



September 20, 2016

TO: Members, Subcommittee on Commerce, Manufacturing, and Trade and
Subcommittee on Energy and Power

FROM: Committee Majority Staff

RE: Joint Hearing entitled “Midterm Review and an Update on the Corporate Average
Fuel Economy Program and Greenhouse Gas Emissions Standards for Motor
Vehicles.”

I. INTRODUCTION

On Thursday, September 22, 2016, at 10:00 a.m. in HVC-210, the Subcommittee on Commerce, Manufacturing, and Trade and the Subcommittee on Energy and Power will hold a joint hearing entitled “Midterm Review and an Update on the Corporate Average Fuel Economy Program and Greenhouse Gas Emissions Standards for Motor Vehicles.”

II. WITNESSES

Panel I

- Janet McCabe, Acting Assistant Administrator for the Office of Air and Radiation, Environmental Protection Agency; and
- Paul Hemmersbaugh, Chief Counsel, National Highway Traffic Safety Administration.

Panel II

- John Bozzella, President and CEO, Global Automakers;
- Mitch Bainwol, President and CEO, Alliance of Automobile Manufacturers;
- Peter Welch, President, National Automobile Dealers Association;
- John D. Graham, Ph.D., Dean, School of Public and Environmental Affairs, Indiana University Bloomington;
- John German, Senior Fellow/U.S. Co-Lead, The International Council on Clean Transportation; and
- Mark Cooper, Ph.D., Director of Research, Consumer Federation of America.

III. BACKGROUND

A. CAFE History

In 1975, Congress passed the Energy Policy and Conservation Act (EPCA) establishing the Corporate Average Fuel Economy (CAFE) program for passenger cars and light trucks sold in the United States.¹ Prompted by rising gasoline prices and fuel shortages stemming from the 1973 Arab oil embargo, the CAFE program was intended to improve vehicle fuel economy, reduce energy consumption and demand for oil imports, and improve the nation's energy independence.²

Under EPCA, the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) was authorized to administer the CAFE program.³ This included the authority to amend fuel economy standards set forth in the statute and to set new standards for passenger cars and light trucks after 1985.⁴ In changing or setting new fuel economy standards, EPCA directed NHTSA to set the fuel standard at the "maximum feasible average fuel economy level" and consider the following factors in its determination: technological feasibility, economic practicability, the effect of other Federal motor vehicle standards on fuel economy, and the need of the United States to conserve energy.⁵ EPCA also authorized the Environmental Protection Agency (EPA) to calculate and test auto manufacturers' compliance with fuel economy standards across their vehicle fleets.⁶

A credit banking system was also introduced under EPCA as a compliance mechanism for auto manufacturers to meet mandated fuel economy standards.⁷ CAFE credits were created to help manufacturers offset their deficiencies or shortfalls in meeting the fuel economy standard for a particular fleet category - domestic and imported passenger cars, or light trucks.⁸ Credits were earned by manufacturers for exceeding fuel economy standards for a specific vehicle fleet in a given model year.⁹ Those credits could then be transferred forward - referred to as "carry forward credits" - or backwards - referred to as "carry back credits" - for up to three consecutive model years and applied to the fleet category in which the credit was earned, if the manufacturer fell short of meeting the fuel economy standard.¹⁰

Energy Independence and Security Act

Following the enactment of EPCA, CAFE standards remained virtually unchanged from 1985 to 2006.¹¹ However, in response to a rapid rise in gasoline prices, global climate concerns,

¹ See <https://www.transportation.gov/mission/sustainability/corporate-average-fuel-economy-cafe-standards>

² See <https://spea.indiana.edu/doc/research/working-groups/fuel-economy-policy-022016.pdf>

³ See <https://www.govtrack.us/congress/bills/94/s622/text>

⁴ See <https://www.govtrack.us/congress/bills/94/s622/text>

⁵ Id.

⁶ Id.

⁷ Id.

⁸ See <http://www.nhtsa.gov/cars/rules/rulings/CAFE/alternativefuels/background.htm>

⁹ Id.

¹⁰ Id.

