

Ferrari North America, Inc.

[REDACTED]

November 9, 2020



Jonathan C. Morrison Esq.
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: Alliance for Automotive Innovation Petition for Rulemaking – 49 C.F.R. Part 578

Dear Mr. Morrison:

Ferrari North America Inc. (“Ferrari”) is writing in support of the Petition for Rulemaking to amend 49 C.F.R. Part 578 that was filed recently by the Alliance for Automotive Innovation (“Innovators”). Innovators is petitioning NHTSA to establish the first Model Year in which a \$14 civil penalty¹ rate will apply as Model Year 2022.

[REDACTED] Ferrari has petitioned NHTSA to establish alternative standards under 49 C.F.R. Part 525 for Model Years 2016 – 2018, years in which Ferrari qualified as a “low volume” manufacturer for purposes of Part 525. [REDACTED]

[REDACTED]

For these reasons, Ferrari has a keen interest in knowing the first Model Year in which the civil penalty will be applied at the \$14 level, and urges the agency to grant the Innovators’ rulemaking petition. [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Applying the civil penalty rate of \$14 prior to MY 2022 serves no public interest and will save no fuel. [REDACTED]

[REDACTED] Subjecting MY 2021 to the \$14 civil penalty rate will result only in a massive wealth transfer, either to the manufacturers that have surplus CAFE credits or to the U.S. Treasury. [REDACTED]

[REDACTED]

For all of these reasons, Ferrari respectfully urges NHTSA to grant Innovators' petition and amend Part 578 to provide that the \$14 civil penalty rate applies to Model Year 2022 and thereafter.

Sincerely,

A handwritten signature in blue ink that reads "David M. Wertheim".

David M. Wertheim
Vice President & General Counsel

[REDACTED]