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May 7, 2002

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Attn: Docket No. 2002-11419 – 7

The National Truck Equipment Association (NTEA) submits the following comments in response to the National Highway Traffic Safety Administration's (NHTSA) February 7, 2002 Request for Comments; National Academy of Science Study and Future Fuel Economy Improvements, Model Years 2005-2010.

The NTEA is in favor of promoting fuel conservation but it is important to note that for commercial and vocational users, the most fuel-efficient vehicle to accomplish a given task may be a full size and adequately powered light size truck or van. Increasing CAFE standards in a manner that eliminates or curtails the availability of such trucks or vans would likely force commercial vehicle users to purchase larger vehicles, outside the scope of CAFE in order to meet their needs. Larger vehicles would cost commercial and vocational users more to purchase and operate and would be detrimental to the overall fuel consumption concerns of the nation.

The NTEA

The (NTEA) is the nation's only trade association representing distributors and manufacturers of multi-stage produced, work related trucks, truck bodies and equipment. The NTEA also represents various industry-related firms and organizations. The NTEA currently has over 1,500 member companies located throughout the nation. Most NTEA members are small businesses that sell on a local or regional basis.

The average NTEA member is a typical small business, a closely held corporation or independent proprietorship, run by community based management, operating a single facility and employing a small local work force. The average distributor member of the NTEA, the companies that sell and install truck bodies and related equipment (and generally are considered final stage manufacturers, intermediate stage manufacturers or alterers under NHTSA definitions), have been in business some 30 years, have less than $5 million in annual sales and employ 20 people. The average NTEA manufacturer member, companies that fabricate and occasionally install truck bodies and related equipment, have been in business over 36 years, have $20 million in annual sales and employ approximately 300 people. Most NTEA distributor and manufacturer members qualify as small businesses for purposes of the Regulatory Flexibility Act.

NTEA member companies produce a wide array of truck body and equipment combinations to fill the needs of the marketplace. Vehicles produced by NTEA member companies for commercial or vocational use include, but are not limited to, fire trucks, ambulances, utility company vehicles, aerial bucket trucks, tow trucks, beverage delivery trucks, walk-in vans, digger derricks, dump trucks, contractor vans and snow removal vehicles.

NTEA members are typically equipment manufacturers, intermediate stage manufacturers, final stage manufacturers or alterers. They complete vehicles in limited numbers and in thousands of possible body/equipment configurations.

CAFE Standards and Commercial Trucks and Vans

The NTEA urges NHTSA not to increase either the scope or the mileage standard of CAFE for light trucks and vans. As we have indicated, it is vital that full sized and adequately powered light duty trucks and vans are available to commercial and vocational users. We applaud that NHTSA has recognized that any future modifications to the scope of the standard would accommodate the inability of true work/cargo vehicles to achieve as high fuel economy due to their utilitarian nature. The NTEA is concerned that it will not be possible to adequately define commercial vehicles from personal use vehicles in the current, or contemplated, weight ranges.

Many commercial vehicles under 10,000 lbs. GVWR are actually altered vehicles. Altered vehicles are vehicles that are completed by an initial stage manufacturer and then altered by another company prior to the first retail sale of the vehicle. For instance, a complete pickup truck is sent to a truck equipment upfitter and the pickup box is removed and replaced with a utility body and certified as altered. The truck is then sent to the dealership and sold to the customer. Similarly, a completed minivan might be drop shipped to an

alterer for bins and racks to be installed, the vehicle is certified as altered and shipped to the dealer for sale.

The initial stage manufacturer, i.e. Ford, GM Daimler-Chrysler, who has the responsibility for CAFE will not always know which vehicles will end up being altered and used commercially and which will be used for personal use.

It is also important to note that commercial truck and van users will always gravitate towards the most economical vehicle that will do the job. The ability to perform the required job, however, is tantamount in the purchasing decision. It is immaterial that a vehicle may cost less to operate and purchase if it can't do the job. In such a case, the commercial user will opt for a larger and more powerful vehicle that is capable of performing properly, even if that vehicle ends up with excess capacity. Allowing for the widest range of vehicle choices will result in commercial and vocational truck and van creating the most economical overall fleet. Restricting the choice of available vehicles will force commercial and vocational users to buy larger and less fuel-efficient vehicles than might otherwise satisfy their needs.

Sincerely,

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