



Consumer Federation of America

REPORT ON CONSUMER ATTITUDES TOWARD FUEL ECONOMY STANDARDS

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The Consumer Federation of America is an association of more than 250 non-profit consumer groups that, since 1968, has sought to advance the consumer interest through research, education, and advocacy.

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EXECUTIVE SUMMARY

There is broad, intense and consistent support for federal fuel economy standards in all states and across all political orientations. Respondents who are Democrats or lean democratic have a very high level of support (in the range of 75% to 80%), followed by other independents (in the 60%-65%). Among Republicans, there is a bare majority of support. A decade's worth of public opinion polling by Consumer Federation of America shows that consumers have consistently supported fuel economy standards, that the variations in support are consistent with fluctuations in gas prices, i.e. support increases slightly when gas prices rise, and a small decline in support occurs when gas prices are low.

Support for the standards with a 3-year payback is somewhat lower (62%), but is still a clear majority of the public. Previous survey results have shown consumers support fuel economy standards at roughly the same level with a 5-year payback period. There is a smaller, but still obvious majority with a 10-year payback period.

Consistent with support for standards in general and with a payback period, there is strong (76%) rejection of the Administration's claim that increasing fuel economy will compromise vehicle safety. Support for the standards with a payback period is also very broad, with 59% of Republicans, 82% of independents and 89% of Democrats rejecting the Administration's rationale.

Support for a state's right to adopt a second, higher standard, is equally broad, but not quite as strong (around 65%), which is consistent with previous survey results on the subject.

While CFA polling found that a wide margin of respondents (76%) were not convinced by the Administration's rationale for rolling back the standards, we did find very mixed reactions between Republicans (45% oppose) and others (73% of Democrats oppose) on support for Administration's proposal to freeze and rollback the standards.

At the state level, states whose economies are heavily dependent on the auto industry, Indiana, Michigan, Missouri, and Ohio, have stronger support for fuel economy standards (78%). This support is particularly significant as the citizens of those states know firsthand what happens to their states' economy when fuel inefficient vehicles don't sell, as was the case in 2008.

More than just being unpopular with a clear majority, the rollback is also a divisive policy that not only sets Republicans against the majority of independents and Democrats, it also fractures the Republicans in the survey. While one-fifth of Republicans are "full" opponents of standards (i.e. against standards and support the rollback), almost one-third are the opposite – support standards and oppose the rollback. More than one third are conflicted by the Trump Administration's proposal, supporting standards, but also supporting the rollback. Democrats are much less divided and full independents somewhat less divided.

Our detailed economic analysis of fuel economy standards set by the National Program, as well as the entire history of standards going back forty years and our preliminary analysis of the Notice of Proposed Rulemaking gives a good indication of why consumers are right to support the standards and oppose the rollback. The proposed rollback is bad economic policy that would harm consumers and the economy by draining consumer pocketbooks of half a trillion

dollars of cost saving over the next few decades that they could otherwise use to stimulate substantial economic growth.

The Administration's proposed freeze and rollback of the standards is not only uneconomical, unpopular, it is also violates the Administrative Procedure Act (ACT) because of the flawed nature of the SAFE (Safer Affordable Fuel-Efficient Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks) analysis. By disregarding current and historical evidence, the proposed rule will hurt Americans financially, reduce auto sales, and harm the environment, thereby violating not only the APA but also the underlying statues that govern EPA and NHTSA in setting standards.

INTRODUCTION

The Consumer Federation of America (CFA) has been sampling public opinion on fuel economy standards for over a decade. The results of our most recent survey confirm what we have been consistently finding throughout the last decade, but our 2018 survey adds key insights in two ways.

First, this is a unique moment in the history of the fuel economy standards. After half a century of remarkable success, the Trump Administration has proposed to abandon the process of steady increases in fuel economy, which was initiated after President Bush rebooted the CAFE program by signing the Energy Independence and Security Act of 2007 (EISA). This change in direction is not supported by public opinion.

Second, we have not only added a survey to the historical record, we have deepened the analysis by constructing a very large survey, with comparable national and state-by-state sampling to examine public opinion about key aspects of the current debate, we are able to:

- Ask specific questions about current policy issues, as well as long term general questions;
- Do intensive analysis of different types of states combining a national random sample telephone survey with an online survey conducted in 4 automotive states;
- Analyze the responses across political identification to questions in both the national and auto state surveys.

OUTLINE

The analysis proceeds as follows. We analyzed the national and state-oriented responses separately in two chapters. We analyzed five questions (contained in Appendix A) twice, once for the national survey and once for the auto states survey. In analyzing the data by states, we examined responses of four groups of states – Clean Cars, Climate Concerned, Auto States and Others. As explained below, we relied primarily on the large online survey of Indiana, Michigan, Missouri and Ohio to describe attitudes in auto states.

In each chapter we begin by describing two questions about support for the standards. One question asks generally about attitudes toward standards. The second question asks about support for the standards subject to a three-year payback period. This is a cautious payback because a three-year payback period places a significant constraint on the inclusion of technology, which, as we show, is a constraint that consumers are not actually bound by and the statute does not require. This is a fairly rigorous level for a car, a capital good that most consumers finance over a five-year period and keep for approximately ten years on average. Our earlier analysis shows consumers will accept longer payback periods.

Next, we turn to two questions involving the rationale offered for the dramatic change in policy. One question asks about the impact of higher fuel economy on safety. The second asks about the rights of states to adopt a different, higher standard.

Finally, we analyze the question of the Administration's proposed rollback and freeze of the fuel economy standards to the 2020 level through 2026, a full 24% below the current standard which goes through 2025.

In each chapter we analyze the responses across the political spectrum using five categories of political identification: Republican, Republican leaning independent, full independent, Democrat leaning independent and Democrat.

Where data is available, we compare the results of this survey to the historical data we have compiled and reported in the past. CFA has been conducting surveys on a variety of questions and issues in regard to the fuel economy standards program for almost fifteen years. Throughout this analysis, when we add the historical dimension, we focus on two periods – the period just before the adoption of the National Program¹ and the period since the 2016 election.

The National Program involved the cooperation of two federal agencies with rulemaking authority that affected fuel economy (EPA and NHTSA) and the California Air Resources Board (CARB), which has independent rulemaking authority under the Clean Air Act. The federal agencies are important because they set the standards that are now at issue in the proposed rollback and freeze of the fuel economy standards. The importance of the CARB being involved in the rulemaking process is obvious.

¹ We used surveys conducted in March and September of 2010.

1. NATIONAL SURVEY RESULTS

INTRODUCTION

Over the past decade, the Consumer Federation of America has examined public opinion about both vehicle fuel efficiency and the regulation of fuel efficiency. During this process, the survey questions have varied slightly due to the policy issues being considered at the time. But it is clear that over the last decade consumers have consistently supported a desire for both fuel-efficient vehicles and regulatory efforts to improve fuel efficiency.

Given the significant impact that gas costs have on household budgets, the volatility of gas prices and consumers' desire for technological improvements in the products they buy, it is no surprise that consumers want more fuel-efficient vehicles. On the other hand, bringing about those improvements has been a challenge, as the auto industry, and specifically the U.S. manufacturers, have, until 2012, generally opposed regulations requiring improvements. It wasn't until the economic disaster which befell GM, Chrysler and Ford during the days of skyrocketing gas costs (2008-2009) when fuel inefficient vehicles sat on dealer lots for months, that the car companies saw the wisdom of joining an extraordinary collection of stakeholders to come to consensus on a regulatory plan. The National Program set the goal of creating a fleet of vehicles that reached 42 MPG² by 2025. Never before had car companies, unions, consumer advocates, environmentalists, suppliers, transportation companies and other industries been so unified on regulatory policy.

In spite of the strong consumer demand for more fuel-efficient vehicles and the fact that car companies are fully capable of complying with the standards they agreed to in 2012, automakers asked President Trump to roll those standards back. The juxtaposition of this request in the face of recently rising gas prices shows a callous disregard for the economic welfare of America's already financial beleaguered households.

In our previous report, [*Pocketbook Savings, Macroeconomic Growth and Other Public Benefits of Fuel Economy Standards*](#), we looked at the macro, legal, and administrative ramifications of rolling back the standard. In our following report entitled [*An Analysis of Consumer Savings and Automaker Progress On the Road to 2025 CAFE Standards*](#), we found that car companies are not only on the road to full compliance, but increasing fuel efficiency increases car sales. In this report we are presenting a current and historical look at the most important reason for improving vehicle fuel efficiency – consumer desire for more fuel-efficient vehicles.

SUPPORT FOR FUEL ECONOMY STANDARDS

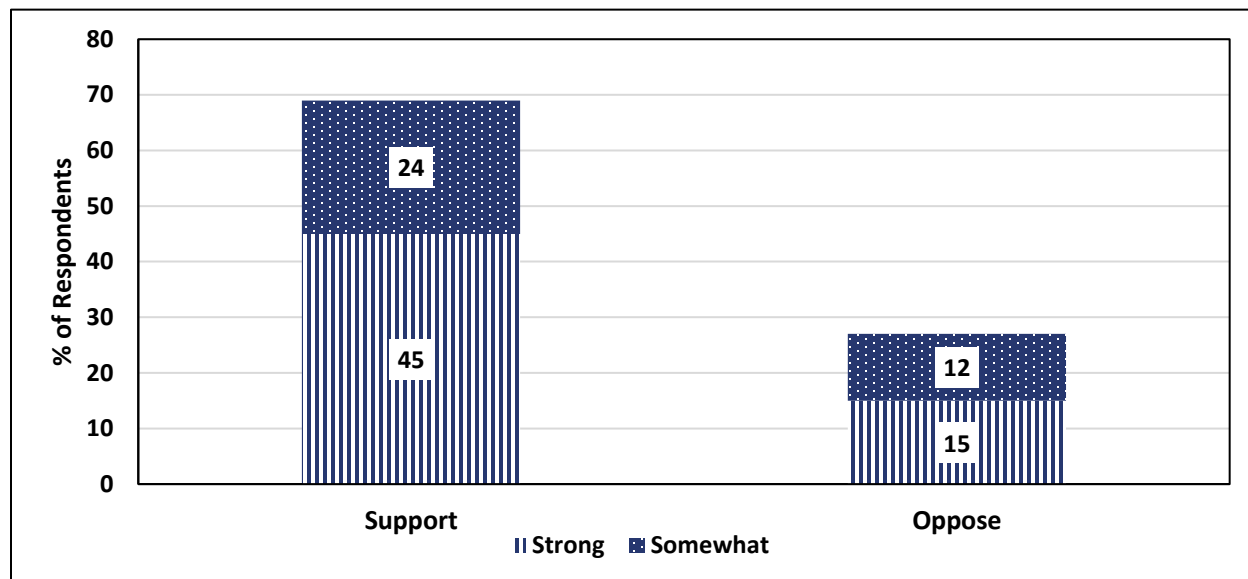
Current Survey³

² CFA uses the EPA “real-world” sticker MPG conversion of the 54.5 MPG by 2025 number based on the DOT CAFÉ standard.

³ The survey was conducted for CFA by ORC International by cell phone and landline on August 23-26, 2018, using a representative sample of 1002 adult Americans. The survey's margin of error is plus or minus 3.1 percentage points.

In our most recent survey conducted from Aug. 23-26, 2018, by ORC International, as shown in Figure 1.1, we found almost seventy percent of respondents support fuel economy standards (45% strongly) compared to less than 30 percent who oppose standards (15% strongly). Thus, while supporters outnumber opponents by a margin of 2-to-1, strong supporters outnumber strong opponents by 3-to-1 (see Figure 1.1)

Figure 1.1: Current Consumer Support for Federal Fuel Economy Standards



There are very few statistically significant differences between demographic groups in support for standards. Non-Hispanic whites are more likely to support standards (76% compared to 69% overall) and blacks and Hispanics are more likely to oppose (35%, 36% respectively compared to 26% overall.)

Past Survey Evidence

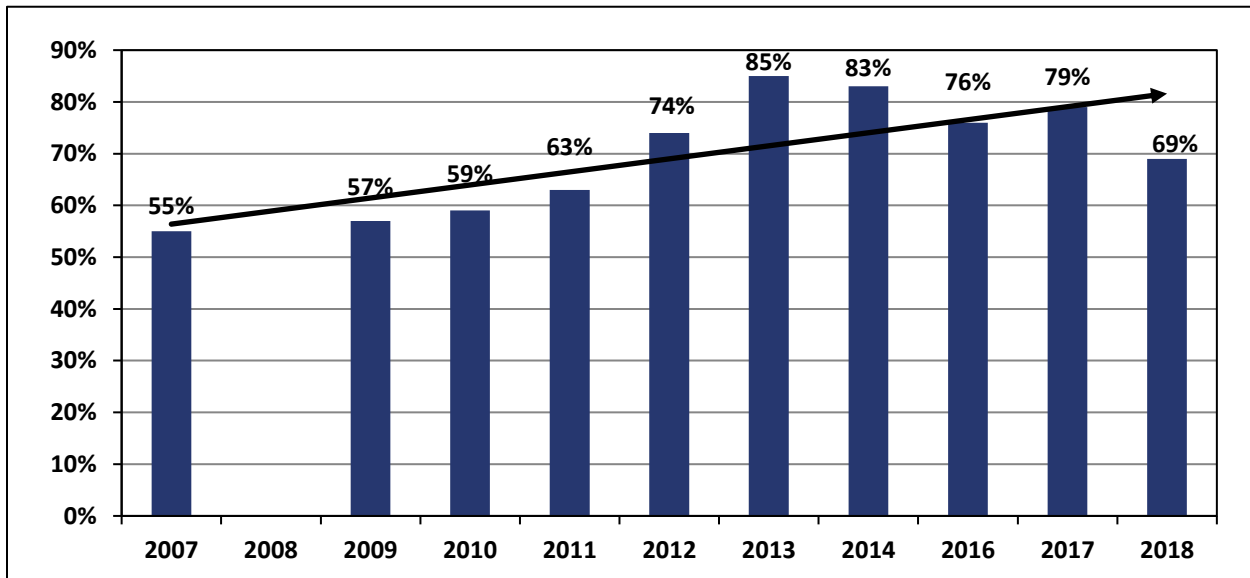
Since we began conducting public opinion polls in 2007, the overall trend of consumers supporting fuel economy standards has been increasing, as shown in Figure 1.2. Even during the recent years of lower gas prices, the level of support has remained strong and consistent. In our most recent survey (August, 2018), increasing federal fuel economy standards for cars and light duty trucks, to approximately 40 MPG by 2025, rather than reducing them to about 30 mpg, is supported by 69 percent of Americans.

In addition to the broad support for standards that we have observed over the last decade of surveying public opinion on the matter, we began surveying attitudes toward raising standards to specific targets, as the agencies were developing the National Program. In two surveys conducted in 2010⁴, we found a clear majority of respondents supported setting the standard for

⁴ Mark Cooper, *Issue Brief: Public Support for a 60 Mile per Gallon Fuel Economy Standard* (Consumer Federation of America, September 2010), p. 2 (hereafter *2010 Issue Brief*).

