



Susan M. Cischke
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May 20, 2010

The Honorable Ray LaHood
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania, NW
Washington, DC 20460

Dear Secretary LaHood and Administrator Jackson:

Ford Motor Company recognizes the benefits for the country of a uniform National Program to address greenhouse gases (GHGs) and fuel efficiency from medium and heavy-duty vehicles. Ford Motor Company; therefore, fully supports the adoption of a uniform National Program covering these vehicles and welcomes this opportunity to be a partner in advancing that goal. Ford Motor Company is a major manufacturer of heavy-duty pickup trucks and vans, an important segment of the broader medium and heavy-duty vehicle industry. We look forward to working with EPA and NHTSA, the states, and other interested parties to help address three of the most pressing issues facing the U.S.: greenhouse gas reductions, fuel efficiency improvements, and energy security.

We support a National Program comprised of GHG emission standards and fuel efficiency standards that is consistent with the following principles.

Program Principles:

- Addresses heavy-duty pickups and vans in a fashion similar to the light-duty vehicle program issued jointly by EPA and NHTSA on April 1, 2010.
- Begins no earlier than model year 2014 with full implementation within 5 years.
- Closely harmonize all elements of the program under the various legal requirements from NHTSA and EPA.
- Establish standards for heavy-duty pickups and vans, as well as other medium and heavy-duty vehicles, in a manner that:
 - recognizes the needs of the trucking industry and other commercial users
 - increases the use of known technologies found to be feasible and effective in this market segment
 - preserves the utility and functionality of these commercial vehicles
 - is compatible with the complexities of the marketplace
 - avoids unintended consequences
- Significantly reduces CO₂ emissions and achieves significant fuel savings for the Nation.
- Incentivize the early introduction of advanced technologies.
- Continue to collaborate with other countries recognizing the global nature of the issues and the industry.



Ford Motor Company understands that EPA and NHTSA will jointly propose the comprehensive National Program for full public review and comment, affording all interested parties the right to participate in a public hearing, and submit comments and other relevant information to the Agencies for consideration prior to reaching any final determinations. We also understand that EPA and NHTSA's preliminary analysis indicates that such a National Program could reduce up to approximately 250 MMT of CO₂, save up to approximately 500 million barrels of oil over the lifetime of all heavy-duty vehicles built during 2014-2018, and achieve approximately \$70 billion in fuel savings. Nevertheless, the results of the rulemaking are not pre-determined but depend upon processes set by laws. Ford Motor Company is committed to supporting the adoption of a uniform National Program consistent with these principles.

We thank you for undertaking this collaborative effort and look forward to working together in the future.

Sincerely,



Susan M. Cischke
Group Vice President
Sustainability, Environment & Safety Engineering
Ford Motor Company

