

**Alliance for Automotive Innovation**

**Comments on Notice of Proposed Rulemaking: National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways**

**Docket ID No.  
FHWA-2020-0001**

**May 14, 2021**

The Alliance for Automotive Innovation (Auto Innovators)<sup>1</sup> hereby submits comment on the Federal Highway Administration's (FHWA) Notice of Proposed Rulemaking for revisions to the Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways.

Automakers have invested tens of billions of dollars over the last ten years in every facet of electric vehicle (EV) technology – from batteries to fuel cell stack design and production, electric motors to battery cell controllers, different vehicle types and capabilities, and more. Our industry's investment in vehicle electrification is estimated to reach over \$250 billion globally by 2023.<sup>2</sup> Due to this massive industry investment, around 130 electric vehicle models are expected by 2025, with more options to meet a wider variety of customer needs.

To accommodate the significant increase in EVs coming onto our roads and highways, proper signage for EV charging and hydrogen refueling locations is critical. Customers need to have knowledge of where they can safely and conveniently refuel their vehicle. In addition to aiding existing EV customers, it is important for potential EV buyers to have confidence that there is an EV charging and hydrogen refueling network available to fuel their vehicle. The recommended changes in the MUTCD to prohibit EV charging locations from being included on specific service signs is a step in the

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<sup>1</sup> Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The organization, a combination of the Association of Global Automakers and the Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country. Members include motor vehicle manufacturers, original equipment suppliers, technology and other automotive-related companies and trade associations. The Alliance for Automotive Innovation is headquartered in Washington, DC, with offices in Detroit, MI and Sacramento, CA. For more information, visit our website <http://www.autosinnovate.org>.

<sup>2</sup> AlixPartners. "Betting Big in Electrification and Autonomous." *Global Automotive Outlook 2018 – EMEA Release* (June 2018). [https://iwk-cp.com/wp-content/uploads/2018/07/Automotive-Global-Outlook-2018-European-version\\_IWK\\_FINAL.pdf](https://iwk-cp.com/wp-content/uploads/2018/07/Automotive-Global-Outlook-2018-European-version_IWK_FINAL.pdf).

wrong direction and is counter-productive to the Department of Transportation's commitment to increased EV adoption.<sup>3</sup>

This is a pivotal time in the auto industry, as more and more EVs are coming online. Accommodating this increase in EVs will require states to have the flexibility to expand signage, allowing infrastructure to keep pace with the market and ensuring that motorists can refuel their vehicles. Prohibiting EV charging signage from highway service signs will tie states' hands and reduce the opportunity for citizens to make the switch to an EV. Signage needs to evolve with the markets, and the markets are moving more and more to electric and hydrogen.

To support the auto industry's commitment to an increased electrified fleet, the President has set a goal of installing 500,000 new public EV chargers by 2030, many of which will be installed on corridors along federal highways. Proper signage is necessary to ensure that motorists can charge their vehicles safely and efficiently, and that the investment in public charging is not under-utilized. In an April 2021 report on available federal funding for EV charging along the national highway system, the FHWA stated support for the Administration's goal: "The U.S. Department of Transportation's (DOT) Federal Highway Administration (FHWA) supports the Biden-Harris Administration's goal of installing 500,000 new electric vehicle (EV) chargers by 2030."<sup>4</sup> We encourage the FHWA to eliminate the prohibition of EV charging signage on highway service signs and be consistent in their support for EV charging buildout along the national highway system.

Auto Innovators appreciates the opportunity to provide feedback on the proposed changes to the MUTCD, and looks forward to working with the Department of Transportation to increase EV adoption throughout the U.S. If you have any questions on these comments, please contact Dan Bowerson, Senior Director of Energy & Environment at the Alliance for Automotive Innovation, [dbowerson@autosinnovate.org](mailto:dbowerson@autosinnovate.org).

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<sup>3</sup> U.S. Department of Transportation Federal Highway Administration, "Federal Funding is Available for Electric Vehicle Charging Infrastructure on the National Highway System."  
[https://www.fhwa.dot.gov/environment/alternative\\_fuel\\_corridors/resources/ev\\_funding\\_report\\_2021.pdf](https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/resources/ev_funding_report_2021.pdf)

<sup>4</sup> *Id.*