

Comment from Grant Carr

This comment is in regard to enforcement of penalties for non-compliance to fuel efficiency standards.

The auto manufacturers have had notice of their need to improve the average efficiency of the vehicles they build and sell for many years and the penalties they would pay should they fail to do so. Technology has not been a barrier to compliance with the average mpg standards established by the Federal government. One only needs to review the average mpg attained in 2018 by Honda (30.0 mpg), Subaru (28.7 mpg), Mazda (28.7 mpg), Kia (27.8 mpg), Nissan (27.1 mpg) and BMW (26.0 mpg) to see this is true. Federal penalties and laws are meaningless until they are applied. Failure to apply them discourages any innovation that might be required for compliance and rewards non-compliance. This is evident in the behaviors of those auto manufacturers who have heavily promoted and invested in manufacturing vehicles with sub-standard (frankly dismal) mpg performance. Automakers who failed to comply with the average fuel efficiency standards established by the Federal government under the framework adopted in 1975 should be held to account and required to immediately pay the full penalty defined by the law for each year in which they failed to comply (and didn't pay the penalty). In the absence of this action, the past behaviors of these manufacturers over the last 45 years has clearly demonstrated we can have no expectation that they will ever change their behavior to comply with Federal fuel emission standards. Meanwhile those US companies will become increasingly non-competitive versus foreign auto manufacturers as they continue to fall further and further behind in the average fuel efficiency achieved by their vehicles, Enforcing the penalties will encourage the behaviors required to protect US based manufacturing jobs. Please enforce the law and levy the penalties defined by it. Thank you.