NTEA
THE ASSOCIATION FOR THE WORK TRUCK INDUSTRY

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May 4, 2023

Attn: Docket No. DOT-OST-2023-0011

Notice of Request for Clearance of a New Information Collection:
Electric Vehicle Inventory and Use Survey (eVIUS)

AGENCY: Bureau of Transportation Statistics (BTS) Office of the
Assistant Secretary for Research and Technology (OST-R), DOT

NTEA – The Association for the Work Truck Industry represents more than 2,000 companies that manufacture, distribute and utilize work trucks across North America and globally. Many of these companies would be considered small businesses and operate on a local or regional basis.

Unlike mass-produced assembly-line passenger cars and trucks, commercial work trucks are primarily designed and produced individually or in small numbers, on a custom-order basis. Their diverse applications, limited volume and nearly limitless body and equipment variations dictate this method of production.

Vehicles produced by NTEA member companies for commercial or vocational use include, but are not limited to, dump trucks, utility company vehicles, agricultural platform and stake body trucks, van-based delivery or service vehicles, shuttle buses, aerial bucket trucks, tow trucks, beverage delivery trucks, digger derricks, snow removal vehicles, fire trucks, ambulances, and a host of other specialized configurations.

Work trucks are vital to everyday life and support the activities of every major sector of the economy, from agriculture and energy, to utilities and construction.

Electric Work Trucks

According to the Notice, the BTS, with its partners, the Federal Highway Administration (FHWA) and the U.S. Department of Energy (DOE), is planning to conduct the first Electric Vehicle Inventory and Use Survey (eVIUS).

As the industry moves towards a zero-emission future, NTEA agrees that information concerning the population of alternatively fueled vehicles will be important. We support the Bureau's efforts to create an eVius. T the data collected by an eVius will be critically important as the nation determines its needs to facilitate and make successful the transition to zero-emissions.

Suggestions

NTEA would suggest that the Bureau consider expanding the proposed eVius to include all zero-emission vehicles, not only battery electric powered vehicles. At this time, it is clear that the industry and marketplace are moving towards the zero-emission goal through different methods. Certainly, battery electric appears to be the leading technology for passenger cars, however, that is not necessarily the case in the upper GVWR's. Hydrogen fuel cell, propane, natural gas and other possible future methods of propulsion should be counted as the infrastructure needs to support these alternative fuels will likely be different than the needs for battery electric vehicles.

NTEA also suggests that the Bureau consider collecting data on government owned vehicles (federal, state and local). Many vocational vehicles are owned and operated by government entities. Without such data, the view provided by an eVIUS may be inaccurately skewed.

Thank you for the opportunity to provide comments on this important project.

If you would like any additional information, please contact me at (202) 552-1600 or mkastner@ntea.com.

Sincerely,

Michael Kastner
Senior Vice President
NTEA Washington, DC Office

May 4, 2023

U.S. Department of Transportation
1200 New Jersey Ave. SE
West Building Room W12-140
Washington D.C. 20590

Subject: (Docket No. DOT-OST-2023-0011) Notice of Request for Clearance of a New Information Collection Electric Vehicle Inventory and Use Survey (eVIUS)

The Alliance for Automotive Innovation[1] (Auto Innovators) appreciates the opportunity to provide comments to the (Docket No. DOT-OST-2023-0011) Notice of Request for Clearance of a New Information Collection Electric Vehicle Inventory and Use Survey (eVIUS). Auto Innovators and its members are committed to achieving a net-zero carbon transportation future for America's cars and light trucks. The auto industry is investing $1.2 trillion globally by 2030 to advance vehicle electrification and will increase the number of EV models available from 91 today to around 150 by model year (MY)2026[2]. If constructed correctly, the information collected through this electric vehicle survey will help to better understand the characteristics and uses of battery electric vehicles (BEV).

We understand the request to limit the estimated burden per respondent to approximately ten minutes, however, we want to stress the importance of the need to collect useful information that can help guide the industry with future decisions related to electric vehicle (EV) policies. We suggest that a multiple-choice format be used to allow for more detailed information without becoming too burdensome for the respondent. Current EV buyers are still considered early adopters who are usually more likely to want to talk to others about their EV experiences. A multiple-choice format will allow the respondents to provide more detail on their responses.

For example, according to a previous Department of Energy report, over 80% of EV owners charge at home. It is not only important for us to confirm this number to still be accurate during this survey, but there are additional questions that need to be answered. What time of day do EV owners charge and how often? Do they charge every day a little, or do they wait until the battery gets lower? How low do they allow the battery to get before charging? Do they charge their battery to 100% or the recommended 80%?

We present the following targeted questions that will help collect meaningful answers that will help us to better understand the EV owner, their use case and charging habits. Below is a sample of the types of questions that we feel will be most useful to everyone.

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[1] The Alliance for Automotive Innovation ("Auto Innovators") represents automakers that produce and sell approximately 98% of all the new light-duty cars and trucks sold in the U.S. Auto Innovators is the authoritative and respected voice of the automotive industry.

