



**ZERO EMISSION
TRANSPORTATION
ASSOCIATION**

July 15, 2022

Mr. Davon Collins

Environmental Counsel
United States Postal Service
475 L'Enfant Plaza SW
Office 6606
Washington, DC 20260-6201

**Re: “Notice of Intent To Prepare a Supplement to the Next Generation Delivery Vehicles Acquisitions Final Environmental Impact Statement”
SUBMITTED VIA ELECTRONIC MAIL TO: NEPA@USPS.gov**

The Zero Emission Transportation Association (ZETA) is an industry-backed coalition of nearly 60 member companies advocating for 100% electric vehicle (EV) sales by 2030. ZETA is committed to enacting policies that drive EV adoption, create hundreds of thousands of jobs, dramatically improve public health, and significantly reduce carbon pollution. Our coalition spans the entire EV supply chain, encompassing critical minerals developers, original equipment manufacturers, charging infrastructure installers, utility providers, and battery recyclers, among others.

We thank the United States Postal Service (USPS) for the opportunity to comment on its notice of intent to prepare a Supplemental Environmental Impact Statement (SEIS): 2022-12581, which will analyze USPS’s additional considerations that have evolved since it issued the final environmental impact statement (FEIS) and Record of Decision (RoD) related to its next-generation delivery vehicle (NGDV) procurement. Given battery electric vehicles’ (BEVs) marked cost savings and high potential for reducing greenhouse gas (GHG) emissions, ZETA looks forward to working with USPS to transition its vehicle fleet from internal combustion engine vehicles (ICEVs) to BEVs.

The USPS’s SEIS proposes to consider three new areas: the impacts of route network optimization and refinement on its delivery fleet operations, the need to accelerate the replacement of its aged and high-maintenance Long Life Vehicles (LLVs) and Flexible Fuel Vehicles (FFVs), and the potential consequences of replacing other aged and high-maintenance non-LLV/FFV delivery vehicles, including personally owned vehicles (POVs).

In addition to addressing these novel considerations, this SEIS affords USPS an opportunity to remedy the errors contained in its earlier FEIS. As the Environmental Protection Agency (EPA), White House Council on Environmental Quality (CEQ), USPS Office of the Inspector General

(OIG), United States Congress, environmental advocates, and ZETA have all previously noted, the FEIS's errors misinformed USPS's decision-making process, resulting in USPS's decision to lock in generations of fossil fuel-powered mail delivery. This decision, if left unchanged, will leave all Americans worse off; USPS, however, has a unique and important opportunity to reexamine and correct these deficiencies through this SEIS.

In this comment, we will provide market data and insights that will help USPS analyze its three new considerations. We believe this comment will help USPS to justify a Proposed Action that will facilitate the rapid electrification of its fleet. The evidence is clear that electrifying the USPS delivery fleet would dramatically reduce GHG emissions, boost public health, and comply with President Biden's recent executive order to fully electrify the federal fleet—which, it is worth noting, specifically requires USPS electrification.¹

Cost Savings of BEVs

The evidence shows that electrification will generate operational cost savings for USPS. Because this claim has been a major point of contention (including during the U.S. House of Representatives Committee on Oversight and Reform hearing on USPS electrification), it is worth illustrating a few items for additional reconsideration in the SEIS.

First, BEVs deliver substantial cost savings on maintenance, and this point is particularly important for USPS to consider given the extraordinary maintenance costs of its current delivery fleet. A recent study conducted by Argonne National Lab posited that maintenance and repair costs are particularly important to consider while evaluating total cost of ownership (TCO).² Due to their greatly reduced maintenance requirements, BEVs provide significant savings over time, even if their upfront costs can be higher than those of ICEVs.³ This is true in the medium- and heavy-duty vehicle sector as well.⁴ TCO should be the most important cost-related consideration for an entity with the organizational scale and vast time-horizons of USPS.

