

Message

From: Spangler, Todd [tspangler@freepress.com]
Sent: 8/3/2018 4:53:15 PM
To: rebecca.grapsy@dot.gov
CC: Abboud, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b6f5af791a1842f1adcc088cbf9ed3ce-Abboud, Mic]
Subject: RE: re: from Detroit Free Press-USA Today Network

Resending to make sure you got this. thanks

From: Spangler, Todd
Sent: Friday, August 3, 2018 10:59 AM
To: 'rebecca.grapsy@dot.gov' <rebecca.grapsy@dot.gov>
Cc: 'Abboud, Michael' <abboud.michael@epa.gov>
Subject: FW: re: from Detroit Free Press-USA Today Network

Rebecca—I wanted to send this to you too, in case you or someone at NHTSa can help. Thanks—

todd

From: Spangler, Todd
Sent: Friday, August 3, 2018 10:50 AM
To: 'Abboud, Michael' <abboud.michael@epa.gov>
Subject: re: from Detroit Free Press-USA Today Network

Mike—I had a follow up question about the proposal from yesterday. Around Pg 777 of the document here <https://www.epa.gov/sites/production/files/2018-08/documents/safe-my-2021-2026-cafe-ld-ghg-nhtsa-epa-nprm-2018-08-02.pdf> it gets into comparing the baseline with the preferred alternative on both CAFÉ and then CO2 by company and then overall in terms of technology costs, sales, job-years.

My first question is this.... Should I be adding these together when looking at possible ramifications of this? For instance, if BMW's undiscounted regulatory costs (page 780) under CAFÉ alternative would be \$200 million less in 2026 than the baseline and \$1.5 billion (page 802) under the CO2 alternative, should I add those together to get a total?

Maybe more importantly on pages 784-785, the chart labelled "Technology Costs, Average Prices, Sales, and Labor Utilization under Baseline and Proposed CAFE Standards" gets into reductions in technology costs, car prices, increases in sales and reductions in job years. (It says there would be 60,000 fewer job years in 2026 compared to the baseline), and then, beginning on pg 806, there is a similar chart for CO2 standards similar (though different in some rows) changes for the same items... My questions is should they be added together for a total forecasted impact? (note that, for instance, the technology costs are different than the CAFÉ chart, suggesting they should be added together; but the vehicle price and sales numbers definitely shouldn't be added together, so I don't know how to account for them; then there's jobs year: 60,000 jobs lost in CAFÉ, + 60,000 jobs lost in CO2 = 120,000 jobs-years but is that correct?)

Thanks for any help with this. Trying to get an answer by EOB today but if it's Monday that's cool---

Todd

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