

3. *Option No. 3:* This option deletes specific reference to EPA's emissions standards on the front of the AFV label, and instead directs interested consumers to EPA's green vehicle guide website where detailed information is provided. This website provides all of the necessary background information in a format more conducive to understanding and assessing comparative tailpipe emissions. It also includes references to all vehicles and is not limited to AFVs. Accordingly, the Commission requests comment on whether referring consumers to this website may provide a significantly more helpful basis for a consumer to assess relative costs and benefits in terms of purchasing an AFV than listing all the EPA emissions standards or disclosing which certification standard has been met.

This proposal is based on several considerations. First, the emissions information on the current label is based on emissions standards that change over time. Any label revisions made to reflect the new Tier 2 standards also will become obsolete in the future. Second, the emissions information on the current label already is complex. Revising the label to reflect the federal Tier 2 and California LEV II standards would add more complex and non-contextual information to the label, which may not be particularly helpful to consumers. Additionally, although the bins reflect all of EPA's Tier 2 emission standards, the overwhelming majority of AFVs ultimately may fall within only a limited number of bins. Thus, depicting bins that may never be referenced may not be helpful.

The Commission further proposes moving the information in parts two and

three of the AFV label from the back to the front of the label. This information includes the specific factors consumers should consider before buying an AFV, as well as referrals to DOE, EPA, and NHTSA for more information about AFVs. This option would eliminate the need to include information on the back of the label. A one-sided label may be easier for consumer to use, and possibly less costly to produce, even if the label dimensions are increased to encompass information now on two sides.¹⁶ A downside, however, may be that the front of the label includes so much information that it overwhelms consumers and does not help them make informed decisions.

¹⁶ Currently the Rule specifies that the label must be 7 inches wide and 5½ inches long. One possibility would be to expand the label to 7½ inches wide and 7 inches long, or larger, so that the print size can be proportionately larger.