

May 9, 2022

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

Dear Administrator Regan:

We, the undersigned, have a shared interest in the proposed rule to establish a stronger national standard to reduce nitrogen oxides (NOx) emissions from heavy-duty commercial vehicles. We support the push for cleaner air and healthier communities for all, and stand ready to serve as constructive partners as EPA develops a workable final rule that will achieve those results.

To that end, we strongly encourage you to keep two key considerations in mind as you work toward a final rule.

First, cleaner air and healthier communities for all require replacing older trucks and buses with newer ones. Today, roughly half of the trucks on the road were built before 2010, and those older vehicles emit significantly more air pollutants than modern trucks equipped with effective emission reduction technology. If the new rule does not facilitate the development of affordable, durable commercial vehicles that can meet customer needs, fleet owners are more likely to hold onto their older, higher-emitting vehicles longer – which could result in the loss of good-paying jobs. Most importantly, that also would delay the cleanest trucks and buses from hitting the road and cause further harm in communities near highways, ports, and warehouses that historically and currently suffer from the highest concentration of air pollution.

Second, we must ensure the final rule serves as a bridge, not a potential barrier, to a zero-emissions future. Zero Emission Vehicles (ZEVs) will eliminate all tailpipe emissions and greatly benefit public health. However, ZEV technology still is in its infancy. While the industry is investing heavily in a zero-emissions future, the high costs of zero-emission trucks and buses and the lack of the essential national recharging/refueling infrastructure needed to operate those vehicles virtually guarantees that fleets cannot yet make the switch to zero. We must invest in a comprehensive strategy to build the nationwide infrastructure that is essential to support widespread ZEV adoption while also providing fleet owners – [97% of which are small businesses](#) – with the incentives necessary to offset the higher costs of ZEVs.

We are committed to partnering with EPA and other stakeholders to further reduce emissions from heavy-duty commercial vehicles and foster a phased transition to ZEVs. We look forward to working with you to finalize a cost-effective rule – informed by data and science – that will further reduce emissions, protect American jobs, and result in cleaner air and healthier communities for all.

Sincerely,



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COUNCIL OF AMERICA

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FLEET MANAGEMENT ASSOCIATION

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M. NATIONAL ASSOCIATION OF
Manufacturers

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Cotton Council
OF AMERICA



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NPTC
National Private Truck Council

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MEAT INSTITUTE

NTEA
THE ASSOCIATION FOR THE WORK TRUCK INDUSTRY

PACCAR

RIPA
REUSABLE INDUSTRIAL PACKAGING ASSOCIATION

ema Truck & Engine
Manufacturers
Association



TCA TRUCKLOAD
CARRIERS
ASSOCIATION



U.S. Chamber of Commerce

V O L V O

American Bakers Association
American Beverage Association
American Bus Association
American Cotton Producers
American Truck Dealers (ATD, a division of NADA)
American Trucking Associations
Consumer Energy Alliance
Cummins Inc.
Daimler Truck North America LLC
Diesel Technology Forum
Gases and Welding Distributors Association
Leather and Hide Council of America
Meat Import Council of America
NAFA Fleet Management Association
Navistar, Inc.

National Association of Manufacturers
National Aquaculture Association
National Cotton Council
National Cotton Ginners Association
National Energy & Fuels Institute
National Private Truck Council (NPTC)
North American Meat Institute
NTEA — The Association for the Work Truck Industry
PACCAR Inc
Reusable Industrial Packaging Association
Truck & Engine Manufacturers Association
Truck Renting and Leasing Association
Truckload Carriers Association
U.S. Chamber of Commerce
Volvo Group North America