



**Statement of the
Motor & Equipment Manufacturers Association (MEMA)
Before the
National Highway Traffic Safety Administration (NHTSA)**

**RE: Notice of Proposed Rulemaking on Corporate Average Fuel Economy
Standards for Model Years 2024-2026 Passenger Cars and Light Trucks**

Docket No. NHTSA-2021-0053

October 13, 2021

MEMA¹ represents more than 900 companies that manufacture components, systems and materials for the light- and heavy-duty vehicle original equipment and aftermarket industries. The vehicle supplier parts industry is the nation's largest sector of manufacturing jobs – directly employing more than 907,000 workers in all 50 states.

Vehicle suppliers provide 77 percent of the value of a new vehicle, including a wide range of technologies and products such as the complex, highly integrated systems to make vehicles safer, more efficient and lower emissions.

After EPA and NHTSA finalized their respective rules in 2012, vehicle suppliers took the leadership position and the substantial associated risk in making long-term investment and commitment decisions on advanced fuel efficiency technologies. Vehicle suppliers continue to invest billions of dollars leading the industry's research, development, and deployment of these advanced technologies to assist vehicle manufacturers in meeting the standards.

As a result, MEMA continues to support working toward a cleaner more efficient transportation future and, therefore, supports the goals of the NHTSA program. MEMA generally supports NHTSA's proposed standards for model years 2024–2026.

MEMA supports NHTSA's approach of encouraging the industry to continue improving the fuel efficiency of all vehicles, supporting a broad spectrum of advanced technologies, instead of focusing on only producing a small segment of electric vehicles in these model years.² While MEMA supports an increase in a wide range of electrification technologies, MEMA also strongly supports encouraging further advances and innovation to internal combustion engine (ICE) technologies. All these technologies can play a part in meeting our nation's goals.

MEMA continues to strongly support harmonization as much as possible between EPA, NHTSA and California. While MEMA understands the statutory authority limitations of each agency, MEMA urges NHTSA and EPA to work together to align stringency, streamline compliance and reduce unnecessary

¹ MEMA represents its member companies via the Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); MERA – The Association for Sustainable Manufacturing; and, Original Equipment Suppliers Association (OESA). For more information, visit <http://www.mema.org>.

² 86 Fed Reg 49604

burden including restrictions on credit transfers. The agencies should strive to finalize regulations that are aligned in stringency by at least MY2026. As technology investments become more diversified, this harmonization and consistency are critical for vehicle suppliers.

While NHTSA's proposed standards are achievable, it will also be challenging. A finalization of these standards will require suppliers to continue and increase significant capital investments and long-term commitments. MEMA urges policymakers at all levels to ensure there is an overall comprehensive plan for complementary policies that will help to create an ecosystem to support and secure an advanced transportation technology future. A strategic plan needs both supply- and demand-side policies that include investments in manufacturing, infrastructure, consumer incentives and training to further enhance our skilled workforce.

MEMA appreciates consideration of these comments.

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