

April 19, 2021

Stephanie Pollack
Acting Administrator
Federal Highway Administration
U.S. Department of Transportation
RE: FHWA Docket No. FHWA-2020-0001
National Standards for Traffic Control Devices

Dear Acting Administrator Pollack,

The Electric Drive Transportation Association (EDTA) is the cross-industry trade association promoting the advancement of electric drive technology and electrified transportation. EDTA's members represent the entire value chain of electric drive, including vehicle manufacturers, battery and component manufacturers, utilities and energy companies, smart grid and charging infrastructure developers. Collectively, we are committed to realizing the economic, national security and environmental benefits of displacing oil with electricity in hybrid, plug-in hybrid, battery, and fuel cell electric vehicles.

We are writing in opposition to a proposed addition to Section 2J.02 of the Manual on Uniform Traffic Control Devices (MUTCD) that would limit interstate drivers' access to important charging location information. The proposed language would prevent private sector charging companies from identifying their facilities along interstate highways. The effect would be detrimental to electric vehicle drivers, unfair to electric vehicle charging providers and contrary to the expressed intent of the Administration and Congress.

The proposed rule would create a specific limitation on electric charging providers, a restriction that does not apply to other private travel service providers – gas, lodging and dining – whose brand and locations can be identified on highway signage. Electric charging providers would be uniquely singled out with this restriction and electric vehicle drivers would be uniquely disadvantaged by limited access to charging information.

Congress recognized this problem last year and explicitly directed the Federal Highway Administration “to allow the use of specific service signs for electric vehicle charging stations in the publication of the MUTCD” in the Consolidated Appropriations Act of 2021, which became Public Law No: 116-260 on Dec 27, 2020.

The MUTCD should enable EV drivers to obtain information on charging stations in the same way that they are able to determine which gas stations or restaurants are available at an upcoming exit. This would also be in keeping with the Administration's commitment to expanding electric transportation, including the deployment of 500,000 EV charging stations. Limiting consumer access to EV charging information undermines the stations' value to drivers and to the national electrification effort.

We appreciate your consideration of our concerns and we look forward to working with you to advance a sustainable, safe and innovative transportation sector.

Sincerely,

Genevieve Cullen
President