

**CEVA Members:**

**April 14, 2021**

Amazon  
American Airlines Group, Inc.  
AT&T, Inc.  
Best Buy Co, Inc.  
CBRE  
Centrica Business Solutions  
Clif Bar & Company  
Consumers Energy  
DHL  
Edison International  
Exelon Corporation  
Genentech, Inc.  
Hertz Global Holdings, Inc.  
IKEA USA  
JLL  
LeasePlan  
Lime  
Lyft  
National Grid  
Siemens  
T-Mobile  
ThyssenKrupp Elevator  
Uber  
UNFI

Administrator Michael Regan  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Acting Administrator Steve Cliff  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington DC, 20590

Re. Light Duty Vehicle Standards

Dear Administrator Regan and Acting Administrator Cliff,

As companies that represent over \$1 trillion in annual revenue<sup>1</sup> and collectively own, lease, or operate nearly one million fleet or networked vehicles in the United States, we are writing to express our support for strong light duty vehicle standards. We share a common goal of electrifying our fleets and networks, as well as reducing our transportation carbon footprint, but recognize that strong policies will be necessary to effectuate this critical transition throughout the sector.

Accordingly, we applaud the Administration's directive to revisit the rollback of the fuel economy and greenhouse gas (GHG) standards, and support the adoption of strong replacement standards, as well as stringent post-MY2026 standards, that align with climate science and are consistent with 100% zero emission vehicle (ZEV) sales in 2035.

We recognize that clean vehicles, including ZEVs and efficient ICE vehicles, bring significant economic and environmental benefits, including operational cost savings, protection from fuel price volatility, and a reduced carbon footprint, as well as air quality and reputational benefits. We recently unveiled a set of electrification [principles](#) providing guidance on measures necessary to support businesses in transitioning to clean vehicles. The first principle is particularly germane in this context; it highlights the importance of a greater variety and volume of ZEV model options, and states in part, *"(w)e support policies that promote the availability and sales of light-, medium- and heavy-duty ZEVs and facilitate their use throughout the country. As we transition to electrification of our fleets, we also support more near-zero emission and efficient ICE vehicles in order to accelerate decarbonization of the transportation sector, reduce pollution, and spur additional cost savings."*

Strong vehicle standards are critical to ensuring economic benefits as well as staving off the worst

<sup>1</sup> Based on 2020 annual revenue.

impacts of climate change. While we are working to do our part as individual companies, we need strong standards to ensure the widespread availability of clean vehicles in the U.S., and to drive the economies of scale that will facilitate the rapid transition to electrification needed to meet climate goals.

Accordingly, we urge you to adopt standards that are aligned with climate science; consistent with a pathway to 100% ZEV sales of light duty vehicles by 2035, while ensuring requisite emission reductions and corresponding improvements in vehicle fuel economy in the interim.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Forni". The signature is fluid and cursive, with the first name "Sara" and last name "Forni" clearly distinguishable.

Sara Forni

On behalf of the Corporate Electric Vehicle Alliance (CEVA), led by Ceres  
Head of CEVA