¹¹ See <https://spea.indiana.edu/doc/research/working-groups/fuel-economy-policy-022016.pdf>

and a push for greater energy security in the United States, Congress passed the Energy Independence and Security Act (EISA), increasing fuel economy standards and amending elements of the CAFE program.¹²

EISA established a new national fuel economy target of 35 mpg (miles per gallon) by 2020 for both passenger cars and light trucks, and established a CAFE program for medium and heavy-duty trucks, as well as work trucks.¹³ EISA also changed how the average fuel economy would be calculated among auto manufacturers' fleets. Instead of using one average miles per gallon standard for all cars and light trucks, the average fuel economy would now be calculated based on each vehicle's attributes or size, known as the "footprint standard."¹⁴ The change to a size-based standard occurred for safety reasons and to protect domestic manufacturers producing larger vehicles from being disproportionately affected by CAFE standards in comparison to foreign manufacturers that traditionally produced smaller cars that could run on less fuel.¹⁵

The credit banking system was also modified under EISA. The new law expanded how credits could be used allowing auto manufacturers to trade credits with each other and to transfer credits between their car and light truck fleets.¹⁶ The period of time over which manufacturers could bank and borrow credits was also extended. EISA authorized manufacturers to carry forward credits up to five consecutive model years; carry back credits, however, remained permissible for only three model years.¹⁷

Environmental Protection Agency

The Clean Air Act authorized the EPA to establish national standards for air quality and to regulate sources of hazardous air pollutants and other toxins.¹⁸ The 1970 amendments to the Clean Air Act expanded EPA's authority to include the regulation of tailpipe emissions from new automobiles.¹⁹ The first tailpipe emissions standards for cars went into effect in 1975, and since that time, EPA has modified, tightened, and introduced new emissions standards for cars and other classes of vehicles, including light-duty and heavy-duty trucks.²⁰

In 2007, the Supreme Court affirmed EPA's authority under the Clean Air Act to regulate greenhouse gas emissions from new motor vehicles as air pollutants in *Massachusetts v. EPA*.²¹ The Court's decision, however, compelled EPA to determine whether greenhouse gases

¹² Id.

¹³ See https://www1.eere.energy.gov/manufacturing/tech_assistance/pdfs/crs_report_energy_act_2007.pdf

¹⁴ Id. See also <http://www.rff.org/files/sharepoint/WorkImages/Download/RFF-DP-13-14.pdf>

¹⁵ See <http://www.rff.org/files/sharepoint/WorkImages/Download/RFF-DP-13-14.pdf>

¹⁶ See http://www.theicct.org/sites/default/files/publications/ICCTbriefing_CAFE-credits_20140307.pdf

¹⁷ See <http://www.rff.org/files/sharepoint/WorkImages/Download/RFF-DP-13-14.pdf>; See also NHTSA CAFE Public Information Center Frequently Asked Questions. Available at: http://www.nhtsa.gov/CAFE_PIC/AdditionalInfo.htm

¹⁸ See <http://www.crs.gov/Reports/RL30853?source=search&guid=e0589f29daff409587d587c77852cb9e&index=0>

¹⁹ Id.

²⁰ See <https://www3.epa.gov/otaq/consumer/f99017.pdf>

²¹ See <http://www.crs.gov/Reports/R40506?source=search&guid=1dc40efba2884c79bb33b828418d2097&index=0>

contribute to air pollution and endanger public health or welfare.²² Such a finding would require the agency to establish emissions standards for new cars.”²³

In 2009, the EPA issued an endangerment finding establishing that greenhouse gas emissions from new automobiles endanger both public health and welfare.²⁴ The 2007 *Massachusetts* decision and the 2009 endangerment finding have since “formed the basis for EPA’s regulatory actions” on tailpipe emissions.²⁵ EPA has also acted with NHTSA to integrate the regulation of greenhouse gas emissions with fuel economy standards because reducing fuel consumption through increased fuel economy standards is viewed as the most direct means for reducing tailpipe emissions.²⁶ Failure to comply with EPA’s emissions standards, however, amounts to a violation of the Clean Air Act – a penalty that could be as high as \$37,500 per car.²⁷ Noncompliance under CAFE standards results in a per mile per gallon per vehicle fine, the amount of which is currently being examined but which had been at \$55.²⁸

Similar to NHTSA, EPA also has its own credit banking program; however, it has significant differences to the NHTSA credit program. EPA’s credit program allows manufacturers to earn credits when they produce sales-weighted average fleets with fewer grams of CO₂ emissions per mile than the agency’s standard.²⁹ EPA established a 5-year credit banking period, but has permitted manufacturers that earned credits between model years 2010 and 2016 to carry those credits forward through model year 2021.³⁰ There are also no limits on transfers between cars and trucks in each manufacturer’s fleet under EPA rules as there are with NHTSA. Carryback credits under EPA rules are permitted for a 3-year period.³¹

