COLTURA
Moving Beyond Gasoline

January 8, 2026

TO: Joseph Bayer, CAFE Program Division Chief, Office of Rulemaking, National Highway Traffic Safety Administration (NHTSA)

FR: Rob Sargent, Coltura

Re: Comments on Proposed Rule to Amend Fuel Economy Standards for Model Years 2022–2031

I submit these comments in opposition to the National Highway Traffic Safety Administration's proposed rule to weaken corporate average fuel economy (CAFE) standards for light-duty vehicles for model years 2022 through 2031. The proposal would impose significant and unnecessary costs on consumers, undermine technological innovation, and conflict with both demonstrated industry capability and NHTSA's own economic analysis.

Fuel economy standards have long served as an effective, market-shaping policy that reduces consumer fuel expenditures, enhances national energy security, and drives cost-effective technological improvements across the U.S. vehicle fleet. Many households have no choice but to drive a lot. Changes in vehicle fuel economy lead directly to major increases in fuel costs for them. When standards are weakened, many consumers cannot easily adjust by driving less; instead, they incur higher fuel expenditures over the useful life of their vehicles.

Under the proposed rule, NHTSA would require fuel economy improvements of only 0.5 percent annually through model year 2026 and just 0.25 percent annually through model year 2031, resulting in an estimated fleet-wide average of 34.5 miles per gallon in 2031. This represents a substantial departure from the existing standards trajectory, which would have resulted in approximately 50.4 miles per gallon by 2031. Notably, the proposed 2031 standard is less stringent than fuel economy levels manufacturers ***have already achieved*** in recent model years, including model year 2024.

This fact alone raises serious questions about the rule's consistency with the statutory requirement that standards reflect maximum feasible improvement. The automotive industry has already demonstrated its ability to meet significantly higher efficiency levels using a combination of existing internal combustion technologies, hybridization; and, most important in the long-run, vehicle electrification. Rolling back standards below demonstrated performance levels does not reflect technological constraints; rather, it signals a policy decision to slow progress despite clear feasibility.

NHTSA contends that weakening fuel economy standards will increase consumer choice by reducing compliance burdens on manufacturers. Historical experience with fuel economy regulation indicates that strong, predictable, and technology-neutral standards expand effective consumer choice rather than constrain it. Robust standards encourage automakers to deploy fuel-saving technologies across a wide range of vehicle classes and price points, increasing the availability of efficient options and resulting cost savings.

Weakening standards reduces investment certainty and dampens incentives to advance technologies that will bring more fuel-efficient models to market. The result is fewer efficiency-optimized vehicles, slower deployment of advanced technologies, and higher fuel and maintenance costs for consumers. Consumer choice—defined by the availability of affordable vehicles with low lifetime ownership costs—will be reduced. This will hit the hardest higher-mileage drivers, for whom fuel costs represent a disproportionate share of household expenditures.

Research by Coltura underscores this dynamic. A relatively small share of U.S. drivers account for a disproportionate share of total gasoline consumption and household fuel spending. These high-mileage drivers often

include working families, rural residents, and individuals with long commutes who have limited alternatives to driving. Policies that reduce fleet fuel efficiency and obstruct advances in the deployment of electric vehicles will negatively impact household expenditures for these households hardest, while increasing overall gasoline consumption and consumers' vulnerability to fuel price volatility.

Importantly, NHTSA's own regulatory impact analysis undermines the proposal's stated consumer benefits. The agency acknowledges that increased lifetime fuel costs associated with weaker standards exceed any modeled reductions in upfront vehicle purchase prices. In effect, the proposal shifts costs from the point of sale to years of recurring fuel expenditures, leaving consumers worse off overall. This outcome is inconsistent with sound benefit-cost principles and contradicts the rationale for weakening the standards.

In sum, the proposed rule would increase consumer fuel costs, reduce effective vehicle choice, weaken incentives for technological innovation, and increase national gasoline consumption, all while setting standards below levels the industry has already achieved. These outcomes are inconsistent with the statutory objectives of the CAFE program and with NHTSA's obligation to establish economically justified and technologically feasible standards designed to drive continuous improvements in fuel economy.

For these reasons, I respectfully urge NHTSA to withdraw the proposed rule and maintain fuel economy standards that reflect demonstrated industry capability, protect consumers from unnecessary fuel expenditures, and advance long-term economic and energy security interests.

Respectfully submitted,

Rob Sargent

Policy Director, Coltura