



August 21, 2007

Federal Trade Commission
Office of the Secretary Room H-135 (Annex M)
600 Pennsylvania Avenue
Washington, DC 20580

Chairman
J. PRESS
Toyota

President
M. STANTON

Subject: Comments to Fuel Economy Guide Review, Matter No. R7811008

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The Association of International Automobile Manufacturers, Inc.¹ (“AIAM”) submits this letter in response to the Federal Trade Commission (FTC) review of the Fuel Economy Guide, Matter No. R7811008. AIAM recognizes that the comment deadline has passed but requests that this brief letter, expressing AIAM’s support for the continued publication of the Fuel Economy Guide and the July 20, 2007 comments of the Alliance of Automobile Manufacturers, Inc. (“Alliance”) previously filed with the FTC, be considered and made part of the administrative record so that the entire industry is represented.

AIAM believes the Fuel Economy Guide is an important industry and consumer resource that should be regularly updated, when needed, to reflect changes in EPA regulations and other legislative developments impacting fuel economy. The recent EPA amendments to the fuel economy labeling rules, however, do not require any changes to the Fuel Economy Guide. These regulations made changes to the mandatory tests for fuel economy and the adjustment factors for the city and highway label values, but did not change the basic information on fuel economy provided in the Guide.

We do recommend, consistent with the Alliance comments, making some technical changes to the text of the Guide. Specifically, we suggest: (1) adding medium duty passenger vehicles to the set of vehicles requiring fuel economy labels beginning with the 2011 models; (2) updating the citation to the Energy Policy and Conservation Act to 49 USC 32901 et seq; and (3) using the term “fuel economy” when referring to miles per gallon. Please refer to the Alliance submission for the recommended language to be inserted.

¹ AIAM is a trade association representing 14 international motor vehicle manufacturers that account for about 40 percent of the passenger cars and 20 percent of light trucks sold annually in the United States. AIAM member companies include American Honda Motor Co., American Suzuki Motor Corp., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Maserati North America, Inc., Mitsubishi Motors North America, Inc., Nissan North America, Inc. Peugeot Motors of America, Renault, SA, Subaru of America and Toyota Motor North America, Inc. AIAM also represents original equipment suppliers and other automotive-related trade associations.

We appreciate this opportunity to put AIAM's position on the record.

If you have any questions regarding these comments, please contact me at (703) 247-2107.

Sincerely,

John Cabaniss
Director, Environment & Energy

cc: Hampton Newsome
Linda Hormes

