



The Vehicle Suppliers Association

**Emily Sobel, Senior Manager, Regulatory Policy  
MEMA, The Vehicle Suppliers Association – January 7, 2025  
Public Hearing for SAFE Vehicles III  
Docket ID No. NHTSA-2025-0491**

**INTRODUCTION**

Good morning. My name is Emily Sobel, and I am the Senior Manager, Regulatory Policy for MEMA, the Vehicle Suppliers Association.

MEMA represents more than 900 vehicle supplier companies across the U.S., including original equipment and aftermarket suppliers for light-, medium-, and heavy-duty vehicles. Our members form the largest manufacturing sector in the country, employing over 932,000 Americans directly and supporting more than 4.8 million jobs in related industries.

MEMA shares the Administration's objectives of strengthening the domestic manufacturing base and growing U.S. manufacturing jobs.

My remarks today highlight three critical areas where suppliers will be impacted by NHTSA's proposal.

**1. Need for Regulatory Stability**

Consistency in standards is critical to keeping the U.S. motor vehicle industry competitive and maintaining the U.S.'s leadership in technology deployment. The supplier sector has seen continued employment growth, which is directly tied to the development and deployment of advanced technologies. Clear and reliable standards ensure consideration of the full range of technology offerings, balance stakeholder interests, and allow consumers to make informed purchase decisions that best meet their needs.

**2. Need for Continued Progress in the Standards**

MEMA supports year-over-year increases in the stringency of the standards. MEMA has long supported maximum feasible standards that are technology neutral and provide manufacturers with sufficient lead time. Suppliers have invested significant resources in providing a wide range of technological offerings for consumers- recent reports from the ITC cite increased investment in U.S. automotive manufacturing, with the U.S. as the primary recipient in the USMCA region.



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As NHTSA finalizes its standards, MEMA urges the agency to take a measured approach that will encourage both technological development and deployment, while ensuring the final standard is feasible.

### **3. Need for Continuing the FCIV Program**

MEMA strongly supports the continuation of the A/C efficiency and off-cycle technology fuel consumption improvement values (FCIVs) in the CAFE program, which is an important compliance mechanism. The supplier community works independently and in collaboration with OEMs to develop technologies that can be utilized to provide real-world fuel economy improvements. The continuation of this program will sustain supplier jobs and spur further investments in advanced technology development in the U.S.

### **Conclusion**

We are committed to work with NHTSA on solutions that provide consumers with choice, keep the U.S. supplier base competitive globally, and ensure that MEMA's past and future investments in innovation continue to benefit the market, the workforce, and the U.S. economy.

Thank you for the opportunity to share our perspective today, we look forward to discussing more in our written comments.