

January 22, 2020

Dear Auto Executives:

Consumer Reports writes to urge your company to 1) commit to deliver low and zero emission vehicles that meet “Clean Car” standards (fuel economy and greenhouse gas standards for light duty vehicles out to Model Year 2025, as agreed to in 2012), and 2) to withdraw from litigation against existing Clean Car standards and state authority under the federal Clean Air Act.

Consumers overwhelmingly support the existing Clean Car standards, which will save consumers money and reduce pollution.

- 75,364 consumers signed a petition (attached) calling on automakers to support the existing Clean Car standards and drop its opposition to states’ low emission vehicle standards.
- 88% of Americans agree that automakers should continue to improve fuel economy for all vehicle types.<sup>1</sup>
- 80% of Americans agree that “increasing average fuel economy from 25 miles per gallon (MPG) today to 40 MPG by 2025 is a worthwhile goal.”<sup>2</sup>
- However, only 34% of Americans think automakers actually care about lowering fuel costs for their customers.<sup>3</sup>
- A complete rollback of the standards would cost consumers \$3,300 per MY 2026 vehicle, on net, while the likely 1.5% annual improvement standard would still impose a net cost of \$2,100 per MY 2026 vehicle.<sup>4</sup>

Clean Car states comprise 40% of the American market, and trying to take away the power of citizens in those states to address climate change and save money through cleaner cars is anathema to the consumer and public interest. In addition, NHTSA and EPA action to block state authority and weaken the standards is premised on deeply flawed analysis, as documented in articles in peer-reviewed journals such as Science,<sup>5</sup> the EPA’s own Scientific

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<sup>1</sup> Consumer Reports’ 2019 nationally-representative survey, August 23, 2019, at [https://advocacy.consumerreports.org/press\\_release/fueleconomysurvey2019/](https://advocacy.consumerreports.org/press_release/fueleconomysurvey2019/).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

<sup>4</sup> Consumer Reports, “The Un-SAFE Rule Update: Weakening Fuel Economy and Emissions Standards Costs Consumers Money in Every State,” November 13, 2019, at [https://advocacy.consumerreports.org/press\\_release/new-consumer-reports-analysis-shows-near-freeze-of-fuel-economy-rules-would-cost-consumers-300-billion/](https://advocacy.consumerreports.org/press_release/new-consumer-reports-analysis-shows-near-freeze-of-fuel-economy-rules-would-cost-consumers-300-billion/)

<sup>5</sup> Bento, et al. (2018) “Flawed analyses of U.S. auto fuel economy standards,” Science, 362:6419, pp 1119-1121. Available at: <https://science.sciencemag.org/content/362/6419/1119.summary>

Advisory Board,<sup>6</sup> and numerous independent public comments entered into the docket as part of the rule.<sup>7</sup> For an automaker, siding with agency action that is built on unsound justification and hurts consumers, the economy, and the environment is alienating and detrimental to relationships with current and future customers, and we urge you to reconsider this ill-advised course of action.

We are interested in learning more about your commitment to low and zero emission vehicles that meet consumer expectations and your plans for supporting legal and governmental action that aligns with these goals. We respectfully request a written response or the opportunity to hear from you via phone or in-person by **February 21, 2020**.

We also welcome a conversation about setting future standards beyond MY 2025.

Sincerely,



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<sup>6</sup> Science Advisory Board (SAB) Consideration of the Scientific and Technical Basis of the EPA's Proposed Rule titled The Safer Affordable Fuel-Efficient(SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks. Available at: [https://yosemite.epa.gov/sab/sabproduct.nsf/WebBOARD/3BD8A1AEA4943223852584E1005463DE/\\$File/SAFE+SAB+Draft+Review\\_10\\_16\\_19\\_.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/WebBOARD/3BD8A1AEA4943223852584E1005463DE/$File/SAFE+SAB+Draft+Review_10_16_19_.pdf)

<sup>7</sup> See e.g. NGO Joint Legal Comment Docket NHTSA-2018-0067-12369; ICCT Comment Docket NHTSA-2018-0067-11741; Consumers Union, Consumer Federation of America, and ACCEEE Comment Docket NHTSA-2018-0067-11731; and California Air Resources Board Comment Docket NHTSA-2018-0067-11873.