

ConsumersUnion®

POLICY & ACTION FROM CONSUMER REPORTS

September 20, 2017

Hon. Thad Cochran, Chairman
Hon. Patrick J. Leahy, Ranking Member
U.S. Senate Committee on Appropriations
Room S-128, The Capitol
Washington, D.C. 20510

Hon. Susan M. Collins, Chairman
Hon. Jack F. Reed, Ranking Member
U.S. Senate Committee on Environment
and Public Works
410 Dirksen Senate Office Building
Washington, D.C. 20510

Hon. John R. Thune, Chairman
Hon. Bill Nelson, Ranking Member
U.S. Senate Committee on Commerce,
Science, and Transportation
512 Dirksen Senate Building
Washington D.C. 20510

Dear Chairman Cochran, Chairman Thune, Chairman Collins, Ranking Member Leahy, Ranking Member Nelson, and Ranking Member Reed:

Consumers Union, the policy and mobilization division of Consumer Reports, writes to urge you to authorize and appropriate additional funds to the National Highway Traffic Safety Administration (NHTSA) and the Environmental Protection Agency (EPA) to make fuel economy, emissions, and fuel cost information publicly available for heavy-duty pickup trucks.

Based on new data from testing at Consumer Reports,¹ these heavy-duty diesel pickups cost about \$35,000 to fuel over the first 15 years of the vehicles' lives.² Further, they can cost \$7,000 to \$10,000 more to fuel than their light-duty gasoline counterparts over that same time.² Without information like this, consumers are powerless to make informed decisions when shopping for these vehicles for their businesses or family.

While new light-duty trucks and passenger vehicles carry window sticker labels that display important consumer information about the vehicle's fuel economy, emissions, and expected average fuel costs, no such label is available for heavy-duty pickup trucks. Further, consumers can easily find light-duty vehicle fuel economy information online at fuelconomy.gov thanks to the public availability of the information. Easy access to information NHTSA and EPA already

¹ Consumer Reports. *Heavy Duty Pickup Truck Fuel Economy Numbers You Can't Find Anywhere Else*. September 20, 2017. Available at: <https://www.consumerreports.org/pickup-trucks/heavy-duty-pickup-truck-fuel-economy/>

² See Attachment A for details and methodology.

have for heavy-duty pickups would empower consumers to consider the cost of fueling their vehicles alongside other attributes. It would also encourage competition on fuel economy among automakers.

When I was the Deputy and Acting Administrator of NHTSA, I recognized the value of public fuel economy information and the benefits it would provide in the heavy-duty truck market, which covers annual sales of hundreds of thousands of vehicles. However, when we were looking to fulfill NHTSA and EPA's intention to consider consumer information as we developed the next round of standards,³ there was insufficient funding at the agency to dedicate the staff and resources needed.⁴

As NHTSA continues to work on fuel economy standards for light-duty vehicles for MY 2022-2025, which are very important to consumers,⁵ resources for expanding public availability of the data likely remain tight. We therefore encourage the authorizing and appropriating committees to dedicate sufficient new funding to NHTSA and EPA programs with the express purpose of making fuel economy information for heavy-duty pickup trucks publically available and more accurate, first through fueleconomy.gov and then through a label affixed to the window. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "David Friedman". The signature is fluid and cursive, with the first name "David" written in a larger, more prominent script than the last name "Friedman".

David Friedman
Director of Cars and Product Policy and Analysis
Consumers Union
202-462-6262

cc:

Members of the U.S. Senate Committee on Appropriations
Members of the U.S. Senate Committee on Commerce, Science, and Transportation
Members of the U.S. Senate Committee on Environment and Public Works

³ As stated in the 2011 rulemaking establishing the first-ever fuel efficiency and greenhouse gas standards for medium- and heavy-duty vehicles. Federal Register, Vol. 76 Thursday, No. 179, September 15, 2011.

⁴ While the 2011 Senate Appropriations report directed the Department of Transportation to prioritize a rulemaking for heavy-duty pickup fuel economy labels, additional funds were not provided to do so. Senate Report 112-83 for "Transportation and Housing and Urban Development, and Related Agencies Appropriations Bill, 2012," September 21, 2011, at 63, accessed at <https://www.congress.gov/112/crpt/srpt83/CRPT-112srpt83.pdf> on September 18, 2017.

⁵ Consumer Reports' June 2017 public survey show that 73% of the American public support the U.S. government setting strong fuel economy standards and enforcing them.

