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January 24, 2022

The Honorable Pete Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

The Honorable Stephanie Pollack
Acting Administrator
Federal Highway Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

**Re. Electric Vehicle Charging Infrastructure: Open
Standards & Interoperability**

Dear Secretary Buttigieg and Acting Administrator Pollack,

The Corporate Electric Vehicle (EV) Alliance is a group of companies that together represent over \$1 trillion in annual revenue¹ and collectively own, lease, or operate over one million fleet or networked vehicles in the United States. We are writing to express our support for strong standards for consumer-facing and systems management interoperability for publicly funded electric vehicle (EV) charging infrastructure. We share a common goal of electrifying our fleets and networks, and we write to

emphasize the need for widespread open charging standards that would rapidly accelerate zero emission vehicle deployment in the U.S. through enhanced accessibility.

Accordingly, we applaud the Administration's ambitious EV infrastructure goals, and we strongly support the efforts to achieve them in the bipartisan Infrastructure Investment and Jobs Act and the Build Back Better Act.

As the agencies tasked with building the Administration's vision of a national network of EV charging infrastructure and an all-electric federal fleet, we urge you to develop public charging infrastructure funding programs and plans that incorporate Open Charge Point Protocol (OCPP) and Open Charge Point Interface (OCPI, or a similar standard). OCPP and standards such as

¹Based on 2020 annual revenue.

OCPI are critical in enabling EV drivers to freely utilize public charge points while stimulating competition in the marketplace and growing the EV market as a whole.

Corporate EV Alliance members represent a wide variety of industries and operate under diverse use cases. Publicly available infrastructure with open charging standards such as OCPP and standards that enable roaming like OCPI, provide fleets with much-needed charging flexibility and allows fleet operators to deploy a greater number of EVs on more diverse routes. Similarly, while many fleet vehicles are able to charge at home or at a fleet depot, public charging stations with open charging access located in key areas such as along highway corridors are necessary to help reduce range-anxiety among EV drivers and enable electrified long-distance travel. Just as importantly, open charging standards significantly reduce the risk of technology obsolescence for fleet operators as they ensure forwards and backwards compatibility between EV models and charging infrastructure.

Interoperability is a critical component of our [Corporate EV Alliance principles](#), which serve as a roadmap and playbook for policymakers, regulators, and vehicle manufacturers on steps they can take to accelerate commercial EV deployment in the United States. We appreciate your support on this key issue.

We urge you to implement standards that establish an interoperable charging network that maximizes driver access to public charging stations and provides for simplified and universal payment methods.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sara Forni', with a stylized, cursive script.

Sara Forni
On behalf of the Corporate EV Alliance, led by Ceres
Director, Clean Vehicles