



September 14, 2026

Mr. Chad Pilié
Western Weights and Measures Association
Specifications and Tolerances (S&T) Committee
4315 South 2700 West
TSOB South Bldg. Floor 2
Taylorsville, Utah 84129-2128

Re: Letter of Support for Proposed Amendment to NIST Handbook 44, Section 3.40 (Electric Vehicle Fueling Systems) to Establish Fleet Sales Exemptions.

Dear Members of the Committee:

NATSO, Representing America's Travel Centers and Truck Stops,¹ writes to express support for the proposed amendment (referred to in regional agendas as EVS-27.2) to NIST Handbook 44, Section 3.40 that would establish fleet sales exemptions for Electric Vehicle Supply Equipment (EVSE), consistent with the exemptions already in place for liquid fuel dispensers under Section 3.30. NATSO supports the item and its designation as a voting item.

NATSO's members fuel the country's commercial trucking fleets, and an increasing number are investing in EV charging infrastructure to serve fleet customers alongside traditional liquid fuels. As currently written, Handbook 44 treats functionally identical fleet-sale transactions differently depending on whether the vehicle is fueled with diesel or electricity. There is no reason for this asymmetry. Liquid fuel dispensers used exclusively for fleet sales, price contract sales, and truck refueling are appropriately exempt from requirements to provide a transaction receipt and to require driver selection of unit price. These exemptions reflect the reality that fleet drivers are not responsible for payment or pricing decisions, which are instead governed by pre-negotiated contracts and consolidated monthly invoicing to fleet administrators. EV transactions would operate most efficiently under the same business model, but they do not have a comparable exemption.

The proposed amendment corrects that inconsistency. It does not create a new regulatory concept but rather extends the longstanding framework for liquid fuels to a new fuel type. Without this amendment, retailers deploying fleet-dedicated EVSE would confront unnecessary compliance burdens around designing, certifying, and maintaining equipment to support a customer interaction that does not occur in a fleet billing context.

NATSO urges the Specifications and Tolerances (S&T) Committee to adopt this proposal. We appreciate the opportunity to comment and would welcome the chance to provide additional information or testimony as this proposal moves through the NCWM process.

Sincerely,

NATSO, Representing America's Travel Centers and Truck Stops

¹ NATSO, Representing America's Travel Centers and Truck Stops, currently represents approximately 5,000 travel centers and truck stops nationwide, comprising both national chains and small, independent locations.