



## **Consumer Federation of America**

**Statement of  
Mel Hall-Crawford, Director of Energy Programs  
Consumer Federation of America  
on the  
The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026  
Passenger Cars and Light Trucks  
U.S. Environmental Protection Agency and Department of Transportation  
Docket ID: EPA-HQ-OAR-2018-0283 & NHTSA-2018-0067**

**Prepared for the Public Hearing in Fresno, CA  
September 24, 2018**

My name is Mel Hall-Crawford. I am the director of Energy Programs at the Consumer Federation of America (CFA) based in Washington, DC. CFA is an association of more than 250 national, state and local non-profit groups that since 1968, has sought to advance the consumer interest through research, education and advocacy on the federal and state levels.

I appreciate the opportunity to speak today. CFA has been involved in the fuel economy issue for the past 15 years—we oppose the Administration's proposed rollback of the fuel economy standards. And, as a California resident looking to buy a new car, I am personally invested in having good, strong fuel economy standards.

There are four important points I'd like to make today:

1. First, the current fuel economy standards provide tremendous benefits to consumers, saving them money at the pump. Since 2012, when the standards went into effect, the average efficiency of the American car fleet has risen by 3 miles per gallon. And so, for example, a consumer who purchased a car in 2017, is saving \$220/year at 2018 gas prices. A consumer will save over \$2,000 over the life of a vehicle (about 11 years) after the cost of the fuel saving technology is paid back. The proposed rollback will rob consumers of even greater savings.

On the macroeconomic level, money saved at the pump is being spent on other goods and services with a greater multiplier effect stimulating our economy and creating jobs rather than going overseas to giant oil companies. Our analysis shows that for every one dollar of consumer pocketbook savings (i.e. gasoline savings net of technology costs), we also find about \$0.90 cents of macroeconomic stimulus.

2. The second point is: consumers support increased fuel economy in cars and light duty trucks. CFA has been conducting public opinion polling over the past decade and has found

consistent, strong, and broad support for increasing the fuel economy of vehicles and for the government to gradually increase the fuel economy standards, and we specifically found support for the CAFE target of 42 MPG—in real world driving-- by 2025.

3. The current standards are producing the cleanest, most fuel-efficient and safest vehicles the U.S. has ever known. Safety has been a key rationale for this proposed rollback. CFA analysis has shown that MY 2018 vehicles are safer and more fuel efficient compared to their previous models. For example, “all new” 2018 vehicles now include 60% more safety features, such as blind spot warning, automatic emergency braking, lane-keeping assist, compared to their pre-standard counterparts. The costs of fuel economy technologies in these cars, as well as the cost of these new safety features and other technology improvements, are eclipsed by the gas savings provided by these newer, more advanced models –thanks to the standards we have in place today.
4. Lastly, CFA supports the ability of states to lead on emissions standards that also result in greater fuel economy and savings for consumers, and, according to our polling, so does the public. And there are additional savings to the economy due to health benefits of cleaner air through reduced lost workdays and hospitalizations. States’ rights have always been a tenant of Republican administrations, so it is contradictory for the Trump Administration to propose revoking the authority of states to adopt a standard that addresses their unique air quality problems.

This standard is currently being used by twelve states and Washington DC, representing 113 million Americans and over a third of the automotive market (with Colorado planning to join.) We applaud these states for adopting an alternative standard and California’s leadership, which has spurred innovation for hybrids and electric vehicles that save consumers even more money at the pump and relieve them from the volatility of gas prices. We believe states should continue to have the right to protect their citizens.

In conclusion, the Administration’s proposal to roll back the fuel economy standards and revoke the authority of states is ill founded, misguided and will hurt American consumers and our economy. The Consumer Federation of America firmly believes the current standards, for which a strong record has been established, should remain in place without any changes that would weaken them and erode consumer benefits.

Thank you.