



April 18, 2022

California Air Resources Board
Clerk's Office
1001 I Street
Sacramento, CA 95814

RE: Electric Vehicle Supply Equipment Minimum Payment Standards
Submitted at <https://ww2.arb.ca.gov/applications/public-comments>

The undersigned California-based and national trade associations appreciate the opportunity to comment on this important proposal. We note that the supporting data and appendices to the Final Regulation recognize the necessity of broad open payment access for drivers seeking to recharge their electric vehicle (EV).

CARB should continue to support policy that encourages the adoption of open payments which offers secure, and globally interoperable solutions for electric vehicle charging to ensure drivers can pay using their existing cards or mobile device. Global implementation of EMV technology, mobile payments, and tokenization establishes a foundation to deploy easy-to-use, secure open payments technology for EVs.

Payment methodologies continually evolve as new products and entrants into the marketplace come on line. The evolution of payments requires CARB to recognize current, and new innovative ways to pay with more frequent technology reviews and flexibility to be able to make adjustments to requirements to align with technology currently available in market. For instance, the new payment technology, Plug & Charge which uses the ISO 15118 standard allows a charging session to be authenticated and paid for simply by plugging in a vehicle, with no card, reader or app required.

We support CARB's proposal to require open payment terminals with contactless technology at a minimum in all EV charging stations as this is the reality of the current payment infrastructure. CARB should consider reviewing exceptions based on municipalities adoption of digitizing open payments (*i.e.* Transit).

We note, however, that §2360.2 inexplicably leaves out a national payment network. Subsection (d)(1) sets standards for the minimum number credit card types must be accepted at card readers. At least one of the major networks must be accepted, *e.g.*, American Express, Mastercard or

Visa. Yet the standard excludes Discover, which operates a significant national payment card network like those mentioned above.

We urge CARB to correct this oversight.

Like CARB, we cannot predict which method or product will be dominant in the future. Customers will make that decision—not the payment industry or government.

However, we urge CARB to adopt a policy encouraging the use of open payment methods that will not force drivers to download multiple single point of sale apps or closed-loop prepayment cards that can only be used at one branded charge point system.

While some charge point systems operate a subscription model, that is inconvenient to EV drivers who migrate from petroleum stations offering multiple payment options. We note challenges to payment accessibility—or lack thereof—is not limited to California. While the United Kingdom encourages the use of EVs, drivers find the lack of payment options to be a disincentive to leaving internal combustion powered vehicles.¹

We urge CARB to encourage, as a matter of public policy, the adoption of open-loop, card-based payment options at all public charging points.

Our organizations would be happy to meet with CARB staff to determine how we may be helpful as CARB grapples with this ever emerging issue.

Sincerely,

California Bankers Association
www.calbankers.com

Card Coalition
www.cardcoalition.org

Electronic Transactions Association
www.electran.org

¹ For example, *Electric Vehicle Men*, a popular UK-based YouTube channel advocating for the adoption of EVs recently aired an episode entitled “*EV Charge Networks Are A Mess! (Some)*” which showed the complexity of paying for recharging using multiple apps. At https://www.youtube.com/watch?v=kVXpHs8_VCs.

Similarly, another YouTuber posted a video about this challenges recharging a car in Wales with particular emphasis on coping with charge points that only accept one form of payment. See “*MG ZS EV Review! Cold weather range test GONE WRONG!*” at <https://www.youtube.com/watch?v=qxR9b-ZPoaY>