California Air Resources Board

California’s state legislature established the California Air Resources Board (CARB) in the late 1960s to address California’s worsening air pollution problem.³² Seeking greater federal action on fuel economy standards in the late nineties and early 2000s, the California legislature passed a law in 2002 limiting greenhouse gas emissions from new motor vehicles sold in the state.³³ The law required CARB to obtain a reduction in greenhouse gas emissions equivalent to approximately 36 mpg by model year 2016.³⁴

California’s law prompted legal challenges contesting the state’s authority to implement its own greenhouse gas emission standards separate from EPA’s federal standard.³⁵ However, a

²² Id.

²³ Id.

²⁴ Id.

²⁵ See <http://www.c2es.org/federal/executive/epa/greenhouse-gas-regulation-faq>

²⁶ Id.

²⁷ See http://www.rff.org/files/document/file/RFF-Resources-190_USVehicleMarketCreditTrading_0.pdf

²⁸ See <http://www.rff.org/blog/2016/nearly-tripled-cafe-fine-highlights-differences-epa-and-nhtsa-rules>

²⁹ See http://www.rff.org/files/document/file/RFF-Resources-190_USVehicleMarketCreditTrading_0.pdf

³⁰ Id.

³¹ Id.

³² See <http://www.arb.ca.gov/knowzone/history.htm>

³³ See <https://spea.indiana.edu/doc/research/working-groups/fuel-economy-policy-022016.pdf>

³⁴ Id.

³⁵ Id.

federal court affirmed that California had authority under the Clean Air Act to set its own tailpipe emissions standards for motor vehicles if it met certain conditions and obtained a waiver from EPA.³⁶ After being denied a waiver in 2008, California was granted a waiver in 2009 from EPA for its greenhouse gas emissions standards beginning with model year 2009 vehicles.³⁷

a. Zero Emission Vehicles

In a separate effort to improve air quality and reduce vehicle emissions to zero, California instituted a Zero Emission Vehicle (ZEV) mandate in 1990.³⁸ Under this mandate, auto manufacturers are required to produce for sale a certain percentage of ZEVs in the state.³⁹ ZEVs include cars such as plug-in hybrid electric vehicles, fuel cell vehicles, and battery electric vehicles.⁴⁰

Overtime, CARB has amended the mandate to increase the percentage of ZEVs that must be sold by automakers.⁴¹ By 2025, 15 percent of a manufacturers new vehicle sales must be ZEVs.⁴² Nine other states have adopted California's ZEV mandate, including Connecticut, Maine, Maryland, Massachusetts, New Jersey, New York, Oregon, Rhode Island, and Vermont.⁴³

B. National Program

In 2009, President Obama announced a National Fuel Efficiency Policy that proposed further modifications to the average fuel economy standard for new cars and light trucks sold in the United States.⁴⁴ Under the new national policy, known as the National Program, the Obama Administration proposed new fuel economy standards covering model years 2012 to 2016 vehicles that would increase the average fuel economy standard to 35.5 mpg by 2016.⁴⁵ The National Program was intended to address growing global climate concerns and reduce oil consumption; it was also intended to establish harmonized national standards and a coordinated Federal program for fuel economy standards and greenhouse gas emissions across the United States.⁴⁶ A uniform, national policy on fuel economy and greenhouse gas emissions was expected to help auto manufacturers "build a single light-duty national fleet that satisfies all requirements under [NHTSA's CAFE program and EPA's greenhouse gas emissions program]" as well as applicable state standards.⁴⁷ California also committed to accept vehicles in compliance with EPA emissions standards under the National Program for model years 2012 to

³⁶ Id.

³⁷ Id. See also <https://www3.epa.gov/otaq/climate/ca-waiver.htm>

³⁸ See <https://www.arb.ca.gov/msprog/zevprog/zevregs/zevregs.htm#background>

³⁹ Id.

⁴⁰ See <http://www.zevfacts.com/zev-mandate.html>

⁴¹ Id.

⁴² See https://www.arb.ca.gov/msprog/zevprog/zevregs/1962.2_Clean.pdf

⁴³ See <http://www.zevfacts.com/zev-mandate.html>

⁴⁴ See <https://www.whitehouse.gov/the-press-office/president-obama-announces-national-fuel-efficiency-policy>

⁴⁵ Id.

