

Message

From: David Schwietert [DSchwietert@autoalliance.org]
Sent: 10/27/2018 6:51:56 PM
To: Jackson, Ryan [jackson.ryan@epa.gov]; Wheeler, Andrew [wheeler.andrew@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]
Subject: RE: Auto Alliance comments
Attachments: Auto Alliance Full Comment Set Oct 26 2018.pdf

Here's the Auto Alliance Comments – minus the 9 attachments that were also uploaded when we submitted the docs yesterday.

While this attachment amounts to 202 pages, the first 15 pages provide a useful summary.

This doesn't appear to have posted on-line yet via Regulations.gov but wanted to ensure you had our filing.

Happy to answer any questions in the coming days/weeks.

Thanks,

Dave

From: David Schwietert
Sent: Friday, October 26, 2018 4:57 PM
To: 'Jackson, Ryan' <jackson.ryan@epa.gov>; Andrew Wheeler (wheeler.andrew@epa.gov) <wheeler.andrew@epa.gov>; 'wehrum.william@epa.gov' <wehrum.william@epa.gov>; 'Gunasekara, Mandy' <Gunasekara.Mandy@epa.gov>
Subject: Auto Alliance comments

I wanted to ensure you had the following preview of the more expansive comments that will be submitted by the close of the comment period today.

I will also ensure you get the 15-page summary and the related comments once they are transmitted.

Dave

Automakers Call for CAFE/GHG Progress Reflecting Marketplace

The Auto Alliance will be submitting comments by the end of today (Friday, Oct. 26) to NHTSA and EPA on the Safer Affordable Fuel-efficient (SAFE) Vehicles Rule for MYs 2021-2026. Here is a preview of those comments, and the full executive summary will be available on Monday, Oct. 29:

“The Alliance has consistently and actively supported a single national program covering all 50 states that spurs continued improvements in fuel economy and greenhouse gas (GHG) emissions while recognizing marketplace realities such as consumer choice, fuel prices and technology costs.

“Automakers have invested substantially in technologies so consumers can visit dealerships and select from approximately 500 models that achieve 30 MPG or more (highway), including 45 hybrid-electric and over 50 plug-in electric and hydrogen fuel cell models.

“With respect to fuel economy and GHG emissions, automakers are committed to ongoing progress in a journey with no end date. That commitment has not wavered. At the same time, future government mileage and emission standards need to align with marketplace realities. The CAFE and GHG programs evaluate automakers based on a sales-weighted average of vehicles sold, not on models offered for sale.

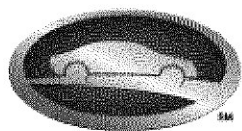
“The Alliance appreciates NHTSA and EPA issuing a joint Proposed Rule that incorporates the latest data and will consider standards for MYs 2021 to 2026. Many of the projections and assumptions upon which MYs 2022-2025 standards were based have proven to be incorrect; the level of technology modeled by the agencies in 2012 is insufficient to meet the standards, and the actual level of technology that industry projects is needed to comply with the standards is misaligned with market realities. Data from the past few years have also disproven assumptions regarding the market share of cars and trucks, future gas price projections, and the adoption rate of alternative powertrain vehicles.

“The Alliance remains committed to supporting One National Program. This program was developed in cooperation by NHTSA, EPA, California and automakers, and was based on the shared recognition that harmonized standards that maintained the authorities of all agencies were the best path forward.

“The Alliance urges the federal government to set achievable future standards that continue to advance environmental and energy goals while recognizing marketplace realities, incentivizing innovative new technologies, harmonizing government programs, maintaining a strong auto manufacturing sector, and keeping new vehicles affordable so more Americans can replace older vehicles with newer models that are cleaner, safer, and more energy-efficient.”

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