



Consumer Federation of America

1620 I Street, N.W., Suite 200 * Washington, DC 20006

June 12, 2008

Secretary Mary E. Peters
Office of the Secretary
Department of Transportation
West Building, 1200 New Jersey Avenue, SE
9th Floor
Washington, DC 20590

Re: Request for Public Hearings on Docket No. NHTSA-2008-0089; RIN 2127-AK29:
Average Fuel Economy Standards, Passenger Cars and Light Trucks, Model Years 2011-
2015

Dear Madam Secretary:

The undersigned national, state and local consumer groups, representing millions of consumers, are writing to urge the National Highway Traffic Safety Administration (NHTSA) to hold public hearings with sufficient time to address the public's concerns before the final rule is issued. NHTSA should hold hearings around the country to learn how important better fuel economy is to the American people and how essential it is to meet statutory requirements/goals of conserving energy.

This rulemaking is the most important change since the beginning of regulation of fuel economy in America. It represents the first major revision in the approach to fuel economy standards in over two decades, and it will set the direction for fuel economy for the most vital decade in the struggle to end America's addiction to oil and begin the process of responding to climate change. With household budgets straining under the weight of soaring gasoline prices and the U.S. importing almost two-thirds of the crude oil it consumes, it is vitally important that NHTSA hear from the American people in hearings, not just through comments submitted to the docket. Public hearings on this critical issue provide Americans with greater access to the process, and NHTSA will be better able to appreciate the public's concerns.

The severity of the energy crisis facing the U.S. must be reflected in the fuel economy standards. Consumers are clamoring for fuel efficient vehicles now, yet the standards proposed for model years 2011-2015 on April 22, 2008 fail to put technology to work for consumers because NHTSA ties its proposed standards to low fuel prices. The use of more realistic fuel prices make more technology cost-justified and will result in higher standards.

We appreciate the fact that you have recognized the gas price problem in the rulemaking, stating less than a month after the proposed rule was released that: "As we look toward the finalization

of the rule and look again what the average fuel costs are then, I think we're going to make more progress on the miles per gallon at a lower overall cost." High gasoline prices should not have been a surprise to the agency. The price predictions on which NHTSA has relied in the past several years have consistently been used to undercut the use of existing technology to meet the statutory goals.

Under the statute, properly reflecting the value of gasoline and the value consumers place on the need to conserve energy are among the most important elements of NHTSA's analysis. Consumer attitudes and behaviors play a vital role in NHTSA's analysis of fuel economy standards. Public hearings are an ideal way for NHTSA to ensure that it hears from the American people and has a proper understanding of how important energy conservation is to the public and the nation.

We would like to see NHTSA hold hearings before the comment deadline, July 1. But, if that is not feasible, we hope they will be held as early as possible in the summer so the agency can hear from the public—especially consumers who will be looking to buy the vehicles these standards will affect, and that it can give the public comments received at the hearings the critical weight and consideration they rightly deserve.

Thank you for your attention. Detailed comments on the rulemaking will be submitted before the comment deadline. In the meantime, we look forward to your response and hope that you will see the benefit and necessity of holding public hearings before the final rule is issued and act accordingly.

Sincerely,

Consumer Federation of America

Consumer Action
Consumers Union
Public Citizen
USPIRG

AkPIRG
Arizona Consumers Council
Arizona PIRG
Arkansas Public Policy Panel
CALPIRG
Citizens' Utility Board of Oregon
Consumer Assistance Council of Cape Cod
Consumer Federation of the Southeast
Consumers for Auto Reliability and Safety
Democratic Processes Center
Empire State Consumer Association
Florida Consumer Action Network
Florida PIRG

Illinois PIRG
Maryland Consumer Rights Coalition
Maryland PIRG
Massachusetts Consumers Council
New Jersey Citizen Action
New Mexico PIRG
North Carolina Consumers Council
NYPIRG
PennPIRG
Utility Consumers Action Network
Victims Committee for Recall of Defective Vehicles
Virginia Citizens Consumer Council
Wisconsin Consumers League

cc: NHTSA Administrator Nicole Nason

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