

PLUG IN AMERICA



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June 27, 2008

Stephen Kratzke
Associate Administrator for Rulemaking
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, DC 20590

Re: Petition on Rulemaking for Vehicle Classifications

Dear Mr. Kratzke:

Please consider this a formal request to establish a new class of electric vehicle (EV) that falls in between Low Speed Vehicles (LSVs) and fully highway-capable, long-range electric vehicles. This new class – which could be called City EVs or Medium Speed EVs – should have definitions and standards set by NHTSA for minimum safety requirements, as well as maximum speed and weight.

Please note: We do NOT support simply allowing cars designed as LSVs to go faster than the current maximum speed of 25 mph without meeting revised safety standards. Five states (Minnesota, Montana, Oklahoma, Tennessee, and Washington) have passed legislation that allows LSVs to increase speeds to 35 mph (in conflict with existing federal regulations), but consumers may not understand the increased risks of driving LSVs at higher speeds. To be clear, we are suggesting an entirely new class, with a top speed of 40-50 mph, to accommodate those vehicles that are more robust than the average LSV, but not intended for the highway.

It's important for NHTSA to quickly and assertively set safety standards for a new class of Medium Speed EVs or City EVs. There couldn't be a better time to do so, and there are multiple potential benefits from creating this new class:

- As our automotive industry moves toward greater electrification of cars, Medium Speed or City EVs will be a more-affordable option than fully highway-capable EVs.
- Getting our transportation system off of its dependence on oil is a political imperative for national security. EVs shift cars from foreign oil to domestic electricity.
- Creating a Medium Speed or City EV class will get more EVs on the road, and faster, than relying on the current vehicle classifications. Many consumers who have hesitated to purchase LSVs say they would buy a Medium Speed or City EV that could go at least 35 mph.

- The former Ford Th!nkCity EV demonstration program, which operated under a waiver from NHTSA, showed that a City EV could be practical, popular, and safe.
- Other countries have City EV or Medium Speed EV classes that provide more choices for consumers.
- Creating this new class would decrease U.S. greenhouse gas emissions and air pollutant emissions by powering more vehicles with cleaner, cheaper, domestic electricity that increasingly comes from renewable sources.

Plug In America is the pre-eminent organization in the world representing consumers who want plug-in cars. We are an independent organization with no ties to industry. We are thrilled that the surge in consumer demand for EVs has caught the attention of legislators in five states (and more coming), but want to ensure the safety of those consumers.

We call on NHTSA to quickly create a new class of Medium Speed EVs or City EVs and to establish standards for speed and safety requirements. Please feel free to contact me if we can be of assistance in this matter.

Sincerely,

Linda Nicholes
President, Plug in America
(714) 469-7753

Plug in America is a California non-profit organization that advocates the use of plug-in cars, trucks, and SUVs powered by cheaper, cleaner, domestic electricity to reduce our nation's dependence on petroleum and improve the global environment. For more information, see www.PlugInAmerica.org.