



August 14, 2024

VIA ELECTRONIC FILING

Mariia Zimmerman
Principal Deputy Assistant Secretary for Transportation Policy
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Department of Transportation Equity Action Plan Update [Docket No. DOT OST-2024-0072]

Dear Principal Deputy Assistant Secretary Zimmerman,

The Alliance for Automotive Innovation (“Auto Innovators”)¹ welcomes the opportunity to submit comments to the United States Department of Transportation (US DOT) on its Request for Information (RFI) regarding equity within the transportation system. Auto Innovators continues to support the goal of creating equitable policies through a data-driven approach as outlined in Executive Order (EO) 13985, “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government” and US DOT’s commitment to equity.

Specifically, we want to provide information on installation of electric vehicle charging infrastructure in multi-family housing and [tax] credits for used electric vehicles and how those policies could improve air quality in traditionally underserved and overburdened communities. In addition, Auto Innovators encourages US DOT to focus on the opportunities presented by advanced vehicle technologies to provide mobility to communities that have traditionally been underserved, including rural areas and areas of persistent poverty. These technologies can support equitable solutions to transportation challenges and deliver resources and benefits to a wide range of people who face persistent inequity including people with disabilities, people of color, LGBTQ+ people, those who live in rural areas, and those who live in areas of persistent poverty.

¹ From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer and smarter personal transportation future. www.autosinnovate.org.

EV Charging: Multi-family

The most convenient feature of an electric vehicle is the ability to charge at home. A study conducted by the National Renewable Energy Laboratory found that a key enabler for early adoption of EVs has been home charging at residential locations.² This is often feasible for those customers who live in a single-family home with a garage; however, this is not the case for those that live in apartments or condominiums. It is important to ensure low- to moderate-income (LMI) and multi-family housing residents have the identical access to low-cost, convenient, and reliable level 2 (L2) home charging that single-family homeowners enjoy.

Special attention should be given to the infrastructure needs in underserved communities to ensure that access to affordable and convenient charging and hydrogen refueling options are made available on an equally aggressive timeline. Multi-family housing residents, however, often face the greatest, most costly, and burdensome obstacles to installing residential EV charging. For multi-family housing residents, the additional costs to upgrade the electrical panel, install conduit between the electrical panel and their parking space, and the logistical challenges of securing building owner approval, coordinating the billing with the building owner, and persuading an owner to make a long-term investment on a rental property, make it near impossible to be an EV driver in an apartment, townhome, condominium, or other multi-family housing.

Multi-family housing residents could be forced to charge elsewhere such as DC fast charging stations or public chargers. Charging at home is far cheaper, more reliable, and vastly more convenient. It is unreasonable to expect residents to pay two or three times as much for charging and spend hours away from home each week fueling their EVs.

US DOT should set targets for residential charging and then monitor and track progress toward meeting those targets. US DOT should also consider public and private programs to support retrofitting of existing homes for multi-family housing.

Used Vehicle Tax Credits

The majority of vehicle sales in the United States in any given year are used vehicles.³ In order to increase EV adoption to a majority of vehicle buyers, state and federal governments should look to incorporate incentives for used EVs. These incentives can be in the form of tax credits, similar to the Section 25E credit that is currently available for used EVs if the buyer meets income limits and the vehicle meets MSRP requirements, or point of purchase rebates. Making used EVs more affordable will help increase the

² <https://www.nrel.gov/docs/fy23osti/85654.pdf>

³ <https://www.motortrader.com/motor-trader-news/automotive-news/majority-buy-consumers-opt-used-new-cars-28-10-2019>

opportunity for a broader population to make the transition from internal combustion engine vehicles to electric.

Automated Technologies

Auto Innovators has long believed that the safety improvements brought about by automation of the driving function and other safety technologies have the potential to significantly improve roadway safety, reducing traffic fatalities. In 2022, 42,514 people died on our nation's roadways.⁴ Of those, roughly 7,500, or almost one-fifth, were pedestrians and another 1,105 cyclists.⁵ These numbers continue to increase despite small decreases in overall fatalities. Data shows that racial minorities are disproportionately represented in pedestrian crashes and are more likely to be the victim of a traffic fatality per miles travelled than whites, accounting for the percentage of the population and the rate of miles traveled.⁶ Autonomous Vehicles (AVs) have the potential to provide equitable solutions to transportation challenges broadly, including increasing mobility independence for individuals with disabilities, elderly, and other underserved communities that have historically faced discrimination.

US DOT can facilitate more of such equity by implementing policies to enhance the oversight, testing and deployment of AVs including completing the work to remove existing barriers within the Federal Motor Vehicle Safety Standards (FMVSS) that impede manufacturers from commercializing AVs. The broader deployment of these technologies can also eliminate discrimination that may occur when a taxi or TNC vehicle driven by a human refuses to provide a ride to a person of color, an LGBTQ+ individual, a person with disabilities, or a person who lives in a particular neighborhood.

Increasing Access to Mobility. AV technology can play an important role in increasing mobility for people who cannot currently drive, lack access to reliable public transportation, and/or lack a reliable caregiver to assist with mobility activities. A recent SAFE study found that more than 25 million adults in the United States have a travel-limiting disability. AV technology can increase transportation accessibility for this community to complete essential daily tasks such as getting to and from work, school, medical appointments, grocery stores, community events, and social activities.

US DOT can support such increased access by working with community members as well as industry and government subject matter experts to create a best practices document that can help AV developers navigate the legal and regulatory framework, and can be relied upon by AV manufacturers when designing an accessible AV. In addition, US DOT can fund accessible infrastructure including sidewalks, curb cuts, and crosswalks. Wheelchair

⁴ <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813560>

⁵ <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813590> and <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813591>

⁶ <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813188>



accessible AVs and those transporting people with disabilities should be granted priority to accessible curbspace, so they may be picked up and dropped off safely.

Workforce; Access.To.Jobs; AVs have the unique opportunity to increase access to jobs for those who are currently unemployed or underemployed because of lack of access to transportation. This may include individuals with disabilities who cannot currently drive, people who cannot afford the cost of existing transportation options, or people who live in communities without extensive or reliable public transit options. AVs may expand the reach of public transit if they are used to provide first and last mile solutions. Because low-wage and minority workers often commute farther for employment opportunities, the off-peak accessibility of AVs has the potential to provide access to transportation for people in these communities. Some AV technology use cases (e.g. robo taxis or AV shuttles), can also foster greater independence by increasing access to job opportunities for people with disabilities, a group that faces an unemployment rate twice that of people without disabilities.⁷

To facilitate these equity benefits, US DOT could develop a consistent framework and methodology for assessing equity in transportation and clarify state and local agency obligations related to equity and shared mobility services, including those using AVs, that are used by public transportation agencies to provide services to the public...

Auto Innovators looks forward to continuing to work with US DOT to facilitate cleaner, safer, and smarter mobility that makes the transportation system more equitable for all users.

Sincerely,

Sarah Puro
Vice President
Safety & Technology Policy

Dan Bowerson
Vice President
Energy & Environment Policy

⁷ <https://www.nationaldisabilityinstitute.org/reports/autonomous-vehicle-adoption/>