

September 30, 2022

Mr. Brian Hogge
Office of Infrastructure
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Mr. Patrick C. Smith
Office of the Chief Counsel
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Notice, Federal Highway Administration; Proposed Waiver of Buy America Requirements for Electric Vehicle Chargers; 87 Fed. Reg. 53539; Docket No. FHWA-2022-0023 (August 31, 2022)

Dear Mr. Hogge and Mr. Smith:

We, the undersigned members of the Americans for Transportation Mobility coalition, write in support of the Proposed Waiver of Buy America Requirements for Electric Vehicle (EV) Chargers. We support the goal of creating a more robust and resilient supply chain for the raw materials needed to manufacture electric vehicle chargers based on a diverse array of domestic suppliers as well as suppliers among U.S. allies and trade agreement partners. Creating such a supply chain, including the items included in this waiver, is necessary to the success of the National Electric Vehicle Infrastructure (NEVI) program. However, we also recognize that achieving the goals of NEVI and establishing American leadership in the EV arena requires an immediate investment in these materials. This waiver will help provide adequate time for a proper ramp-up in domestic capacity – which is currently limited for many key inputs – for the long-term deployment of the EV charging network.

As discussed in the Notice, American companies have the opportunity to leverage a first-mover advantage to establish leadership in the EV space. To fully realize the benefits of this first-mover advantage, rapid deployment of EV charging infrastructure is necessary. The timeline provided in the Notice allows U.S. companies to fully utilize the first-mover advantage while shifting manufacturing capacity to the United States, creating good jobs domestically without stunting the growth of the industry by waiting for manufacturing capacity to grow before they can fully scale construction and deployment. By allowing rapid growth in EV charger manufacturing, EV charger installation and maintenance capabilities will also grow, creating immediate good-paying American jobs that will stay in America.

EVs will transform our roadways and make significant contributions to reducing the effects of climate change. To realize the full promise of this industry, rapid

deployment of infrastructure is key while we build domestic capacity for a self-sustaining electric future, and this waiver strikes the necessary balance between these two objectives. Thank you for the opportunity to comment.

Sincerely,

American Public Transportation Association
American Society of Civil Engineers
The Associated General Contractors of America
U.S. Chamber of Commerce