



necessary infrastructures are in place. That presents unique regulatory challenges and unique implementation problems. We need a whole of government approach to solve the problem and meet the challenge. But, EPA still has a role to play. EPA must adopt a final rule that includes a requirement to assess progress on the development of the needed infrastructure and a commitment to adjust the projected ZEV penetration rates or timelines as required.

Transitioning to heavy-duty ZEVs requires a regulatory program with a much more expansive approach than just mandating the manufacture of new technologies. To be successful, the government's approach to transitioning the commercial vehicle industry to ZEVs must address the market conditions essential to enable their deployment. We cannot afford a scenario where manufacturers must sell ZEVs but fleets won't purchase them because there is no infrastructure in place to operate them. That is a recipe for disaster.

We also note that the rule proposes to reopen the current 2027 GHG Phase 2 standards. EMA and its members defended against reopening and rolling back those standards in the previous Administration. This Administration should not set the precedent that established standards can be changed from Administration to Administration thus completely undermining regulatory certainty and stability and undermining manufacturers necessary multi-year investment plans.

We are fully committed to working with EPA and other stakeholders to support a GHG Phase 3 rule that will accomplish our shared objective of a zero-emission commercial vehicle future. We will provide data and comments to help EPA modify its proposal to achieve that goal.

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