

RE: Docket ID No. [FHWA-2023-0054-0001](#)

The EV Charging for All Coalition is a non-profit advocacy group dedicated to ensuring reliable, affordable, and equitable access to EV charging for all who drive – or would like to drive – electric vehicles. Because of their historic marginalization and exclusion from convenient and affordable home-based charging, we focus in particular on the needs of residents of multi-family housing. We thank you for the opportunity to comment on minimum standards and requirements for EV charging.



### **Equity and multi-family housing**

It is our goal to see federal programs prioritize equity when it comes to EV charging. While we understand that private home-based EV charging is outside the purview of this Request for Information, we feel it is important to acknowledge that residents of multi-family housing (in particular low-income multi-family housing) are typically at a disadvantage in terms of access and cost of charging, compared to the convenient, affordable home-based EV charging available to most single-family housing residents. Rates for charging at public chargers or multifamily chargers installed on a common meter are unregulated and, due to third-party fees, are two to five times more expensive than single-family residential rates. Rectifying this inequity for MFH residents may require any number of solutions by FHWA, including incentives, rebates, etc., and should be an explicit program goal.

### **New J3400 standard**

We support the development of the J3400 charging standard as a universal standard, while recognizing the importance of healthy competition among charging networks to avoid the abuse of monopoly power. However it is critical that NEVI funding supports all EV vehicles, including the many older EV models utilizing diverse charging standards. Interoperability will allow all EV drivers in the United States to reliably charge their vehicles within the NEVI network. This is a particularly important equity concern, as older EV models that lack the J3400 connection will continue to be the only EVs affordable for lower-income drivers for many years to come.

We also recognize the potential safety hazards presented by unlisted third-party adapters, now readily available for sale online. To enable an equitable transition to universal J3400 charging, we therefore encourage you to consider using NEVI funds to pay for *providing a free UL-listed adapter to all qualifying US-registered EVs* (or perhaps providing subsidies for inlet conversions) – rather than simply continuing to invest in obsolete charging infrastructure.

### Travel cordsets

We also recommend looking at the European standard of a take-along travel cord, paired with locking EV Ready receptacles, rather than having a cord installed at every station. This approach has many benefits:

- It aligns incentives for renters, who can own their own cordset with their car and take it with them when they move;
- It dramatically decreases the cost of charging infrastructure installation;
- It decreases the likelihood of vandalism and provides a more flexible option for curbside charging (e.g. light pole charging).

Federal requirements of automakers to provide UL-listed charging cordsets with appropriate adaptors (including Level 1 and both 20A and 40A Level 2) would go a long way toward ensuring all cars can take advantage of this lower-cost infrastructure safely.



### Factor in dwell-time and economic co-benefits

Public charging stations should be sited in proximity to services *appropriate to the anticipated dwell time*, which correlates to the charging speed provided. For instance, a DCFC supercharger with a typical dwell time of 40 minutes might be sited near a lunch spot or bookstore or library, while a level 2 charging station with an anticipated dwell time of 2-4 hours might be more appropriate in an entertainment/dining district.

We also strongly recommend requiring direct outreach with local chambers of commerce in any project funding, to ensure that NEVI investments are in alignment with the needs of local economic development.

Thank you again for the opportunity to contribute. We are available to answer any questions as needed.

Sincerely,

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Co-Leads, EV Charging for All Coalition