Several assertions in USPS's FEIS deserve additional scrutiny in the SEIS. The claim that BEVs have a higher total cost of ownership than fossil fuel-powered delivery vehicles conflicts with nearly every other existing independent analysis. For example, Atlas Public Policy suggests that full electrification could save USPS \$4.3 billion over the vehicles' lifetimes.⁵ Atlas also found that 97% of USPS delivery vehicles can be electrified at a lower total cost of ownership than comparable fossil fuel-powered vehicles. OIG also determined USPS could cost-effectively electrify much of its fleet.⁶

¹ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

² <https://publications.anl.gov/anlpubs/2021/05/167399.pdf>

³ <https://advocacy.consumerreports.org/wp-content/uploads/2020/10/EV-Ownership-Cost-Final-Report-1.pdf>

⁴ <https://www.zeta2030.org/news/zero-emission-transportation-association-releases-comprehensive-report-on-medium-and-heavy-duty-fleet-electrification>

⁵ https://atlaspolicy.com/wp-content/uploads/2021/09/Federal_Fleet_Electrification_Assessment.pdf

⁶ <https://www.uspsoig.gov/sites/default/files/document-library-files/2022/RISC-WP-22-003.pdf>

In the FEIS, USPS stated that electric NGDVs would have a “significantly higher total cost of ownership,” primarily due to the cost of EV charging infrastructure installation. The basis for these total cost of ownership claims is opaque, but the limited data we have seen from USPS shows that some of their assumptions are not grounded in fact. As we explain in greater detail later in this comment, USPS dramatically overestimated the cost of EV charger installation.

When USPS issued its RoD, it also cited that it would continue to evaluate its financial resources. The Postmaster General recently remarked that electrifying the full delivery fleet would cost approximately \$3.3 billion more than procuring an updated fossil fuel-powered fleet (or, \$11.6 billion versus \$9.3 billion).⁷ While this number is a high overestimate, it is nevertheless a small fraction of the nearly \$50 billion that USPS saved due to the passage of the Postal Service Reform Act of 2022.⁸ The short-term solvency of USPS is no longer in doubt, and its financial situation is drastically different than it was when the RoD was issued.

Finally and most explicitly, USPS should reassess its projected costs for gasoline. The FEIS showed that USPS selected an extremely low fuel cost point from which it modeled its future gasoline price projections. USPS based its benchmark gasoline cost on the October 12, 2020 national average, when gasoline cost \$2.19 per gallon. This peak-pandemic price was near a 5-year low.⁹ Due to the inherent volatility of the fossil fuel market, no American can purchase gasoline for anything close to \$2.19 per gallon today. This low-estimate modeling dramatically drove down USPS’s long-term fuel cost assessments. Electricity is far cheaper than gasoline, and its price is far more stable because electricity is not subject to foreign supply chain interruptions. OIG reiterated this fact, writing in a report that, “Since 2000, gasoline and other petroleum products have experienced significant price fluctuations. Electricity prices, on the other hand, tend to show only cyclical price variations from summer months to winter months.”¹⁰ ZETA recently published a report showing that across the country, ICEVs are 3–5 times more expensive to drive per mile than BEVs. In many states, some ICEVs are 6 times more expensive to drive.¹¹

Route Optimization

USPS’s delivery network modernization plan would serve to consolidate its delivery operations into Sort and Delivery Centers, which would help avoid underutilized facility and cargo space and boost efficiency in mail delivery. USPS noted in its “Delivery Network Improvement Plan” press release that this operational shift could “[add] miles to most delivery routes at both the front and back end—more miles out to the delivery stops and more miles to return from the route

⁷ <https://www.newsweek.com/louis-dejoys-plan-new-gas-post-office-truck-fleet-last-straw-1681429>

⁸ <https://www.whitehouse.senate.gov/news/release/congress-poised-to-put-stamp-of-approval-on-bipartisan-postal-reform-#:~:text=The%20new%20law%20will%20help,timely%20mail%20and%20package%20deliveries>

