

Submission to Dockets Nos. NHTSA-2021-0053 and NHTSA-2021-0001

Rebecca Schade
Attorney-advisor, Office of Chief Counsel

The Docket

Thru: Ann Carlson
Chief Counsel

On September 28, 2021, NHTSA met virtually with representatives of Volvo Cars to discuss issues relating to the Proposed Rulemaking to Revise Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks and the Supplemental Notice of Proposed Rulemaking for CAFE Civil Penalties. NHTSA was represented by Greg Powell, Joe Bayer, Vinay Nagabhushana, Seiar Zia, Walt Lysenko, and Bahman Habibzadeh of the Office of Rulemaking; Maurice Hicks of the Office of Enforcement; and Rebecca Schade, Hannah Fish, and Michael Koppersmith of the Office of the Chief Counsel. Volvo Cars was represented by Katherine Yehl, Dan Doku, Diana Lidgett, Hans Mathiasson, Per-Anders Lennvi, Johan Sjörs, Thomas Fleischer, and Peter Ewerstrand. Volvo's representatives stated that they believed the proposed CAFE standards were potentially achievable, and reiterated their corporate commitment to vehicle electrification. They also discussed comments that they intend to submit to the docket on the standards proposal, specifically regarding the future use of templates for CAFE compliance submissions, and asked clarifying questions about NHTSA's requirements for those templates. Additionally, they discussed challenges with pricing and selling credits due to regulatory uncertainty in the area, particularly regarding when an increase to the penalty rate will be applied.