



**ARCONIC**

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October 26, 2021

Steven S. Cliff  
Acting Administrator  
National Highway Traffic Safety Administration (NHTSA)  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

*RE: Notice of Proposed Rulemaking; Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks (Docket No. NHTSA-2021-0053; RIN 2127-AM34)*

Dear Acting Administrator Cliff:

Arconic Corporation appreciates the opportunity to provide comment on the recent Notice of Proposed Rulemaking issued by the National Highway Traffic Safety Administration (NHTSA) to revise Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks.

Arconic Corporation is a global leader in manufacturing aluminum sheet, plate, extrusions and architectural products that serve primarily the ground transportation, aerospace, building and construction, industrial, and packaging end markets. We maintain a leadership position in our targeted markets through our global footprint of 22 primary manufacturing facilities.

Aluminum has been proven to enable low-weight, high-strength solutions for existing internal combustion platforms as well as for emerging electric vehicles. The latest DuckerFrontier “North American Light Vehicle Aluminum Content and Outlook” report affirmed that aluminum—already the fastest growing automotive material—is expected to grow further by 2026.

In the automotive industry, material engineers are increasingly turning to aluminum to improve vehicle performance, fuel efficiency and to enhance battery life and driving range in electric vehicles. Arconic’s lightweight aluminum sheet and extruded solutions are found bumper to bumper in a variety of vehicles – from doors and hoods to heat exchangers and structural parts. Aluminum sheet products are used in auto closures and body-in-white (BIW) components. Arconic also produces proprietary heat exchanger products like multilayer brazing sheet and aluminum sheet used in truck cab structures and fuel tanks and plate products used in trailer applications. Additionally, the company produces a range of extruded products, including driveshafts, anti-lock brake housings, and components of turbo chargers.

The NPRM makes specific references to aluminum, which are accurate and consistent with practical automotive industry experience and future program expectations. Mass reduction utilizing advanced materials like aluminum is recognized as one of the technology options to achieve safe, fuel-efficient and cost-effective vehicles that meet or exceed consumer demands.

Further, Arconic supports the following items outlined in the NPRM:

- Fuel economy standards revisions that increase 8% year-over-year from MY 2024-2026.
- Continued use of footprint-based standards for separate vehicle classes, as those are an appropriate means of characterizing the vehicle fleet and an effective way to drive fuel-efficiency improvement across all vehicle classes. Footprint-based standards eliminate an incentive to shift fleet volume to smaller cars, which has been shown to slightly decrease safety in vehicle-to-vehicle collisions. It also provides an incentive for reducing weight in the larger vehicles, where weight reduction is of the most benefit for fleet safety. Arconic has observed the application of aluminum to reduce weight occurs mainly in the larger vehicles, especially the large pickup truck segment and large SUVs. As an example of this, large vehicles like Ford's top-selling, aluminum-bodied F150 pickup truck has achieved the highest 5-Star safety [rating](#) from NHTSA. Clearly, the footprint-based regulatory approach is working as intended.
- Alignment of fuel efficiency standards between EPA, NHTSA and the California Air Resources Board (CARB) to establish clarity for continued development in vehicle technologies and the related investments that will be required. We recognize the statutory limitations between EPA and NHTSA but recommend that these standards be aligned by MY 2026.
- Incentives for full-size hybrid pickup trucks. As NHTSA acknowledges, full-size pickup trucks typically require high towing capability and cargo capacities.

In addition to supporting the technical comments submitted by the Motor & Equipment Manufacturers Association (MEMA) and the Aluminum Association, Arconic appreciates the opportunity to provide input to NHTSA as it considers revisions to vehicle fuel economy regulations for MY 2024 and beyond.

Sincerely,



Herve GEHANNO

Herve Gehanno  
Vice President, Commercial Global Automotive Sales  
Arconic Corporation