

Congress of the United States
Washington, DC 20515

July 19, 2005

Dr. Jeffrey W. Runge
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Subject: Light Truck Fuel Economy Standards and NHTSA's Advance Notice of Proposed Rulemaking – Reforming the Automobile Fuel Economy Standards Program.
Reference: DOT DMS Docket Number 2003-16128

Dear Dr. Runge:

Our nation's dependence on oil puts America's national security, economy and environment at serious risk. We must take steps to cut this dangerous dependence. For this reason, we are writing to urge the National Highway Traffic Safety Administration (NHTSA) to significantly increase fuel economy standards in its upcoming rulemaking process.

As you craft a proposed rule, we would like to advise you of three principles upon which we believe a successful policy must be based. First, any proposed policy should significantly increase the overall fuel economy of the fleet and improve safety. Second, if NHTSA restructures the Corporate Average Fuel Economy (CAFE) program, any change must not allow overall fuel economy or safety to be undermined. Third, any new program should provide automakers incentives to use technological innovations to improve efficiency and safety.

Principle 1. Increase overall fuel economy and safety

The biggest single step we can take to reduce America's oil dependence, save consumer money at the gas pump, and curb greenhouse gas emissions is to require all new vehicles to go farther on a gallon of gas. According to the National Academy of Sciences (NAS), at today's gas prices "off-the-shelf" technologies such as more efficient engines and smarter transmissions can safely and economically raise the average fuel economy of America's cars and light trucks to at least 33 miles per gallon. Setting such a standard by 2015 would save 2 million barrels of oil per day by 2020. And even greater fuel savings are possible if NHTSA considers more advanced hybrid technology and high-strength, lightweight materials, two existing technologies that the NAS did not consider in its 2001 report.

In addition to raising CAFE standards, we urge NHTSA to strengthen the existing program to reap even more fuel savings. We strongly support the agency's consideration of expanding the program to include vehicles up to 10,000 pounds Gross Vehicle Weight Rating.

Principle 2. Do not allow overall fuel economy or safety to be undermined

We have serious concerns regarding the agency's consideration of fundamental changes to the structure of the CAFE program, such as basing standards on weight. Such a system could actually result in a fleet of less efficient and more dangerous vehicles if it were to allow automakers to add weight to vehicle designs to qualify them for weaker fuel economy standards. Any incentive to increase vehicle weight could simultaneously erode fuel economy and have adverse implications for safety because it could increase incompatibility in the fleet, making the heaviest vehicles, which are the most damaging in crashes with other cars, even heavier.

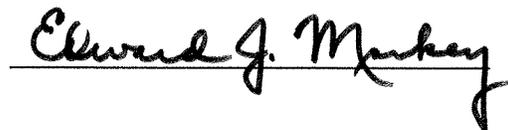
If NHTSA does propose an attribute-based standard, it must either be aggressive enough to prevent a decrease in fuel economy regardless of the future mix of vehicles in the fleet, or contain some other mechanism to prevent backsliding of overall average fuel economy and vehicle safety.

Principle 3. Encourage technology innovation to improve fuel economy and safety

Any policy should provide an incentive for automakers to develop and use technology, such as high-strength lightweight materials, to improve fuel economy and safety. These materials, along with hybrids and the technologies identified by the NAS, show great promise for improving fuel economy without reducing safety. As noted earlier, the NAS analysis omitted more advanced hybrid technology which, in a very short time, has moved from "experimental" to "off-the-shelf" to "on-the-road." A successful policy should continue to encourage promising innovation.

The United States' growing oil dependence, rising gas prices, and increasing greenhouse gas emissions from vehicles put the country at risk. We urge you to increase CAFE standards significantly to reduce our dependence on foreign oil and cut pollution from U. S. vehicles, and to ensure that any reforms to the CAFE system decrease our dependence on oil. We look forward to working with you throughout the rulemaking process.

Sincerely,

A handwritten signature in black ink, appearing to be "G. B. ...", written over a horizontal line.A handwritten signature in black ink, reading "Edward J. Markey", written over a horizontal line.

John Lewis

Alan Kim

Todd R. Platts

Robert Menendez

Wayne T. Gilchrist

Felicia L. Solis

Dino DeBette

Timothy J.

Mike Castle

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Samy Baldwin

John Spratt

Bart

Nancy L. Glenn

Earl Blumenauer

J. Saxton

J. - Lusk

Joe Walden

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Kenneth Ehlken

Laura Kelly

Jim Truitt

John A. L. Bundo

Joe Bunch

Clair Smith

Cliff Jones

Ray School

Lois Capps

Erica L. Engel

Wes G. Eshoo

Tom Call

Frank Pallan, Jr.

George Miller

J. Connaughton

Jim Davis

Cc:

Mr. James L. Connaughton, Chairman, Council on Environmental Quality

Dr. John D. Graham, Administrator, Office of Information and Regulatory Affairs, Office
of Management and Budget