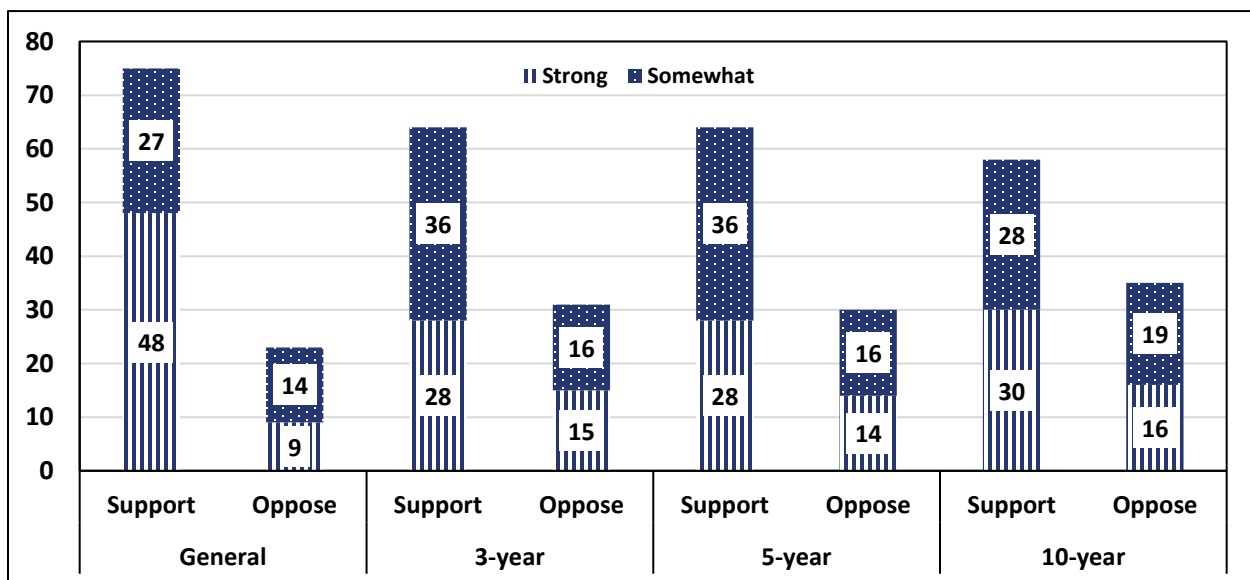
2025⁵ in the range of 38 miles per gallon (65% in March 2010) and 46 miles per gallon (59% in September 2010).

Figure 1.2: Consumers Historically Support Federal Fuel Economy Standards



In 2011, we used the same general approach as in the current survey to ask about support for fuel economy standards and the results track our current findings closely. As Figure 1.3 shows there was strong majority support for standards, with support outweighing opposition by 3-to-1. Strong support outweighs strong opposition by 5-to-1. We will analyze the support across payback periods in the next section.

Figure 1.3: 2011 Support for Standards: General and by Payback Period



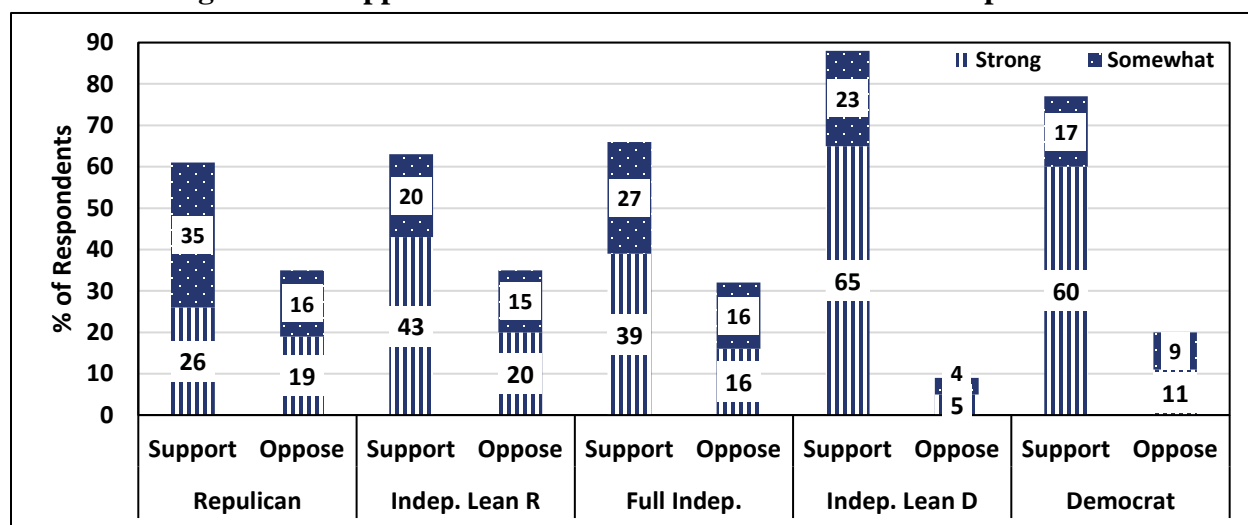
⁵ In this analysis, we use the now standard adjustment for the difference between laboratory and high mileage, which has become the norm since about 2016.

POLITICAL ORIENTATION AND SUPPORT FOR STANDARDS

Current Survey

Support for the standards in the recent survey is also bipartisan, as it has always been. While 69% of all respondents support standards, as shown in Figure 1.1, above, 61% of Republicans, 63% of independents leaning Republican and 66% of full independents do, as shown in Figure 1.4. Independents leaning Democrat (83%) and Democrats (77%) express much higher support. While only one quarter of Republicans express strong support, about 40% of independent leaning Republican and full independents do. Democrat leaning Independents and Democrats express even stronger support (65% and 60%) respectively. This support for the standards across party lines is one indication that the Trump Administration’s proposal to weaken these standards is out of line with public opinion.

Figure 1.4: Support for the Standards Across the Political Spectrum



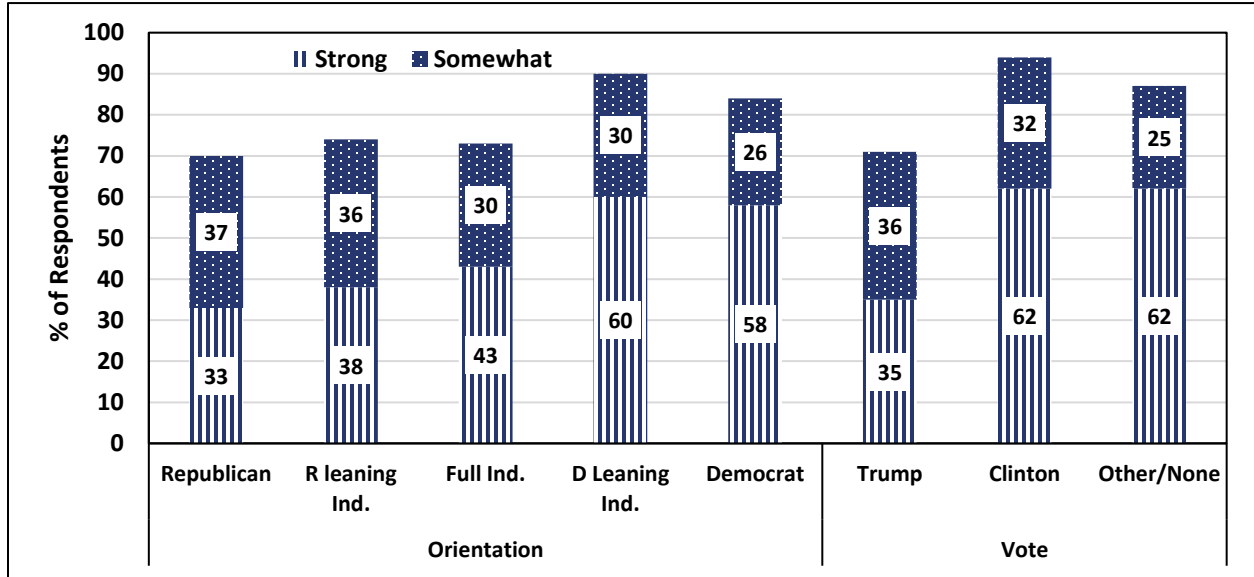
Past Survey Evidence

In December of 2016, we conducted a national public opinion poll that considered how political orientation of the respondents affected their attitudes toward standards, as shown in the upper graph of Figure 1.5.⁶ We found levels of support for the program are similar to those we found in our recent 2018 survey across party-orientation and even among voters in the 2016 presidential election. There was clear majority support among Republicans, Republican leaning independents and Trump voters and full independents. Democratic leaning independents and Democrats express higher levels of support (around 90%). Support among Trump voters is close to the Republicans, while Clinton and Other voters are close to the Democrats. As shown in the lower graph of Figure 1.5, support for standards across the political spectrum was similar in 2011 as in 2018, with a slight decline among Republicans but slight increases among Republican leaning independents and Democrats.

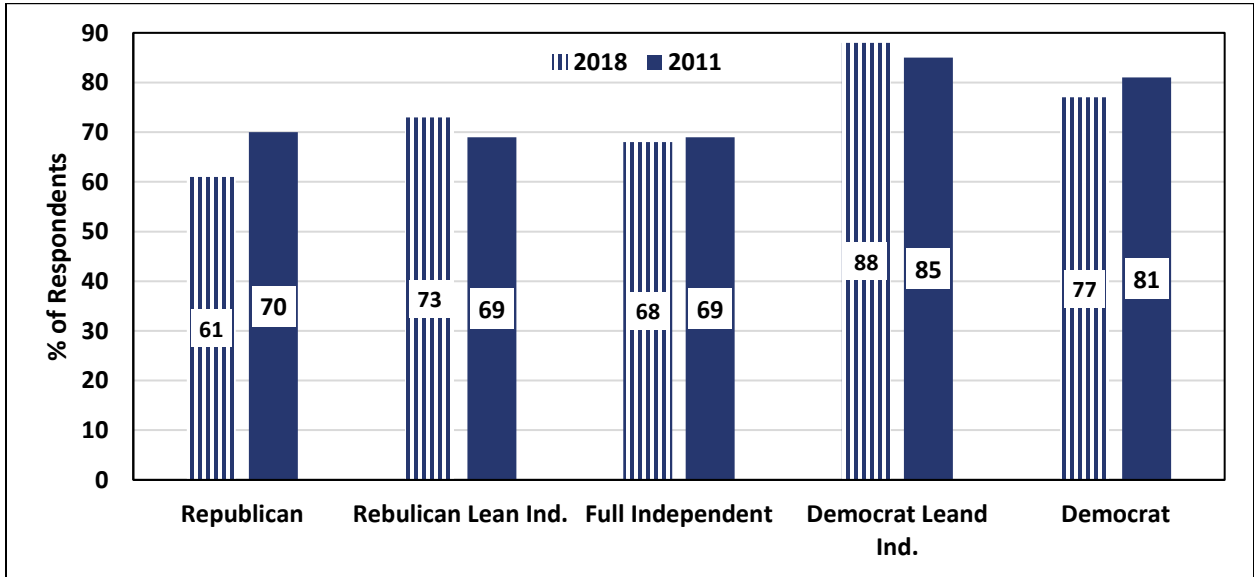
⁶ Mark Cooper, *Comments of the Consumer Federation of America in the Matter of Proposed Determination on the Appropriateness of the Model Year 2022-2025 Light Duty Vehicle Greenhouse Gas Emissions Standards Under the Midterm Evaluation*, December 30, 2016 (hereafter *2016 Post-Election Survey*).

Figure 1.5: Historical Support for Standards

2016 by Orientation and Vote



2011 and 2018

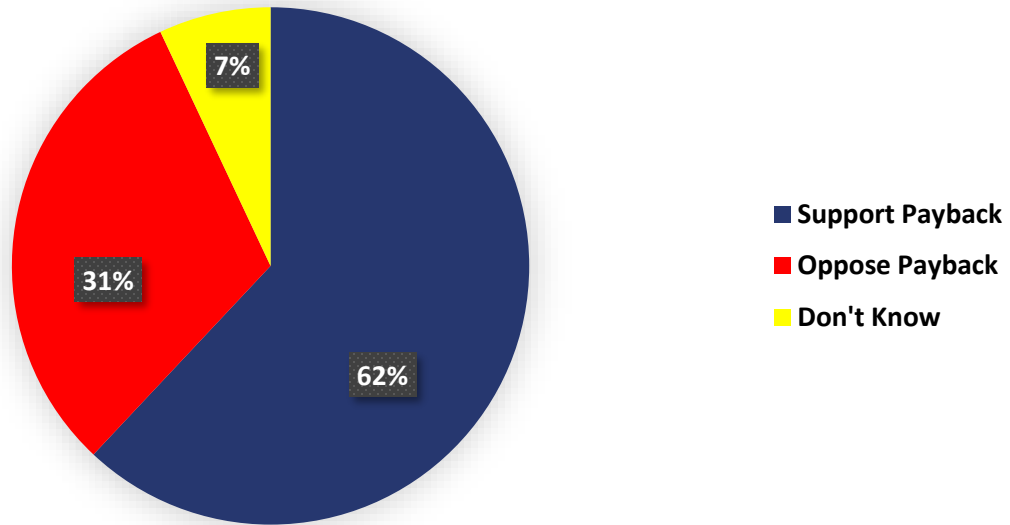


SUPPORT FOR STANDARDS AND PAYBACK PERIODS

Current Survey

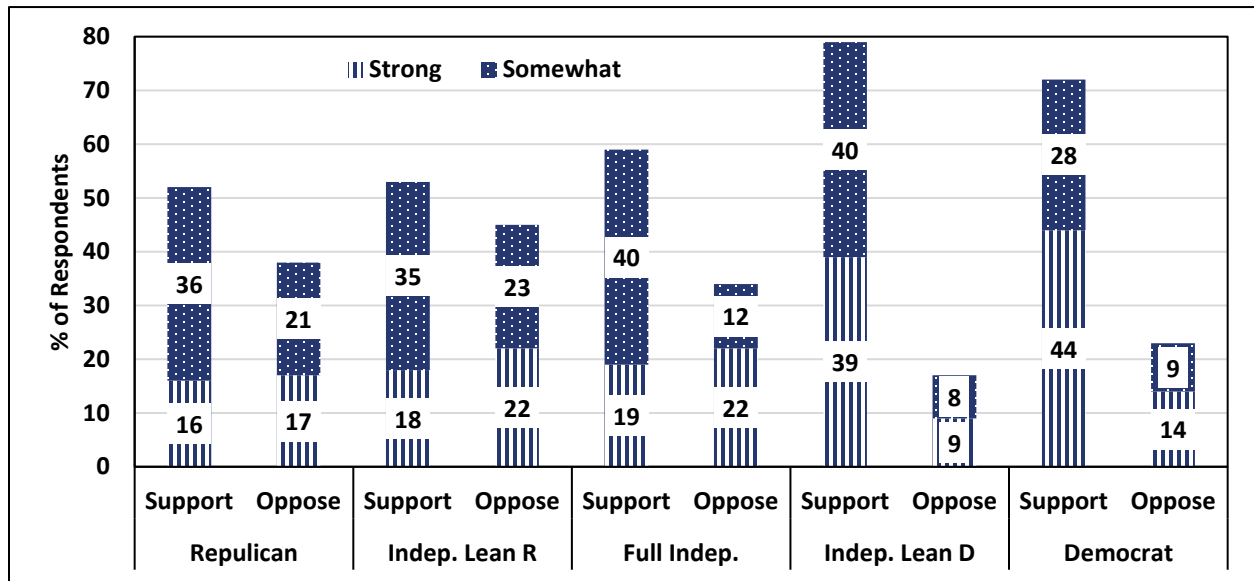
Consumers understand that the technology needed for increasing fuel economy costs money and may increase the overall vehicle cost. To determine if consumers would accept a higher initial price for a vehicle knowing that savings on fuel costs would pay for the fuel economy technology and that they would save money after being ‘paid back’, we asked consumers if they would accept a 3-year payback period. Three out of five consumers support a 3-year payback period for vehicles (see Figure 1.6).