⁹ <https://www.gasbuddy.com/charts>

¹⁰ <https://www.uspsaig.gov/sites/default/files/document-library-files/2022/RISC-WP-22-003.pdf>

¹¹ <https://www.zeta2030.org/news/electric-vehicles-are-delivering-cost-savings-to-drivers-strong-electric-vehicle-tax-credits-will-ensure-that-all-americans-benefit-from-clean-transportation>

to the Sort and Delivery Centers.” It further emphasized that these changes “may also streamline the charging infrastructure for electric vehicles, as [they] would reduce the number of facilities where charging installations are needed and... would permit the upgraded electrical systems and infrastructure that are needed for the task.”¹² **These optimization efforts will justify an increase in USPS’s minimum BEV NGDV procurement.**

In the FEIS, USPS justified its Proposed Action to procure a 90% ICEV and 10% BEV NGDV fleet by claiming that BEVs are incapable of handling the route distance, weather conditions, or charging requirements on up to 12,500 of the USPS’s 232,000 routes (FEIS p. 3-2). Yet 12,500 routes is less than 5.4% of the USPS’s total routes. In other words, despite USPS’s finding that 94.6% of routes are suitable for electrification, it proceeded to initially propose a 90% ICEV and 10% BEV fleet, which it then boosted to 20% BEVs in its first tranche of orders.

Adding more miles to each route will not diminish the number of routes suitable for BEVs. Currently, delivery routes average 21 miles (FEIS p. 3-2). Even expanding these routes by several miles will be well within the range of modern BEVs. After all, the FEIS indicated that these BEV NGDVs will achieve 70 miles of range. As OIG articulated, only 2% of current routes are longer than 70 miles, and extending most delivery routes by several miles would not dramatically increase this percentage.¹³

BEV Battery Estimates

Additionally, the BEV NGDV should achieve a far greater range than USPS and Oshkosh Defense have proposed, and USPS’s range estimates should be reassessed. USPS expects that its BEV NGDVs will achieve a mere 70 miles of range from a 94 kilowatt-hour (kWh) battery. Based on currently available battery capabilities, these vehicles should see upward of 200 miles of range—after all, achieving less than one mile per kWh is extremely inefficient, as is explained in the following example and in the next section.

The following example compares similarly weighted vehicles: the proposed BEV NGDV has a gross weight rating of 8,877 pounds (FEIS p. 3-2), and the electric GMC Hummer EV will weigh 9,046 pounds.¹⁴ They also share similar aerodynamic frames. Under USPS’s estimates, the BEV NGDV will achieve 70 miles using a 94 kWh battery for a 0.74 miles per kWh ratio. The GMC Hummer EV will achieve 350 miles using a 200 kWh battery for a 1.75 miles per kWh ratio. USPS notes that the NGDV battery does not just move the vehicle; it also powers air conditioning, heating, defrosting, headlights, cameras, and sensors. The same is true with the Hummer’s battery, as is true for all BEV batteries. And the BEV NGDV has an even more

¹² <https://about.usps.com/newsroom/national-releases/2022/0601-usps-delivery-network-improvement-plan-offers-expand-number-of-electric-vehicles.htm>

¹³ <https://www.usps.oig.gov/sites/default/files/document-library-files/2022/RISC-WP-22-003.pdf>

¹⁴ <https://insideevs.com/news/510334/gmc-hummer-ev-weight-acceleration/>

suitable use case than the Hummer due its frequent stopping, which enables regenerative braking. In addition to helping to preserve the vehicle's brake pads, regenerative braking recharges the battery each time the driver slows down the vehicle.

The battery pack is the most expensive component in a BEV, so sourcing a larger-than-needed battery has drastic price impacts for the BEV NGDVs. We encourage USPS to examine different potential batteries sizes, densities, and chemistries to further reduce costs. Sourcing BEVs with a smaller battery would decrease BEV NGDVs costs without undermining their operational requirements.