⁴⁶ Id. See also Joint Final Rule, Light-Duty Vehicle Greenhouse Gas Emission standards and Corporate Average Fuel Economy Standards, May 7, 2010. Available at: <http://www.nhtsa.gov/Laws+&+Regulations/CAFE++Fuel+Economy/Model+Years+2012-2016:+Final+Rule>

⁴⁷ Id. See also <https://www3.epa.gov/otaq/climate/regulations/420f10014.pdf>

2016 to be compliant with its own state regulations.⁴⁸ California later extended that commitment to apply to model years 2017 to 2025 vehicles as well.

In 2010, NHTSA and EPA issued a joint final rule establishing the first phase of the National Program.⁴⁹ Under the final rule, NHTSA set new average fuel economy standards for passenger cars and light trucks manufactured in model years 2012 through 2016.⁵⁰ The new standards required those vehicles to meet an estimated combined average of 34.1 mpg in model year 2016, which represented “an average annual increase of 4.3 percent from the 27.3 mpg combined fuel economy level in model year 2011.”⁵¹ When combined with the EPA’s greenhouse gas emission standard, the expected fuel economy increase would be 35.5 mpg for model year 2016 vehicles.⁵²

Following the publication of the 2010 joint final rule, President Obama called on NHTSA and EPA to extend the National Program to model years 2017 through 2025 cars and light trucks.⁵³ In response, NHTSA and EPA issued another set of joint final rules in October 2012 extending the National Program to passenger cars and light trucks manufactured in those model years.⁵⁴ The rules on fuel economy included two phases: the first phase applied to vehicles model years 2017 to 2021, and the second phase applied to vehicles model years 2022 to 2025.⁵⁵ The first phase established a finalized combined fleet-wide fuel economy standard of 40.3 to 41.0 mpg by model year 2021.⁵⁶ The second phase projected a fuel economy standard of 48.7 to 49.7 mpg in model year 2025.⁵⁷ The second phase consisted of only “augural standards” or NHTSA’s “best estimate, based on the information available to the agency, of what the levels of stringency might be maximally feasible in those years.”⁵⁸ Due to statutory requirements, NHTSA is not permitted to set average fuel economy standards for more than five years at a time.⁵⁹ When combined with EPA’s greenhouse gas emissions standards, the projected average industry fleet-wide fuel economy level would be equivalent to 54.5 mpg.⁶⁰

Prior to NHTSA and EPA issuing the October 2012 joint final rules, in January, CARB approved a package of new emissions rules, known as the “Advanced Clean Car” program.⁶¹

⁴⁸ See <http://www.arb.ca.gov/regact/2010/ghgpv10/res1015.pdf>

⁴⁹ See Joint Final Rule, Light-Duty Vehicle Greenhouse Gas Emission standards and Corporate Average Fuel Economy Standards, May 7, 2010. Available at: <http://www.nhtsa.gov/Laws+&+Regulations/CAFE+-+Fuel+Economy/Model+Years+2012-2016:+Final+Rule>

⁵⁰ Id.

⁵¹ See Joint Final Rule CAFE and GHG Emission Fact Sheet. Available at:

<http://www.nhtsa.gov/Laws+&+Regulations/CAFE+-+Fuel+Economy/Model+Years+2012-2016:+Final+Rule>

⁵² See <https://www3.epa.gov/otaq/climate/regulations/420f10014.pdf>

⁵³ See <https://www.whitehouse.gov/the-press-office/presidential-memorandum-regarding-fuel-efficiency-standards>

⁵⁴ See DOT and EPA Establish CAFE and GHG Emissions Standards for Model Years 2017 and Beyond Final Rule. Available at: <http://www.nhtsa.gov/fuel-economy>

⁵⁵ See DOT & EPA Establish CAFÉ and GHG Emissions Standards for Model Years 2017 and Beyond Fact Sheet. Available at: <http://www.nhtsa.gov/fuel-economy>

⁵⁶ Id.

⁵⁷ See DOT and EPA Establish CAFE and GHG Emissions Standards for Model Years 2017 and Beyond Final Rule. Available at: <http://www.nhtsa.gov/fuel-economy>

⁵⁸ Id.

⁵⁹ Id.

