February 25, 2022

California Air Resources Board
Sustainable Transportation and Communities Division
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Dear CARB Sustainable Transportation and Communities Division Team:

The California Integrated Travel Project (Cal-ITP) is grateful for the opportunity to provide feedback on the Electric Vehicle Supply Equipment (EVSE) Standards Technology Review, published February 2022. We applaud the CARB team for its efforts in understanding and seeking to reduce the barriers to accessibility of public charging stations for all Californians. Leveraging the experience we have built over the past several years in understanding the impact and opportunities of contactless payments for use in transit, our comments are intended to offer experience to CARB in carrying out the recommendations outlined at the end of the report, as the Division’s regulatory activities move into the next phase.

1. **Clarify the key data points and thresholds that signify “broad availability”**

Cal-ITP understands CARB’s conclusion based upon the information collected and analyzed that tap (contactless EMV or “cEMV”) technologies cannot be confirmed as sufficiently widespread to remove the EMV chip requirement in the EVSE Standards Regulation.

We recommend that rather than leaving it open ended, the report specify the methodology for determining when cEMV would be deemed to be sufficiently available. The report does not identify specific metrics by which CARB is making its determination of cEMV accessibility, such as the overall percentage of cEMV transactions, the percentage of California residents or EV drivers with access to a cEMV-enabled card, or the percentage of active bank cards that are cEMV-enabled (and in particular the key subset of active bank cards issued by the financial institutions with $10 billion or more in assets, which issue most of cards in the US and the vast majority of debit cards used disproportionately by low-income customers). Cal-ITP recommends clarifying which measurable data points will be tracked by CARB going forward, and for each data point (or a combination thereof), the threshold level at which cEMV would be deemed sufficiently accessible.

We also recommend that the data be collected on a regular cadence, and be reported publicly, for example posted on [California's Open Data Portal](https://data.ca.gov/) so that the public, EVSPs and payments organizations all have access.

1. **Take a more active role in addressing root causes of accessibility barriers**

Cal-ITP was encouraged by CARB’s recommendation of conducting a pilot project to evaluate how people, particularly low-income residents, pay for transportation services including public EV charging, and is prepared to support CARB in such a pilot. As CARB lays out in the report, significant effort is still needed to define, in a targeted and precise way, the key customer segments for whom public EV charging is a barrier. We agree.

Additionally, CARB has the ability to take a more active role in understanding and addressing the root causes of the barriers that these public EV charging customers are experiencing. For example, if access to bank accounts and cEMV technology is the primary hurdle for a subset of current or future EV owners/drivers, we can work together, in conjunction with advocacy and industry partners, to get these customers access to accounts and cEMV payment credentials, thereby addressing the root cause of the problem directly rather than passively measuring it. However, measurement and data collection (qualitative and quantitative) are also critical in shaping how a pilot project will be conducted and informing CARB and Cal-ITP’s understanding of the prevalent barriers.

Real world demonstration projects offer an unparalleled opportunity to collect this information directly. Over the next six to twelve months, we look forward to working with CARB in developing and refining opportunities to both a) address the information gaps identified in the report and b) address the cEMV access gaps among key customer segments.

We sincerely appreciate your consideration of our comments, and look forward to a fruitful collaboration in the coming months and years.

Best regards,

Gillian Gillett

Program Manager, California Integrated Mobility, Caltrans