Figure 1.6: Consumers Are Willing to Pay for Fuel Efficiency: 3-year Payback Period



Support for standards among Republicans and independent leaning Republicans is a bare majority, with a 3-year payback period (see Figure 1.7). It rises to 60% among independents and 80 percent among Democrats and independent leaning Democrats.

Figure 1.7: Details on Consumer Support for Standards and 3-year Payback Period



From another perspective, as a practical matter, CFA compared the price and fuel efficiency of 20 “all-new”⁷ vehicles with their 2011 predecessors, the year before the new standards were implemented. These 20 vehicles had 82 different models with Environmental

⁷ Each year only about 10 percent of the model year is made up of truly “all-new” vehicles. Typically, when a new model is introduced, that vehicle essentially stays the same for 5-6 years. This is called a “model series” and while there may be some style and feature changes during a model’s series, the mechanics of the vehicle generally stay the same.

Protection Agency mileage ratings. Of these models, 27% (22) of the “all-new” models introduced in 2018 actually cost less than their 2011 models and all had improved their fuel efficiency. Also, when considering the 5 years of fuel cost savings, half of these 2018 models (42) cost less to buy and fuel than their 2011 predecessors.

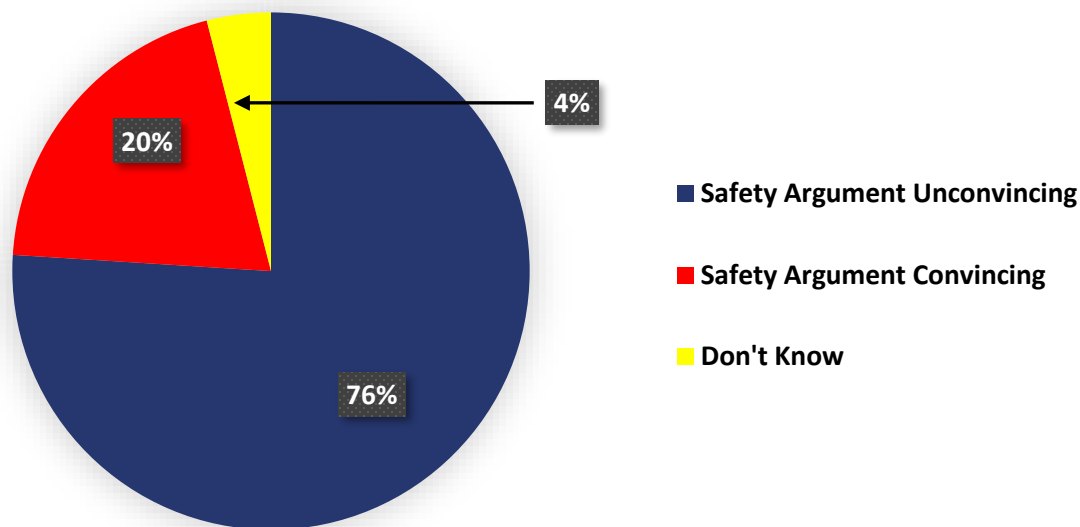
Past Survey Evidence

As shown above in Figure 1.3, in May of 2011, we reported results from a double national random sample poll (2000 respondents)⁸ in which we considered the question of support for standards when specific payback periods were specified. We found that 64% of the respondents supported a 46-MPG standard with 3-year and 5-year payback periods. Even a 10-year payback period garnered majority support (58%). A year earlier in 2010, we asked whether people were willing to pay for the standard set at 46 MPG and found strong majority support (72%) for a five-year payback across all income levels.⁹

FUEL ECONOMY AND SAFETY

One of the rationales that the Trump Administration is using to justify lowering fuel economy standards is the claim that higher standards will diminish auto safety. They reason that more fuel efficient cars will cause people to drive more and therefore will result in more accidents. We asked consumers if they agreed with this logic. A significant majority of consumers (76%), correctly rejected this rationale (see Figure 1.8).

Figure 1.8: Consumers Reject the Trump Administration’s Argument that Lowering Fuel Economy Standards Would Increase Accidents

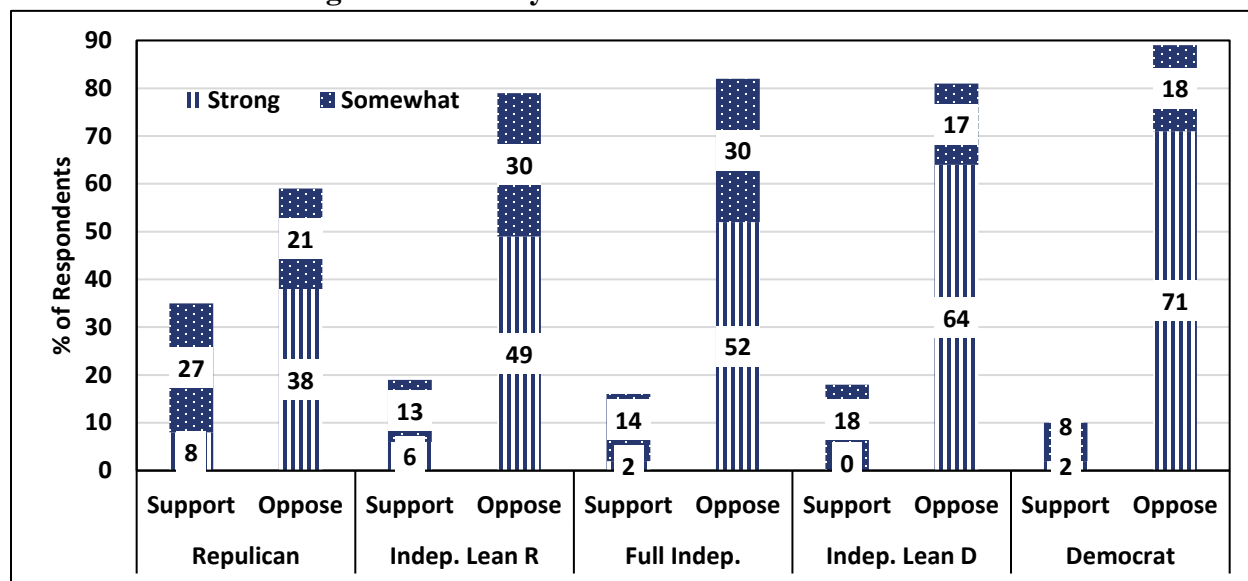


⁸ Mark Cooper, *Rising Gasoline Prices and Record Household Expenditures* (Consumer Federation of America, May 31, 2011), p. 16 (hereafter, 2011 *Double National Sample*).

⁹ 2010 *Issue Brief*, p. 3.

The rejections of the claim about accidents is the strongest and most uniform across political identification of all the responses in the national survey. Republicans (at 60%) to all types of independents at about 80% and Democrats at 90% reject this claim (see Figure 1.9).

Figure 1.9: Details on Consumer Rejection of the Trump Administration’s Argument that Lowering Fuel Economy Standards Would Increase Accidents



From another point of view, the reality is today’s more fuel-efficient vehicles are also safer. The average number of high-tech [safety features](#)¹⁰ has increased from between 2011, the year before the standards were enacted and 2018. Looking at 2018’s “all-new” vehicles, they now include an average of 12.3 advanced safety features¹¹ such as blind-spot detection and lane keeping assist, compared to an average of only 7.4 in 2011 the year before the standards were enacted. Specifically looking at [crashworthiness](#), when CFA looked at all 19 of the new 2018 models, which NHTSA crash tested and had a crash test for the previous model. We found that 14 models weighed less and had better fuel efficiency than the previously crash tested vehicles. Of those lighter vehicles, NHTSA gave 8 of the 14 the exact same crash test rating as the previous version and 6 actually received better crash test ratings.

STATE’S RIGHT TO SET A HIGHER STANDARD

Current Survey

In addition to rolling back the popular national fuel economy standards, the Trump Administration plans to revoke states’ rights to adopt their own emissions standards which lead

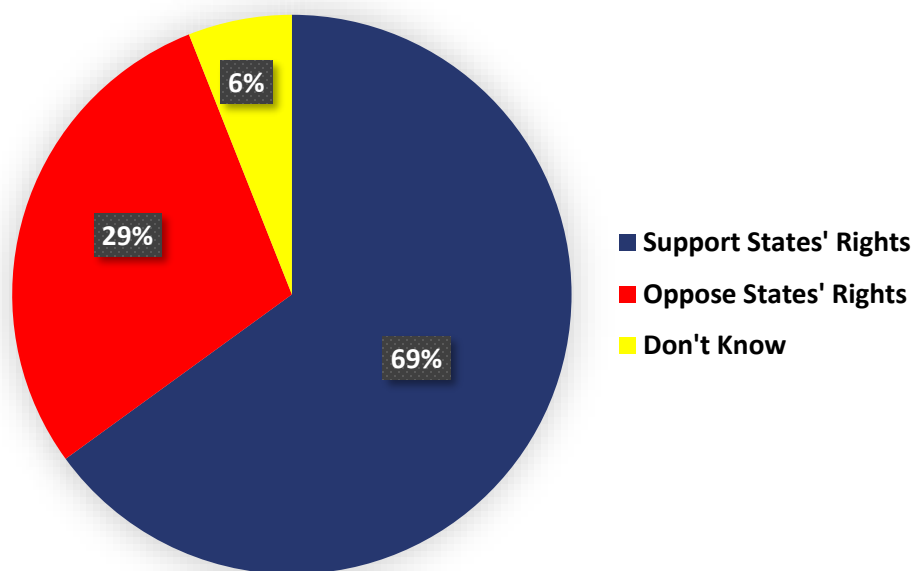
¹⁰ We examined the presence of four critical safety features—automatic emergency braking, blind spot detection, lane keeping assist, and pedestrian crash avoidance—and determined the average presence of those features in the 2011 fleet versus the 2018 fleet, using the data from NHTSA’s safecar.gov.

¹¹ The 15 features we reviewed included Head Airbag, Torso Airbag, Knee Airbag, Roll Sensing, Stability Control, Frontal Collision Warning, Collision Avoidance, Lane Departure Warning, Lane Keep Assist, Blind Spot Detection, Auto Crash Notification, Day Running Lamps, Dynamic Head Restraints, Pretensioners, and Adjustable Front Belts using data from NHTSA’s safecar.gov.

to increased fuel economy. Over forty years ago the Clean Air Act established a very cautious approach to allowing states to adopt an alternative standard to improve air quality. To prevent the chaos of fifty different state standards, the law allowed EPA to authorize California to adopt its own standard. States can then choose to follow either the California standard or the federal standard. Setting of clean air standards has direct and unavoidable consequences for fuel economy because the reduction of consumption of petroleum is the most direct and least costly way to reduce pollution. The physics of the emission of pollutants that results from the burning of fossil fuels is inextricably linked to the economics of pollution reduction.¹²

The ability of states to adopt an alternative standard is currently used by twelve states and Washington DC, representing 113 million Americans and over a third of the automotive market (with Colorado planning to join). Almost 2 out of 3 Americans support a state's right to adopt standards resulting in greater fuel efficiency, as shown in Figure 1.10. States' rights have always been a tenant of Republican administrations, so it is ironic that the Trump Administration is suggesting revoking of this right.

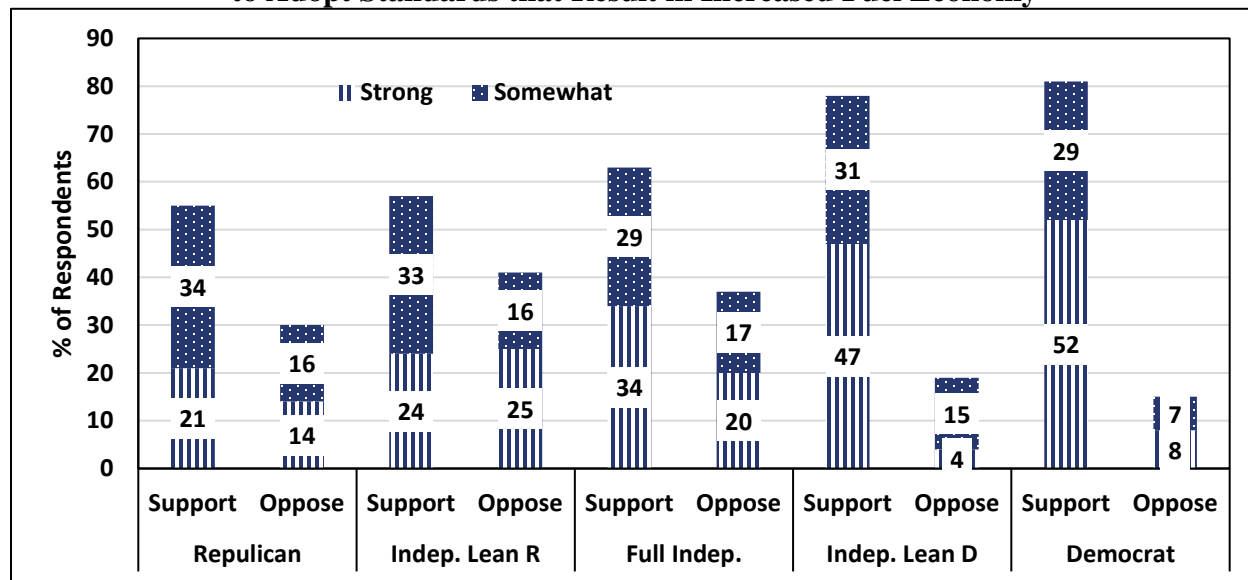
Figure 1.10: Consumers Believe That Individual States Should be Have the Right to Adopt Standards that Result in Increased Fuel Economy



¹² This is a point we have consistently made in our comments on standards and support for the clean cars states. Comments of the Consumer Federation of America, before the Department of Transportation, Office of the Secretary of Transportation, Re: Notification of Regulatory Review: 14 CFR Chapters I, II, and III, 23 CFR, Chapters I, II, and III, 46 CFR Chapter II, 48, CFR Chapter 12, 49 CFR Chapters I, II, III, V, VI, VII, VIII, X, and XI, Docket No. DOT-OST-2017-0069, November 1, 2017; Comments of the Consumer Federation of America on the California Air Resources Board *Mid-Term Review*, March 24, 2017; Comments of the Consumer Federation of America, Before the Environmental Protection Agency, Evaluation Draft Technical Assessment Report for Model Year 2022-2025 Light Duty Vehicle GHG Emissions and CAFE Standards, EPA-HQ-OAR-2015-0827; NHTSA-2016-0068; FRL-9949-54-OAR, Department Of Transportation RIN 2060-AS97; RIN 2127-AL76, September 26, 2016.