Benefits of Consolidated Charging

USPS's plan to coordinate its delivery service via Sort and Delivery Centers is also particularly conducive to fleet electrification. USPS surmised correctly in its press release that this route optimization would “streamline the charging infrastructure for electric vehicles.” Equipping these facilities for major sorting and delivery operations would effectively prepare these facilities for electrical vehicle supply equipment (EVSE). Based on how delivery vehicles are used, their charging requirements are not extensive: because BEVs are parked overnight, they do not require rapid charging. For that reason, USPS's BEV fleet could charge using lower-voltage, non-networked Level 2 (L2) chargers, rather than the higher-voltage, more expensive Direct Current Fast Chargers. L2 chargers—which have been widely installed in residential and commercial buildings across the country—do not require substantial electrical infrastructure upgrades.

Consolidating charging at these Sort and Delivery Centers will also facilitate USPS's ability to follow OIG's recommendation to allocate multiple BEVs per charger. This is possible because, as OIG posited, a BEV NGDV “would deplete only 20 percent of battery capacity on an average route.”¹⁵ Thus, most BEV NGDVs would not require nightly charging and could therefore share chargers. USPS has argued that it would prefer to keep all BEVs fully charged at all times to preserve maximum operational flexibility. However, we concur with OIG that “recharging [BEVs] every other night (or even less frequently) could be the best strategy for maintaining optimal battery health and maximizing battery lifespan.” To maintain BEV battery health, drivers are encouraged to maintain their BEVs at a range of 20–80% charged capacity. Frequently draining the battery to completely empty or recharging to 100% will degrade the battery faster over time.¹⁶ Likewise, we agree that “a lower charger-to-vehicle ratio would not only save infrastructure costs but also preserve battery performance and longevity by potentially extending battery life and delaying battery replacement costs.” Because the average range of similar BEVs is longer than most routes, a less-than-100% charge will not impose restraints on operational flexibility.

¹⁵ Ibid.

¹⁶ <https://blog.evbox.com/ev-battery-longevity>

Finally, the SEIS should reexamine the costs of installing L2 chargers. OIG's report took issue with USPS's charging infrastructure cost estimate of \$18,000 per charger, and we concur that this estimate is extremely high. We encourage USPS to pursue a bulk purchase agreement to further drive down costs. The General Services Administration (GSA) offers bulk purchase agreements for L2 chargers at a fraction of USPS's estimated costs.¹⁷

Replacing The Remaining LLV And FFV Fleet

As it considers acquiring approximately 37,000 left-hand drive COTS ICEVs and BEVs to replace the remainder of its aging LLVs and FFVs, USPS should emphasize purchasing COTS BEVs. These new COTS delivery vehicles will boost the efficiency of USPS's delivery fleet compared to the LLVs and FFVs they are replacing. The 1988 Grumman LLVs currently in service have an EPA-rated fuel economy of 17 miles per gallon (mpg), which is higher than that of the NGDV ICEVs, which USPS reports will achieve 8.6–14.7 mpg, depending on air conditioning usage. Replacing the remaining aging LLVs and FFVs with BEVs—either NGDV or COTS—will generate emissions reductions and cost savings.

While USPS noted in its FEIS that procuring 100% BEVs would reduce emissions by 200% compared to the Proposed Action, we concur with EPA that the actual emissions reduction could be at least 2.5 times greater. From our own analysis, we believe that procuring 75,000 NGDVs under the framework of USPS's Proposed Action in the FEIS will—based on USPS's own social cost of carbon calculations—cost Americans \$200 million per year, and perhaps far more, in public health and environmental damages due to these increased emissions. **As USPS considers the additional replacement of its LLVs and FFVs, USPS should reassess these emissions models from its FEIS.**

