



December 13, 2023

The Honorable Rick Crawford
Chairman
U.S. House Committee on
Transportation and Infrastructure
Subcommittee on Highways and Transit
2165 Rayburn House Office Building
Washington, DC 20515

The Honorable Eleanor Holmes Norton
Ranking Member
U.S. House Committee on
Transportation and Infrastructure
Subcommittee on Highways and Transit
2165 Rayburn House Office Building
Washington, DC 20515

Chairman Crawford, Ranking Member Holmes Norton and Members of the U.S. House Committee on Transportation and Infrastructure Subcommittee on Highways and Transit:

On behalf of Associated Builders and Contractors, a national construction industry trade association with 68 chapters representing more than 22,000 member companies, we thank you for holding the hearing, "Oversight of the Infrastructure Investment and Jobs Act: Modal Perspectives".

With hundreds of billions of dollars directed to modernize our nation's most critical infrastructure, the modal administrators at the U.S. Department of Transportation are largely responsible for the distribution of these funds that will carry out projects across various transportation sectors

Implementation of IJJA and

The final rule contains a number of concerning labor provisions. It requires that all electricians working on electric vehicle supply equipment either be certified by the International Brotherhood of Electrical Workers' Electric Vehicle Industry Training Program or be a graduate or recipient of a continuing education certificate from a government-registered apprenticeship program with a focus on EVSE installation approved by the U.S. Department of Labor in consultation with the DOT. Additionally, the final rule requires all NEVI-funded projects that require more than one electrician to use at least one GRAP-enrolled apprentice.

ABC previously submitted comments in response to the proposed rule and a [request for information](#), urging the DOT to avoid union labor requirements and to instead welcome all qualified contractors to build EV chargers. Unfortunately, the agency disregarded these recommendations in the final rule which took effect on March 30, 2023.

Thank you for your consideration of ABC's concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Swearingen", is written over a series of horizontal lines. The signature is somewhat stylized and partially obscured by the lines.

Kristen Swearingen
Vice President, Legislative & Political Affairs