INSURANCE INSTITUTE
FOR HIGHWAY SAFETY

December 1, 2009

Mr. Ronald Medford
Acting Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Notice of Proposed Rulemaking to Establish Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Model Years 2012-2016; Docket No. NHTSA-2009-0059

Dear Mr. Medford,

The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the National Highway Traffic Safety Administration's (NHTSA) notice of proposed rulemaking regarding corporate average fuel economy (CAFE) standards for light-duty vehicles, covering model years 2012 through 2016. IIHS supports NHTSA's efforts to increase fuel economy while maintaining vehicle safety through the use of an attribute-based system.

NHTSA has again proposed using vehicle footprint as the attribute for setting CAFE standards, and IIHS agrees that this attribute will reduce the incentive for automakers to downweight or downsize vehicles to improve fuel economy. As we have stated in previous comments on this topic, vehicle shadow, defined as a vehicle's overall length multiplied by its overall width, is a better attribute to use for minimizing this manufacturer behavior, and would better maintain the safety benefits associated with vehicle weight, size, and structure. One problem with vehicle footprint is that wheelbase may be manipulated within the confines of overall vehicle package to target lower fuel economy targets without concomitant increases in safety associated with large size. However, the close correlation between shadow and footprint suggests that using vehicle footprint instead of vehicle shadow will have a negligible safety effect.

IIHS also is encouraged to see that NHTSA has extended the "breakpoint" of the fuel economy curve at the lower extreme where footprint is the smallest (see Figure IV.A.5-1 on page 49638 of the notice). This "breakpoint" is the leveling-off point on the fuel economy curve where fuel economy requirements cease to increase as footprint decreases. This change is important in order to not encourage manufacturers to downweight the lightest vehicles for further fuel economy credits.

From a safety standpoint, IIHS is supportive of the proposed CAFE standards put forth by NHTSA in this rulemaking. The use of an attribute-based system will help increase fuel efficiency while keeping manufacturers from significantly downweighting or downsizing vehicles, and thus will mitigate the safety costs that might otherwise occur as fuel economy increases are required by the federal government.

Sincerely,

Adrian K. Lund, Ph.D.
President

1005 N. GLEBE RD., ARLINGTON, VA 22201 TEL. 703/247-1500 FAX 703/247-1678 www.iihs.org