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September 6, 2018

Andrew K. Wheeler
Acting Administrator
U.S. Environmental Protection Agency
Office of the Administrator, Code 1101A
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Heidi King
Deputy Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Request for Extension of Comment Periods in The Safer Affordable Fuel Efficient Vehicles Proposed Rule for Model Years 2021-2026 (Dockets EPA-HQ-OAR-2018-0283, NHTSA-2018-0067/NHTSA-2017-0069) and Draft Environmental Impact Statement for SAFE Vehicles Rule (Docket NHTSA-2018-0067-1425)

Submitted electronically to www.regulations.gov

Dear Acting Administrator Wheeler and Deputy Administrator King:

The Alliance of Automobile Manufacturers¹ (“Alliance”) requests an extension of the public comment periods for The Safer Affordable Fuel Efficient (SAFE) Vehicles Proposed Rule for Model Years 2021-2026 (“NPRM”) issued jointly by the U.S. Environmental Protection Agency (“EPA”) and the National Highway Traffic Safety Administration (“NHTSA”) (“the Agencies”) as well as for NHTSA’s related Draft Environmental Impact Statement (“DEIS”) for this proposed rule.²

The Alliance requests an extension of the NPRM comment period from the current 60 days to a total that is not less than 120 days. We also ask that NHTSA align the comment period for the Draft EIS to end on the same day as the comment period for the NRPM.

¹ Alliance members are BMW Group, FCA US LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche Cars North America, Toyota, Volkswagen Group of America and Volvo Car USA. For additional information, go to <http://www.autoalliance.org>.

² 83 Fed. Reg. 42986 (Aug. 24, 2018) (SAFE Vehicles Proposed Rule for Model Years 2021-2026) and 83 Fed. Reg. 39750 (Aug. 10, 2018) (availability of NHTSA Draft EIS No. 20180178) respectively.

The Alliance has provided the Agencies meaningful information, data, analyses and comments on all aspects of the Midterm Evaluation process including the Draft Technical Assessment Review (Draft TAR”) and Proposed Determination.³

As part of its formal comments on the NPRM for this important rulemaking, the Alliance will submit several detailed technical and economic analyses and reports. Due to extensive changes to NHTSA’s model, developed by the Volpe National Transportation Systems Center, and the numerous supporting documents released by the Agencies, some of the Alliance’s analyses and reports cannot be completed within the current 60-day comment period.

Our request for an extended NPRM comment period both is reasonable and necessary to ensure our submissions to the dockets are timely and can become part of the formal rulemaking record. Since NHTSA’s DEIS is so closely related to the NPRM, the comment periods must be carefully aligned to ensure the public has the opportunity to submit comprehensive and meaningful comments.

Thank you for your prompt consideration of this extension request. If you have any questions or wish to discuss this matter, please contact me at (248) 281-0070 or CNevers@autoalliance.org.

Sincerely,



Chris Nevers
Vice President, Energy and Environment

Cc: James Tamm, NHTSA
Ken Katz, NHTSA
Chris Lieske, EPA
Susan Conti, Alliance

³ Alliance of Automobile Manufacturers Comments and Supplemental Comments on Draft TAR <https://www.regulations.gov/document?D=EPA-HQ-OAR-2015-0827-4089L> , <https://www.regulations.gov/document?D=EPA-HQ-OAR-2015-0827-5733> and Comments on Proposed Determination <https://www.regulations.gov/document?D=EPA-HQ-OAR-2015-0827-6156>