

October 27, 2022

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

*Submitted Via In-Person Delivery*

**Subject: Request to Amend Proposed Advanced Clean Fleets (ACF) Regulation**

Dear Board Members:

Please accept the comments below on behalf of Enterprise Holdings (Enterprise). Enterprise is one of the world's largest total transportation solution companies, operating the Enterprise Rent-A-Car, National Car Rental and Alamo Rent-A-Car brands, as well as other service models such as Enterprise Truck Rental, Enterprise CarShare and Commute ridesharing. Enterprise has been delivering transportation alternatives right where people live and work for six decades.

As a result of our extensive network of locations, Enterprise is able to quickly and efficiently introduce millions of drivers to new fuel and vehicle technology. In addition, our network makes it possible to provide sustainable mobility options to consumers who rely on mass transit during the week in large urban centers; to suburban and rural areas markets; to small and medium business owners with seasonal or temporary truck fleet needs; as well as, to those who simply cannot afford to purchase or maintain a vehicle on their own – all of which supports local economies and individuals' access to jobs, medical care, education, and much more.

**Enterprise has been *sharing* our fleet of vehicles with our customers for more than 60 years. Each of our service models provides customers with access to our fleet of shared vehicles, and many offer the opportunity for our customers to also share their trips. Shared fleets and shared trips are key elements of shared mobility that support sustainable transportation objectives.**

#### **Advanced Clean Fleets**

Enterprise appreciates the intent of the proposed ACF regulations and recognizes the significant role CARB can play to ensure the approach adopted recognizes the criticality of access to vehicles and infrastructure in a sustainable mobility future. That is why we respectfully submit that our six decades of experience in serving mobility needs in communities across California can provide beneficial perspectives to improve the impacts of the ACF proposal. We believe that accelerating the adoption of low and zero-emission transportation requires a comprehensive approach focused on accessible infrastructure and supported consumer demand. Mandatory adoption thresholds, by themselves, can be counterproductive when imposed on shared mobility service providers, such as Enterprise and the businesses that we serve. Enterprise firmly believes these concerns can be resolved and would welcome discussion on ways to further the intent of the proposed ACF regulation, including incentive-based approaches, strategic infrastructure deployment, and consumer demand incentives, among others.

### **Adopt incentive-based approach to increase consumer demand for**

Shared mobility fleet operators, like Enterprise, can play an essential role in showcasing new, sustainable technology to consumers. With government incentives for use of zero-emission, shared vehicles for business and personal use, more businesses and individuals can be exposed to the technology during their rental experiences. When consumers experience zero-emission vehicles positively, our services become a potential accelerator of individuals transitioning to smart, sustainable mobility.

However, when the experience is less favorable, due to insufficient access to public charging infrastructure, the opposite can result. While on its face, requiring large rental fleets to purchase significant numbers of medium- and heavy-duty trucks might appear to advance California's GHG reduction goals, vehicle purchases alone will not reduce GHG emissions in this sector. Absent consumer and business demand for renting zero-emission medium- and heavy-duty trucks, such mandates will have no impact on actual emissions.

**Shared mobility fleet operators, like Enterprise Holdings, are part of the sustainable mobility solution, not part of today's urban mobility problem and should be embraced and incorporated into future policy development.**

### **Avoid fleet mandates for shared mobility fleets**

Incentivizing consumer demand includes refraining from punitive measures that limit the delivery of comprehensive mobility services that meet the broad range of consumer mobility needs. By recognizing that the full range of shared mobility vehicles (ICE/Hybrid/ZEV) is part of a comprehensive strategy solution for the transition to a future of smart, sustainable mobility; and by providing incentive-based schemes for adoption while avoiding punitive policies targeted at vehicle uses that are still necessary for customer needs that cannot be met by current zero emission technology, the overall goal of accelerated transition to carbon neutral transportation is better served.

It is critical to account for the fact that a range of service models is necessary to meet diverse needs of the travelling public. Both incumbent and developing business models of shared-asset mobility (car and truck rental/share, rideshare, ride hailing), combined with public/mass transit, form the basis of sustainable mobility systems that accommodate a range of individual and business user needs while creating more opportunity to incorporate active travel segments. Existing shared vehicle fleets are often the cleanest vehicles on the road and reduce dependence on individual vehicle occupancy/usage. A focus on incentive-based accelerators of sustainable mobility, and avoidance of arbitrary mandates, will enable shared fleet operators to lead the way to a sustainable mobility future.

**Fundamentally, the continued ability to rent an internal combustion medium- or heavy-duty truck offers the logistical security for businesses and consumers that seek to purchase a zero-emission truck for their every-day use. Those businesses know that if they need to go into areas where charging infrastructure is deficient; need a larger capacity truck; or have other unique needs that cannot be met by a ZEV, traditional medium- and heavy-duty shared vehicles will still be available for their short-term use.**

### **Prioritize infrastructure where users live, work and recreate**

Renters of EVs are disproportionately dependent on public charging infrastructure, which is especially in short supply among medium and heavy-duty use cases. It is imperative that EVs and EV infrastructure meet customer expectations if EV adoption is to be sustainable. Addressing customer range anxiety

issues is critical. Overcoming range anxiety depends both on the levels of available infrastructure and readily accessible consumer information on charging options in terms of location, type, and pricing.

Put in different terms, sufficient levels of new infrastructure deployment configured to serve the opportunity charging and vehicle dimensions of medium and heavy-duty vehicles are essential to introducing a greater number of such EVs into shared mobility fleets. Behavior change is only possible where charging infrastructure is adequate to ensure consumer confidence in electrified transport, a key in attaining near-term emission reduction goals for transportation.

**By recognizing the full range of shared mobility services as part of a comprehensive strategy solution for smart, sustainable mobility; providing incentive-based schemes for adoption; and avoiding punitive policies targeted at vehicle uses that are still necessary for customer needs that cannot be met by current zero emission technology, the overall goal of accelerated transition to carbon neutral transportation is better served.**

Given these concerns, Enterprise respectfully suggests that, without changes, the proposed regulation will not have the intended impact of reducing GHG emissions. We welcome the opportunity to discuss how Enterprise, a leader in the mobility services industry, can help CARB achieve these goals in a meaningful, thoughtful way that results in accelerating the adoption of zero-emission medium- and heavy-duty vehicles.

Respectfully,  
Randal T. Narike  
Executive Vice President & Chief Strategy Officer  
Enterprise Holdings