

**DOCKETED**

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**CAFCP OEM Performance And Technical Comments, POS**

*Additional submitted attachment is included below.*



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U.S. Department of Energy  
U.S. Environmental Protection Agency

September 6, 2019

California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Docket No. 18-HYD-04, Draft Solicitation Concepts for Light-Duty Hydrogen Refueling Infrastructure, CaFCP Performance and Technical Comments, Point of Sale.

Dear CEC Administrator:

The California Fuel Cell Partnership (CaFCP), on behalf of Original Equipment Manufacturer (OEM) members participating and commenting, respectfully submit this letter of comment to the California Energy Commission (CEC) in response to 18-HYD-04. CaFCP, working within its charter, provided the membership a platform for open discussion and input. Although CaFCP acted as the facilitator to develop the content of this letter, the views expressed are a consensus solely of the stakeholders listed.

The OEMs are providing additional clarification to our comments specific to, "Section 20. Minimum Technical Requirements for Open Retail HRS. Part G – POS," regarding the use of near-field communications and other wireless payment methodologies as related to the retail station Point of Sale (POS) system.

Given the prospect of implementing such near-field POS payment methods (smartphone) within the next 2 years as a part of this GFO, OEMs support such new/innovative payment systems, however introduction of this technology must be only IN ADDITION to a credit-card magnetic strip reader customer payment method. OEM's currently provide fuel payment cards to the customer that would require a card reader payment method as part of their vehicle purchase and lease terms. Therefore, accommodation of current and near-term future customer card-like payment methods must continue. OEM's have no opposition to this as a SECONDARY payment method. This GFO must maintain its requirement for a card-swipe payment method.

In partnership,

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