

Three comments were received by BTS in response to the 60-day public notice. A summary of the comments received by BTS in response to the 60-day public notice for eVIUS, and the BTS' responses to those comments are provided below:

Comment 1:

From: The Association for the Work Truck Industry (NTEA)

Summary of Comment:

“Electric Work Trucks

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. 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.”

BTS' Response to Comment 1:

For this initial round of eVIUS, BTS would like to focus on light-duty electric vehicles (EVs). The reasons for this decision are:

- The light-duty EV is becoming a fast-growing mode of transportation as EV sales are increasing substantially³. The electric vehicle (BEVs and PHEVs) sales in the United States increased 55% in 2022 reaching a sales share of 8%⁴. Since the light-duty EVs (e.g., passenger cars) comprise the majority of the EV population, to aid determination of charging infrastructure gaps and inform policy decisions, it is essential to collect timely data on use and charging patterns of EVs as currently there is no existing source of such data and no national statistics;
- Vehicles using the other suggested alternative fuels (i.e., hydrogen fuel cell, propane, natural gas and other possible future methods of propulsion) are operated differently from EVs. Consequently, expansion of the scope of eVIUS to include these vehicles would require adding many questions to the survey questionnaire to measure the characteristics and use of such vehicles. This will greatly increase the complexity and length of the survey questionnaire, and add to the respondent burden;

- Further, adding other alternatively fueled vehicles in the eVIUS survey would require inclusion of an adequate number of such vehicles in the sample frame, which will increase the sample size and potentially reduce the overall survey estimation precision, and add to the time and budget required for data collection. As alternatively fueled vehicles comprise a small proportion of the entire vehicle population in the U.S., producing robust statistics will be a challenge due to a small population size, which leads to an inadequate sample size.

The eVIUS sample frame is the states' vehicle registration data; therefore, any EVs registered in the state have a chance to be sampled and included in the sample frame—i.e., government-owned fleets (federal, state, local) will not be actively excluded. The eVIUS survey questionnaire includes multiple-choice questions that ask respondents about the ownership type and usage purpose of the vehicle—allowing them to select options that indicate if the vehicle is a government-owned vehicle (state or local), and if the vehicle was used for a government business purpose.

Since increasing the eVIUS scope to include alternatively fueled vehicles would result in the data collection operation schedule and the respondent burden considerations becoming less flexible, it is not a feasible option for this first round of eVIUS as BTS intends to produce timely data (within one year).

BTS is considering creating a data collection program specific to the other alternatively fueled vehicles, depending on availability of funds.

Comment 2:

From: Alliance for Automotive Innovation

Summary of Comment:

“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.

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?*

- o Every day regardless of battery level
 - o 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?
- o 80%
 - o 100%
11. How often and where do you charge your vehicle per month?
- o Home (%)
 - 90 - 100%
 - 80 - 90%
 - 70 - 80%
 - Less than 70%
 - o Public (%)
 - 10-30
 - 30+
 - 0-10
 - o Work (%)
 - 0 -10
 - 10-30
 - 30+
 - o Other
12. What type of charger do you most often use?
- o Level one - household 3 prong plug (L1-110V)
 - o L2-240V
 - o DC Fast Charge (DCFC)
 - o I don't know.
13. Do you have a Time-Of-Use rate with your utility provider?
- o Yes
 - o No
 - o 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 stand by ready to work with the Department of Transportation and key stakeholders."

BTS' Response to Comment 2:

A multiple-choice format has been used for the eVIUS as suggested.

The survey includes questions related to vehicle background and type of use, home base, miles traveled, long-distance travel, general charging behavior and needs, as well as demographics—capturing information for most of the proposed targeted questions.

Comment 3:

From: The National Automobile Dealers Association (NADA)

Summary of Comment:

“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 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.”

BTS’ Response to Comment 3:

The eVIUS sample frame has been expanded to include owners of plug-in hybrid electric vehicles (PHEVs) as suggested. For this initial round of eVIUS, BTS will focus on light-duty EVs due to reasons previously outlined (please see “BTS’ Response to Comment 1” above). BTS is considering future data collections focusing on vehicles above 10,000 pounds, depending on availability of funds.

A multiple-choice format has been used for the eVIUS as suggested.

A draft survey was not provided in the sixty-day notice (88 FR 14667). The survey questionnaire was developed and will be finalized in collaboration with subject matter experts and stakeholders. In addition, subject matter experts from various agencies/organizations, including academia, have provided BTS with suggestions for survey questions. These suggestions were carefully considered, and where appropriate, incorporated into the survey questionnaire.

To test question understanding and clarity of instructions, a pre-test of the draft survey was also conducted with participation of five EV owners. Following completion of the survey, one-hour long

cognitive interviews were conducted with each of the pre-testers to collect information on their survey experience and other feedback for improving the survey. Overall, the pre-testers reported that the survey was clear, and they did not have any major issues with understanding the survey questions/instructions. "Please see Attachment 1".