

truck CAFE standards. We also seek comment on potential reforms that

could reduce or eliminate these adverse economic effects.

TABLE 2

Manufacturer	<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.	Overall mpg
GM .....	29.8	25.7	23.1	24.7	21.2	20.3	19.6	18.0	19.9
Ford .....	28.8	24.8	23.0	20.0	21.1	19.6	19.1	17.5	20.3
DaimlerChrysler .....	N/A	25.5	19.5	21.1	22.3	20.6	18.1	16.9	20.4
Toyota .....	29.0	28.3	22.6	23.4	20.5	19.3	18.0	17.8	22.1
Honda .....	29.7	27.8	N/A	N/A	24.0	22.6	N/A	N/A	25.3
Nissan .....	N/A	26.2	24.3	20.6	19.5	19.0	N/A	N/A	20.7
Isuzu .....	N/A	22.4	22.5	21.2	20.7	19.5	N/A	N/A	21.0
Hyundai .....	N/A	N/A	24.5	N/A	N/A	N/A	N/A	N/A	24.5
Suzuki .....	23.3	22.4	21.4	N/A	N/A	N/A	N/A	N/A	21.8
Kia .....	N/A	23.3	23.0	N/A	N/A	N/A	19.8	N/A	21.4
BMW .....	N/A	N/A	N/A	N/A	N/A	20.3	N/A	17.5	20.2
VW .....	N/A	N/A	N/A	N/A	20.6	N/A	N/A	20.0	20.6
Total .....	29.0	25.7	22.7	22.1	21.6	20.1	19.1	17.7	20.6

### Light Truck Fuel Economy (mpg) by Weight Class (lbs.) for MY 2002

A fourth reason for considering CAFE reform is to modernize the definitions and classifications of light trucks within the program. The markets for, and designs of, cars and light trucks have changed substantially since the inception of the CAFE program in the late 1970's. The existing CAFE program creates a bright line distinction between passenger and non-passenger automobiles (light trucks) and that distinction—found in both the statute and subsequent rulemakings—reflects the vehicle fleet prevalent in the 1970's.

Since then, the American public has resoundingly responded to the development of new types of vehicles, such as minivans and sport utility vehicles (SUVs). As compared to traditional passenger cars, these multipurpose vehicles are better able to satisfy the demand for family transportation, cargo carrying capability and recreational use. The market for traditional pick-up trucks has also expanded, giving rise to a broader variety of sizes, performance abilities and uses.

The market suggests that while some light trucks may be used primarily to transport passengers, their “peak use or value” capability (towing boats, hauling heavy loads, etc.) may be a critical factor in the purchase decision. In other words, a consumer may require substantial towing capability only periodically, but nevertheless may base his purchasing decision on a vehicle's ability to meet that peak need rather than his daily needs. The motor vehicle market has thus developed a demand for vehicles capable of cross-servicing traditional needs—that is, for vehicles capable of transporting people and cargo, for vehicles capable of servicing

personal transportation needs as well as recreational and commercial ones, and for vehicles capable of substantial performance, even if such performance is only needed periodically.

While minivans, SUVs and pick-up trucks dominated the market of the 1990s, “crossover” vehicles are an emerging motor vehicle trend. Many of these vehicles reverse some of the adverse consequences of the past vehicle fleet. As previously mentioned, they tend to be smaller, lighter, potentially more fuel efficient and designed with lower centers of gravity than the more traditional light trucks of the 1990s.

Any potential reforms to the CAFE system should be considered in light of their ability not only to enhance fuel economy but also to ensure the economic well-being and safety of the American public. In considering CAFE reforms, our aim is to develop a CAFE program consistent with, and not in any way adverse to, our economic and safety objectives.

### III. Comments to Date on CAFE Reform

In February 2002, NHTSA issued a request for comments (RFC) seeking information, views and data regarding future fuel economy standards and potential changes to the CAFE program. Published in the **Federal Register** on February 7, 2002 (26 FR 5767; Docket No. 2002–11419), the RFC requested comments on the recommendations in the National Energy Policy, the conclusions found in the NAS report on fuel economy, and the technical, economic and regulatory obstacles to improvements in fuel economy. The RFC sought to elicit comments on possible reforms to the CAFE program, as it applies to both passenger cars and light trucks, with an eye toward

protecting passenger safety, advancing fuel-efficient technologies, and obtaining the benefits of market-based approaches.

We have received comments relating to CAFE reform both in response to the RFC and in response to our Notice of Proposed Rulemaking to establish light truck fuel economy standards for MYs 2005–2007.<sup>6</sup> (Docket No. 2002–11419, Notice 2) Many argued for a variety of amendments to the current system and others argued against any form of reform—whether through revisions to the current regulatory scheme or more fundamental changes in the way corporate average fuel economy is measured and applied.

While we have considered these comments, the original RFC was quite general and the comments received tended to focus on the various alleged shortcomings of the current program—

<sup>6</sup> We received comments from, amongst others, Public Citizen, Insurance Institute for Highway Safety (IIHS), Sierra Club, American Council for an Energy-Efficient Economy (ACEEE), Union of Concerned Scientists (UCS), Alliance to Save Energy (Alliance) and Coalition for Vehicle Choice (CVC), the Recreation Vehicle Industry Association (RVIA), Japan Automobile Manufacturers Association, Inc. (JAMA), National Truck Equipment Association (NTEA), National Automobile Dealers Association (NADA), Association of International Automobile Manufacturers, Inc. (AIAM), Alliance of Automobile Manufacturers (AAM), and Rubber Manufacturers Association (RMA). Manufacturers filing comments included General Motors (GM), Daimler Chrysler (DC), Ford Motor Company (Ford), Toyota Motor Corporation (Toyota), American Honda Motor Company (Honda) and Nissan North America (Nissan). A number of individuals also provided comments—Marc Ross from the University of Michigan both individually (Ross) and in conjunction with Tom Wenzel from the Lawrence Berkeley National Laboratory (Wenzel and Ross) and a class from Harvey Mudd College Engineering Department; Professor Patrick Little, Hans Meyer, Leryn Gorrilitsky, Naomi Tomimatsu, Jordan Kwan, Anna Olson, Chris Holcomb, and Carman Ng.