



ZERO EMISSION
TRANSPORTATION
ASSOCIATION

December 6, 2023

Jina Mahmaoudi
VIUS/eVIUS Program Manager
Bureau of Transportation Statistics
Department of Transportation
1200 New Jersey Avenue SE
Room E34-471
Washington, D.C. 20590

RE: Docket No. RITA-FRDOC-0001-0154
Agency Information Collection: Electric Vehicle Inventory and Use Survey (eVIUS)
Submitted via Rulemaking Portal: <http://www.regulations.gov>.

The Zero Emission Transportation Association (ZETA) is an industry-backed coalition of over 60 member companies advocating for 100% electric vehicle (EV) sales. ZETA is committed to enacting policies that drive EV adoption, create hundreds of thousands of jobs, dramatically improve public health, and significantly reduce emissions. Our coalition spans the entire EV supply chain including vehicle manufacturers, charging infrastructure manufacturers and network operators, battery manufacturers and recyclers, electricity providers, and critical minerals producers, among others.

We thank the Department of Transportation (DOT) Bureau of Transportation Statistics (BTS) for the opportunity to comment on the Electric Vehicle Inventory and Use Survey (eVIUS) Approval for New Information Collection. Understanding the experiences of early EV adopters is key to ensuring a smooth transition to cleaner transportation. Public surveys are an important tool to improve federal policy, inform investments in technology innovation, and place consumer realities at the center of conversation around EVs. ZETA strongly supports the proposed collection of information and is grateful for the opportunity to help maximize the utility and effectiveness of a federal survey on EV ownership in the U.S.

Background

Through the eVIUS, the Bureau of Transportation Statistics Registered seeks to collect information from the owners of battery electric vehicles (BEVs) and plug-in hybrid electric vehicles (PHEVs). The survey will aim to gain an in-depth understanding of the characteristics, usage, and charging patterns of electric vehicles (EVs) as well as the demographics and charging preferences of EV owners.

The proposed 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. ZETA’s feedback below draws from our experience administering two separate U.S. representative surveys on public opinion of electric vehicles in the United States. Our surveys, done in February and September 2022, were administered in collaboration with Seven Letter. The results of these surveys have informed our public education strategy.

Suggested Targeted Questions

ZETA recognizes that the eVIUS aims to understand electric vehicle use, specifically behavior related to charging. ZETA would like to emphasize the importance of this opportunity to collect a set of data that comprehensively assesses the experience of EV owners. It is important that a national survey includes questions that will help provide clarity around how EV ownership is shifting the cost of living for Americans—specifically as it relates to the cost of vehicle ownership.

Additionally, ZETA urges BTS to include questions that capture how EV owners interact with their local energy providers, many of which offer customer programs for data collection and managed charging that are imperative to improving and ensuring grid resilience and proactive investment. The inclusion of such questions will help improve the visibility of these customer programs, which are critically important to national and energy security.

In addition to supporting the questions submitted by other stakeholders through the previous comment period,¹ ZETA has included the following questions for suggested inclusion in the eVIUS:

Suggested Targeted Questions at EV Total Cost of Ownership

Compared to ICE ownership, have you noticed a change in your vehicle maintenance costs (vehicle maintenance: non-refueling related costs of owning a vehicle)

- a. Significantly lower
- b. Somewhat lower
- c. No Change
- d. Somewhat higher
- e. Significantly higher

Compared to ICE ownership, have you noticed a difference in the cost of charging your electric vehicle relative to the cost of refueling a gas-powered vehicle?

- a. Significantly lower

¹ Docket No. DOT-OST-2023-0011

- b. Somewhat lower
- c. No Change
- d. Somewhat higher
- e. Significantly higher

Suggested Targeted Question on Utility Customer Programs

Are you aware of the managed EV charging customer incentive programs through your local utility company?

- a. Yes, I am a participant in these programs
- b. Yes, I have heard of customer programs, but I am not enrolled
- c. No, I haven't heard of such programs
- d. No, my utility does not offer such programs
- e. Other

Other Questions

How often do you experience range anxiety in your electric vehicle?

- a. Frequently
- b. Sometimes
- c. Rarely
- d. Never

What motivated your decision to purchase an EV rather than a gas-powered car? (Select All that Apply)

- a. Environmental concern
- b. Cost savings benefits
- c. Technology Performance
- d. Other

After having owned an electric vehicle, do you foresee yourself purchasing a gas-powered vehicle?

- a. Definitely
- b. Likely
- c. Unsure
- d. Unlikely
- e. Absolutely not

Conclusion

We thank you again for the opportunity to comment on the Electric Vehicle Inventory and Use Survey (eVIUS) Approval for New Information Collection. We appreciate the work of DOT and BTS to improve national understanding of EV use in the U.S. ZETA would also note that we strongly support future data collections focused on vehicles over 10,000 lbs and look forward to opportunities to actively collaborate in the drafting of such a survey.

ZETA and its member companies thank you for your attention to these comments and are available should you have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Albert Gore', written in a cursive style.

Albert Gore
Executive Director
Zero Emission Transportation Association