Also, it is important that USPS elects to replace its aging FFVs with BEVs rather than ICEVs. FFVs already provide some emissions reductions compared to the rest of USPS's delivery fleet due to the passage of the Energy Policy Act, which requires that all USPS FFVs must operate on alternative fuel.¹⁸ While these FFVs tend to have lower emissions profiles than pure ICEVs, they can achieve relatively poor fuel economy when using ethanol because their engines are optimized for gasoline.¹⁹ To replace these vehicles with fossil fuel-powered ICEVs would increase USPS's emissions and directly conflict with President Biden's Executive Order 14008, which requires a fully electrified federal fleet, including vehicles within USPS's fleet.²⁰

¹⁷ <https://gsa.gov/evse>

¹⁸ USPS FFVs can operate on conventional petroleum if they are granted a waiver by DoE. Waivers are granted if alternative fuel is not reasonably available or is unreasonably more expensive than gasoline.

¹⁹ https://afdc.energy.gov/vehicles/flexible_fuel.html

²⁰ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

COTS BEV Delivery Vehicles

Today, a wide variety of COTS BEV delivery vehicles are already available or are rapidly forthcoming in the United States. These include, for example, the vehicles that several ZETA members are producing, along with a variety of other manufacturers' delivery vehicles. ZETA members Arrival and Rivian are bringing delivery vehicles to market for their partners at UPS and Amazon respectively, and ZETA member Canoo is producing several electric delivery vans that Walmart is procuring. ZETA member Proterra is supplying batteries for Lightning eMotors vehicles and the forthcoming Blue Arc delivery vans.

- Arrival's delivery van is available in three variants and the battery capacity is available up to 111 kWh and a range of 180 miles, achieving 1.62 miles per kWh.²¹ In addition to producing up to 600 vans this year, Arrival has announced its first U.S. Van Microfactory in Charlotte, North Carolina.
- Rivian is also building its delivery vans in the United States at its plant in Normal, Illinois and at its forthcoming plant near Atlanta, Georgia. Its three delivery vehicles—the EDV 500, 700, and 900 (named for the cubic feet of storage available in each vehicle)—boast 120–150 mile ranges with a yet-to-be-specified battery size.²² While OIG reported that Rivian's delivery vehicles have reduced ranges than advertised (especially in adverse weather conditions), it is worth noting that OIG's source was referring to an uninsulated prototype vehicle, rather than the final model.²³
- Canoo's Lifestyle Delivery Vehicle (LDV) and larger Multipurpose Delivery Vehicle (MPDV) 1 and MPDV2 will have multiple battery pack sizes available, but even their smallest size will be sufficient for USPS's needs. The smaller LDV has an 80 kWh battery and will achieve 250 miles of range for 3.13 miles per kWh. And weighing in at a gross vehicle weight of 5,730 pounds, the MPDV1 and 2 are equipped with 40 kWh batteries (at minimum) that deliver 170 and 110 miles of range, respectively (for ratios of 4.25 and 2.75 miles per kWh).²⁴
- Proterra is partnering with Lightning eMotors and Blue Arc to build electric delivery vans. The Lightning eMotors vans will have a gross vehicle weight of up to 11,000 pounds, and it will have 80 kWh and 120 kWh versions. It will achieve ranges of up to 120 and 170 miles respectively, for ratios of 1.50 miles per kWh and 1.42 miles per kWh.²⁵ Proterra also powers Lightning eMotors' larger Class 4 and 5 vehicles, which

²¹ <https://www.canarymedia.com/articles/clean-fleets/electric-delivery-vans-set-to-surge-in-the-us>

²² <https://www.autoevolution.com/news/rivian-delivery-vans-will-have-three-derivatives-edv-500-700-and-900-180976.html>

²³ <https://www.reuters.com/technology/rivians-electric-van-amazon-raises-battery-power-doubts-information-2021-11-19/>

²⁴ <https://www.press.canoo.com/press-release/mpdv#:~:text=The%20two%20vehicle%20variants%2C%20multi.20%25%20to%2080%25%20charge>

²⁵ <https://lightningemotors.com/lightningelectric-ford-transit-cargo/>

USPS could consider procuring, too, for longer distance mail transport. The Blue Arc vans will feature a base-level battery of 120 kWh (with larger options to extend range), and it will be able to travel 150 miles per charge for a 1.25 miles per kWh. This unique design is scalable to weigh as little as a Class 3 vehicle or as much as a Class 6 vehicle.²⁶

Additionally, other manufacturers are producing a variety of electric delivery vans, including the following examples.

