



Consumer Federation of America

January 27, 2009

The Honorable Barack H. Obama
President of the United States
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

We applaud your decision to move ahead with the increase in fuel economy standard for 2011 proposed by the National Highway Traffic Safety Administration which the Bush Administration failed to complete. As we indicated in our comments in that proceeding, the 2011 level is an acceptable initial level, but the standards for later years are far too low. Thus, adopting the standard for 2011 will comply with the requirements of the Energy Independence and Security Act (EISA) and allow the U.S. to start the long delayed move to higher fuel efficiency in the vehicle fleet.

We urge the Administration to withdraw the standards for future years and launch a thorough, considered, and thoughtful revision of the approach that NHTSA used in setting the standards. There are serious, but avoidable, flaws in the approach taken by the Bush Administration, which would deny vital energy savings for consumers and the nation.

EISA established a fleet average of 35 miles per gallon by 2020 as a floor, but the Bush Administration treated it as a ceiling. The law requires that the fuel economy standard be set at the maximum feasible level and our analysis concluded that if the proper methodology and data were used, the standard could be set at least at 35 mpg by 2015 and at 40 mpg or more by 2020. Setting the standard at 35 miles per gallon in 2015, as we recommend, will save an additional 22 billion gallons of gasoline, while putting the U.S. on a rapid path to a higher long-term goal. This approach will save hundreds of billions of gallons in the ensuing decades.

Thus, implementing the 2011 standard is the first step to ensuring that the vehicle fleet makes its maximum contribution to securing America's energy future, but it is only the first step. We look forward to working with your Administration in charting a new course for energy policy in the U.S., one that will reduce our dependence on foreign oil, improve the environment and revitalize the U.S. auto industry.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Brobeck", with a large, sweeping initial "S" and a smaller "B" and "robeck" following.

Stephen Brobeck
Executive Director
Consumer Federation of America

cc: Raymond H. LaHood, Secretary of Transportation
Lisa P. Jackson, U.S. Environmental Protection Agency Administrator
Carol M. Browner, White House Coordinator of Energy and Climate
Policy