⁶⁰ See <https://www3.epa.gov/otaq/climate/documents/420f12051.pdf>

⁶¹ See <http://www.arb.ca.gov/newsrel/newsrelease.php?id=282>

This program applied to cars and light trucks, model years 2017 through 2025, and combined “the control of smog, soot causing pollutants, and greenhouse emissions into a single, coordinated package of requirements,” for cars sold in California.⁶²

Compliance Flexibility Mechanisms

The 2012 joint final rules included a set of compliance flexibility mechanisms for auto manufacturers to use in order to meet new standards for model years 2022 to 2025.⁶³ Compliance flexibility mechanisms included additional credits to manufacturers for improving the efficiency of a vehicle’s air conditioning system; applying greater weight to electric vehicles, plug-in hybrid electric vehicles, fuel cell vehicles, and natural gas vehicles in the calculation of fleet average compliance; offering additional credits to automakers using “game-changing” technologies in full-size pickup trucks that reduce greenhouse gas emissions; and offering “off-cycle” credits to manufacturers using technologies that achieve tailpipe emissions reductions in the real world, but are not adequately captured in testing.⁶⁴ The established credit banking and trading system remained in place as a compliance flexibility mechanism for manufacturers.

Medium Duty and Heavy Duty Trucks

In addition to establishing a National Program for the regulation of fuel economy and greenhouse gas emissions for passenger cars and light trucks, NHTSA and EPA also proposed a National Program to reduce fuel consumption and greenhouse gas emissions in the medium and heavy-duty highway vehicle sector.⁶⁵ Medium and heavy duty vehicles include pick-up, garbage, and delivery trucks, buses, vans, and tractors, known as big rigs and semi-trucks.⁶⁶

In 2012, NHTSA and EPA issued a joint final rule on fuel economy and greenhouse gas emissions standards covering medium and heavy-duty vehicles model years 2014 to 2018.⁶⁷ The new standards require trucks to achieve an approximate 10 to 20 percent reduction in fuel consumption and greenhouse gas emissions by model year 2018 depending on the design and purpose of the vehicle.⁶⁸

In June 2015, NHTSA and EPA issued a notice of proposed rulemaking for Phase 2 of the fuel efficiency and greenhouse gas emission program for medium and heavy-duty trucks.⁶⁹ Phase 2 of the program covers vehicles model years 2018 to 2027 and is intended to “further reduce

⁶² See http://www.arb.ca.gov/msprog/clean_cars/acc%20summary-final.pdf

⁶³ See DOT and EPA Establish CAFÉ and GHG Emissions Standards for Model Years 2017 and Beyond, Final Rule. Available at: <http://www.nhtsa.gov/fuel-economy>

⁶⁴ See <https://www.federalregister.gov/articles/2015/06/03/2015-13503/alternative-method-for-calculating-off-cycle-credits-under-the-light-duty-vehicle-greenhouse-gas>

⁶⁵ See Phase 1 of Fuel Efficiency and GHG Emission Program for Medium-and Heavy-Duty Trucks, MYs 2014-2018 Notice of Proposed Rulemaking Fact Sheet. Available at: <http://www.nhtsa.gov/fuel-economy>

⁶⁶ Id.

⁶⁷ Id. See also Phase 1 of Fuel Efficiency and GHG Emission Program for Medium-and Heavy-Duty Trucks, MYs 2014-2018 Final Rule. Available at: <http://www.nhtsa.gov/fuel-economy>

⁶⁸ Id.

⁶⁹ See Proposed Phase 2 Fuel Efficiency and GHG Emissions Standards for Medium & Heavy Duty Vehicles, MY 2018-2027, Notice of Proposed Rulemaking. Available at: <http://www.nhtsa.gov/fuel-economy>

fuel consumption and carbon pollution through performance-based standards.”⁷⁰ In August 2016, NHTSA and EPA released joint final rules for Phase 2 of the fuel efficiency and greenhouse gas emissions program for medium and heavy-duty trucks.⁷¹ The new standards are expected to reduce greenhouse gas emissions and fuel consumption by 10 percent.⁷²

C. Midterm Evaluation

When NHTSA and EPA issued joint final rules in October 2012 for cars and light trucks model years 2017 to 2025, both agencies committed to conducting a Midterm Evaluation beginning in 2016.⁷³ Given that fuel economy and greenhouse gas emissions standards were developed based on assumptions about future market conditions, and NHTSA’s statutory obligation to “conduct a de novo rulemaking in order to establish final standards for [model years] 2022 to 2025,” the Midterm Evaluation would be used as an opportunity to assess developments in technology, marketplace penetration of fuel efficient technologies, the effects of vehicle mass and size on safety, and other factors that may impact the suitability of those standards for future years.⁷⁴