- The 2022 Ford E-Transit will get 126 miles of range using a 68 kWh battery (1.85 miles per kWh).²⁷
- The General Motors-brand BrightDrop produces the Zevo 600, which will use a 165 kWh battery to achieve a 250 mile range (1.52 miles per kWh). The Zevo 600 is much heavier than the proposed BEV NGDV.²⁸ BrightDrop's smaller Zevo 400 will be produced beginning in 2023.
- The RAM ProMaster EV's specifications are not yet public, though it is widely believed that the model will be similar to the E-Ducato, another model built by RAM's European sister company, Fiat. The ProMaster will likely have a 79 kWh battery capable of traveling 174 miles for 2.20 miles per kWh.²⁹

Several auto manufacturers also produce electric vans for European markets, and some have plans to introduce these vehicles in U.S. markets.

- Mercedes-Benz produces several EV van models. Its forthcoming 2023 ESprinter will include a 120 kWh battery that will enable an approximately 250 miles range (2.08 miles per kWh).³⁰
- Renault's Master E-Tech electric van has a 52 kWh battery that can achieve 124 miles of range (2.38 miles per kWh).³¹

Suffice it to say, this sampling of available domestic and international electric delivery vehicles shows that reasonably-priced, far more efficient COTS BEVs are available. The above-listed miles-per-kWh ratios of these vehicles—some of which are much bigger and heavier than the BEV NGDV—raise questions about the Oshkosh Defense BEV model's capabilities and cost estimates.

²⁶ <https://www.proterra.com/customer-vehicles/blue-arc-ev-solutions-the-blue-arc-electric-walk-in-delivery-van/>

²⁷ <https://media.ford.com/content/fordmedia/fna/us/en/products/evs/e-transit/2022-ford-e-transit.html>

²⁸ [https://www.motortrend.com/reviews/2022-brightdrop-zevo-600-quick-drive-facts/#:~:text=Fast%2DCharge%20Capable%20\(But%20Most,for%20250%20miles%20of%20range](https://www.motortrend.com/reviews/2022-brightdrop-zevo-600-quick-drive-facts/#:~:text=Fast%2DCharge%20Capable%20(But%20Most,for%20250%20miles%20of%20range)

²⁹ <https://carsauthority.com/2023-ram-promaster/>

³⁰ <https://www.autoweek.com/news/green-cars/a39110340/2023-mercedes-benz-esprinter-ev-winter-testing/>

³¹ <https://www.drive.com.au/news/2024-renault-master-e-tech-ev-confirmed-australia/>

Last-Mile Delivery Service BEV Procurements

Major delivery services are electrifying their fleets—both to achieve their emissions reduction goals and to generate significant cost savings. These companies, operating in the free market, believe that electrifying their fleets will deliver long-term competitive advantages—including against USPS:

