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[Via electronic mail and submission to Regulations.gov as available]

Christopher Lieske  
Office of Transportation and Air Quality  
Assessment and Standards Division  
U.S. Environmental Protection Agency  
2000 Traverwood Drive Ann Arbor, MI 48105  
Email: [lieske.christopher@epa.gov](mailto:lieske.christopher@epa.gov)

James Tamm  
Office of Rulemaking  
Fuel Economy Division  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE Washington, DC 20590  
Email: [james.tamm@dot.gov](mailto:james.tamm@dot.gov)

Re: The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026  
Passenger Cars and Light Trucks (Docket ID Nos. EPA-HQ-OAR-2018-0283;  
NHTSA-2018-0067)

Dear Mr. Lieske and Mr. Tamm:

In its comments to the dockets established for the SAFE rulemaking that were submitted on October 26, 2018, the Alliance of Automobile Manufacturers (“Alliance”)<sup>1</sup> requested that the Agencies provide stakeholders with an opportunity to supplement comments in order to provide information and analysis not available at that time.

I am enclosing supplemental comments related to the report “Evaluation of Alternative Passenger Car and Light Truck Corporate Average Fuel Economy (CAFE) Standards for Model Years 2021-2026” (the NERA/Trinity Report) which was submitted as an attachment to our original comments on the subject rulemaking.<sup>2</sup> These supplemental comments respond to three comments submitted in response to that report. They also provide updated tables and figures for the NERA/Trinity report that correct small rounding and model coding errors, but do not affect

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<sup>1</sup> For more information about the Alliance, please visit <https://autoalliance.org/>.

<sup>2</sup> NERA Economic Consulting and Trinity Consultants, EVALUATION OF ALTERNATIVE PASSENGER CAR AND LIGHT TRUCK CORPORATE AVERAGE FUEL ECONOMY (CAFE) STANDARDS FOR MODEL YEARS 2021-2026,” (October 26, 2018). Available as “Attachment 1 NERA Evaluation of Alternative Passenger Car and Light Duty Truck CAFE Standards” at Regulations.gov, Docket IDs NHTSA-2018-0067-12073 and EPA-HQ-OAR-2018-0283-6186.

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**Alliance of Automobile Manufacturers**

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the conclusions originally drawn. In addition, electronic files that provide input data, parameter assumptions, and modeling code for the NERA/Trinity Report are provided.<sup>3</sup>

It was not possible to provide these supplemental comments at an earlier time, owing to the need to evaluate and prepare responses to comments submitted by others and to assemble the data submission package. The Alliance asks that the Agencies consider these supplemental comments as they prepare final rules and supporting documentation.

Sincerely,

A handwritten signature in black ink that reads "Michael Hartrick". The signature is written in a cursive style and is positioned above a solid horizontal line.

Michael Hartrick  
Director of Fuel Economy & Climate  
Alliance of Automobile Manufacturers

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<sup>3</sup> These files may be submitted separately via U.S. mail or similar means if Regulations.gov and/or your electronic mail systems are not capable of handling the number or size of electronic files to be submitted.