[2] EVs, PHEVs hitting U.S. dealerships through 2026 | Automotive News (autonews.com)

Suggested Targeted Demographic Questions:

1. Is your electric vehicle (EV) the primary source of transportation?
    - Yes
    - No
        - If No, how many vehicles are in the household?
            - 2
            - 3
            - More than 3
2. Do you own, lease or is it a company/business car?
    - Own
    - Lease
    - Company/business car
3. How long have you owned an electric vehicle?
    - 0 – 6 months
    - 6 months – 1 year?
    - More than a year?
4. What is your actual battery range % based on your usage and driving style?
    - 100% of listed range
    - 99% to 90%
    - 90% to 70%
    - 70% to 50%

Suggested Targeted Usage Questions:

5. How many miles a day do you drive your EV?
    - 0 - 25 miles
    - 26 - 50 miles
    - 50+ miles
        - Please respond with distance.
6. How many long-distance trips (more than 300 miles) do you make in a year?
    - 0 – 2
    - 2 – 5
    - 5+
7. Do you use your EV for non-driving purposes such as a home power back-up system?
    - Vehicle-to-Home (V2H)
    - Vehicle-to-Grid (V2G)
    - Vehicle-to-Load (120V power outlet – camping, power tools, etc.)
    - None of the above
8. Do you tow with your vehicle, if so, how much weight are you towing, and how often?

Suggested Targeted Charging Questions:

9. How often do you charge your EV?
    - Every day regardless of battery level
    - Wait until the battery level is low
        - 0-10%
        - 20-50%
        - 50%+
10. Do you charge to 100% max level or the recommended 80% level?
    - 80%
    - 100%
11. How often and where do you charge your vehicle per month?
    - Home (%)
        - 90 - 100%
        - 80 – 90%
        - 70 – 80%
        - Less than 70%
    - Public (%)
        - 10-30
        - 30+
        - 0-10
    - Work (%)
        - 0 -10
        - 10-30
        - 30+
    - Other
12. What type of charger do you most often use?
    - Level one - household 3 prong plug (L1-110V)
    - L2-240V
    - DC Fast Charge (DCFC)
    - I don't know.
13. Do you have a Time-Of-Use rate with your utility provider?
    - Yes
    - No
    - I do not know.

These targeted multiple-choice questions will help to enhance the quality, utility, clarity, and content of the collected information, while minimizing the collection burden. This will allow the Department of Transportation to gather useful information that can help guide future decisions related to EV policies.

Thank you for the opportunity to provide the auto industry's perspective on this new information collection for electric vehicle inventory and use survey. We standby ready to work with the Department of Transportation and key stakeholders.

Sincerely,

Tom Miller
Senior Director, Environment & Energy
Alliance for Automotive Innovation

May 5, 2023

By regulations.gov
Ryan Grube, Program Manager
Bureau of Transportation Statistics (BTS)
Office of the Assistant Secretary for Research and Technology
Docket Management Facility (M-30)
U.S. Department of Transportation
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue S.E.
Washington, DC 20590

Re: Notice of Request for Clearance of a New Information Collection (ICR): Electric Vehicle (EV) Inventory and Use Survey (eVIUS); Doc. No. DOT–OST–2023–0011.

Mr. Grube:

The National Automobile Dealers Association (NADA) represents over 16,000 franchised automobile and truck dealerships that sell new and used motor vehicles and engage in service, repair, and parts sales. Together they employ more than 1,100,000 people nationwide, yet most are small businesses as defined by the Small Business Administration.

Earlier this year, BTS requested comment on a new ICR.[1] Specifically, BTS seeks approval from OMB to conduct the above-mentioned eVIUS. NADA understands that it will be administered to a national sample of EV owners, and that the information collected will be used to "produce national statistics on the characteristics and uses of BEVs" and publish a summary report of survey findings.[2]

NADA and its members are "all-in" on selling and servicing the new EVs being produced by the manufacturers they represent and the used EVs coming to their lots.[3] NADA estimates that franchised dealers across America will spend between $2 billion to $3 billion installing EV chargers, buying EV-related equipment, parts, and tools, and investing in EV training for sales and service personnel. NADA strongly supports this ICR and concurs that the information collected will help interested stakeholders to better understand EV uses and characteristics. However, NADA suggests that the quality of the information collection would be improved by expanding the eVIUS survey to include owners of all sizes of EVs (Classes 1-8) and to include

[1] 88 Fed. Reg. 14667, *et seq*. (March 9, 2023).
[2] 86 Fed. Reg. at 14667.
[3] Franchised dealers sell approximately 14 million used vehicles annually, or one-third of the total.

government-owned vehicles, as suggested by the Association for the Work Truck Industry, and by laying it out in a multiple-choice format, as suggested by the Alliance for Automotive Innovation. NADA also strongly suggests that the eVIUS be extended to include owners of plug-in hybrid electric vehicles (PHEVs) to, in part, help accurately determine the degree to which PHEVs are used in EV mode vs. hybrid electric vehicle (HEV) mode.

NADA notes that it was unable to locate the draft eVIUS form in the Notice published in the Federal Register or on either the regulations.gov or reginfo.gov webpages. Knowing what BTS intends to ask of eVIUS respondents would enable NADA and its members—new motor vehicle dealers experienced with selling electric vehicles to consumers—to fully evaluate the survey and provide helpful input for making the survey more useful and productive. NADA, therefore, urges BTS to defer on conducting the eVIUS until after providing the form for stakeholder comment.

On behalf of NADA, I thank BTS for the opportunity to comment on this matter.

Respectfully submitted,

Douglas I. Greenhaus
V.P., Regulatory Affairs,
Environment, Health and Safety