



Submitted via <http://www.regulations.gov>

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

October 19, 2022

Re: Comments in Response to Notice of Intent to Prepare an Environmental Impact Statement for Model Years 2030 and Beyond New Medium- and Heavy-Duty Fuel Efficiency Improvement Program Standards (Docket No. NHTSA-2022-0076)

Dear Sir or Madam,

Cummins Inc. appreciates the opportunity to provide comments to the U.S. Department of Transportation National Highway Traffic Safety Administration (NHTSA) in response to the Notice of Intent to prepare an Environmental Impact Statement (EIS) for Model Years 2030 and Beyond New Medium- and Heavy-Duty (HD) Fuel Efficiency (FE) Improvement Program Standards. Cummins supports tough, clear, and enforceable standards that deliver real-world environmental and energy benefits and are feasible with reliable technologies that our customers can readily adopt. This support includes advocating for and collaborating with NHTSA, U.S. Environmental Protection Agency (EPA), and diverse stakeholders on Phase 1 and Phase 2 Greenhouse Gas (GHG) Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles.^{1,2}

Cummins also envisions a zero-emissions future and in January 2022 introduced its

¹ See <https://investor.cummins.com/news/detail/55/cummins-announces-intent-to-meet-new-fuel-efficiency-and> (last accessed October 13, 2022).

² See <https://investor.cummins.com/news/detail/330/cummins-ready-to-deliver-fuel-savings-and-greenhouse-gas> (last accessed October 13, 2022).



decarbonization strategy called Destination Zero.³ Destination Zero is the company's strategy to go further, faster to reduce the GHG and air quality impacts of its products and reach net-zero emissions by 2050 in a way that serves all stakeholders in a sustainable way for Cummins' business. The strategy calls for developing and advancing low- and no-carbon platforms for those customers who are ready for them while also working to reduce carbon emissions from the company's more traditional products. In addition to battery and fuel cell electric platforms and electrolyzers critical to producing low-carbon and green hydrogen, Cummins is bringing to market fuel-agnostic internal combustion engines offering a common architecture that can be optimized for different low-carbon fuels.⁴

Aligned with Cummins' commitments described above, we offer these principles for consideration as NHTSA develops its range of alternatives for analysis in the EIS:

- A **harmonized national program** for fuel efficiency and GHG standards by NHTSA, EPA, and the California Air Resources Board (CARB) is essential to assure the greatest improvements are achieved in the most cost-efficient manner and to provide vehicle and engine manufacturers, suppliers, and end-users with the certainty necessary for investment in technologies to improve fuel efficiency.
- Sufficient regulatory **lead time and stability** should be provided to allow manufacturers to develop and implement the technologies needed to improve fuel efficiency and spread investments over time to minimize cost to customers.
- Standards should be **performance-based and technology neutral**, not technology mandates, to allow manufacturers to innovate across a broad range of technologies to meet customers' diverse needs.
- The Phase 1 and Phase 2 regulatory framework of **separate engine (powertrain) and vehicle standards** should be maintained to ensure the rule delivers efficient technologies at all levels of the system while recognizing the diversity and complexity of the market and preserving customer choice.
- Standards should be **fuel neutral** (i.e., same stringency regardless of fuel type) to ensure the environmental and fuel-saving benefits of the regulation are achieved regardless of the fuel type chosen by customers.
- The **tradeoff between oxides of nitrogen (NOx) and carbon dioxide (CO₂) reductions** must

³ See <https://www.cummins.com/company/esg/environment/destination-zero> (last accessed October 13, 2022).

⁴ See <https://investor.cummins.com/news/detail/551/cummins-unveils-industry-first-fuel-agnostic-internal> (last accessed October 13, 2022).



be considered when setting the stringency of FE standards. EPA will finalize new HD Low NOx standards for 2027 and later by the end of this year. The stringency of EPA's future NOx standards will impact the range of feasible FE standards which NHTSA should consider. Also, certification cycles for engine/powertrain criteria pollutants and fuel efficiency should remain aligned as in the Phase 1 and 2 rules so that improvement in one is not achieved at the expense of the other.

- **Well-to-wheels emissions and energy use** should be considered in assessing technology effectiveness to ensure alignment of the standards with the most beneficial path to zero emissions.

Cummins looks forward to engaging with NHTSA and a broad variety of stakeholders in the new rulemaking which is the subject of NHTSA's upcoming EIS and thanks NHTSA for this opportunity to provide initial comments. For any questions, please contact me via email at jackie.m.yeager@cummins.com.

Sincerely,

Jackie M. Yeager

Jackie M. Yeager

Director – Emissions and Fuel Efficiency Policy

Product Compliance & Regulatory Affairs

Cummins Inc.