The two-thirds support for states' rights to adopt a second standard is composed of a modest majority of support among Republicans (55%) and Republican leaning independents (57%), as shown in Figure 1.11. This rises above 60% among full independents and 80% among Democratic leaning independents and Democrats.

Figure 1.11: Detail on Consumer Support for the Right of Individual States to be Allowed to Adopt Standards that Result in Increased Fuel Economy

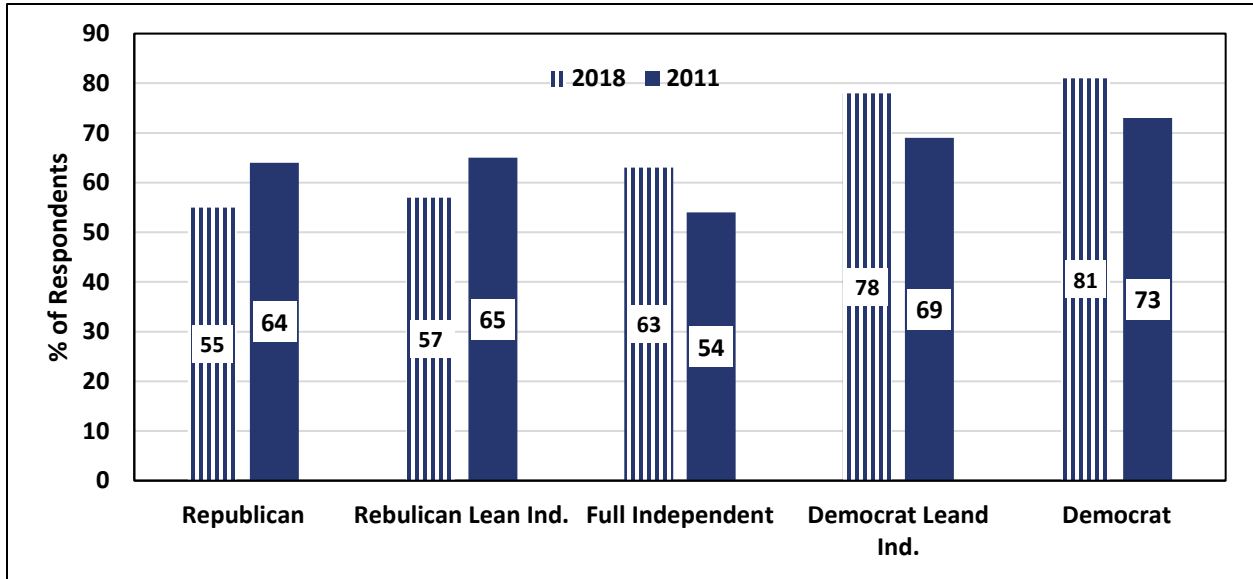


Past Survey Evidence and Political Orientation

In 2011, we asked respondents about their attitude toward states adopting a second, higher standard (see Figure 1.12). We found that support for state standards in the 2011 survey¹³ mirrors the support reported in the 2018 survey. Support among Republicans and Republican leaning independents is around 65%. For full independents, support is somewhat lower, still a majority (54%). Support increases among Democrat leaning independents (69%) and Democrats (73%).

¹³ 2011 Double National Sample, p. 3

Figure 1.12: Political Orientation and State Standard: 2011 and 2018

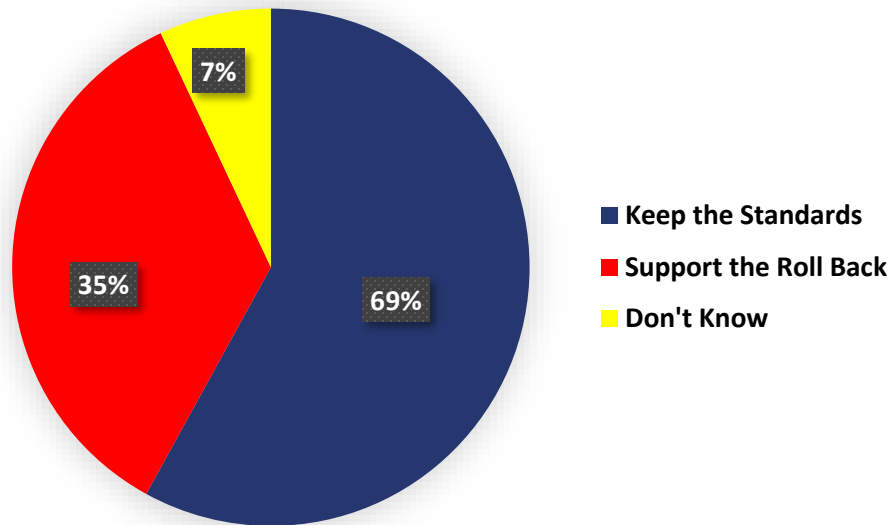


ATTITUDES TOWARD ROLLBACK

Current Survey

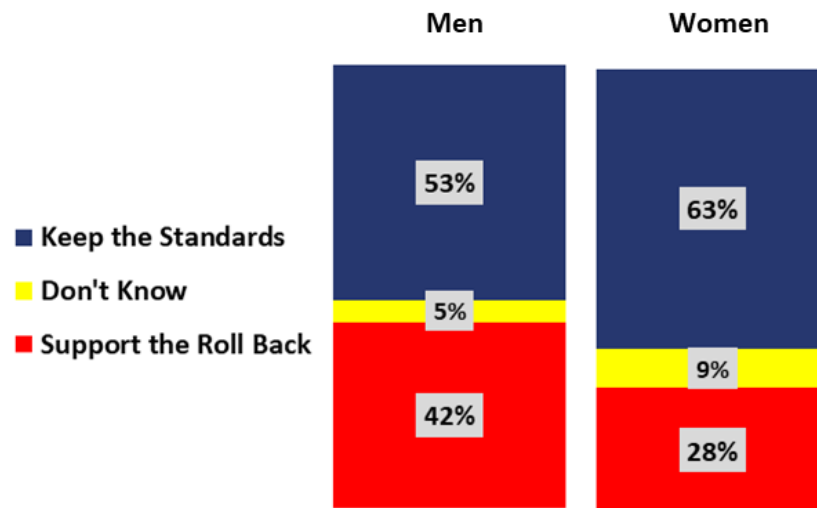
The Trump Administration’s plans to freeze the highly-popular, cost-saving fuel economy standards, which were agreed to by all of the stakeholders, including the car companies, at their 2020 level is about 24% below the original target. When consumers were asked whether the president should roll back the standards, almost 3 out of 5 said keep the standards (see Figure 1.13).

Figure 1.13: Attitudes Toward Rollback: Support for Current Fuel Economy Standards



While a majority of the public doesn't want a rollback of the standards, interestingly more women than men want the standards to stay in place (see Figure 1.14).

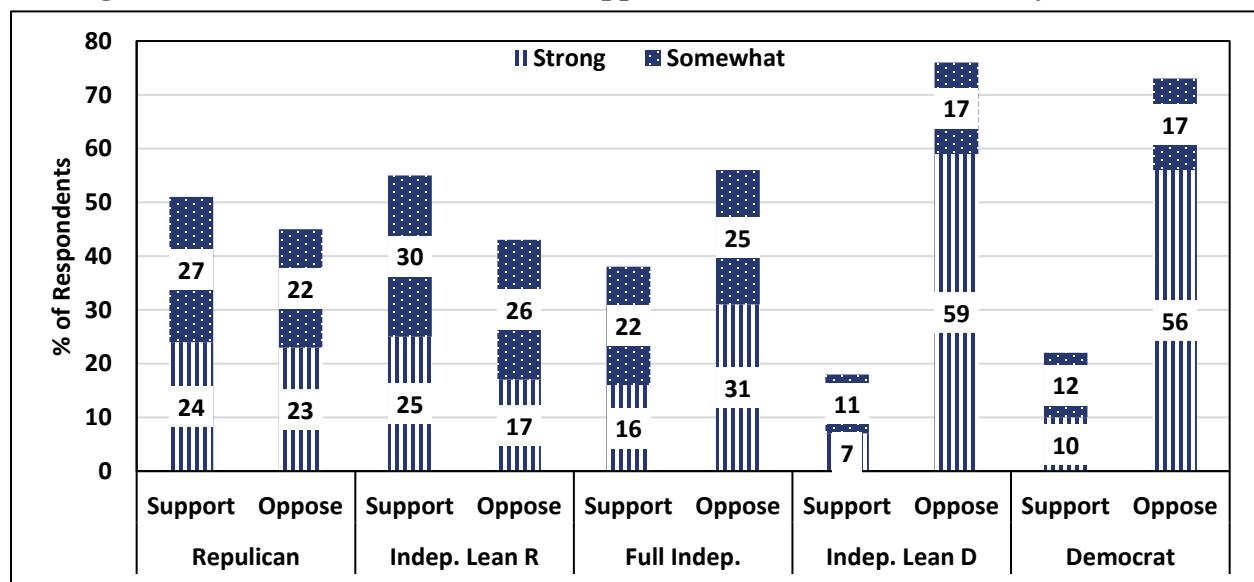
Figure 1.14: Support for the Keeping, Not Rolling Back the Fuel Economy Standards is Greater Among Women



Political Orientation

Looking at the attitudes toward the rollback in detail, we see a sharp divide between Republicans and Others, as shown in Figure 1.15. A bare majority of Republicans (51%), and Republican leaning independents (55%) support the rollback. The remainder of respondents oppose it. A majority of full independents oppose the rollback (55%) and over 70% of Democrat leaning independents and Democrats do so, as well.

Figure 1.15: Detail on Rollback and Support for Current Fuel Economy Standards



Past Survey Evidence

In the polls conducted since the election, we did not ask questions about the rollback of standards, but we do note that respondents express strong support for the level chosen in the National Program. In surveys conducted in 2013, 2014 and 2016 (post-election), we found strong support for the standards across political orientations.¹⁴ The 2016 data shows a dip of 5% in support for the current standards down to 78%, and the most recent survey in 2018, shows a further decline, but continuing majority support (69%) for the standards.

We did, however, in 2016 (post-election), broach the broad question of a rollback indirectly by noting that automakers had been raising the issue and were among the first industries to visit the White House seeking a change in the rules.¹⁵ We asked respondents how this action would affect their support for the standards. As shown in Figure 1.16, among Republicans, the percentage saying it would increase support (49%) exceeded those who said it would lead them to oppose the standard (28%). Among independents the difference is sharper (52% would increase support to 15% would oppose) and sharper still among Democrats (72% to 8%).

¹⁴ *2016 Post-Election Survey*, p. 19

¹⁵ *2016 Post-Election Survey*, p. 22.

2. STATE LEVEL ANALYSIS

METHODOLOGY

In order to examine public opinion about standards and the current policy debate at this crucial moment, CFA undertook a deep dive into the national data by examining groups of states. In addition to conducting a national consumer survey, we also surveyed Americans in four states whose economies are heavily dependent on the auto industry: Indiana, Michigan, Missouri, and Ohio.

Combining the two current surveys, we have adequate sample sizes to examine public opinion in four groups of states. The groups are described in Table 2.1.

1. **Clean Cars states** have adopted the standard set by California as allowed under the Clean Air Act.
2. A second group of **Climate Concerned states** is composed of states in which mayors of major urban areas have committed to the clean Cars standards, or states that have joined the Climate Alliance.
3. **Automotive states** as defined above.
4. **Other states**

Table 2.1: Groups Used for Analysis

Groups of States	Entities	National Sample (n)
Clean Cars	CA CO, CT, DC, DE. MA, MD, ME, NJ, NY, OR, PA, RI, VT, WA	350
Clean Cars Mayors	FL: Miami, Fort Lauderdale, Orlando, St. Petersburg, Tampa GA: Atlanta, +4 TN: Nashville, Memphis TX: Austin, Dallas, Houston, San Antonio AZ: Phoenix, Tucson, +3	224
Climate Alliance	NM. IA, IL, NC, VA, MN	94
Auto States	IN, MI, MO, OH	106
Other	AL, AR, ID, KS, KY, LA, MS, ND, NE, NH, NV, OK, SC, SC, UT, WI, WV, WY	226

This auto state survey was on an online survey of 400 respondents in each state between August 8-14. Although this is a self-selected sample, it is carefully weighted to be representative. Because we have the contemporaneous national random sample, we can compare the group of auto states in the two polls. We find that, as a group, the attitudes are similar in the national and state level surveys.

In an earlier, double national random sample survey, we had taken a similar approach, so we have a baseline for comparison. The responses to the current survey are similar to the prior double national random sample survey.

