Comment from Luna Fulgueiro

I agree with the final ruling of increasing the civil penalty to \$5.50 for models starting at 2019 instead of 2022. Leaving the penalty at \$5.50 for the model years of 2019-2021 could incentivize manufacturers to be more fuel efficient in their next models. As well as improving the fuel economy through the lack of credits in future models. They should start with 2019 or maybe even 2020. 2019 models are already made but 2021 or 2020 are still new and it could be better regulated if the car has not come out yet.