



June 21, 2005

1600 20th Street, N.W.
Washington, D.C. 20009

**INCREASES IN FUEL ECONOMY WILL IMPROVE SAFETY:
SAFETY “THREAT” IS AUTO INDUSTRY MYTH**

Dear Senator:

The Senate will be voting this week on several much-needed Corporate Average Fuel Economy (CAFE) amendments offered by Sens. Dianne Feinstein, Olympia Snowe and Dick Durbin.

The Feinstein-Snowe amendment would create a combined fleet (cars, SUVs, pickups and vans) and require all vehicles to achieve a corporate average of 27.5 mpg by 2011. The Durbin amendment, co-sponsored by Sens. Bill Nelson (D-Fla.), James Jeffords (I-Vt.), Jon Corzine (D-N.J.), Jack Reed (D-R.I.), Edward Kennedy (D-Mass.) and Barbara Boxer (D-Calif.), carves out a separate category for pick-up trucks, which must achieve an average of 27.5 mpg by 2017, and requires a combined fleet average for cars, SUVs and minivans, which would reach 40 mpg by 2017. We ask that you support these reasonable targets for improved fuel economy and vote in favor of these amendments.

In response to such advances, auto industry allies may construct a long-outdated and inaccurate argument about safety impacts from CAFE standards. The claim is essentially that fuel economy increases will require vehicle weight reductions, which, it is argued, reduce safety.

Yet numerous studies have shown this oft-promoted story to be a myth. The absence of a real fuel economy increase for the past 20 years has helped to create a bloated, heavy and dangerously overpowered SUV and pickup vehicle fleet. The current fleet of vehicles is the heaviest in history and has the lowest overall fuel economy in 20 years.¹ As a result, there is a dangerous mismatch of vehicles on the highway, which undermines safety.

As described by the Environmental Protection Agency (EPA) in its annual Trends Report, rather than improve fuel economy, automakers have used annual average gains of 1.9 mpg in engine efficiency to massively bulk up vehicles and ramp up engines, which increases the overall mass in collisions and poses a serious risk to other drivers on the road. Heavier light trucks, with their rigid frames and elevated heights, are exceedingly destructive in crashes with passenger cars.

The industry's primary support for its position comes from a highly controversial study by Charles Kahane of the National Highway Traffic Safety Administration (NHTSA). The Kahane study suffers from three major flaws:

1. It does not sort out the conflated effects of vehicle size and vehicle weight. Yet size is primarily helpful for safety, and weight is primarily hostile.

2. It does not distinguish the effects of safety design differences among vehicles, yet other research shows that the quality of a vehicle's safety design is by far the largest factor affecting occupant risks.
3. It treats the historical relationship between size and weight as a given, discounting the critical role that high-strength, light-weight steels and aluminum could play in improving safety design and fuel economy in both smaller and larger vehicles.

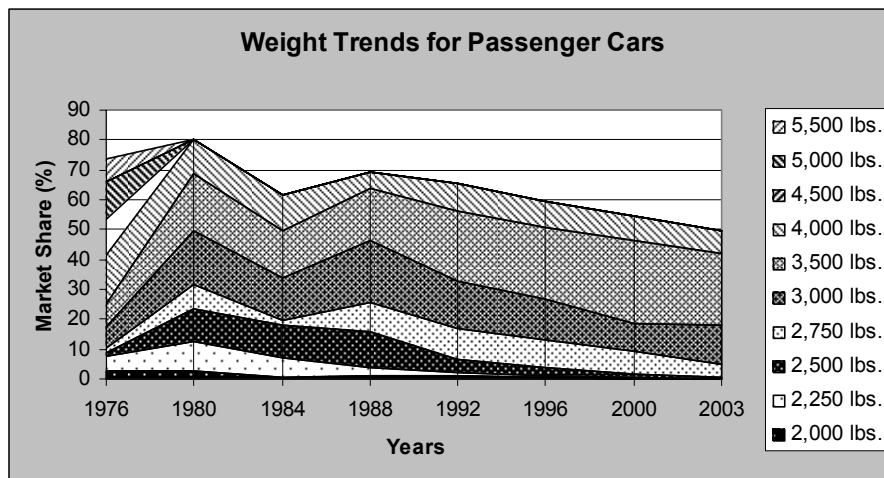
Kahane's hypothesis arbitrarily assumes a 100-lbs weight reduction in vehicles, yet the historical record shows that improvements in fuel economy were achieved 85 percent through improved technology. Similarly, there have now been many decades of stagnation in vehicle fuel economy and there are a large number of on-the-shelf technologies that could dramatically improve fuel economy without any weight reductions whatsoever.

Even if improved fuel economy were achieved through vehicle weight reductions, these reductions would be focused, as in the past, on the heaviest vehicles in the fleet, where they are most cost-effective. This would reduce vehicle mismatch on the road and improve safety.

His conclusions have also been disproven by more discerning research that does sort out the confounding effects of vehicle size from vehicle weight. Dynamic Research, Inc. (DRI) found that there was *no likelihood of a net increase in fatalities* if vehicle weight were reduced across today's fleet. In fact there was a net decrease in fatalities.

Safety-related objections were also raised when I was Administrator of NHTSA, when we established the 1977 vehicle fuel economy standards. Dire predictions that new standards would result in millions of miniature vehicles were proven wrong by historical events. As shown below, weight reductions occurred only in the heaviest sedans, while the tiniest cars dropped out of the fleet altogether due to consumer preferences. As the standards took effect, there was a convergence in overall weights, resulting in a safer, more compatible fleet.

**Market Share of the Smallest and Largest New Passenger Cars Dwindled
as Passenger Cars Consolidated around 3,000-3,500 lbs.**



Better congressionally mandated fuel economy standards, such as those in the Durbin and Feinstein-Snowe amendments, would produce a vehicle fleet that is more compatible and therefore safer, and, as before, would not lead to the proliferation of tiny vehicles, which do little to improve an automakers' overall CAFE average.

Congress should move forward with confidence to pass fuel economy legislation which meaningfully improves the environment and public health, enhances national security by reducing our dependence on foreign oil, and advances the interests of highway safety.

Sincerely,

A handwritten signature in black ink that reads "Joan Claybrook". The signature is written in a cursive, flowing style.

Joan Claybrook
President, Public Citizen

ENDNOTES:

¹ U.S. Environmental Protection Agency, *Light-Duty Automobile Technology and Fuel Economy Trends: 1975 Through 2004*, Washington, D.C.: EPA, Apr. 2004, at 6, 9.