognize that strong policies will be necessary to effectuate
UNFI	this critical transition throughout the sector.

Accordingly, we applaud the Administration's directive to revisit the rollback of the fuel economy and greenhouse gas (GHG) standards, and support the adoption of strong replacement standards, as well as stringent post-MY2026 standards, that align with climate science and are consistent with 100% zero emission vehicle (ZEV) sales in 2035.

We recognize that clean vehicles, including ZEVs and efficient ICE vehicles, bring significant economic and environmental benefits, including operational cost savings, protection from fuel price volatility, and a reduced carbon footprint, as well as air quality and reputational benefits. We recently unveiled a set of electrification [principles](#) providing guidance on measures necessary to support businesses in transitioning to clean vehicles. The first principle is particularly germane in this context; it highlights the importance of a greater variety and volume of ZEV model options, and states in part, *"(w)e support policies that promote the availability and sales of light-, medium- and heavy-duty ZEVs and facilitate their use throughout the country. As we transition to electrification of our fleets, we also support more near-zero emission and efficient ICE vehicles in order to accelerate decarbonization of the transportation sector, reduce pollution, and spur additional cost savings."*

Strong vehicle standards are critical to ensuring economic benefits as well as staving off the worst

¹ Based on 2020 annual revenue.

impacts of climate change. While we are working to do our part as individual companies, we need strong standards to ensure the widespread availability of clean vehicles in the U.S., and to drive the economies of scale that will facilitate the rapid transition to electrification needed to meet climate goals.

Accordingly, we urge you to adopt standards that are aligned with climate science; consistent with a pathway to 100% ZEV sales of light duty vehicles by 2035, while ensuring requisite emission reductions and corresponding improvements in vehicle fuel economy in the interim.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Forni". The signature is fluid and cursive, with the first name "Sara" and last name "Forni" clearly distinguishable.

Sara Forni

On behalf of the Corporate Electric Vehicle Alliance (CEVA), led by Ceres
Head of CEVA