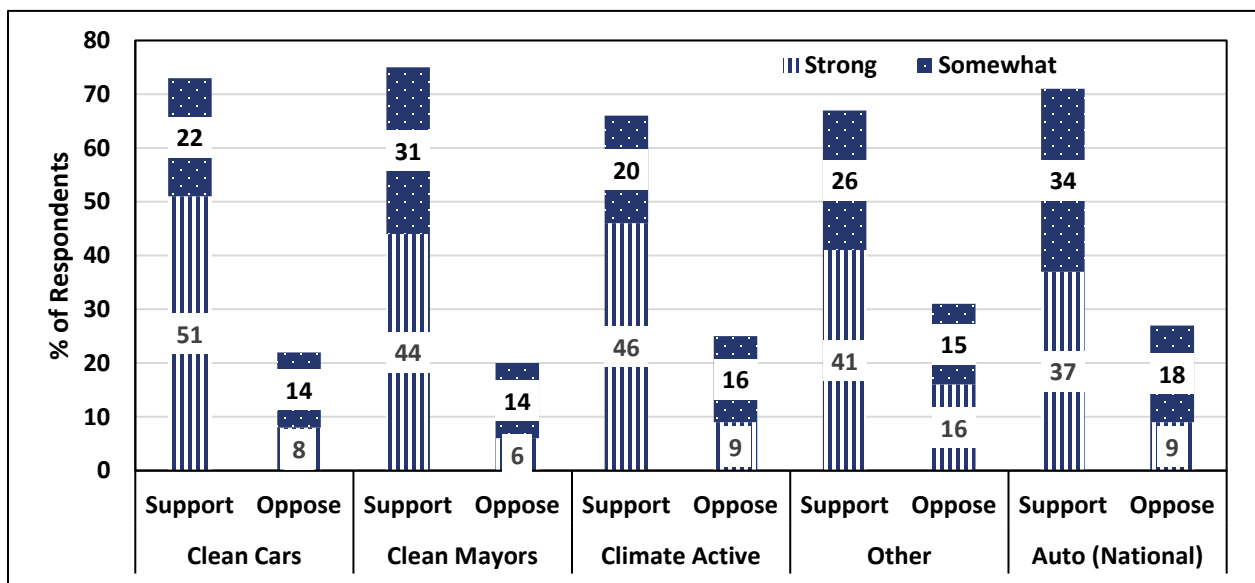
SUPPORT FOR STANDARDS

Current Survey

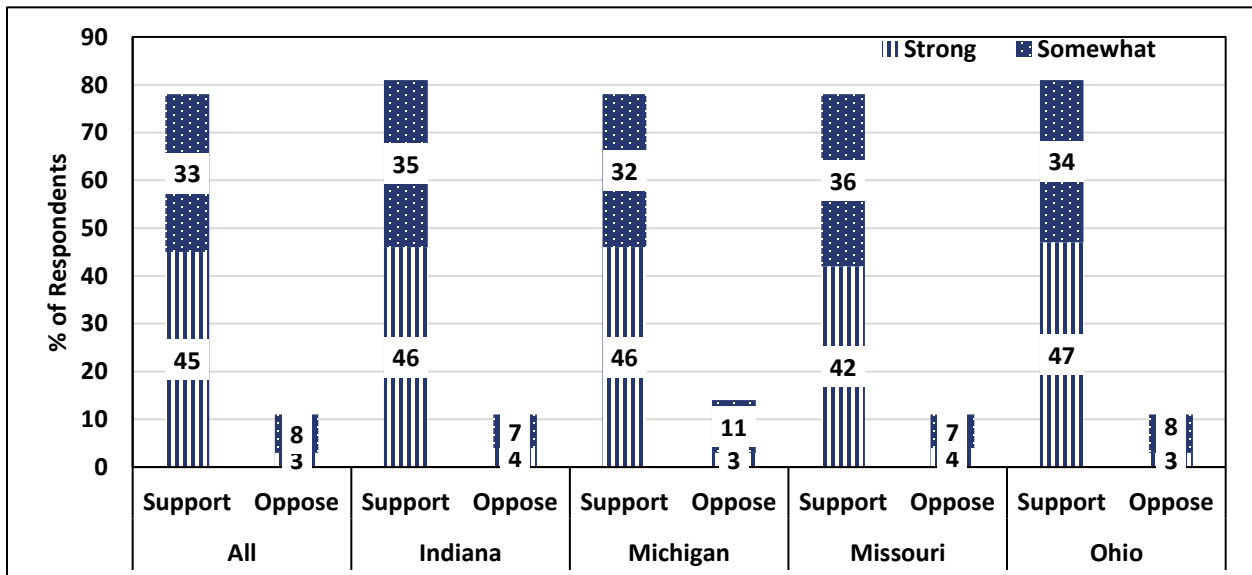
We observe consistent support for standards in every group of states (see Figure 2.1). In the national survey, about 70% of respondents supports standards in each group of states. Strong support hovers around 40%, while strong opposition is in single digits for all groups, except the “other” states, where it is 16%.

Figure 2.1: Support for Federal Fuel Economy Standards

Across Groups of States



In Auto States



Respondents to the online survey in auto states express somewhat stronger support for standards, as support is closer to 80% in each state. In the aggregate, the difference is not very great (78% to 70%). Because the sample size for the auto states is small, we rely on the much larger online survey for further analysis.

The following table compares the responses to the national survey to those from the state surveys. The pattern for the responses to the other questions is similar to the support for standards. None of the differences are statistically significant, except for the response to the rollback question, where the auto states respondents were less opposed to the rollback. The percentage who oppose the rollback still exceeds the percentage that supports it by a substantial margin (49% to 39%). Thus, the difference between the national and state surveys does not alter any of the conclusions we draw.

Table 2.2: Comparing Auto State Responses in the National and State Surveys

Attitude	Strength	Standards		3-year Payback		Rollback		Accident Claim		States' Rights	
		National	State	National	State	National	State	National	State	National	State
Support	Strong	37	45	25	25	11	14	5	7	33	31
	Somewhat	34	34	40	45	21	25	17	17	36	37
Oppose	Strong	18	3	14	6	39	22	55	42	12	7
	Somewhat	9	8	17	15	26	27	21	34	17	13

POLITICAL ORIENTATION AND SUPPORT OF STANDARDS

Looking at the support for the standards across the four groups of states, we find that in all three groups of states and all four automotive states, using five political categories, a majority of respondents supports standards in 33 of 35 of the subgroups. (see Table 2.3) The exceptions are independent, full independents in climate aware states and Republican leaning independents in other states.

Table 2.3: Support for the Standards Across the Political Spectrum

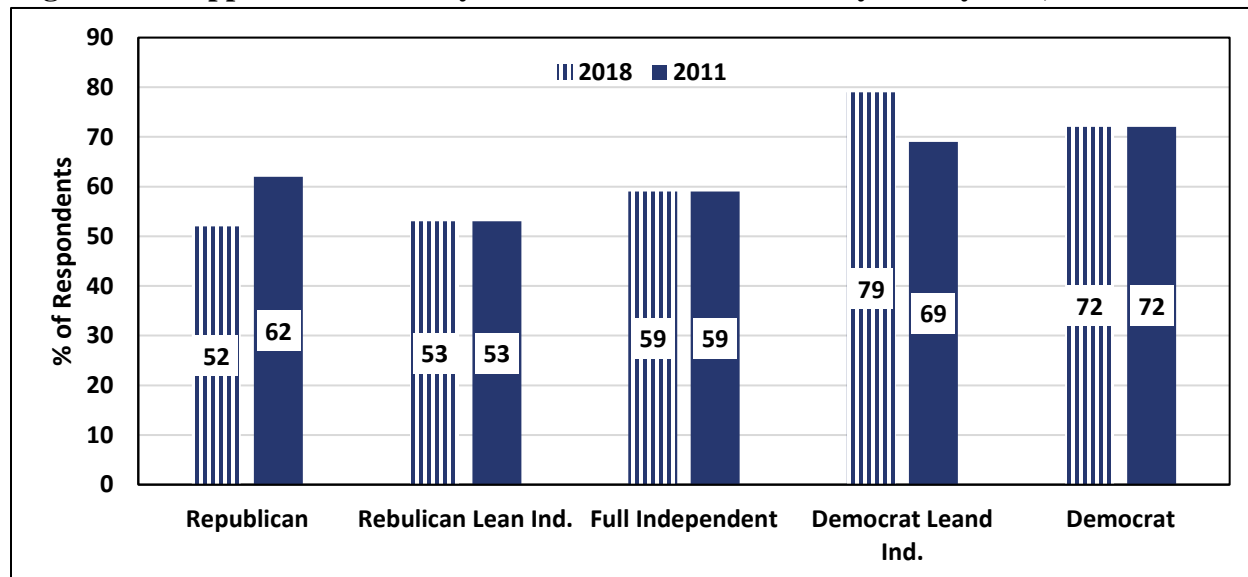
		Clean Cars	Climate Aware	Auto	Other	Indiana	Michigan	Missouri	Ohio
Republican	Support	65	60	58	52	57	58	63	69
	Oppose	30	35	29	44	12	20	10	15
Ind. Lean R	Support	63	61	76	47	72	73	78	73
	Oppose	35	28	24	51	12	19	17	12
Ind. Ind.	Support	77	42	69	78	84	86	83	84
	Oppose	18	57	31	20	5	7	6	9
Ind. Lean D	Support	80	90	99	98	74	78	82	71
	Oppose	16	8	0	2	23	16	13	18
Democrat	Support	80	78	80	73	85	85	85	84
	Oppose	13	19	27	28	7	6	6	10

See Appendix C for a detailed breakdown of responses by strength of attitude.

Past Survey Evidence

Our 2011 double national sample survey enabled us to create groups of states similar to those reported above. At the time we did not break out “climate concerned” states, as it is only recently that this category has become relevant in a reaction to the Trump Administration’s withdrawal from the Paris Agreement on climate change and its hostility to increasing the fuel economy standards after 2020. The results are quite consistent with the findings of the current survey, as shown in Figure 2.2.

Figure 2.2: Support Standards by Political Orientation and 3-year Payback, 2011 and 2018



Using the 3-year payback period, which is comparable to the current survey, we find clear majority support for the 46-MPG standard, with Clean Cars states (66%) slightly higher than the Automotive (63%) and Other states (62%).¹⁶ The support for the policy across political identifications in the 2011 study also follows the current survey. Democrat leaning independents (69%) and Democrats (72%) were most supportive, while Republicans (62%) were less so. Republican leaning independents were least supportive (53%), while full independents were slightly more supportive (56%).¹⁷ There has been a 10-percentage point decline in support among Republicans and a 10-percentage increase among Democrat leaning independents, with the other groups identical in the two surveys.

SUPPORT FOR STANDARDS AND PAYBACK PERIODS

Current Survey

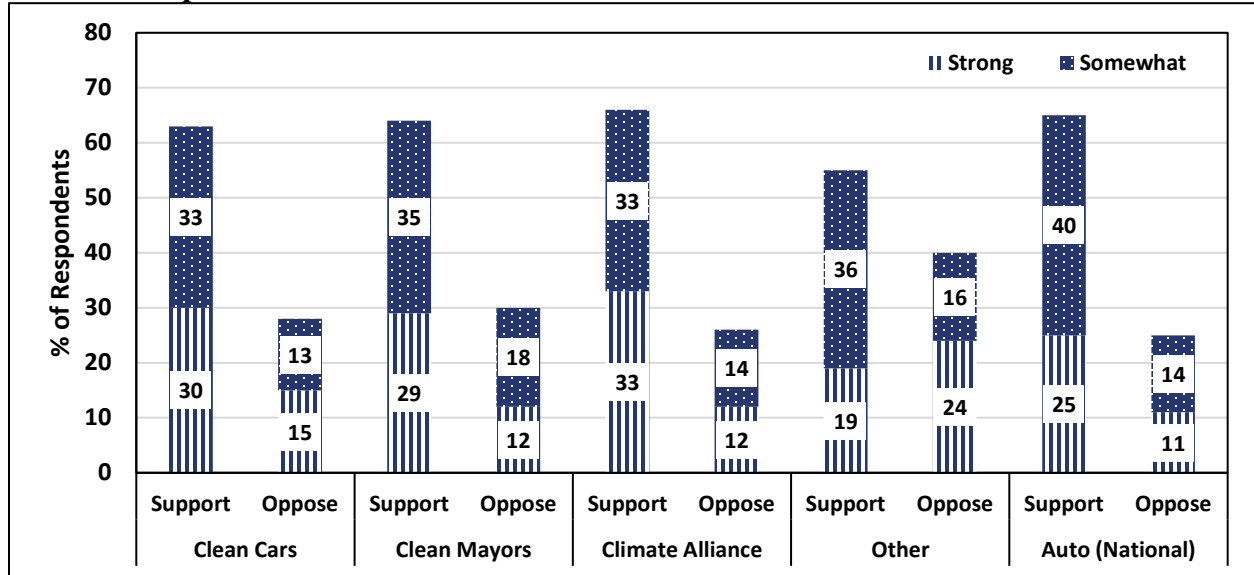
The stipulation of a three-year payback period shifts respondents’ overall support for standards (see Figure 2.3). However, clear majorities across all the groups of state continue to support standards.

¹⁶ 2011 Double National Sample, p. 16

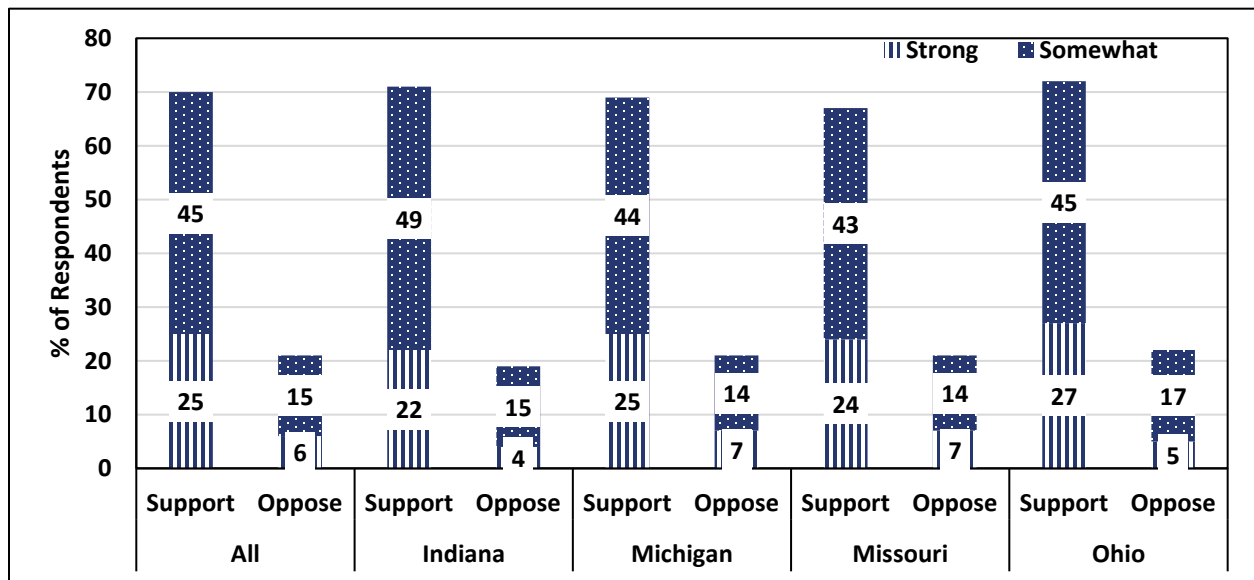
¹⁷ 2011 Double National Sample, p. 16

Figure 2.3: Details on Consumer Support for Standards with a 3-year Payback Period

Across Groups of States



In Auto States



Political Orientation

Support for standards with a payback period is consistent across the groups and political orientations (see Table 2.4). In only two of the subgroups, (both Republican) is there majority opposition. In all 38 other comparisons, support exceeds opposition, with 36 being majority and 2 being a plurality.

