

TESTIMONY



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January 7, 2026

**MECA Oral Testimony at the NHTSA Public Hearing on the
SAFER AFFORDABLE FUEL-EFFICIENT VEHICLE RULE III (SAFE III) FOR
MODEL YEARS 2022 TO 2031 PASSENGER CARS AND LIGHT TRUCKS
DOCKET ID: NHTSA-2025-0491**

Good morning, I am Kevin Brown with the Manufacturers of Emission Controls Association. For nearly 50 years, MECA has represented the leading suppliers of clean mobility technologies. These products enable more efficient conventional powertrains as well as those with increasing levels of hybrid and full electrification. The result is that vehicles are able to meet more stringent fuel efficiency standards, which lowers overall costs for consumers. The clean mobility industry invest billions each year in technology research, development, and manufacturing capacity. These companies currently provide over 70,000 jobs, which are located in nearly every state. Clean mobility investments support industry competitiveness and facilitate innovation, ensuring U.S. leadership in the global automotive industry.

MECA supports technology-neutral, performance-based standards which continue to cost-effectively improve fuel economy and lower vehicle lifetime ownership costs. Our members' technologies enable automakers to offer consumers a choice in the vehicles they drive through the use of a range of powertrains. Gradual and consistent progressive standards avoid business uncertainty caused by wide policy swings which are typically followed by protracted litigation.

MECA is in favor of the proposed reclassification of vehicle types to "Passenger Vehicles" and "Non-Passenger Vehicles" based upon the identified design features and Light-Duty Work Factor. We believe

this change will more effectively group vehicles, providing a greater ability to tailor distinct and effective fuel economy standards.

MECA is concerned that NHTSA's preferred alternative projects automaker overcompliance across all model years with little or no growth in market penetration for any advanced fuel efficiency technologies. This suggests that the preferred alternative does not represent a "maximum feasible" level of fuel efficiency, as required by statute. To address this, MECA recommends that the projected "Achieved" values should become the "Required" targets. This will ensure minimum reasonable progress while providing greater market stability for automotive supplier investments in manufacturing and employment. We stress that in the absence of reasonable progressive targets, there is a likelihood that future investments and associated employment will shift overseas and away from the U.S.

In addition, we support the retention of off-cycle credits which reward technologies whose performance is not represented in standard tests. Off-cycle credits expand the toolbox to enable vehicles to achieve higher real-world fuel economy delivering real-world fuel savings to consumers and lower lifetime vehicle operating costs.

Finally, we urge NHTSA to evaluate the impact of the \$0 civil penalty rate on compliance with CAFE standards. This analysis should include the effect on U.S. investment and innovation across the automotive sector, from suppliers to vehicle manufacturers.

In closing, our industry remains committed to working with NHTSA to achieve the goals of the CAFE fuel economy program. We will be submitting more detailed written comments to the docket. Thank you.