

Comment from Anonymous

Posted by the **National Highway Traffic Safety Administration** on Aug 23, 2021

NHTSA should immediately affirm the December 2016 final rule and apply the adjustment beginning with the 2019 model year. Every month it does not do so it violates the Inflation Act. It should also immediately update the civil penalty for the MY2022 to account for the change in the CPI since 2016 and make these adjustments annually as it is required to do so, and has this year done for other civil penalties under its purview.

It is unlikely that NHTSA will receive any novel legal theories as to why the Dec. 2016 rule should not be confirmed. It will instead receive a public relations campaign from those that had far advance notice of upcoming inflation adjustments. They will complain about jobs while failing to invest in the jobs of the future while America's automotive industry continues its long slide toward uncompetitiveness. Their executives live by socializing the costs and privatize the profits. They want the public to pay for its electric transition while they reap significant profits selling full-size trucks and SUVs and discontinue passenger cars.

Again, NHTSA should immediately affirm the December 2016 final rule and apply the adjustment beginning with the 2019 model year. Conclusive evidence in regulatory filings shows that automakers knew this rule would be in effect and should have made efforts to comply with their CAFE targets. Failure to do so is in fact a retroactive bailout for scofflaws.