The Midterm Evaluation consists of a three-step process: 1) a June 2016 Draft Technical Assessment Report (Draft TAR) issued jointly by NHTSA, EPA, and CARB examining the relevancy of the 2022 to 2025 standards; 2) a notice of proposed rulemaking from NHTSA on CAFE standards for 2022 to 2025 vehicles, and a proposed determination from EPA on whether its greenhouse gas emissions standards are appropriate for those model year vehicles; and 3) a final rule and determination from both agencies on those standards, which is expected April 2018.⁷⁵

In July, NHTSA and EPA, in coordination with CARB, issued the Draft TAR. The Draft TAR did not present alternatives to EPA’s greenhouse gas emission standards or NHTSA’s augural standards proposed for vehicles model years 2022 to 2025, but rather examined a range of technical issues, including the technologies available, marketplace trends, fleet projections, consumer acceptance, effects on vehicle safety, and other factors that may impact auto manufacturers’ ability to comply with the future standards.⁷⁶

In conducting independent analyses of those issues, both NHTSA and EPA reached similar conclusions finding that: 1) a wide range of technologies exist for manufacturers to meet the model years 2022 to 2025 standards at costs similar or lower than those projected in the 2012 rule; 2) advanced gasoline vehicle technologies will continue to be the predominant

⁷⁰ See Proposed Phase 2 Fuel Efficiency and GHG Emissions Standards for Medium & Heavy-Duty Vehicles, MY 2018-2027 Overview Fact Sheet. Available at: <http://www.nhtsa.gov/fuel-economy>

⁷¹ See Final Rule for Phase 2 Fuel Efficiency and GHG Emissions Standards for Medium & Heavy-Duty Vehicles MY2018-2027, News Release and Final Rule. Available at: <http://www.nhtsa.gov/fuel-economy>

⁷² Id.

⁷³ See <http://www.nhtsa.gov/Laws+&+Regulations/CAFE++Fuel+Economy/ld-cafe-midterm-evaluation-2022-25>

⁷⁴ Id.

⁷⁵ Id.

⁷⁶ See Draft Technical Assessment Report: Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards for Model Years 2022-2025. Available at: <http://www.nhtsa.gov/Laws+&+Regulations/CAFE++Fuel+Economy/ld-cafe-midterm-evaluation-2022-25>

technologies; and 3) the proposed mix of cars and trucks in a manufacturer's fleet reflects updated consumer trends.⁷⁷ The agencies also noted in the Draft TAR that on average, the auto industry has been "over-complying" with the first several years of the National Program.⁷⁸ NHTSA and EPA did find, however, that the projection of 54.5 mpg for the fleet average by model year 2025 would likely not be reached if current market trends continue and instead may be closer to 50.8 mpg.⁷⁹

The Draft TAR is now open for public comment until September 26, 2016. In August, Chairmen Upton, Whitfield, and Burgess sent a letter to NHTSA and EPA requesting an extension to the public comment period on the Draft TAR given its length and technical complexity.⁸⁰ NHTSA and EPA denied that request.⁸¹

IV. ISSUES

The following issues will be examined at the hearing:

- The status of economic and marketplace estimates and projections made in 2012 and the impact that those assumptions will have on auto manufacturers' ability to meet increasing fuel economy standards.
- What changes are occurring in the marketplace and how those changes should be accounted for in the midterm review
- How fuel economy standards impact vehicle safety, cost, and performance.
- Consumer demand for and acceptance of varying vehicle types and technologies.
- The uniformity and consistency of standards under the National Program
- Flexibility mechanisms available to assist manufacturers in meeting fuel economy standards.
- The CAFE program's impact on economic growth, innovation, product development and job creation within the auto industry.
- How the Midterm Evaluation will inform NHTSA and EPA's assessment of the suitability of fuel economy and greenhouse gas emissions standards for model years 2022-2025.

⁷⁷ Id.

⁷⁸ Id.

⁷⁹ Id.

⁸⁰ See <https://energycommerce.house.gov/news-center/letters/letter-epa-administrator-mccarthy-and-nhtsa-administrator-rosekind>

⁸¹ Hemmersbaugh, P. & McCabe, J. (2016, September 15). Response to Draft TAR Comment Extension. Ltr to Chairman Burgess.

V. STAFF CONTACTS

If you have any questions regarding this hearing, please contact Paul Nagle, Tom Hassenboehler, Ben Lieberman, or Olivia Trusty of the Committee Staff at (202) 225-2927.