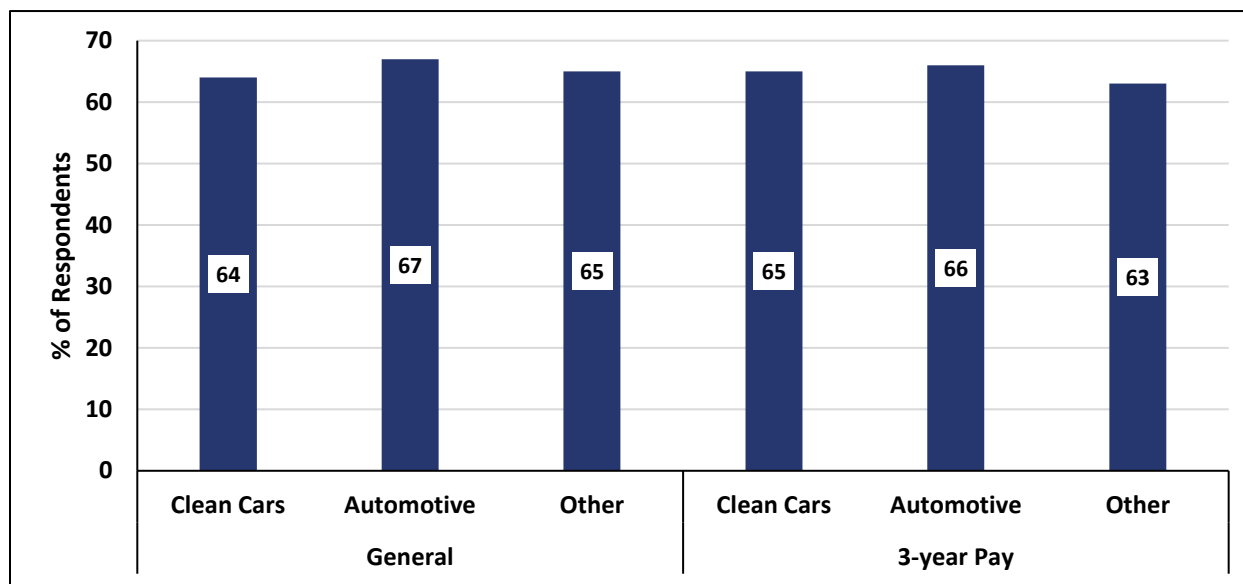
Table 2.4: Attitudes toward Standards Across State Type and Political Orientation: 3-year

		Clean Cars	Climate Aware	Auto	Other	Indiana	Michigan	Missouri	Ohio
Republican	Support	46	63	48	42	58	62	45	59
	Oppose	35	29	50	52	24	25	29	26
Ind. Lean R	Support	39	58	69	54	62	57	57	68
	Oppose	59	42	31	30	23	30	24	26
Ind. Ind.	Support	56	61	66	56	73	81	77	77
	Oppose	33	30	34	38	16	12	13	16
Ind. Lean D	Support	66	78	74	67	63	67	68	61
	Oppose	13	14	26	28	29	20	24	22
Democrat	Support	80	68	83	58	85	81	77	80
	Oppose	15	24	16	42	13	12	17	15

Past Survey Evidence on Payback Period

In the 2011 survey, we found support for the standards in the range of mid-60% with both the 3-year and 5-year payback periods across the different types of states, as shown in Figure 2.4).¹⁸

Figure 2.4: 2011 Support for State Standard by State Type: General and 3-year Payback



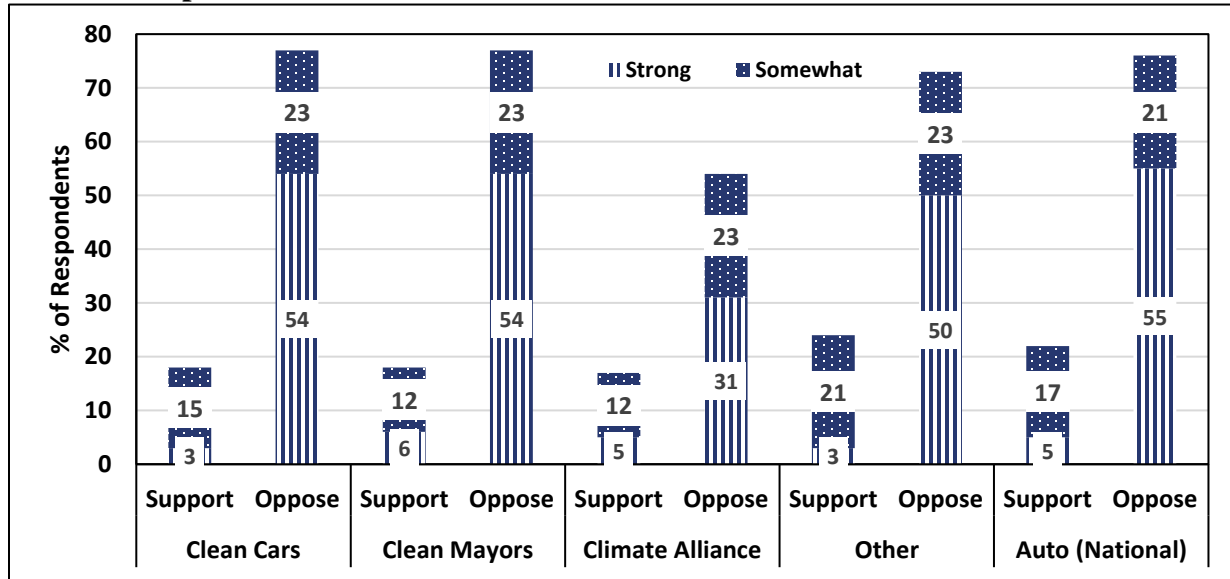
FUEL ECONOMY AND SAFETY

The rejection of the claim that increases in fuel economy will lead to more accidents is quite strong across the groups of states, as shown in Figure 2.5. Between 70% and 80% of the respondents reject this claim in all the groups and individual states.

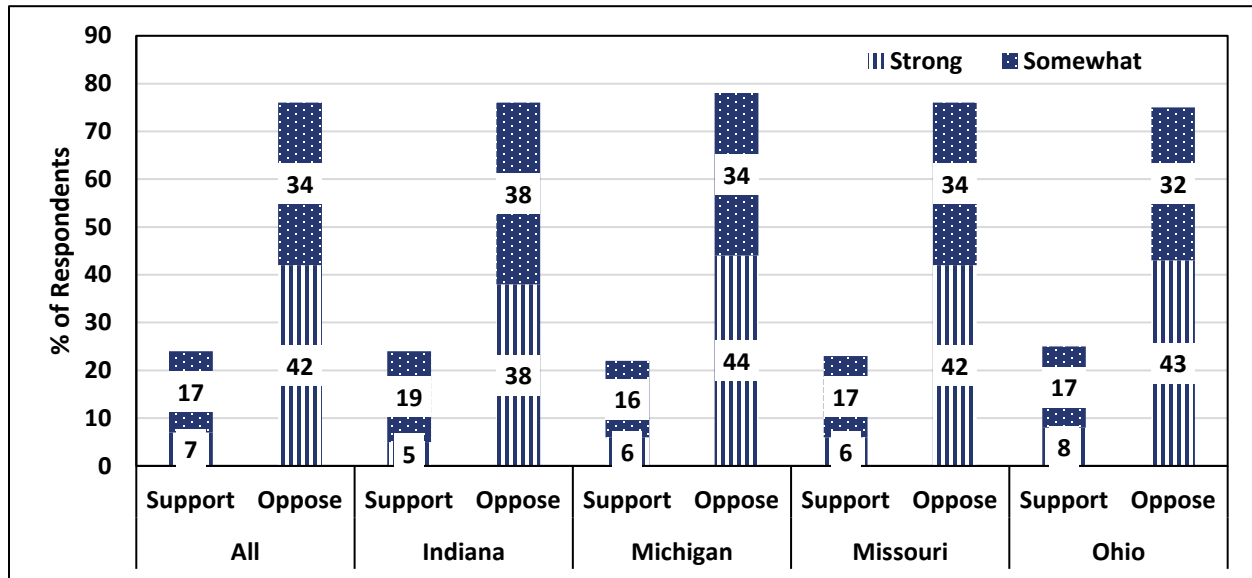
¹⁸ 2011 Double National Sample, p. 3

Figure 2.5: Detail on Consumer Rejection of the Trump Administration’s Argument that Lowering Fuel Economy Standards Reduces Accidents

Across Groups of States



In Auto States



Introducing the political orientation reinforces this conclusion, as shown in Table 2.5. In 39 of the 40 subgroups, a majority rejects the claim, only in one case (Democrat leaning independents in Indiana) is there a bare majority that sees it the other way.

Table 2.5: Attitudes Toward Fuel Economy and Safety Across State Type and Respondent Political Leaning

		Clean Cars	Climate Aware	Auto	Other	Indiana	Michigan	Missouri	Ohio
Republican	Support	34	34	32	33	25	24	22	21
	Oppose	56	58	54	63	78	76	81	79
Ind. Lean R	Support	20	14	28	28	36	31	35	38
	Oppose	74	86	72	72	65	79	65	62
Ind. Ind.	Support	18	8	7	7	8	12	20	20
	Oppose	79	90	87	87	91	88	80	80
Ind. Lean D	Support	23	20	15	15	51	24	34	25
	Oppose	77	80	75	86	49	76	66	75
Democrat	Support	19	6	20	20	12	16	11	16
	Oppose	78	94	70	70	88	84	89	84

STATES' RIGHTS TO ADOPT A HIGHER STANDARD

Current Survey

Analyzing the responses to the question of state adoption of a different standard reinforces the earlier conclusion. Support for states' rights is in the mid-to upper 60% range across all states and state groups. Strong support is in the low to mid 30% range (see Figure 2.6).

Political Orientation

Introducing the political orientation and geographic area variables reinforces the general conclusion. There is majority support across the board, with only on case (Republican leaning Independents in Clean Cars States) where a small majority opposed states' rights (see Table 2.7).

Past Survey Evidence

The historical pattern of support for a state adopting a second standard shows consistent strong support across the period of the National Program. Support is slightly stronger in the 2018 survey, with Clean Cars states increasing by 7 percentage points.

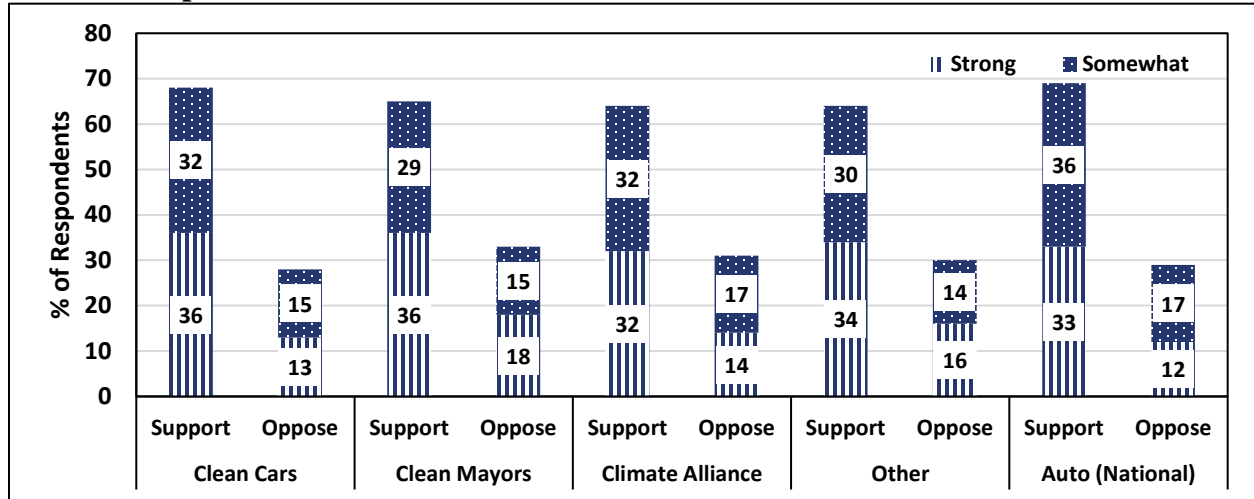
ATTITUDES TOWARD ROLLBACK

Current Survey Evidence

As was the case for the national numbers, opponents of the rollback exceed supporters by a substantial margin (see Figure 2.8). In the national survey, the percentage of those opposing the rollback is around 60%, while the percentage for those supporting rollback is in the mid-30% range. In the auto states, the figures are about 50% in opposition to rollback compared to 39% in support.

Figure 2.6: Consumers Believe That Individual States Should be Allowed to Adopt Standards that Result in Increased Fuel Economy

Across Groups of States



In Auto States

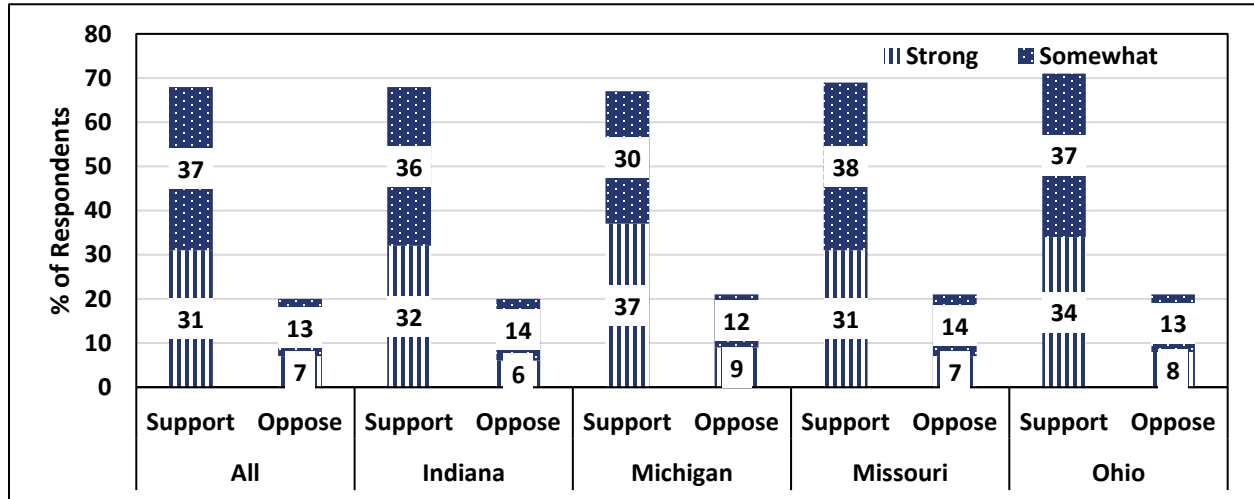


Table 2.7: Attitudes Toward State Setting of an Alternative Standard Across State Type and Respondent Political Leaning

		Clean Cars	Climate Aware	Auto	Other	Indiana	Michigan	Missouri	Ohio
Republican	Support	57	63	49	71	52	69	65	59
	Oppose	35	29	49	25	21	18	9	21
Ind. Lean R	Support	45	58	68	51	67	59	61	73
	Oppose	53	42	32	48	18	29	29	22
Ind. Ind.	Support	58	61	73	59	71	67	70	73
	Oppose	28	30	23	39	24	24	20	15
Ind. Lean D	Support	86	78	79	71	72	62	68	57
	Oppose	14	14	21	27	23	27	29	36
Democrat	Support	83	68	88	72	73	75	78	73
	Oppose	14	24	12	21	17	12	15	18

