

Table 1
U.S. Sales, Market Share, and Production Data for Major Light
Truck Manufacturers*

Mfg.		Total	<3,100 lb	3,101 to 3,400 lb	3,401 to 3,700 lb	3,701 to 4,000 lb	4,001 to 4,300 lb	4,301 to 4,600 lb	4,601 to 4,900 lb	>4,901 lb	North American Built	Domestic Content
GM	Sales	2,412 K	41 K	88 K	101 K	256 K	188 K	390 K	363 K	985 K	100 %	90 %
	Share	30 %	16 %	15 %	13 %	26 %	12 %	32 %	44 %	55 %		
Ford	Sales	2,060 K	59 K	106 K	285 K	118 K	410 K	493 K	237 K	352 K	98 %	81 %
	Share	26 %	23 %	18 %	36 %	12 %	27 %	40 %	28 %	20 %		
DCX	Sales	1,772 K	0	178 K	70 K	293 K	575 K	172 K	140 K	344 K	100 %	79 %
	Share	22 %	0 %	31 %	9 %	30 %	38 %	14 %	17 %	19 %		
Toyota	Sales	747 K	117 K	16 K	198 K	162 K	50 K	66 K	43 K	95 K	59 %	37 %
	Share	9 %	46 %	3 %	25 %	16 %	3 %	5 %	5 %	5 %		
Honda	Sales	336 K	29 K	109 K	0	0	149 K	49 K	0	0	64 %	46 %
	Share	4 %	7 %	19 %	0 %	0 %	10 %	4 %	0 %	0 %		
Nissan	Sales	287 K	0	35 K	5 K	121 K	114 K	12 K	0	0	69 %	40 %
	Share	4 %	0 %	6 %	1 %	12 %	8 %	1 %	0 %	0 %		
Isuzu	Sales	79 K	0	6 K	5 K	42 K	18 K	8 K	0	0	78 %	47 %
	Share	1 %	0 %	1 %	1 %	4 %	1 %	1 %	0 %	0 %		
Hyundai	Sales	83 K	0	0	83 K	0	0	0	0	0	0 %	1 %
	Share	1 %	0 %	0 %	10 %	0 %	0 %	0 %	0 %	0 %		
Suzuki	Sales	51 K	6 K	10 K	35 K	0	0	0	0	0	46 %	15 %
	Share	1 %	2 %	2 %	4 %	0 %	0 %	0 %	0 %	0 %		
Kia	Sales	97 K	0	30 K	17 K	0	0	0	50 K	0	0 %	0 %
	Share	1 %	0 %	5 %	2 %	0 %	0 %	0 %	6 %	0 %		
BMW	Sales	39 K	0	0	0	0	0	31 K	0	8 K	100 %	35 %
	Share	>1 %	0 %	0 %	0 %	0 %	0 %	3 %	0 %	>1 %		
VW	Sales	11 K	0	0	0	0	10 K	0	0	1 K	0 %	1 %
	Share	>1 %	0 %	0 %	0 %	0 %	1 %	0 %	0 %	>1 %		
Total		7,974 K	252 K	578 K	799 K	992 K	1,514 K	1,221 K	833 K	1,785 K		

* Sales data from NHTSA's CAFE Database for MY 2002. Percent North American Built are data from 2002 calendar year from Automotive News 2003 Market Data Book. Domestic content percentages were calculated using AALA Reports and sales data from NHTSA's CAFE Database for MY 2002. All weight ranges listed in the table signify curb weights.

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As stated by NAS, the current structure of the CAFE program favors manufacturers with a product mix dominated by small light trucks and disfavors manufacturers with a full line of light trucks or those with a product mix that is dominated by heavier trucks. The potentially adverse effects of tighter light truck CAFE standards on the economic vitality of the auto industry can be seen by ranking vehicle manufacturers by their current CAFE averages and their average fuel economy ratings within weight classes. The fuel economy data in Table 2 suggest that reform toward a weight-class system will affect both domestic and foreign manufacturers. For example, within weight classes, GM vehicles generally rank high in overall fuel economy,

while DaimlerChrysler vehicles do not rank high in several heavier weight classes. Similarly, Honda ranks high in the weight classes where it has substantial volume while Toyota products do not rank as high in fuel economy in several weight classes. These data are only for one model year but such trends are likely to continue in the near term. In the long run, all manufacturers will have sufficient lead time to make new product offerings under a reformed system.

The vulnerability of full-line firms to tighter CAFE standards does not arise primarily from poor fuel economy ratings within weight classes. Their overall CAFE averages are low compared to manufacturers that produce more relatively light vehicles because their sales mixes comprise a

much larger quantity of bigger and heavier vehicles. For example, within given weight classes, the average fuel economy average of GM vehicles weighing in excess of 3,400 lbs. curb weight is actually greater than Toyota's. Yet, Toyota's overall fuel economy average, across all weight classes over 3,400 lbs., is greater than GM's due to the fact that Toyota sells more vehicles in the lower weight classes than GM does and because GM's market share in the three heaviest classes is so large. An attribute-based (weight and/or size) system could neutralize disparate impacts on full-line manufacturers that could result from a sustained increase in CAFE standards. NHTSA seeks comment on these economic concerns, which ultimately relate to the economic practicability of more stringent light-