

March 16, 2021

Stephanie Pollack  
Acting Administrator  
Federal Highway Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

RE: FHWA Docket No. FHWA-2020-0001  
National Standards for Traffic Control Devices

Dear Administrator Pollack,

Together, the signatories of this letter operate and service the vast majority of public electric vehicle (EV) charging stations in the United States, and we are writing to oppose a restriction, proposed to be added in Section 2J.02 of the Manual on Uniform Traffic Control Devices (MUTCD), which would prevent private sector charging companies from informing the public of the location of EV charging stations along our nation's interstate highways. We request that the MUTCD draft changes be modified to allow EV charging station companies and independent charging station owners to inform customers of a charging station at an upcoming highway exit, just as gas stations, restaurants, and hotels may do.

The restriction in the draft MUTCD directly conflicts with Congressional direction and intent. In December 2020, President Trump signed into law the Consolidated Appropriations Act of 2021, in which Congress directed the FHWA to provide the House and Senate Committees on Appropriations with a report outlining key changes in the forthcoming MUTCD, and also directed FHWA "to allow the use of specific service signs for electric vehicle charging stations in the publication of the MUTCD."

Additionally, the provisions in the draft MUTCD would undermine President Biden's goal of supporting private-sector deployment of 500,000 EV charging stations to serve the growing number of electric vehicle models and vehicles in operation on America's roads. Were the MUTCD draft language to become national policy, our companies and independent EV charging station owners would be limited in our options to inform the public about nearby access to EV charging. The policy would inhibit efforts to demonstrate progress towards President Biden's goal.

We support, instead, a revision to the MUTCD that would allow EV charging station providers and independent charging station owners to inform the public of the location of their charging stations, as long as those stations are open to the public and a

reasonable distance from the relevant highway exit. The rules should be designed to ensure that the EV charging station owners, operators, and site hosts are able to take advantage of specific service signs if they so choose, and we look forward to discussions on what could be included. We respectfully encourage the FHWA to avoid imposing any requirements to EV charging stations that are not necessary for the service of electric vehicles, but which FHWA has applied to gasoline stations in the past (e.g., having motor oil available).

We appreciate your consideration of our request, and we look forward to working with you to advance the nation's energy, clean transportation, and climate change goals.

Sincerely,

/S/

Matthew B. Nelson  
Director of Government Affairs  
Electrify America

/S/

Anne Smart  
Vice President, Public Policy  
ChargePoint

/S/

Scott Jarus  
Executive Chairman  
EV Connect

/S/

Jonathan Levy  
Chief Commercial Officer  
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/S/

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