



ZERO EMISSION
TRANSPORTATION
ASSOCIATION

May 15, 2023

Krystal Brumfield
Associate Administrator and Chief Acquisition Officer
Office of Government Wide-Policy
General Services Administration
1800 F St NW
Washington, DC 20006

Re: Docket No. GSA-FTR-2022-0013
Proposed Amendment to the Federal Travel Regulation (FTR)
Submitted Electronically via: <https://www.regulations.gov/>

The Zero Emission Transportation Association (ZETA) is an industry-backed coalition of more than 60 member companies advocating for 100% electric vehicle (EV) sales. Our membership spans the entire U.S. domestic EV supply chain and includes critical minerals producers, charging companies, battery manufacturers and recyclers, utilities, fleet operators, and auto manufacturers, among others. Our coalition is dedicated to ensuring that the United States wins the global clean transportation race and that American workers and consumers benefit as the EV industry expands.

In accordance with E.O. 14057, *Executive Order on Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*, the General Services Administration (GSA) has the opportunity to promote operational policy that advances U.S. climate goals.

ZETA extends its appreciation to GSA for the opportunity to comment on the proposed amendment to Federal Travel Regulation (FTR) allowing for EV greater accommodations. As a central part of our founding policy platform, ZETA has long promoted federal leadership that advances government employee access to and ownership of EVs.¹ Leading by example through robust EV policy, the U.S. federal government signals its commitment to reducing transportation emissions—which account for about 28% of domestic greenhouse gas emissions.² Through the proposed rule, GSA is bridging the gap between drivers pioneering the EV transition and ubiquitous deployment of fueling infrastructure by creating much-needed parity in treatment between federal employee-owned EVs and fossil-fueled vehicles during employee relocations.

ZETA supports the proposed amendments to Federal Travel Regulation § 302-4.201, § 302-4.704, § 302-9.4, and § 302-9.30, and we encourage GSA to look for additional opportunities to provide greater certainty to government employee EV drivers that transportation of their electric vehicle will be supported.

¹ [ZETA 2021 Year in Review](#)

² [Carbon Pollution from Transportation | US EPA](#)

ZETA is committed to increasing consumer awareness of the benefits of electric vehicles. In 2022, 96% of EV owners said they will purchase another EV in the future.³ In addition to their emissions-saving benefits, Argonne National Lab has demonstrated that EVs are less expensive to own and operate than traditional gas-powered vehicles.⁴ And, many EVs are already priced below the average price of a new gas-powered vehicle.⁵ By the mid-2020s, EVs are projected to hit price parity with gas-powered vehicles and will become even more accessible to American families as the used-car market grows.⁶ Today, many EVs provide more than 200 miles of range per charge, and at least 18 models have driving ranges above 300 miles. GSA thoughtfully proposes to amend FTR to provide for alternative fuel exceptions on the basis of “legitimate vehicle range capability fueling availability limitations.” This verbiage comes as proposed additions to all regulations relevant to FTR Case 2022-03. The broad nature of this phrase—as opposed to the use of specific vehicle range thresholds or charging infrastructure concentration—avoids the potential need to repeatedly update the rule as EV range technology improves and chargers are deployed. However, it also leaves room for unjust interpretation of the regulation by employers who may not classify limitations as “legitimate.”

In order to strengthen the rule and provide certainty to government employees who may own EVs, ZETA recommends that GSA develop clear guidance for federal agencies on what types of range and charging availability restrictions constitute “legitimate” limitations, including hypothetical example scenarios. ZETA notes that as EV technology continues to develop, vehicle range will increase and charging will become more readily available. We encourage that the drafting of any principles around legitimate limitations be future-proofed with these forthcoming technological developments in mind.

ZETA once again extends its appreciation to GSA and the Office of Government Wide-Policy for the opportunity to comment on this proposed amendment and for their leadership-by-example in the transportation electrification space.

Sincerely,



Albert Gore
Executive Director
Zero Emission Transportation Association (ZETA)

³ [2022 U.S. Electric Vehicle Experience \(EVX\) Ownership Study | J.D. Power](#)

⁴ [U.S. DOE VTO/HFTO R&D Benefits - Vehicle & Mobility Systems Department](#)

⁵ [Here Are the 11 Cheapest Electric Vehicles You Can Buy](#)

⁶ [Electric cars ‘will be cheaper to produce than fossil fuel vehicles by 2027’ | Automotive industry | The Guardian](#)