- UPS is one of the world’s largest fleet operators, with 125,000 delivery vehicles around the world. In pursuit of reducing its operating costs and emissions, UPS has a commitment to purchase 10,000 delivery vans from Arrival. Arrival’s delivery van is made of proprietary composite materials that significantly reduce the weight of the vehicle, and, along with lower fueling and maintenance costs, reduces each vehicle’s operating cost.³² UPS now drives more than 1 million miles each business day using alternative fuel vehicles, which has saved more than 60 million U.S. gallons of conventional fossil fuels since 2000.³³
- DHL is another example of private industry leading in this space. DHL has already electrified 20% of its fleet, and it plans to decarbonize 70% of its first- and last-mile delivery services by 2025.³⁴ The company also found that its electric vans are saving 60–70% on fuel costs and 60–80% on maintenance and repair costs compared to fossil fuel-powered vehicles.³⁵
- Like UPS and DHL, FedEx is also electrifying its fleet of 87,000 vehicles. It plans to buy only EVs after 2025, and its fleet will be fully electric by 2040. FedEx says an electric fleet will cut maintenance costs in half and eliminate 20 tons of emissions per vehicle per year.³⁶ Its Brightdrop models will decrease the cost of fueling by 75% compared to a fossil fuel-powered truck.³⁷
- Rivian’s partnership with Amazon is another noteworthy example. Amazon plans to purchase 100,000 Rivian delivery vehicles. In addition to reducing Amazon’s GHG by 4 million metric tons per year by 2030, Amazon expects that these electric vehicles’ fuel savings will significantly cut down on the company’s last-mile delivery costs.³⁸ Amazon has also announced plans to procure RAM ProMaster EVs.

³² <https://electrek.co/2020/01/30/ups-orders-10000-electric-delivery-vans-arrival/>

³³ <https://thefreightportal.org/casestudy/electrification-and-charging-infrastructure-upgrade-at-ups-2/>

³⁴ <https://www.dhl.com/discover/en-global/business/business-ethics/future-of-electric-vehicles>

³⁵ <https://www.parcelandpostaltechnologyinternational.com/features/going-electric.html>

³⁶ <https://www.fleetequipmentmag.com/fed-ex-largest-electric-truck-purchase-zero-emission/>

³⁷ <https://www.cnbc.com/2021/12/17/fedex-gets-first-of-500-electric-trucks-from-gms-ev-unit-in-move-to-green-logistics.html>

³⁸ <https://www.forbes.com/sites/alanohnsman/2019/09/19/amazons-multibillion-dollar-bet-on-electric-delivery-vans-is-game-changer-for-startup-rivian/?sh=da6f73ed0138>

- A variety of other last-mile delivery services are also electrifying their fleets. For example, Walmart will also procure at least 4,500 Canoo LDV vehicles, with the option to procure up to 10,000 units.³⁹ Walmart also plans to buy 5,000 electric vans from BrightDrop, which are expected in 2023.⁴⁰ As with FedEx, Walmart’s Brightdrop vehicles will save dramatically on operating costs.
- IKEA is also electrifying all of its customer deliveries in thirty markets by 2025. A quarter of its deliveries are already electric today, and the company believes electrifying its delivery fleet further will create a competitive advantage and generate cost savings.⁴¹
- Finally, EV100 represents a global group of 121 companies that have committed to electrifying their fleets. By 2030, these companies will have electrified 5.5 million vehicles, avoiding nearly 86 million metric tons of pollution.⁴² In its annual report, EV100 stated that “the business case for a transition to EVs is now stronger than ever, and the associated running costs are considerably lower than traditional internal combustion engine vehicles.”

In sum, many fleet operators in the United States and around the world are electrifying. Several of these companies are among USPS’s direct competitors, and they are securing long-term competitive advantages to USPS’s detriment. This overwhelming number of companies that are electrifying their fleets proves the point that electrification is not just the right environmental and public health decision—it also makes financial sense. Finally, it further proves that procuring COTS BEVs is a readily available option for USPS.

Replacing Non-LLV And FFV Postal Delivery Vehicles

Finally, USPS is considering replacing its non-LLV and FFV delivery vehicles, which include POVs used on rural routes and other existing aging COTS delivery vehicles. **Replacing these vehicles with BEVs will allow USPS to effectively operate in these communities while delivering emissions reduction and cost savings.**

We are particularly attuned to rural communities’ needs. State and federal governments are actively addressing the barriers to rural electrification, such as fewer electric vehicle charging stations and limited broadband internet access. For example, the Infrastructure Investment and Jobs Act (IIJA) mandates \$5 billion in support of an accessible, connected national charging network, called the National Electric Vehicle Infrastructure (NEVI) Formula Program. State agencies are currently developing plans to build out this national charging network, which will

