August 15, 2022

Mr. Davon Collins  
Environmental Counsel  
United States Postal Service  
475 L'Enfant Plaza SW, Office 6606  
Washington, DC 20260-6201

VIA EMAIL (NEPA@usps.gov)

RE: National Retail Federation Comments on SEIS for USPS Next Generation Delivery Vehicle Acquisitions; 87 Fed Reg. 43561; Doc. 2022-15616

Dear Mr. Collins,

On behalf of the National Retail Federation (NRF), thank you for the opportunity to comment on the United States Postal Service’s (USPS) ongoing efforts to acquire and deploy its next generation delivery vehicles.

NRF, the world’s largest retail trade association, passionately advocates for the people, brands, policies and ideas that help retail thrive. NRF empowers the industry that powers the economy. Retail is the nation’s largest private-sector employer, contributing $3.9 trillion to annual GDP and supporting one in four U.S. jobs — 52 million working Americans. For over a century, NRF has been a voice for every retailer and every retail job, educating, inspiring and communicating the powerful impact retail has on local communities and global economies.

Retailers rely on the USPS now, more than ever, to stay connected to their customers, especially as e-commerce continues to play an increasingly important role in our country’s economic strength. Only the Postal Service delivers to every address in the United States, serving as a lifeline to small business owners and consumers nationwide. It truly is an essential public service.

The retail industry is committed to leading on sustainability initiatives. Dozens of retailers operating in the United States have made commitments to reduce their greenhouse gas emissions. These commitments address both direct (scope 1) and indirect (scopes 2 and 3) emissions, including the emissions associated with delivering products to consumers at their homes. Smaller retailers also want to reduce their emissions, and, like larger retailers, they see USPS as a valuable partner in those efforts.
Other delivery fleets owned or managed by retailers or by retail delivery partners are expanding purchases of electric vehicles because of long-term cost savings resulting from lower fueling and maintenance costs and because they reduce the pollutants that contribute to poor air quality and climate change. The cost savings and environmental benefits are a critical part of ongoing discussions by retailers and their delivery service providers. We believe that the USPS has similar opportunities to continue improving the affordability and efficiency of its delivery services while decreasing harmful vehicle emissions.

On behalf of the retail community, we strongly support USPS efforts to accelerate its transition to electric vehicles where affordable and practical. Thank you again for the opportunity to share our perspective.

Sincerely,

David French
Senior Vice President
Government Relations