Figure 2.7: Historical Support for State Standard Setting: 2011 and 2018

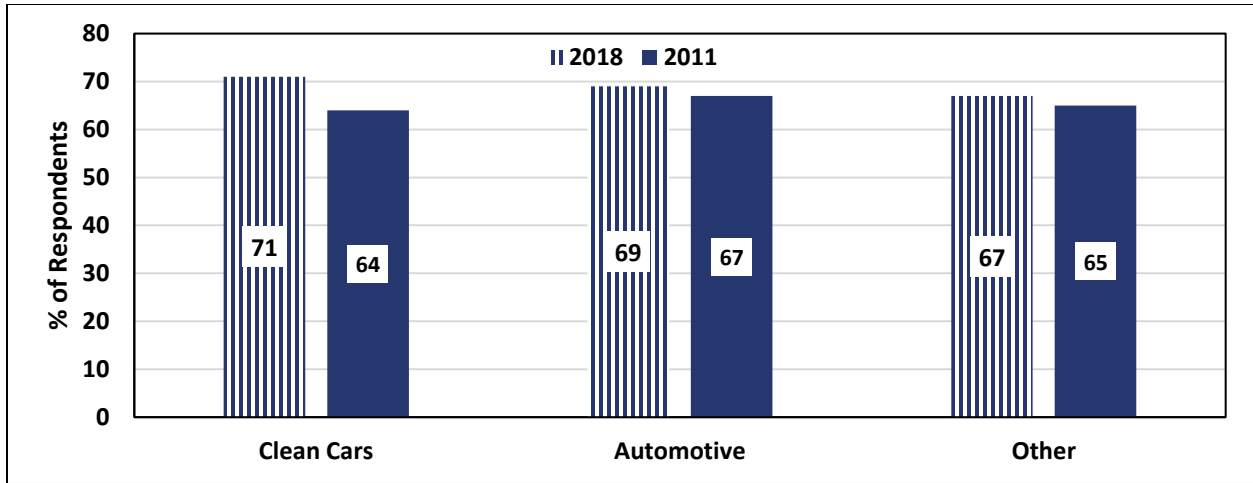
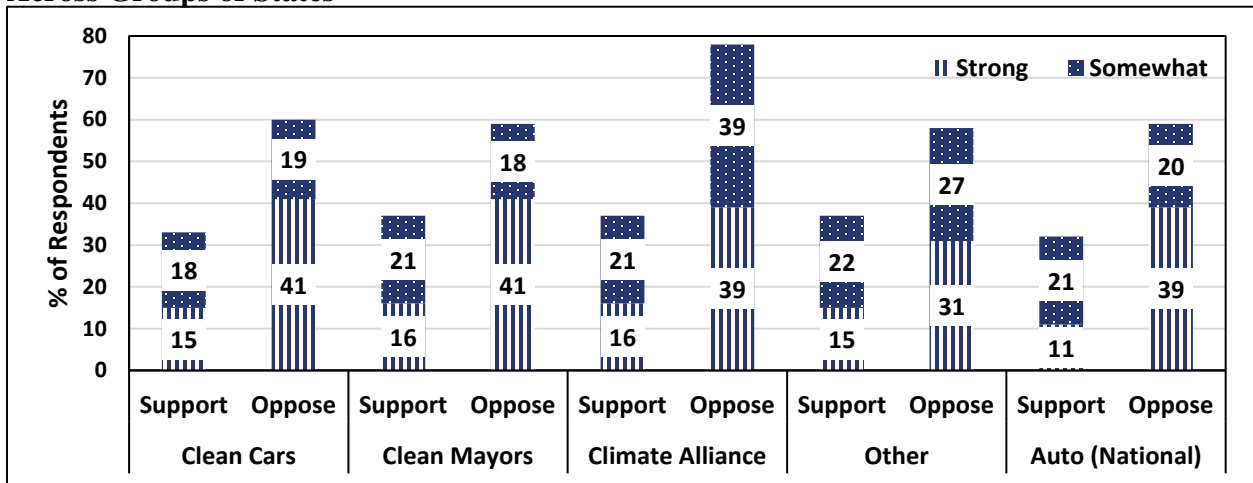
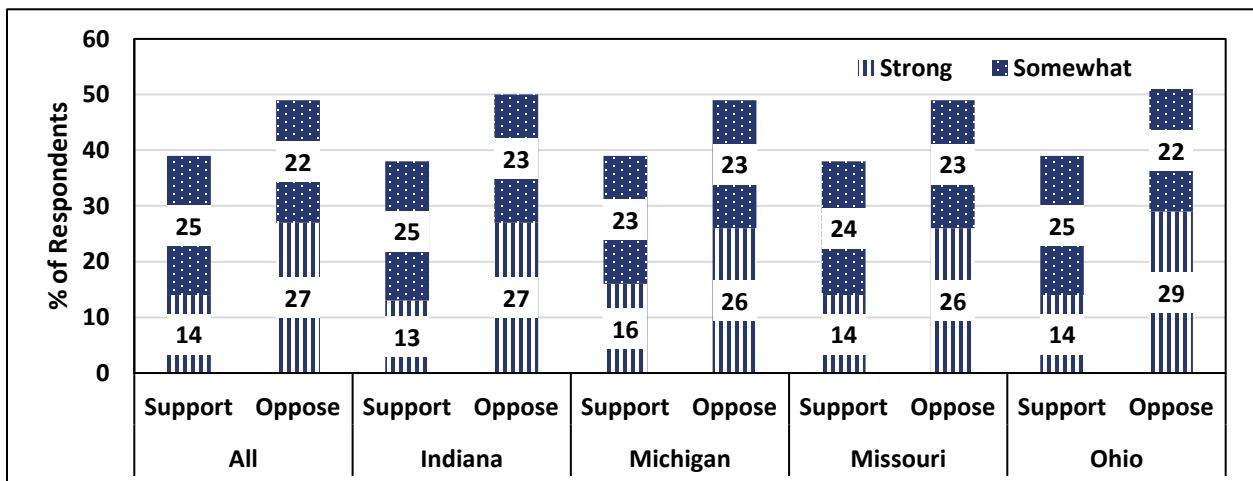


Figure 2.8: Detail on Rollback and Support for Current Fuel Economy Standards

Across Groups of States



In Auto States



POLITICAL ORIENTATION AND ROLLBACK

The attitudes of respondents toward a rollback in the four groups of states is very mixed but also exhibits the divisive nature of the policy, as shown in Table 2.8. On average, all of the Democrats and Democrat leaning independents oppose the rollback by substantial majorities in the groups of states. Pluralities of Democrats in the automotive states also oppose the rollback, but majorities of Democrat leaning independents in those states support the rollback. In the automotive states, a large majority of independents that do not lean to either party oppose the rollback, as does a majority in all of the other groups of states. On the Republican side, all of the Republican leaning independents support the rollback by majorities, but Republicans oppose it with majorities in the automotive and other states. The conclusion reached on the basis of the national survey is supported by this analysis. The rollback lacks majority support and is politically divisive.

Table 2.8: Attitudes Toward Rollback Across State Type and Respondent Political Leaning

		Clean Cars	Climate Aware	Other	Indiana	Michigan	Missouri	Ohio
Republican	Support	59	50	45	33	35	33	36
	Oppose	27	48	52	40	47	40	41
Ind. Lean R	Support	58	53	58	59	56	60	58
	Oppose	37	46	40	31	30	29	32
Ind. Ind.	Support	41	41	37	13	19	16	22
	Oppose	52	52	59	76	71	70	73
Ind. Lean D	Support	20	20	15	57	60	55	50
	Oppose	75	75	76	34	33	37	46
Democrat	Support	18	18	28	21	26	18	24
	Oppose	75	75	62	70	64	72	68

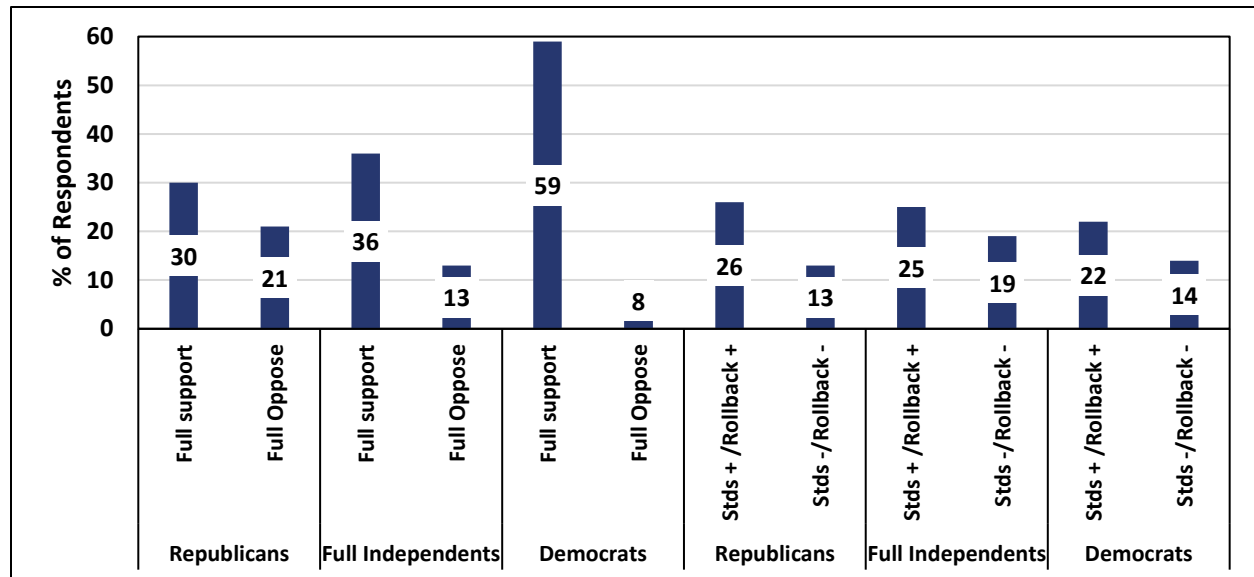
The rollback proposal not only divides Republicans and Republican Leaning Independents from the rest of the population, it also divides Republicans, as shown in Figure 2.9. Thirty percent of these two groups fully support standards (i.e. they support standards in general and oppose the rollback). However, 21 percent of these two groups fully oppose standards (i.e. oppose standards in general and oppose the rollback), a ratio of 3-2. Another, 26 percent of these two groups are conflicted about their positive view of standards (i.e. the support them in general but also support the rollback.) Among full independents, a higher percentage fully support and a lower percentage fully oppose, for a ratio of almost 3-to-1. Pro standards conflicted independents are 25%. Democrats are much less divided with 59% being full supporters and only 8 percent being in full opposition, a ratio of supporters to opposers of over 7-to-1. The positive conflicted respondents represent about the same percentage as among Republicans.

This analysis of public opinion about the National Program to raise fuel economy to 42-mpg by 2025 covers the period from 2010 to today and shows that the overwhelming majority of Americans supports fuel economy standards and rejects the Trump administration's proposal to roll the standards back, in part because they reject the safety claims made for the rollback and the claim that the ability of states to write higher standards must be denied.

More than just being unpopular with a clear majority, the rollback is also a divisive policy that not only sets Republicans against the majority of independents and Democrats, it also

fractures the Republicans in the survey. While one-fifth of Republicans are "full" opponents of standards (i.e. against standards and support the rollback), almost one-third are the opposite – support standards and oppose the roll back. More than one third are conflicted by the Trump Administration’s proposal, supporting standards, but also supporting the rollback.

Figure 2.9: Divided and Conflicted Attitudes Across Political Orientations



To put this another way, only about 9% of respondents are strident opponents of the National Program (i.e. oppose standards and want to roll them back). Of these, about two thirds (6%) are Republicans or Republican leaning independents. In contrast, over 40% are strident supporters of the program (i.e. support standards and oppose rollback), and 15% are supportive of the program, but conflicted by the rollback. If we add in those who did not declare a political identification, the total number of strident opponents rises only to 10%, while the percentage of strident supporters rises to 43% and the supportive/conflicted rise to 18%. Thus, the negative/conflicted respondents (oppose standards and oppose the rollback) constitute about 29% of the total.

CONCLUSION

Our detailed economic analysis of fuel economy standards, including the recent National Program, well as the entire history going back forty years and our preliminary analysis of the Notice of Proposed Rulemaking give a good indication of why consumers are right to support the standards and oppose the rollback.¹⁹ The rollback is bad economic policy that will harm consumers and the economy by draining consumer pocketbooks of half a trillion dollars of cost savings over the next few decades which could have been used to stimulate substantial economic growth. The proposed rollback is not only bad politics--if the Administration pushes it through, the rollback and revocation of states' rights would violate the law, certain to be challenged and overturned in court on administrative law grounds because the evidentiary record will not support it and on policy grounds because the law does not allow the agency to bow to the wishes of the auto industry.

¹⁹ Comments of the Consumer Federation of America, before the Department of Transportation, Office of the Secretary of Transportation, Re: Notification of Regulatory Review: 14 CFR Chapters I, II, and III, 23 CFR, Chapters I, II, and III, 46 CFR Chapter II, 48, CFR Chapter 12, 49 CFR Chapters I, II, III, V, VI, VII, VIII, X, and XI, Docket No. DOT-OST-2017-0069, November 1, 2017; Comments of the Consumer Federation of America on the California Air Resources Board *Mid-Term Review*, March 24, 2017; Comments of the Consumer Federation of America, Before the Environmental Protection Agency, Evaluation Draft Technical Assessment Report for Model Year 2022-2025 Light Duty Vehicle GHG Emissions and CAFE Standards, EPA-HQ-OAR-2015-0827; NHTSA-2016-0068; FRL-9949-54-OAR, Department Of Transportation RIN 2060-AS97; RIN 2127-AL76, September 26, 2016.