**Attachment A: Fuel Economy Results and Fuel Cost Estimates
Based on Consumer Reports' Testing Data**

Heavy-Duty Pickups	Engine	Overall mpg ⁶	Fuel Costs for First 12,000 miles of Ownership ⁷	Fuel Costs for First 15 Years ⁸
Chevrolet Silverado 2500HD LTZ	6.6-liter V8 turbodiesel (445 hp)	14	\$2,125	\$35,541
Ford F-250 Lariat	6.7-liter V8 turbodiesel (440 hp)	15	\$2,055	\$34,324
GMC Sierra 2500HD	6.6-liter V8 turbodiesel (445 hp)	14	\$2,125	\$35,541
Nissan Titan XD SV	5.0-liter V8 turbodiesel (310 hp)	15	\$1,995	\$33,187
Ram 2500 Laramie	6.7-liter 6 turbodiesel (370 hp)	14	\$2,210	\$36,847
Chevrolet Silverado 1500 LT	5.3-liter V8 gasoline (355 hp)	16	\$1,780	\$25,235
Ford F-150 XLT	2.7-liter V6 turbo gasoline (325 hp)	17	\$1,740	\$24,627
Ford F-150 XLT	3.5 V6 turbo gasoline (375 hp)	16	\$1,790	\$25,392
GMC Sierra 1500	5.3-liter V8 gasoline (355 hp)	16	\$1,780	\$25,235
Nissan Titan SV	5.6-liter V8 gasoline (390 hp)	16	\$1,855	\$26,375
Ram 1500 Big Horn	5.7-liter V8 gasoline (395 hp)	15	\$1,965	\$27,810
Ram 1500 Big Horn	3.0-liter V6 turbodiesel (240 hp)	20	\$1,490	\$24,932

⁶ Consumer Reports performs its own fuel-economy tests, independent of the government's often-quoted EPA figures and the manufacturers' claims. Using a precise fuel-flow measuring device spliced into the fuel line, Consumer Reports tests run on two separate circuits. One is on a public highway at a steady 65 mph. That course is run in both directions to counteract any terrain and wind effects. A second is a simulated urban/suburban-driving test done at the Consumer Reports auto test track. It consists of predetermined acceleration, and deceleration rates, as well as idle time. Consumer Reports' overall fuel-economy numbers are derived from those fuel consumption tests. More information about Consumer Reports testing can be found at: cr.org/autotest.

⁷ Assuming \$2.50 per gallon of diesel and \$2.40 per gallon of regular unleaded gasoline.

⁸ Assuming nearly 174,000 miles over the first 15 years of ownership, based on vehicle miles traveled data from Figure VI-6 in Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, published in Federal Register Vol. 81, No. 206, Tuesday, October 25, 2016, Page 73764. Assumes a 3% real discount rate consistent with a 5% new car loan and 2% inflation. Diesel and gasoline prices based on EIA's Annual Energy Outlook available at <https://www.eia.gov/outlooks/aeo/> as of 9/18/2017 (EIA forecasts that, over the next 15 years, diesel prices will vary from \$2.90-\$3.86 and gasoline prices will vary from \$2.26-\$3.11). Fuel expenses while towing or carrying a payload will likely be higher than indicated by CR's tests, while the cost differential will vary depending on the vehicle.

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POLICY & ACTION FROM CONSUMER REPORTS

September 20, 2017

Hon. Rodney P. Frelinghuysen , Chairman
Hon. Nita M. Lowrey, Ranking Member
House Committee on Appropriations
Room H-305, The Capitol
Washington, DC 20515

Hon. Bill Shuster, Chairman
Hon. Peter A. DeFazio, Ranking Member
House Transportation and Infrastructure
Committee
2165 Rayburn House Office Building
Washington, D.C. 20515

Hon. Greg Walden, Chairman
Hon. Frank Pallone, Jr., Ranking Member
House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Frelinghuysen, Chairman Walden, Chairman Shuster, Ranking Member Lowey, Ranking Member Pallone, and Ranking Member DeFazio:

Consumers Union, the policy and mobilization division of Consumer Reports, writes to urge you to authorize and appropriate additional funds to the National Highway Traffic Safety Administration (NHTSA) and the Environmental Protection Agency (EPA) to make fuel economy, emissions, and fuel cost information publicly available for heavy-duty pickup trucks.

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Sincerely,

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David Friedman,
Director of Cars and Product Policy and Analysis
Consumers Union
202-462-6262

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Members of the U.S. House Committee on Appropriations
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