

Message

From: David Schwietert [DSchwietert@autoalliance.org]
Sent: 5/3/2017 12:58:21 PM
To: Bolen, Brittany [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31e872a691114372b5a6a88482a66e48-Bolen, Brit]
Subject: FW: re: Auto Alliance follow up - Administrator Pruitt Meeting
Attachments: Auto Alliance Letter Administrator Pruitt April 27 2017.pdf; Joint Alliance - Global Petition for Rulemaking June 2016.pdf

I realized I had your email incorrect when I sent the following on Thursday of last week

Dave

From: David Schwietert
Sent: Thursday, April 27, 2017 5:49 PM
To: bollen.brittany@epa.gov; 'dravis.samantha@epw.gov' <dravis.samantha@epw.gov>
Cc: Jennifer Thomas <JThomas@autoalliance.org>; Chris Nevers <CNevers@autoalliance.org>
Subject: re: Auto Alliance follow up - Administrator Pruitt Meeting

Brittany and Samantha,

We wanted to pass along an electronic copy of the charts and letter that were raised during today's meeting with Administrator Pruitt.

Please let us know if you have any questions – both regarding the Harmonization Petition that was filed jointly with EPA and DOT last June as well as the Mid Term Review for MY 2022-2025 fuel efficiency standards for light-duty vehicles.

Note, when the Harmonization petition was filed last June, we requested a direct fine rule to resolve various issues in hopes of addressing those items ahead of the Draft Technical Assessment Report (TAR) that kicked off the Mid Term Review.


Soon after our petition was filed, EPA/DOT and CARB released their Draft TAR which now means that the issues outlined in the Harmonization petition would more effectively be addressed via a rulemaking process – or handled administratively via interpretations. Additionally, since late 2015 the Alliance has been seeking various Harmonization changes via legislation because certain changes require statutory modification.

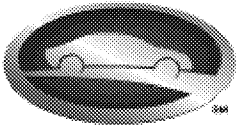
It's also important to keep in mind that the Harmonization issues relate to near term compliance (prior to MY 2022) due to increasing disparity between CAFE and EPA credit and compliance requirements. Effectively, the concept of One National Program hasn't been realized and it can create instances in which an auto manufacturer can be in compliance with more stringent EPA requirements and still be forced to pay CAFE penalties. We have a host of other examples that we'd be happy to walk you through to underscore the changes that need to be made in keeping with the original 2010 and 2012 agreements that were advertised as "One National Tier Program" for compliance purposes.

Thanks,

Dave

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