APPENDIX A

2018 SURVEY QUESTIONS

- E1 For almost 40-years, the Department of Transportation has set standards establishing the minimum level of fuel economy (miles per gallon) of cars, SUVs and pickups. Do you support federal standards requiring auto companies to increase the fuel economy of the vehicles they manufacture? **[Select one answer]**
- 01 Support strongly
 - 02 Support somewhat
 - 03 Oppose somewhat
 - 04 Oppose strongly
 - 05 No opinion
- E2 Now suppose increases in the fuel economy of motor vehicles increased their purchase price but reduced the cost of driving them. If these price increases were offset by reduced gasoline costs over a three-year time period, would you favor or oppose these fuel economy increases? **[Select one answer]**
- 01 Favor strongly
 - 02 Favor somewhat
 - 03 Oppose somewhat
 - 04 Oppose strongly
 - 05 No opinion
- E3 Currently fuel economy standards require each automobile manufacturer to increase the fuel economy of all their new cars and light duty trucks to an average of approximately 40 miles per gallon by 2025. The Trump administration is proposing a reduction from the current 40 miles per gallon by 2025 requirement to an average about 30 miles per gallon through 2026. What is your view of this proposal to reduce the standards? **[Select one answer]**
- 01 Support strongly
 - 02 Support somewhat
 - 03 Oppose somewhat
 - 04 Oppose strongly
 - 05 No opinion

E4 The Trump Administration has argued that reducing the future fuel economy standards for cars and SUVs from approximately 40 to 30 miles per gallon on average, will reduce the number of motor vehicle accidents because Americans will drive fewer miles in less fuel efficient vehicles. Do you find this argument: **[Select one answer]**

- 01 Very convincing
- 02 Somewhat convincing
- 03 Not very convincing
- 04 Not convincing at all

E5 Under the law, states can adopt a higher standard that results in better fuel economy than the overall U.S standards. Do you think that individual states should be allowed to continue to adopt a standard that results in increased fuel efficiency for motor vehicles? **[Select one answer]**

- 01 Support strongly
- 02 Support somewhat
- 03 Oppose somewhat
- 04 Oppose strongly
- 05 No opinion

APPENDIX B

SURVEY QUESTIONS FOR 2011

Do you support or oppose the federal government requiring auto companies to increase the fuel economy of the vehicles they manufacture? Would you say you...

(1) Support strongly, (2) Support somewhat, (3) Oppose somewhat, (4) Oppose strongly
99 DON'T KNOW

The federal government has recently required automobile manufacturers to increase the fuel economy of their motor vehicle fleets from an average of 25 miles per gallon today to 35 miles per gallon by 2016.

Do you think the government should increase this standard to an average of 60 miles per gallon by 2025?

01 YES

02 NO

99 DON'T KNOW

Now suppose increases in the fuel economy of motor vehicles increased their purchase price but reduced the cost of using them. If these price increases were offset by reduced gasoline costs over the following time periods, would you favor or oppose these fuel economy increases?

Would you favor strongly, favor somewhat, oppose somewhat or oppose strongly?

(1) Favor strongly, (2) Favor somewhat, (3) Oppose somewhat, (4) Oppose strongly
99 DON'T KNOW

A. 3 years

B. 5 years

C. 10 years

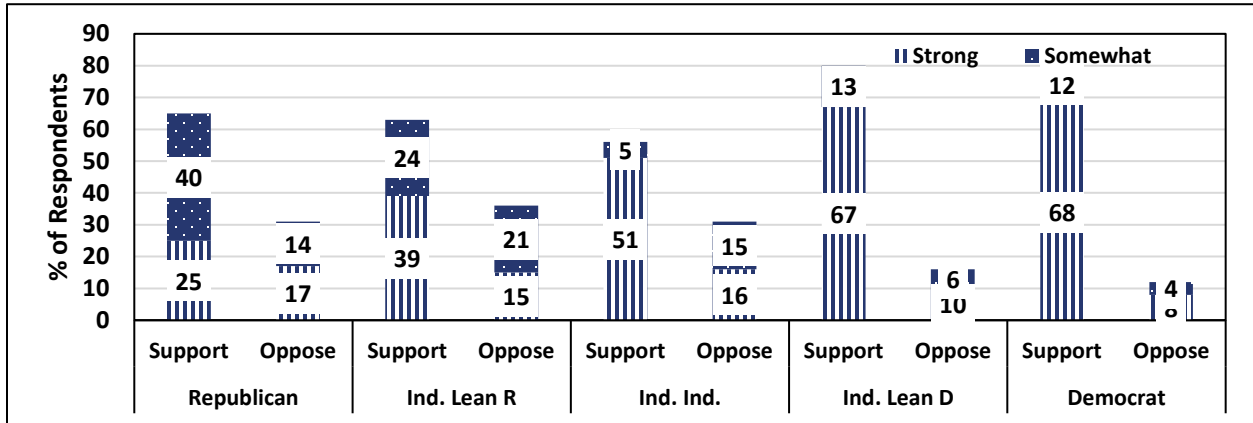
Do you think that state governments should be allowed to continue setting tailpipe emission standards that, as a result, increase fuel economy for motor vehicles? Would you say you. .

(1) Favor strongly, (2) Favor somewhat, (3) Oppose somewhat, (4) Oppose strongly
99 DON'T KNOW

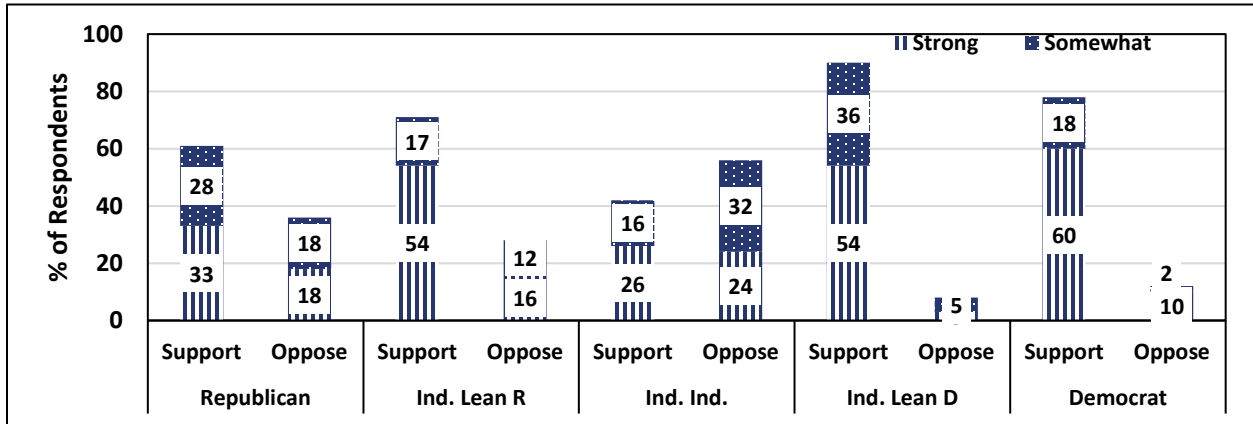
APPENDIX C

SUPPORT FOR THE STANDARDS ACROSS THE POLITICAL SPECTRUM

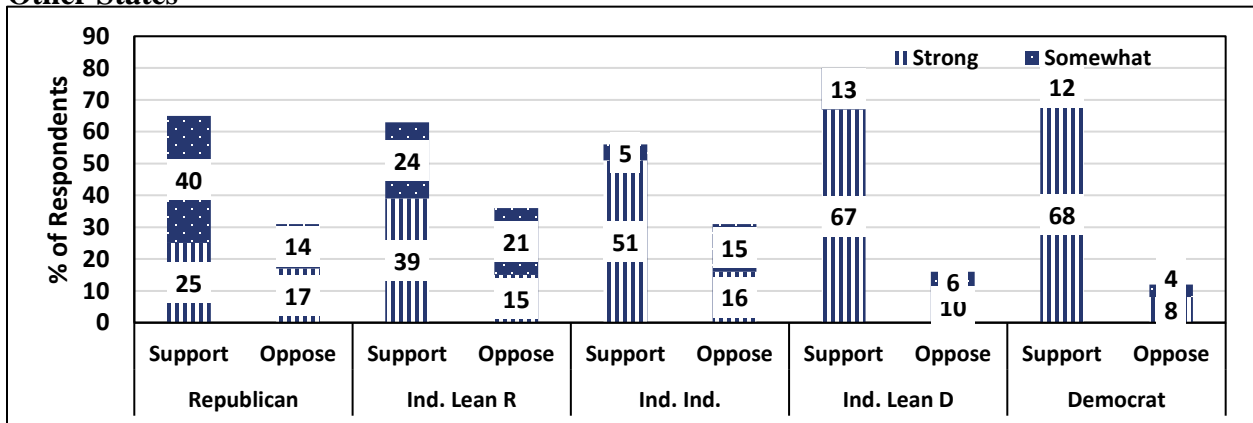
Clean Cars States



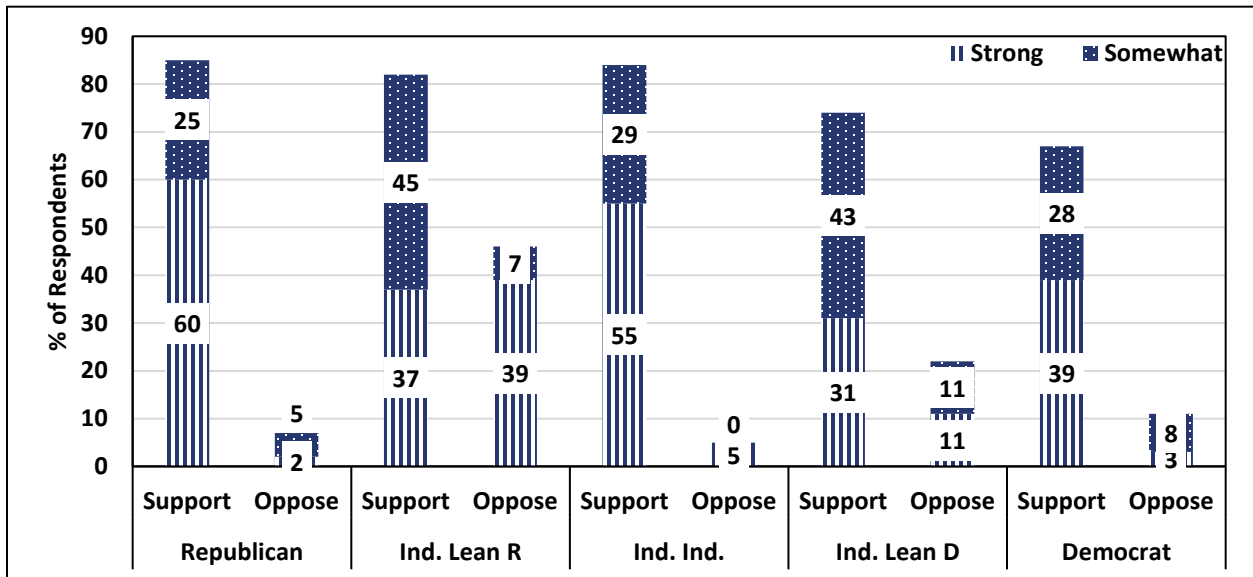
Climate Concerned States



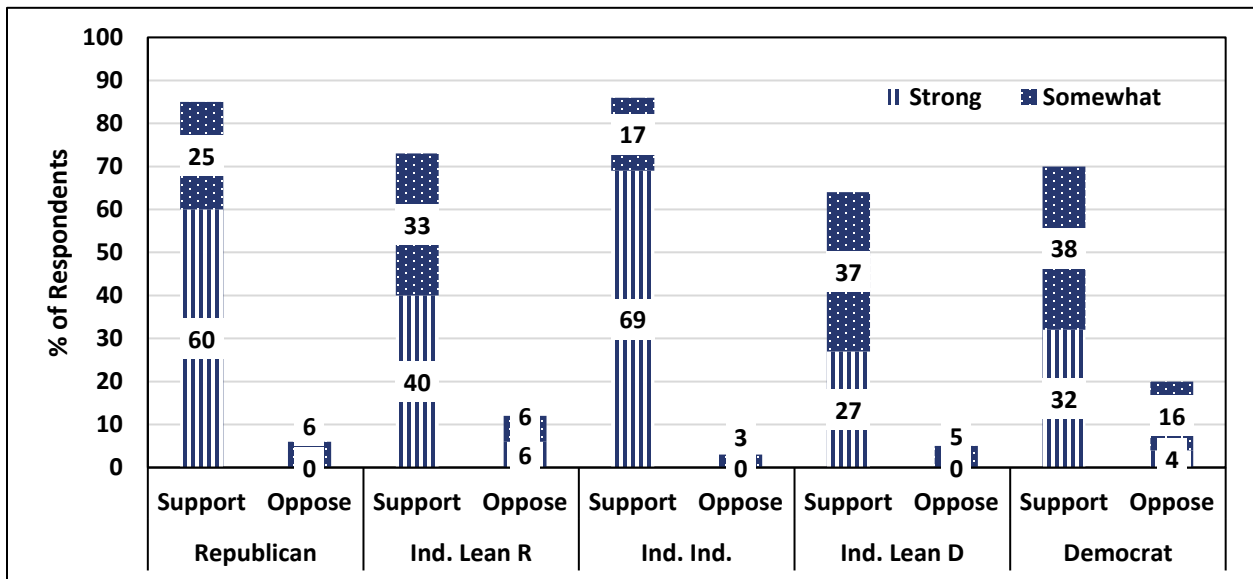
Other States



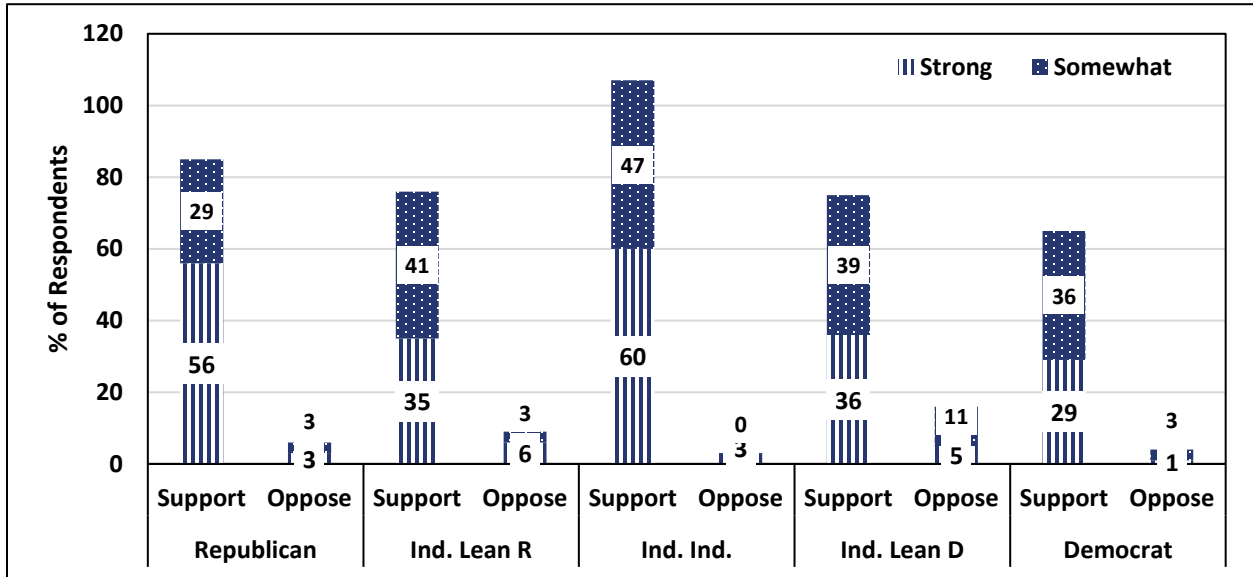
Indiana



Michigan



Missouri



Ohio

