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August 1, 2022

NHTSA Docket Management Facility
M-30, U.S. Department of Transportation
West Building, Ground Floor, Rm. W12-140,
1200 New Jersey Avenue SE, Washington, DC 20590

Re: Docket No. NHTSA-2022-0048 - Comments of Ferrari N.V. and Ferrari North America, Inc. on Exemptions from Average Fuel Economy Standards; Passenger Automobile Average Fuel Economy Standards

Dear Sir or Madam:

Attached please find the comments of Ferrari N.V. and Ferrari North America, Inc. on Exemptions from Average Fuel Economy Standards; Passenger Automobile Average Fuel Economy Standards, Docket No. NHTSA-2022-0048. Please contact me at (201) 816 - 2618 or at gianfranco.mitrione@ferrari.com if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gianfranco Mitrione". The signature is written in a cursive, flowing style.

Gianfranco Mitrione
General Counsel
Ferrari North America, Inc.



Comments of Ferrari N.V. and Ferrari North America, Inc.

on

Exemptions From Average Fuel Economy Standards; Passenger

Automobile Average Fuel Economy Standards

Docket No. NHTSA–2022–0048



Ferrari N.V. and Ferrari North America, Inc. (“Ferrari”) appreciate the opportunity to submit comments on NHTSA’s “Exemptions from Average Fuel Economy Standards; Passenger Automobile Average Fuel Economy Standards” (87 Fed. Reg. 39439-39458) (Docket ID No. NHTSA–2022–0048). **Ferrari supports NHTSA’s proposed standards as applicable to Model Years 2016-2018 and 2020 Ferrari vehicles and urges NHTSA to adopt these as final standards as quickly as possible.**

Ferrari is a low volume manufacturer under the criteria set forth in 49 CFR part 525 until Model Year 2018 included. Ferrari produced more than 10,000 passenger automobiles globally in 2019 and therefore is not eligible for small volume manufacturer status in MY 2019. However, Ferrari produced less than 10,000 passenger automobiles globally in 2020 due to the effects of the COVID–19 public health emergency, fulfilling again criteria set forth in 49 CFR part 525 in MY 2020. Ferrari’s low volume diversified product offering includes different architectures (such as front-engine and mid-rear engine), engine sizes (V6, V8 and V12), technologies (atmospheric, turbo-charged, hybrid, electric), body styles (such as coupes, spiders and targa), and seats (2 seaters and 2+ seaters). Ferrari employs a large number of power train, aerodynamics, and light- weighting technologies to optimize Fuel Economy improvements while keeping the essence of a Ferrari for our customers. Pursuant to 49 CFR part 525, Ferrari submitted petitions for alternative standards for MYs 2016–2018 and 2020. These petitions were all based on the performance of anticipated technologies for future model years, as well as predictions of the sales mix among the



powertrains and models offered in those years. The information provided in these petitions demonstrates that Ferrari has applied advanced technology and has substantially improved Fuel Economy since adoption of Fuel Economy standards by NHTSA.

Ferrari believes NHTSA's proposal is consistent with the basis set forth in 49 CFR part 525 for the Low Volume Manufacturer alternative standards. With regard to Ferrari, we offer a limited number of models and engines. While we employ advanced technologies, due to our low volume globally, it is difficult for suppliers to engineer and provide small numbers of components that could be employed on a year over year basis. This means that for Ferrari, new technologies are employed as models are being revised or totally new models are developed and introduced. In addition, due to the limited number of models and powertrains, annual Fuel Economy levels are highly dependent on the mix of models our purchasers choose. Given the difficulty in predicting customer's choices in advance and the constraints on manufacturers such as Ferrari, NHTSA's approach in establishing the alternative Fuel Economy standards represents the most appropriate means of proceeding.

In addition, it has to be noted that the EPA Administrator has signed on June 25, 2020, the final determination for alternative GHG standards for Small Volume Manufacturers (SVMs) for MYs 2017 through 2021.

EPA's light-duty vehicle greenhouse gas (GHG) program provides a conditional exemption for SVMs with annual U.S. sales of less than 5,000 vehicles due to unique feasibility issues faced by these SVMs.



Four manufacturers have been granted for SVM alternative standards: Aston Martin, Ferrari, Lotus and McLaren. These manufacturers may optionally apply the MY 2017 Alternative Standard to MYs 2015–2016.

Ferrari looks forward to working cooperatively with NHTSA on this and other matters associated with its status as a Low Volume Manufacturer.