

BEFORE THE ENVIRONMENTAL PROTECTION AGENCY

PROPOSED REPEAL OF EMISSION)
REQUIREMENTS FOR GLIDER VEHICLES,) DOCKET NUMBER:
GLIDER ENGINES, AND GLIDER KITS RULE) EPA-HQ-OAR-2014-0827

COMMENTS OF THE CONSUMER FEDERATION OF AMERICA

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January 5, 2018

The Consumer Federation of America¹ appreciates the opportunity to provide comments to the Environmental Protection Agency on the Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits Rule (Docket Number: EPA-HQ-OAR-2014-0827).

Throughout its 50 years of existence, CFA has been a vigorous and continuous participant in the process of setting regulations to improve the efficiency of energy-using consumer durables and lower the cost of energy borne by consumers.²

The administration's new, and we believe woefully misguided interpretation of the Clean Air Act, does not justify weakening any portion of this thoughtful, well-designed, and achievable standard, including the Glider Kit provision. In fact, weakening the Phase 2 heavy-duty standards will not only have harmful economic, consumer health and pocket book impacts, but it will hurt the companies employing thousands of workers who are designing and building new technology aimed at meeting the standard.

As to the proposed Glider loophole being considered, the older-model diesel engines that these kits use produce far more exhaust emissions and are far less efficient than engines that meet the current standard. From a public health

1 The Consumer Federation of America is an association of more than 250 nonprofit consumer groups that was established in 1968 to advance the consumer interest through research, advocacy, and education.

2 The CFA website (<http://consumerfed.org/issues/energy/>) provides links to 140 pieces of testimony and reports published in the past ten years dealing with the efficiency of energy-using consumer durables divided roughly equally between appliances and vehicles.

perspective, the EPA's own data estimates that requiring that gliders use modern engines in 2018 would prevent between 350 and 1,600 premature deaths over the lifetime of those vehicles.

If the glider truck provision in the heavy duty truck rule is weakened or repealed, according to the Union of Concerned Scientists, refurbished trucks would emit more pollution per year than all vehicles affected by the Volkswagen emissions-cheating scandal. These emissions cause chronic breathing problems, asthma attacks, and numerous other health problems. And the lost workdays associated with these illnesses harm our economy. We need healthy air to support a healthy population and a healthy economy.

Rolling Back the Standard will Cost Consumers

While these environmental impacts are important, any lowering of the standards, including the Glider loophole, will disproportionately harm the most vulnerable among Americans struggling to survive financially. It will weaken a standard that saves consumers money. Consumers should not have to pay to benefit glider manufacturers.

Fuel costs associated with shipping goods cross-country significantly impact the price of everything we buy from a carton of milk to a flat screen TV. By keeping the standard intact, we will cut fuel use by nearly 50 percent, putting \$29.5 billion dollars back into the pockets of Americans.³

Before these well-considered standards were implemented, CFA estimated that the average American household spent about \$1,100 extra per year on consumer goods to cover the cost of fueling trucks.⁴ And our polling shows that Americans understand that big truck fuel costs are passed on to them. They understand that big truck fuel economy standards save them money. The good news is that we found that efficiency improvements for big trucks could save the average American household \$250 dollars per year in the cost of consumer goods

³ Mark Cooper, [Paying the Freight: The Consumer Benefits of the Fuel Economy of Medium and Heavy Duty Trucks](#), Consumer Federation of America

⁴ Ibid.

and services. The glider loophole will eat into those savings, hurting most the very population of hard working Americans that the administration vowed to protect.

Supporting and advancing innovation in fuel-efficiency makes both economic and environmental sense – especially for the companies that are making the components and engines for these next generation trucks. Repealing the Glider Kit provision negatively impacts those companies that are already making big investments on advanced efficiency technologies. A consistent, long-term regulatory framework that provides market certainty allows these companies to invest, expand and hire with confidence. Markets work best when there's a level playing field; the glider loophole tips the scales unfairly and essentially penalizes those companies doing the right thing.

The administration's attack on elegant, well-designed, thoughtful and cost-effective standards is illogical. Not only is the proposed glider loophole tragic, but so is the administration's consideration of a roll back of the very popular light-duty fuel economy standards that save consumers every single day at the gas pump.

Reducing fuel use by the nation's transportation sector, whether it's for freight or family vacations, should be a top priority for this administration. Doing so supports a strong economy, saves consumers money and fosters innovation. In short, it provides the economic assistance for hard working Americans that the President promised.

The Consumer Federation of America asks the administration to stay the course and skip the glider loophole. Please keep the money saving, economy building, job creating, and achievable efficiency standards intact.