³⁹ <https://www.press.canoo.com/press-release/walmart-purchases-canoo-electric-delivery-vehicles>

⁴⁰ <https://media.gm.com/media/us/en/gm/home.detail.html/content/Pages/news/us/en/2022/jan/ces/0105-brightdrop.html>

⁴¹ <https://evreporter.com/gati-and-ikea/>

⁴² <https://www.theclimategroup.org/ev100-publications>

play a significant role in rural EVSE deployment. Congress is also considering other policies that will facilitate the build-out of rural EVSE, including via expanding the Rural Energy for America program.

USPS has expressed range anxiety regarding BEV adoption for rural routes. Yet even for the longest rural USPS route—which is 181.4 miles per day—existing COTS BEV delivery vehicles are more than capable of traveling that distance on a single charge.⁴³ A plethora of light-duty COTS BEVs are available as well, and the vast majority of them exceed this range. To name a few of the most popular examples, the Ford Mach-E delivers 314 miles per charge,⁴⁴ the Chevy Bolt reaches 259 miles per charge,⁴⁵ and the Tesla Model 3 achieves 358 miles per charge.⁴⁶ A host of other light-duty COTS BEVs are available or coming to market in the coming model years.

Replacing aging ICEV POVs with BEV POVs will similarly generate cost savings for USPS. ZETA has found that ICEV POVs can cost 3–5 times more to drive per mile than BEV POVs, and the cumulative savings can be greater in rural areas where route lengths are longer.⁴⁷ For example, driving a 150-mile route in Arizona 250 times per year in a Honda Civic ICEV POV would cost approximately \$5,512.50 for the gasoline alone. Driving that same route for a year in a Tesla Model 3 would require only \$975 worth of electricity.⁴⁸ Additionally, because they have fewer parts, BEVs are cheaper to maintain: Consumer Reports estimates that BEVs can deliver \$1,800 to \$2,600 per year in operation and maintenance savings.⁴⁹ By replacing tens of thousands of non-LLV/FFV delivery vehicles over the next decade, USPS would save a tremendous sum of money by electrifying its fleet.

Conclusion

As noted by ZETA and others, USPS's Proposed Action was predicated on a faulty analysis. As a result, USPS chose to procure tens of thousands of ICEVs that will continue to pollute the environment, harm public health, and waste valuable USPS financial resources for generations to come.

Throughout our comment, we have highlighted market data and insights to aid USPS in its decision-making process. We have provided information that will enable USPS to justify a Proposed Action that more rapidly electrifies its fleet. Electrifying USPS's delivery fleet will galvanize benefits across the country—not only for USPS, but for all Americans. With

⁴³ <https://facts.usps.com/longest-rural-delivery-route/>

⁴⁴ <https://www.ford.com/suvs/mach-e/>

⁴⁵ <https://www.chevrolet.com/electric/bolt-ev>

⁴⁶ <https://www.tesla.com/model3>

⁴⁷ <https://www.zeta2030.org/news/electric-vehicles-are-delivering-cost-savings-to-drivers-strong-electric-vehicle-tax-credits-will-ensure-that-all-americans-benefit-from-clean-transportation>

⁴⁸ *Ibid.*

⁴⁹ https://advocacy.consumerreports.org/press_release/new-consumer-reports-analysis-shows-rising-gas-prices-ramp-up-savings-for-ev-owners/

meaningful cost-savings, significant reductions in GHG pollution, and vast public health benefits, electrifying the USPS delivery fleet will provide far-reaching positive outcomes. We appreciate the opportunity to advise USPS as it prepares its SEIS, and we look forward to further contributing to USPS's delivery fleet procurement decisions in the coming months and years.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joe Britton', with a stylized flourish at the end.

Joe Britton
Executive Director
Zero Emission Transportation Association