



July 24, 2003

## **LEVIN-BOND THREATENS SAFETY, THE ENVIRONMENT AND GOOD GOVERNMENT**

Dear Senator:

I am writing to ask that you vote against an amendment to be offered by Senators Carl Levin (D-MI) and Christopher Bond (R-MO) that would raise new hurdles to improvements in Corporate Average Fuel Economy (CAFE). The Levin-Bond amendment would severely threaten reasonable and achievable increases in fuel economy by the National Highway Traffic Safety Administration (NHTSA), and undermine the government's current mandate to carefully balance economic considerations with reductions in our dependence on foreign oil.

### **Levin-Bond will increase oil consumption and decrease highway safety.**

The Levin-Bond provisions would stymie future fuel economy standards, giving automakers further incentives to manufacturer increasingly heavy and fuel-hungry SUVs and trucks. In the absence of meaningful standards, SUVs and other light trucks will become even heavier than they are today and more threatening to other motorists on the road.

SUVs are already responsible for a disproportionate share of deaths on American highways. Heavy, tippy SUVs are unnecessarily prone to roll over, killing thousands of their own occupants annually. And the weight and design of these dangerous vehicles are a serious hazard to other people on the highway. Because weight is a predominant factor in the deadliness of SUVs, further delays in CAFE would enable the further "super-sizing" of these vehicles and cost American lives.

### **Levin-Bond would hinder NHTSA's ability to develop meaningful fuel economy standards and could drastically rewrite the program to reward the poorest performers.**

Levin-Bond would add multiple new factors that are redundant to NHTSA's current decisionmaking process and would upset the careful balance struck in the present statute. NHTSA already considers the following in great detail when setting a standard: technical feasibility, economic practicability, the effect of other motor vehicle standards of the government on fuel economy, and the need of the U.S. to conserve energy. As part of this consideration, the agency also performs in-depth evaluations of the impact of a standard on safety, the environment and American jobs. By complicating the agency's task with a lengthy list of unnecessary and deliberately vague new statutory restrictions, the Levin-Bond amendment would be a long stride backwards.

Levin-Bond would also undercut NHTSA's present mandate to set standards at the "maximum feasible" fuel economy for the industry, considered as a whole. NHTSA's recent light truck average fuel economy rulemaking clearly indicated that the agency would not lower a standard because it is more difficult for one manufacturer to achieve that standard than for others.

In contrast, Levin-Bond would require NHTSA to consider "manufacturer competitiveness" in setting the industry standard. This factor, if taken to a logical extreme, supports a percentage-based approach that would create a race toward the bottom, rewarding the poorest performers among the manufacturers, and undercutting one of the clearest values provided by the current statute.

I urge you to oppose the Levin-Bond Amendment and to support measures, such as those sponsored by Senator's Durbin, Feinstein, McCain and Kerry, that would significantly enhance safety, increase fuel economy, protect the environment, and reduce our dependence on foreign oil.

Sincerely,  
Joan Claybrook  
President, Public Citizen